Cheshire East Local Plan
Site Allocations and Development Policies Document


May 2020
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1. Introduction

1.1 The council is committed to putting in place a comprehensive set of up-to-date planning policies to support our ambition of making the borough an even greater place to live, work and visit.

1.2 The Local Plan Strategy was the first part of the new local plan to be adopted in July 2017. It contains strategic planning policies and site allocations, which are now used by the council to determine planning applications.

1.3 The ‘Site Allocations and Development Policies Document’ (SADPD) will be the second part of the new local plan and it will contain more detailed planning policies and further site allocations. It will replace the detailed policies from the local plans from the former districts (Congleton; Crewe and Nantwich; and Macclesfield). Once adopted, the SADPD policies will be used alongside the Local Plan Strategy policies to determine planning applications.

1.4 The SADPD will cover the whole of Cheshire East, excluding that part of the borough within the Peak District National Park.

1.5 Further information on the SADPD is available on the council’s website.

1.6 A number of consultations have taken place regarding the SADPD.

Issues paper consultation 2017

1.7 Consultation on the SADPD issues paper in February – April 2017 was the first opportunity for stakeholders to tell us what they think the SADPD should contain and the direction its policies should take. The issues paper identified a range of matters and issues that the SADPD is likely to address, and asked a series of questions to seek feedback on these matters and issues.

1.8 At the same time, consultation also took place on the draft sustainability appraisal scoping report, setting out the environmental, economic and social issues against which SADPD policies and proposals will be tested. The 2017 consultation also included a ‘call for sites’ exercise, whereby interested parties were invited to submit sites for consideration to inform future land allocations in the SADPD.

1.9 Further information on the consultation process and responses received is set out in the ‘Report of Consultation: SADPD Issues Paper (July 2017), which is available on the SADPD page of the council’s website. Following consultation on the issues paper, the council prepared a first draft of the SADPD.

1 www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx
First draft SADPD consultation 2018

1.10 The first draft SADPD was published for consultation between 11 September and 22 October 2018. Its draft policies and proposals were informed by:

- The Local Plan Strategy and national planning policies and guidance;
- a variety of studies, reports, statistics and other research, many of which have been completed or commissioned by the council;
- the findings of the 2017 consultation on the SADPD issues paper;
- involvement of key stakeholders, particularly including town and parish councils, infrastructure providers and statutory consultees (such as the Environment Agency; Historic England; and Natural England); and
- recommendations from appraisals and assessments including a Sustainability Appraisal and Habitats Regulations Assessment.

1.11 The consultation was an important opportunity to help shape the policies and proposals in the SADPD. Consultation also took place on the Interim Sustainability Appraisal and Habitats Regulations Assessment documents, which look at the first draft SADPD’s contribution to sustainable development and its impact of internationally-designated nature conservation sites. At the same time, the council also carried out a further ‘call for sites’ that may be suitable for Gypsy, Traveller and Travelling Showpeople accommodation.

1.12 Further information on the consultation process and responses received is set out in the First Draft SADPD Report of Consultation (March 2019), which is available on the SADPD page of the council’s website. Following consultation on the First Draft SADPD, the council prepared the 2019 Publication Draft SADPD.

2019 Publication Draft SADPD

1.13 Following the First Draft SADPD consultation, the 2019 Publication Draft SADPD was prepared, taking into account the responses to the First Draft SADPD consultation.

1.14 The decision to publish the initial Publication Draft SADPD together with its supporting evidence for public consultation was made by a meeting of the council’s Cabinet on 06 August 2019.

1.15 The 2019 Publication Draft SADPD was published to invite representations for six weeks, between 19 August and 30 September 2019, before it could be submitted to the Secretary of State for examination by a planning inspector. The consultation was carried out in accordance with the requirements of the Cheshire East Statement of Community Involvement.

1.16 The council is currently considering all the representations received (summarised in Appendix 9 of this report) prior to submission of the SADPD to the Secretary of State for examination under Section 20 of the Planning and Compulsory Purchase Act 2004. It is currently anticipated that decisions about the policies and proposals in the SADPD will be made during the summer of
2020. If this results in any significant changes to the 2019 Publication Draft SADPD, a further round of public consultation would be needed prior to its submission to the Secretary of State. If this arises, it is anticipated that this consultation would take place in the autumn of 2020.

1.17 This report details the consultation undertaken for the 2019 Publication Draft SADPD and provides a summary of the responses received.

2. Consultation documents

2.1 Representations were invited on the following documents:

- 2019 Publication Draft Site Allocations and Development Policies Document;
- 2019 Publication Draft SADPD Sustainability Appraisal; and

2.2 An extensive series of supporting documents, background evidence and reports was also published. Comments could be made on these documents by relating the comments to the corresponding policy in the 2019 Publication Draft SADPD.

2019 Publication Draft Site Allocations and Development Policies Document

2.3 Once complete, the SADPD will form the second part of the council’s local plan, providing further detailed planning policies and site allocations to support the strategic policies and sites contained in the Local Plan Strategy, which was adopted in July 2017.

2.4 Upon adoption of the SADPD, all of the saved policies from the Congleton Borough Local Plan First Review (adopted 2005); the Borough of Crewe and Nantwich Local Plan (adopted 2005); and the Macclesfield Borough Local Plan (adopted 2004) will be deleted and will no longer be used when deciding planning applications.

2.5 The 2019 Publication Draft SADPD consultation document contains the draft policies and site allocations that are proposed for inclusion in the SADPD. It contains a brief introduction to set the scene and includes 95 draft policies organised into the following chapters:

- Planning for growth;
- General requirements;
- Natural environment, climate change and resources;
- The historic environment;
- Rural issues;
- Employment and economy;
- Housing;
- Town centres and retail;
2.6 It also contains 23 proposed site allocations, nine proposed sites for Gypsy, Traveller or Travelling Showperson use and five proposed parcels of safeguarded land.

2.7 The document also has a chapter on monitoring and implementation, a glossary of terms and an appendix setting out related documents and links.

**2019 Publication Draft SADPD Sustainability Appraisal**

2.8 Sustainability appraisal is an ongoing process that must be carried out during the preparation of a local plan. Its role to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives, when judged against reasonable alternatives.

2.9 The Sustainability Appraisal has been produced to assess the 2019 Publication Draft SADPD. It was published alongside the 2019 Publication Draft SADPD to demonstrate that the sustainability appraisal process has formed an integral part of plan-making. It sets out the method and findings of the sustainability appraisal, including the consideration of any reasonable alternatives.

**2019 Publication Draft SADPD Habitats Regulations Assessment**

2.10 The Habitats Regulations Assessment is an iterative process and plays an important role in refining the contents of the plan, both in terms of policies and site allocations.

2.11 A Habitats Regulations Assessment was prepared to support the development of the Publication Draft SADPD and assesses the impact of its policies and proposals on internationally-designated nature conservation sites. It assesses the impacts both alone and in combination with other plans and projects.

**Background evidence and supporting documents**

2.12 The evidence base to support the draft policies in the 2019 Publication Draft SADPD was also published. All documents (including the consultation documents) were given a reference number:

- 2019 Publication Draft Site Allocations and Development Policies Document [PUB 01]
- Draft adopted policies map [PUB 02]
- 2019 Publication Draft SADPD Sustainability Appraisal [PUB 03]
- 2019 Publication Draft SADPD Sustainability Appraisal Non-technical Summary [PUB 03a]
• Habitats Regulations Assessment: Site Allocations and Development Policies Document [PUB 04]
• Local Service Centres Spatial Distribution Disaggregation Report [PUB 05]
• Settlement and Infill Boundaries Review [PUB 06]
• Site Selection Methodology Report [PUB 07]
• Strategic Green Gaps Boundary Definition Review [PUB 08]
• Ecological Network for Cheshire East [PUB 09]
• Cheshire East Landscape Character Assessment [PUB 10]
• Cheshire East Local Landscape Designation Review [PUB 11]
• Employment Allocations Review [PUB 12]
• Cheshire East, Cheshire West and Chester, Halton and Warrington Gypsy, Traveller and Travelling Showpeople Accommodation Assessment [PUB 13]
• Gypsy, Traveller and Travelling Showpeople Site Selection Report [PUB 14]
• Aircraft Noise Policy Background Report [PUB 15]
• Threshold Policy for Main Town Centres Uses Impact Test: Evidence and Justification Report [PUB 16]
• Cheshire East Retail Study Update [PUB 17]
• Green Space Strategy Update [PUB 18]
• Cheshire East Playing Pitch Strategy and Action Plan [PUB 19]
• Cheshire East Indoor Built Facilities Strategy [PUB 20]
• Indoor Built Facilities Strategy Progress and Evidence Review [PUB 20a]
• Alderley Edge Settlement Report [PUB 21]
• Alsager Settlement Report [PUB 22]
• Audlem Settlement Report [PUB 23]
• Bollington Settlement Report [PUB 24]
• Bunbury Settlement Report [PUB 25]
• Chelford Settlement Report [PUB 26]
• Congleton Settlement Report [PUB 27]
• Crewe Settlement Report [PUB 28]
• Disley Settlement Report [PUB 29]
• Goostrey Settlement Report [PUB 30]
• Handforth Settlement Report [PUB 31]
• Haslington Settlement Report [PUB 32]
• Holmes Chapel Settlement Report [PUB 33]
• Knutsford Settlement Report [PUB 34]
• Macclesfield Settlement Report [PUB 35]
• Middlewich Settlement Report [PUB 36]
• Mobberley Settlement Report [PUB 37]
• Nantwich Settlement Report [PUB 38]
• Poynton Settlement Report [PUB 39]
• Prestbury Settlement Report [PUB 40]
• Sandbach Settlement Report [PUB 41]
• Shavington Settlement Report [PUB 42]
• Wilmslow Settlement Report [PUB 43]
• Wrenbury Settlement Report [PUB 44]
• Call for Sites Report [PUB 45]
• Other Settlements and Rural Areas Report [PUB 46]
• The Approach Towards Housing Supply Flexibility [PUB 47]
• Heritage Impact Assessments of Sites in Local Plan Site Selection [PUB 48]
• Cheshire East Residential Mix Assessment [PUB 49]
• Note on Local Service Centres and Primary and Secondary School Capacity [PUB 50]
• SADPD Duty to Co-operate Statement of Common Ground [PUB 51]
• Local Plan SADPD Viability Assessment [PUB 52]
• Local Service Centres Safeguarded Land Distribution Report [PUB 53]
• Local Plan Monitoring Framework [PUB 54]
• Green Infrastructure Assessment of Cheshire East [PUB 55]
• Green Belt Boundary Alterations Explanatory Note [PUB 56]
• Nationally Described Space Standards [PUB 57]
• The Approach to Small Sites [PUB 58]
• Consultation Statement [PUB 59]

3. Document availability

3.1 Electronic copies of all of the consultation documents and the background evidence and supporting documents were available on the council’s consultation portal which could be accessed via the council’s website.

3.2 Printed copies of all of the consultation documents and the background evidence and supporting documents were available for inspection at:

• The council’s principal offices at Westfields, Middlewich Road, Sandbach CW11 1HZ;
• Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ; and
• Macclesfield Customer Service Centre, Town Hall, Macclesfield, SK10 1EA.

3.3 Printed copies of all of the consultation documents and selected key background evidence and supporting documents were available for inspection at all public libraries in Cheshire East (Alderley Edge, Alsager, Bollington, Congleton, Crewe, Disley, Handforth, Holmes Chapel, Knutsford, Macclesfield, Middlewich, Nantwich, Poynton, Prestbury, Sandbach, Wilmslow and the mobile library service).

3.4 All of the consultation documentation was made available in the above locations ready for the start of the consultation period on 19 August 2019.
4. Publicity and engagement

Consultation notifications

4.1 Notification of the consultation was sent to all active stakeholders on the council’s local plan consultation database. This consisted of 134 printed letters sent on 16 August and 2,200 emails sent on 19 August. The stakeholders on this consultation database include local residents, landowners and developers, along with the ‘specific consultation bodies’, ‘general consultation bodies’, and ‘residents and other persons carrying on business in the Local Planning Authority’s area’ as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The list of consultees included everyone who had responded to the 2017 issues consultation, 2017 call for sites, and 2018 First Draft SADPD consultation (unless they had specifically indicated that they did not want to be contacted). The consultees also included the statutory consultees (Natural England; Historic England; the Environment Agency; and Natural Resources Wales).

4.2 Each of the notifications included a copy of the formal ‘statement of representations procedure’, which is included in this report in Appendix 1. Copies of the notification email and letter are included in Appendix 2.

4.3 Separate email letters were also sent to all town and parish councils in Cheshire East and all MPs whose constituencies lie partly or wholly within Cheshire East Borough.

4.4 Town and parish councils adjoining Cheshire East in neighbouring authorities are included in the local plan consultation database and received the notification letter / email as detailed in ¶4.1.

Other publicity

4.5 A number of pages on the Cheshire East Council website provided information and links to the consultation. These pages included:

- The homepage (in the ‘have your say’ section): www.cheshireeast.gov.uk
- The Cheshire East Council Consultations page: www.cheshireeast.gov.uk/council_and_democracy/council_information/consultations
- The Cheshire East Local Plan page: www.cheshireeast.gov.uk/localplan
- The Site Allocations and Development Policies Document page: www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx

4.6 Screen shots from each of these pages are included in Appendix 3.

4.7 Three press releases were issued, informing people of the SADPD and consultations. The first was issued on 16 July with the title ‘Cheshire East
Council set to strengthen its planning framework; the second was issued on 06 August with the title ‘Cheshire East Council acts to strengthen its planning framework’; and the third was issued on 19 August with the title ‘Cheshire East consults public on the next phase of Local Plan’. Copies of these press releases are included in Appendix 4.

4.8 A series of messages were posted from the council’s Twitter account, highlighting the consultation to users of social media. Copies of these posts are shown in Appendix 5.

4.9 The press releases and social media posts resulted in a number of articles related to the consultation being published on the local and regional press and other news sources, both in printed and online form including:

- ‘Councillors to consider sites proposed for development in Alderley Edge’, alderleyedge.com 17/07/19.
- ‘Councillors to consider sites proposed for development in next phase of Local Plan’, wilmslow.co.uk 17/07/19.
- ‘Plans to strengthen planning framework to move ahead’, Insider Media, 18/09/19.
- ‘Cheshire East earmarks Cledford for transit site in local plan draft’, Winsford and Middlewich Guardian, 31/07/19.
- ‘Cheshire East allocates more sites for development’, Place North West, 31/07/19.
- ‘Gypsy site provision to be discussed at special Cheshire East cabinet meeting’, CheshireLive, 01/08/19.
- ‘Plan proposing sites for development in next phase of local plan approved for consultation’, wilmslow.co.uk, 06/08/19.
- ‘Cheshire East Council acts to strengthen its planning framework’, Canalside Radio, 06/08/19.
- ‘Cheshire council proposes site allocations for 24,000 homes’, Planning Resource, 07/08/19.
- ‘Controversial Gypsy transit site at Cledford Hall moves a step closer’, CheshireLive, 08/08/19.
- ‘Petition launched to stop travellers transit site at Cledford Hall’, NantwichNews, 15/08/19.
- ‘Transit site petition launched in Middlewich’, Signal 1 Radio, 15/08/19.
4.10 The consultation was also highlighted in the September 2019 edition of the council’s ‘Strategic Planning Update’ newsletter which is sent to all town and parish councils, all Cheshire East councillors and is also available on the council’s website.

4.11 A formal ‘statement of representations procedure’ notice was placed in a number of local newspapers, including the Crewe Chronicle; Macclesfield Express; Congleton Chronicle Series (including Sandbach, Biddulph Chronicle); Wilmslow and Knutsford Guardian; and the Northwich Guardian (Mid-Cheshire Guardian).

5. Submitting comments

5.1 Comments could be submitted in a number of ways:

- Using the online consultation portal, linked from the council’s website;
- By email to localplan@cheshireeast.gov.uk; or
- By post to Spatial Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ.

5.2 Screen shots of the consultation portal are included in Appendix 6.

5.3 Printed copies of consultation response forms were available for people to take away from the council’s offices at Westfield, Sandbach; the Crewe Customer Service Centre; the Macclesfield Customer Service Centre and all public libraries in Cheshire East (including the mobile library service).

5.4 There was also an equivalent electronic version of the consultation response form embedded in the consultation portal to enable people to submit responses online.
5.5 Both response forms are shown in Appendix 7.

5.6 In addition to the formal 'statement of representations procedure', information on how to submit comments was included on the consultation portal and on the printed comments form. A guidance note was also published to explain the background and purpose of the consultation, as well as advice on making effective representations. The guidance note was available to view in council’s offices at Westfield, Sandbach; the Crewe Customer Service Centre; the Macclesfield Customer Service Centre and all public libraries in Cheshire East (including the mobile library service). It was also available to download from the consultation portal. A copy of the guidance note is shown in Appendix 8.

6. Representations received

2019 Publication Draft SADPD

6.1 In total, 2,698 comments were received from 774 different parties.

6.2 The method of submission is set out in Table 1.

<table>
<thead>
<tr>
<th>Method</th>
<th>Comments</th>
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<tbody>
<tr>
<td>Online consultation portal</td>
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<tr>
<td>By email</td>
<td>1,170</td>
</tr>
<tr>
<td>By post</td>
<td>891</td>
</tr>
<tr>
<td>Total</td>
<td>2,698</td>
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Table 1: Method of submission

6.3 The number of comments received on each policy / section of the first draft SADPD is shown in Table 2.

<table>
<thead>
<tr>
<th>Section / policy / site (number of comments)</th>
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<tr>
<td>Chapter 1: Introduction (57)</td>
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<td>Chapter 2: Planning for growth (introduction) (22)</td>
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<td>• Policy PG 8 ‘Spatial distribution of development: local service centres’ (267)</td>
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<td>• Policy PG 9 ‘Settlement boundaries’ (58)</td>
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<td>• Policy PG 10 ‘Infill villages’ (40)</td>
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<td>• Policy PG 11 ‘Green Belt boundaries’ (314)</td>
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<td>• Policy PG 12 ‘Safeguarded land boundaries’ (12)</td>
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<td>• Policy PG 13 ‘Strategic green gaps boundaries’ (15)</td>
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<td>• Policy PG 14 ‘Local green gaps’ (8)</td>
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<td>Chapter 3: General requirements (intro) (1)</td>
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<td>• Policy GEN 1 ‘Design principles’ (19)</td>
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<td>• Policy GEN 2 ‘Security at crowded places’ (1)</td>
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<tr>
<td>• Policy GEN 3 ‘Advertisements’ (3)</td>
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<tr>
<td>• Policy GEN 4 ‘The recovery of infrastructure costs and planning obligations reduced on viability grounds’ (18)</td>
</tr>
</tbody>
</table>
### Section / policy / site (number of comments)

- Policy GEN 5 ‘Aerodrome safeguarding’ (3)
- Policy GEN 6 ‘Airport public safety zone’ (2)

#### Chapter 4: Natural environment, climate change and resources (intro) (6)
- Policy ENV 1 ‘Ecological network’ (24)
- Policy ENV 2 ‘Ecological implementation’ (25)
- Policy ENV 3 ‘Landscape character’ (18)
- Policy ENV 4 ‘River corridors’ (4)
- Policy ENV 5 ‘Landscaping’ (6)
- Policy ENV 6 ‘Trees, hedgerows and woodland implementation’ (31)
- Policy ENV 7 ‘Climate change mitigation and adaptation’ (20)
- Policy ENV 8 ‘District heating network priority areas’ (3)
- Policy ENV 9 ‘Wind energy’ (11)
- Policy ENV 10 ‘Solar energy’ (6)
- Policy ENV 11 ‘Proposals for battery energy storage systems’ (3)
- Policy ENV 12 ‘Air quality’ (9)
- Policy ENV 13 ‘Aircraft noise’ (7)
- Policy ENV 14 ‘Light pollution’ (5)
- Policy ENV 15 ‘New development and existing uses’ (3)
- Policy ENV 16 ‘Surface water management and flood risk’ (17)
- Policy ENV 17 ‘Protecting water resources’ (4)

#### Chapter 5: The historic environment (intro) (1)
- Policy HER 1 ‘Heritage assets’ (6)
- Policy HER 2 ‘Heritage at risk’ (4)
- Policy HER 3 ‘Conservation areas’ (6)
- Policy HER 4 ‘Listed buildings’ (6)
- Policy HER 5 ‘Historic parks and gardens’ (2)
- Policy HER 6 ‘Historic battlefields’ (0)
- Policy HER 7 ‘Non-designated heritage assets’ (5)
- Policy HER 8 ‘Archaeology’ (1)
- Policy HER 9 ‘World heritage site’ (10)

#### Chapter 6: Rural issues (intro) (1)
- Policy RUR 1 ‘New buildings for agriculture and forestry’ (5)
- Policy RUR 2 ‘Farm diversification’ (3)
- Policy RUR 3 ‘Agricultural and forestry workers dwellings’ (4)
- Policy RUR 4 ‘Essential rural worker occupancy conditions’ (2)
- Policy RUR 5 ‘Best and most versatile agricultural land’ (12)
- Policy RUR 6 ‘Outdoor sport, leisure and recreation outside of settlement boundaries’ (4)
- Policy RUR 7 ‘Equestrian development outside of settlement boundaries’ (5)
- Policy RUR 8 ‘Visitor accommodation outside of settlement boundaries’ (5)
- Policy RUR 9 ‘Caravan and camping sites’ (2)
- Policy RUR 10 ‘Employment development in the open countryside’ (7)
- Policy RUR 11 ‘Extensions and alterations to buildings outside of settlement boundaries’ (4)
- Policy RUR 12 ‘Residential curtilages outside of settlement boundaries’ (4)
- Policy RUR 13 ‘Replacement buildings outside of settlement boundaries’ (8)
- Policy RUR 14 ‘Re-use of rural buildings for residential use’ (4)

#### Chapter 7: Employment and economy (intro) (5)
### Section / policy / site (number of comments)

- Policy EMP 1 ‘Strategic employment areas’ (6)
- Policy EMP 2 ‘Employment allocations’ (13)

#### Chapter 8: Housing (intro) (22)
- Policy HOU 1 ‘Housing mix’ (38)
- Policy HOU 2 ‘Specialist housing provision’ (8)
- Policy HOU 3 ‘Self and custom build dwellings’ (27)
- Policy HOU 4 ‘Houses in multiple occupation’ (1)
- Policy HOU 5 ‘Gypsy, Traveller and Travelling Showpersons provision’ (9)
- Policy HOU 6 ‘Accessibility, space and wheelchair housing standards’ (21)
- Policy HOU 7 ‘Subdivision of dwellings’ (4)
- Policy HOU 8 ‘Backland development’ (4)
- Policy HOU 9 ‘Extensions and alterations’ (2)
- Policy HOU 10 ‘Amenity’ (2)
- Policy HOU 11 ‘Residential standards’ (14)
- Policy HOU 12 ‘Housing density’ (32)
- Policy HOU 13 ‘Housing delivery’ (23)
- Policy HOU 14 ‘Small and medium-sized sites’ (12)

#### Chapter 9: Town centres and retail (intro) (3)
- Policy RET 1 ‘Retail hierarchy’ (7)
- Policy RET 2 ‘Planning for retail needs’ (3)
- Policy RET 3 ‘Sequential and impact tests’ (3)
- Policy RET 4 ‘Shop fronts and security’ (1)
- Policy RET 5 ‘Restaurants, cafés, pubs and hot food takeaways’ (4)
- Policy RET 6 ‘Neighbourhood parades of shops’ (1)
- Policy RET 7 ‘Supporting the vitality of town and retail centres’ (7)
- Policy RET 8 ‘Residential accommodation in the town centre’ (3)
- Policy RET 9 ‘Environmental improvements, public realm and design in town centres’ (4)
- Policy RET 10 ‘Crewe town centre’ (1)
- Policy RET 11 ‘Macclesfield town centre and environs’ (5)

#### Chapter 10: Transport and infrastructure (intro) (3)
- Policy INF 1 ‘Cycleways, bridleways and footpaths’ (14)
- Policy INF 2 ‘Public car parks’ (1)
- Policy INF 3 ‘Highway safety and access’ (8)
- Policy INF 4 ‘Manchester Airport’ (5)
- Policy INF 5 ‘Off-airport car parking’ (3)
- Policy INF 6 ‘Protection of existing and proposed infrastructure’ (5)
- Policy INF 7 ‘Hazardous installations’ (0)
- Policy INF 8 ‘Telecommunications infrastructure’ (4)
- Policy INF 9 ‘Utilities’ (4)
- Policy INF 10 ‘Canals and mooring facilities’ (3)

#### Chapter 11: Recreation and community facilities (intro) (1)
- Policy REC 1 ‘Green/open space protection’ (22)
- Policy REC 2 ‘Indoor sport and recreation implementation’ (10)
- Policy REC 3 ‘Green space implementation’ (12)
- Policy REC 4 ‘Day nurseries’ (1)
- Policy REC 5 ‘Community facilities’ (4)

#### Chapter 12: Site allocations (intro) (80)
<table>
<thead>
<tr>
<th>Section / policy / site (number of comments)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crewe (general) (13)</td>
</tr>
<tr>
<td>o Site CRE 1 ‘Land at Bentley Motors’ (2)</td>
</tr>
<tr>
<td>o Site CRE 2 ‘Land off Gresty Road’ (3)</td>
</tr>
<tr>
<td>Congleton (general) (11)</td>
</tr>
<tr>
<td>o Site CNG 1 ‘Land off Alexandria Way’ (1)</td>
</tr>
<tr>
<td>Middlewich (general) (3)</td>
</tr>
<tr>
<td>o Site MID 1 ‘Land off St. Ann's Road’ (2)</td>
</tr>
<tr>
<td>o Site MID 2 ‘East and west of Croxton Lane’ (6)</td>
</tr>
<tr>
<td>o Site MID 3 ‘Centurion Way’ (5)</td>
</tr>
<tr>
<td>Poynton (general) (4)</td>
</tr>
<tr>
<td>o Site PYT 1 ‘Poynton Sports Club’ (18)</td>
</tr>
<tr>
<td>o Site PYT 2 ‘Land north of Glastonbury Drive’ (19)</td>
</tr>
<tr>
<td>o Site PYT 3 ‘Land at Poynton High School’ (9)</td>
</tr>
<tr>
<td>o Site PYT 4 ‘Former Vernon Infants School’ (5)</td>
</tr>
<tr>
<td>Alderley Edge (general) (11)</td>
</tr>
<tr>
<td>o Site ALD 1 ‘Land adjacent to Jenny Heyes’ (11)</td>
</tr>
<tr>
<td>o Site ALD 2 ‘Ryleys Farm, north of Chelford Road’ (10)</td>
</tr>
<tr>
<td>o Safeguarded land ALD 3 ‘Ryleys Farm (safeguarded)’ (7)</td>
</tr>
<tr>
<td>o Site ALD 4 ‘Land north of Beech Road’ (12)</td>
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<tr>
<td>Audlem (general) (1)</td>
</tr>
<tr>
<td>o Site AUD 1 ‘Land south of Birds Nest’ (1)</td>
</tr>
<tr>
<td>Bollington (general) (187)</td>
</tr>
<tr>
<td>o Site BOL 1 ‘Land at Henshall Road’ (175)</td>
</tr>
<tr>
<td>o Site BOL 2 ‘Land at Oak Lane/Greenfield Road’ (63)</td>
</tr>
<tr>
<td>o Site BOL 3 ‘Land at Jackson Lane’ (63)</td>
</tr>
<tr>
<td>Chelford (general) (2)</td>
</tr>
<tr>
<td>o Site CFD 1 ‘Land off Knutsford Road’ (4)</td>
</tr>
<tr>
<td>o Safeguarded land CFD 2 ‘Land east of Chelford Railway Station’ (2)</td>
</tr>
<tr>
<td>Disley (general) (7)</td>
</tr>
<tr>
<td>o Site DIS 1 ‘Greystones allotments’ (42)</td>
</tr>
<tr>
<td>o Safeguarded land DIS 2 ‘Land off Jacksons Edge Road’ (185)</td>
</tr>
<tr>
<td>Holmes Chapel (general) (3)</td>
</tr>
<tr>
<td>o Site HCH 1 ‘Land east of London Road’ (6)</td>
</tr>
<tr>
<td>Mobberley (general) (2)</td>
</tr>
<tr>
<td>o Site MOB 1 ‘Land off Ilford Way’ (11)</td>
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<tr>
<td>o Safeguarded land MOB 2 ‘Land north of Carlisle Close’ (4)</td>
</tr>
<tr>
<td>Prestbury (general) (13)</td>
</tr>
<tr>
<td>o Site PRE 1 ‘Land south of cricket ground’ (9)</td>
</tr>
<tr>
<td>o Site PRE 2 ‘Land south of Prestbury Lane’ (62)</td>
</tr>
<tr>
<td>o Safeguarded land PRE 3 ‘Land off Heybridge Lane (safeguarded)’ (10)</td>
</tr>
<tr>
<td>Gypsy, Traveller and Travelling Showpersons sites (general) (2)</td>
</tr>
<tr>
<td>o Site G&amp;T 1 ‘Land east of Railway Cottages, Nantwich’ (12)</td>
</tr>
<tr>
<td>o Site G&amp;T 2 ‘Land at Coppenhall Moss, Crewe’ (1)</td>
</tr>
<tr>
<td>o Site G&amp;T 3 ‘New Start Park, Wettenhall Road, Nantwich’ (8)</td>
</tr>
<tr>
<td>o Site G&amp;T 4 ‘Three Oakes Site, Booth Lane, Middlewich’ (4)</td>
</tr>
<tr>
<td>o Site G&amp;T 5 ‘Cledford Hall, Cledford Lane, Middlewich’ (18)</td>
</tr>
<tr>
<td>o Site G&amp;T 6 ‘Land at Thimswarra Farm, Moston’ (2)</td>
</tr>
<tr>
<td>o Site G&amp;T 7 ‘Land at Meadowview, Moston’ (2)</td>
</tr>
<tr>
<td>o Site TS 1 ‘Lorry park, off Mobberley Road, Knutsford’ (10)</td>
</tr>
<tr>
<td>o Site TS 2 ‘Land at Firs Farm, Brereton’ (5)</td>
</tr>
</tbody>
</table>

Chapter 13: Monitoring and implementation (3)
Table 2: Comments submitted by consultation point

6.4 All comments are available to view on the council’s consultation portal at https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubsadpd

6.5 A summary of the key issues raised is set out in Appendix 9.

Petitions

6.6 During the consultation period, the council received two petitions from Save Disley’s Green Belt Action Committee, relating to safeguarded land DIS 2 ‘Land off Jacksons Edge Road’.

6.7 The first of these petitions states “The signatories of this petition want Cheshire East Council to protect Disley’s Green belt, namely the land off Jackson’s Edge Road as outlined in the SADPD. There are no exceptional circumstances to allow development of this land. Disley has already been affected by a significant development at Waters Edge. We know that there are a wide number of brown sites within Cheshire East that could be developed as an alternative”. This petition had 419 signatures.

6.8 The second of these petitions states “Cheshire East County Council are planning to remove the Green Belt status from the fields off Jackson’s Edge Lane/Lymewood Drive. Developers have said they are ready to start work immediately. They plan to build 73 houses. Save Disley’s Green Belt Action Committee need your help urgently. Without your help we will continue to lose the character of Disley Village, further decrease air quality on the A6, increase congestion and ruin our precious countryside. Please sign the petition below to ask Cheshire County Council and Disley Parish Council to protect this designated green belt land from development”. This petition had 740 signatures.

6.9 Following the close of the consultation period on 30 September, the council received a further petition regarding site DIS 1 ‘Greystones Allotments’. This petition states “Say no to houses on the Greystones Allotments. In response with our leaflet of last week please sign our petition for no more housing in Newtown and Disley”. This petition had 47 signatures.

6.10 The council is also aware of three further petitions that have been circulated, but these have not been submitted to the council for consideration:

- Cledford Transient Travellers Site Petition – Find a site that’s right (486 signatures at 15 October 2019);
- Save Greystones Allotment in Newtown, Disley (29 signatures at 15 October 2019); and
• Say No to a Travellers Showpersons Site in Knutsford (588 signatures at 15 October – petition continued from the First Draft SADPD consultation).

**Sustainability Appraisal**

6.11 In total, 9 comments were received from 9 different consultees.

6.12 In summary, the key points raised were:

- The Equality Impact Assessment should make reference to Census data or consultation feedback.
- It not demonstrated protected characteristics have been considered; or the development needs of people with protected characteristics addressed.
- The SA focusses on LSCs and other settlements and rural areas; it should have considered other reasonable alternatives at higher order centres.
- The SA does not adequately consider the full impacts of the sterilisation of minerals; the site selection criteria fail to recognise the importance of minerals.
- The SA has not considered evidence gathered for the production of the Minerals and Waste DPD.

**Habitats Regulations Assessment**

6.13 In total, 1 comment was received.

6.14 In summary the key point raised was:

- The HTA should consider the National “Nature Improvement Area” (Meres and Mosses) status of significant areas in the south of the borough.

**7. Next steps**

7.1 All comments received on the 2019 Publication Draft SADPD, its Sustainability Appraisal, and Habitats Regulations Assessment will be fully considered before the SADPD is submitted to the Secretary of State for its independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.

7.2 Careful thought will be given as to whether the issues raised require further changes to be made to the SADPD prior to its submission. It is currently anticipated that decisions about the proposals and policies in the SADPD will be made during the summer of 2020. If this results in any significant changes to the 2019 Publication Draft SADPD, a further round of public consultation would be needed prior to submission to the Secretary of State. If this arises, it is anticipated that this further consultation would take place in the autumn of 2020.
Appendix 1: Statement of representations procedure

Site Allocations and Development Policies Document
Statement of the Representations Procedure (19 August 2019)

Cheshire East Council proposes to submit the Site Allocations and
Development Policies Document to the Secretary of State under Section 20
of the Planning and Compulsory Purchase Act 2004.

The Site Allocations and Development Policies Document is now published in accordance with Regulation
19 of the Town and Country Planning (Local Planning) (England) Regulations. Representations are invited in
accordance with Regulation 20.

Title of the Local Plan: The Site Allocations and Development Policies Document.

Subject Matter: The Site Allocations and Development Policies Document will set non-strategic and
detailed planning policies to guide planning decisions and allocate additional sites to meet the overall
development requirements set out in the Local Plan Strategy. It has been prepared to support the policies
and proposals of the Local Plan Strategy by providing additional policy detail.

Area Covered: Cheshire East Borough, excluding the area within the Peak District National Park.

Representation Period: Monday 19 August 2019 to 5:00pm on Monday 30 September 2019. All
representations must be received by the council by 5:00pm on Monday 30 September 2019.

Representations: May be made in writing or by way of electronic communication:
- Online, using the council’s consultation portal accessed from www.cheshireeast.gov.uk/localplan;
- By email to localplan@cheshireeast.gov.uk, using the electronic representations form available to
download from the consultation portal, accessed from www.cheshireeast.gov.uk/localplan; or
- In writing, on a representations form available from the locations listed below (including libraries).
  Forms must be returned to: Cheshire East Council, Strategic Planning (Westfields), C/O Municipal
  Buildings, Earle Street, Crewe CW1 2BJ.

Your personal data will be processed in line with our Strategic Planning Privacy Notice, which is available
online at www.cheshireeast.gov.uk/council_and_democracy/council_information/website_information/

Notification: Representations may be accompanied by a request to be notified at a specific address of any
of the following:
- The submission of the Site Allocations and Development Policies Document for independent
  examination under Section 20 of the Planning and Compulsory Purchase Act 2004;
- The publication of the recommendations of the person appointed to carry out an independent
  examination of the Site Allocations and Development Policies Document under Section 20 of the
  Planning and Compulsory Purchase Act 2004; and
- The adoption of the Site Allocations and Development Policies Document.

Proposed Submission Documents: Documents can be viewed using the council’s consultation portal,
accessed from www.cheshireeast.gov.uk/localplan. They can also be inspected at:
- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ (Mon - Fri
  8:45am - 5:00pm);
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA (Mon - Fri
  8:45am - 5:00pm); and
- Westfields, Middlewich Road, Sandbach CW11 1HZ (Mon - Fri 9:00am - 5:00pm).

Selected proposed submission documents (including the Site Allocations and Development Policies
Document; Sustainability Appraisal; and Habitats Regulations Assessment) can also be viewed at public
libraries in Cheshire East (locations and opening times can be obtained by telephoning 0300 123 5018 or
online at www.cheshireeast.gov.uk/libraries/libraries_opening_hours.aspx).

Further information and paper copies of all proposed submission documents can be requested from the
Strategic Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 655893. Please
note that a reasonable charge will be made to cover printing and postage costs.

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You have received this letter as you have previously responded to a local plan consultation or you have asked to be kept informed of future local plan consultations.

The Council has published the Site Allocations and Development Policies Document (SADPD) for consultation. The consultation provides you and anyone else the opportunity to comment on the SADPD before it is submitted to the Secretary of State for examination by a Planning Inspector.

The SADPD has been prepared to support the policies and proposals of the existing Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations. This consultation is a formal stage in the preparation of the SADPD and is being carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Full details of the consultation are set out in the ‘Statement of Representations Procedure’ on the reverse of this letter, including the deadline by which the Council must receive your comments. Please do not hesitate to contact the Strategic Planning Team using the details at the top of this letter should you require any further information.

Yours sincerely,

Jeremy Owens
Development Planning Manager
From:       LOCAL PLAN
Sent:       19-Aug-2019 10:02
To:         LOCAL PLAN
Subject:    Cheshire East Site Allocations and Development Policies document: publication
draft consultation
Attachments: Statement of Representations Procedure.pdf

Dear Sir or Madam,


You have received this email as you have previously responded to a local plan consultation or you have asked to be kept informed of future local plan consultations.

The council has published the Site Allocations and Development Policies Document (SADPD) for consultation. The consultation provides you and anyone else the opportunity to comment on the SADPD before it is submitted to the Secretary of State for examination by a Planning Inspector.

The SADPD has been prepared to support the policies and proposals of the existing Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations. This consultation is a formal stage in the preparation of the SADPD and is being carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Full details of the consultation are set out in the attached ‘Statement of Representations Procedure’, including the deadline by which the council must receive your comments. Further information is also available from our website www.cheshireeast.gov.uk/localplan or by contacting us using the details below.

Yours faithfully,

Jeremy Owens
Development Planning Manager

Cheshire East Council
Strategic Planning Team
Westfields, Middlewich Road, Sandbach CW11 1HZ
Tel: 01270 685693
Email: localplan@cheshireeast.gov.uk

Cheshire East Council
Working for a brighter future together
Appendix 3: Screen shots from the council website

Screen shot of [www.cheshireeast.gov.uk](http://www.cheshireeast.gov.uk) (taken 19 August 2019)
• Give your feedback on the SLRB Access Options Consultation

Please submit your comments by 11:59pm on Tuesday 3 September 2019.

Council Tax Support Consultation
Cheshire East Council is proposing changes to its Council Tax Support scheme. This could affect how those living in working age households claim their Council Tax Support.
• Read more about the Council Tax support scheme and give your feedback
• Visit our Council Tax Support webpages for further information
• View the Council Tax Support Consultation Equality Impact Assessment (PDF, 352KB)

Please submit your consultation response by 5pm on Monday 16 September 2019.

The council will be holding the following drop-in sessions for anyone with queries about this consultation:
• 12 August 2019 between 12noon and 3pm at Delamere House, Crewe, CW1 2JE
• 13 August 2019 between 12noon and 3pm at Macclesfield Town Hall, Macclesfield, SK10 1EA
Please inform our customer service centre reception on arrival there is no need to book an appointment.

CE Draft Economic Strategy Consultation
Cheshire East Council is consulting on its draft economic strategy, which outlines plans to grow the local economy to deliver £17bn GVA per year, and improve the quality of the local area.

The draft strategy, which was approved for consultation by cabinet on Tuesday 3 July, uses a strong evidence base and has been developed in partnership with representatives from the private sector.

We now want to test the strategy through a consultation so that the local community can tell us what they think.
• View the full draft CE economic strategy (PDF, 877KB)
• Give your views on the draft CE Economic Strategy

Please submit your consultation response by 5pm on Sunday 29 September 2019.

Local Plan: Site Allocations and Development Policies Document
The council has published the Site Allocations and Development Policies Document (SAPD) for consultation. The consultation provides the opportunity to comment on the SAPD before it is submitted to the Secretary of State for examination by a Planning Inspector.

The SAPD has been prepared to support the policies and proposals of the existing Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations. This consultation is a formal stage in the preparation of the SAPD and is being carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Full details of the consultation are set out in the Statement of Consultations Procedure (PDF, 103 KB).
• Read the Site Allocations and Development Policies Document and submit your representations (via our consultation portal).

Please submit your representations by 5pm on Monday 30 September 2019.

Cheshire East High Needs Funding Consultation
Cheshire East Council is looking to improve the system for allocating high needs top-up funding to children and young people with an Education, Health and Care Plan in Cheshire East.

A working group established by the Schools Forum have developed a proposed new model and we would like your views on this proposal.
• Give your feedback on the High Needs Funding Consultation

Please submit your consultation response by 5pm on Friday 4 October 2019.

Screen shot of www.cheshireeast.gov.uk/council_and_democracy/council_information/consultations (taken 19 August 2019)
Cheshire East Local Plan

The Local Plan sets planning policies and allocates sites for development. It is part of the statutory development plan for Cheshire East and is the basis for deciding planning applications. The Local Plan covers a range of matters including the number and location of new homes, the amount and location of employment land, protection and improvement of important open areas, provision of new infrastructure, and improvement of town centres and community facilities in the borough.

Our spatial planning update provides a regular bulletin on planning policy matters affecting Cheshire East.

Key Local Plan documents

The Local Plan consists of a number of key documents which form part of the statutory development plan.

<table>
<thead>
<tr>
<th>Document</th>
<th>Status</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Plan Strategy</td>
<td>Adopted 27 July 2017</td>
<td>The LPS is the centrepiece of the Local Plan, setting out strategic priorities for the development of the area along with planning policies and proposals. It is accompanied by an interactive policies map, which shows sites, policies and environmental/heritage designations.</td>
</tr>
<tr>
<td>Site Allocations and Development Policies document</td>
<td>Representations on publication draft, invited by 2pm Monday 30 September 2019.</td>
<td>The SAPDP will allocate the remaining sites needed for future development and set out further detailed planning policies to be used when considering planning applications. Consultation on the Publication Draft SAPDP is underway until 1pm on 30 September 2019. Full details of the consultation are set out in the Statement of Representations Procedure (PDF, 103 KB).</td>
</tr>
<tr>
<td>Minerals and Waste Development Plan Document</td>
<td>Draft in preparation.</td>
<td>The MWDPD will set out policies for dealing with minerals and waste, and identify sites. Consultation on an Issues Paper took place between 26 April and 05 June 2017, alongside a ‘call for sites’ for minerals and waste sites.</td>
</tr>
<tr>
<td>Crewe Hub Area Action Plan</td>
<td>Consultation on the Development Strategy and Further Options document is underway.</td>
<td>An AAP is a type of SPD providing a planning framework for a specific area of opportunity, change or conservation. Unlike the LPS, the AAP will have a very narrow geographic focus, being confined to an area close to the existing Crewe railway station. Consultation on the Development Strategy and Further Options document is underway until 03 September 2015.</td>
</tr>
<tr>
<td>Saved Policies from previous Local Plans</td>
<td>Saved development plan policies.</td>
<td>A number of saved policies from the Congleton Local Plan, Crewe and Nantwich Local Plan, Macclesfield Local Plan, Cheshire Waste Plan and Cheshire Minerals Plan will continue to be used until the SAPDP and MWDPD have been adopted.</td>
</tr>
</tbody>
</table>

In addition to the Local Plan documents above, made Neighbourhood Plans are also part of the statutory development plan.

Supporting Local Plan documents

Screen shot of [www.cheshireeast.gov.uk/localplan](http://www.cheshireeast.gov.uk/localplan) (taken 19 August 2019)
Site Allocations and Development Policies Document

Consultation on the Publication Draft SADPD is underway until 5pm on 30 September 2019.

The Local Plan Strategy is the first part of the new Local Plan and was adopted in 2017. This Site Allocations and Development Policies Document will form the second part of the Local Plan. It will set non-strategic and detailed planning policies to guide planning decisions and allocate additional sites for development to assist in meeting the overall development requirements set out in the LPS. It has been prepared to support the policies and proposals of the LPS by providing additional policy detail.

Current status

The Publication Draft SADPD has been published to invite representations before it is submitted for examination by a planning inspector. Consultation on the publication draft SADPD is taking place between 16 August and 5pm on 30 September 2019. This consultation is a formal stage in the preparation of the SADPD and is being carried out in accordance with the Town and Country Planning (Local Plannings Regardings) Regulations 2012. Full details of the consultation are set out in the statement of representations procedure (PDF, 103 KB).

The council has published a number of supporting documents in the publication draft SADPD Evidence Base as well as a housing completions and commitments at 31 March 2019 report (PDF, 12.8 MB).

Previous stages

First draft SADPD

The First Draft SADPD consultation (including a Sustainability Appraisal consultation and a Habitats Regulations Assessment consultation) took place between 11 September and 22 October 2018. Consultation documents and responses are available to view on our consultation portal alongside the first draft SADPD evidence base reports.

The First Draft SADPD Report of Consultation (PDF, 3.0 MB) has now been published. All consultation responses have been considered, and the evidence base has been updated to inform the next draft SADPD.

Issues paper

An initial consultation on the site allocations and development policies issues paper took place between 27 February and 10 April 2017, alongside a separate ‘call for sites’ exercise to inform the allocation of development sites.

The production of the SADPD will be informed by Sustainability Appraisal, to assess its social, environmental and economic impacts. A Draft SA Scoping report identifying the scope and methodology for the Sustainability Appraisal was also the subject of consultation between 27 February and 10 April 2017. The updated SA Scoping Report has now been published and can be downloaded from the Local Plan Sustainability Appraisal page.

We have now published the Report of Consultation on the SADPD Issues Paper (PDF, 2.5 MB).

Screen shot of www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx (taken 19 August 2019)
Appendix 4: Press releases

Press release 1

Cheshire East Council set to strengthen its planning framework

16 July 2019

Councillors are to consider the next phase of Cheshire East’s development plan.

The latest version of the second stage of Cheshire East Council’s Local Plan – the site allocations and development policies document (SADPD) – will be considered by members of the authority’s strategic planning board on 24 July.

The document, once finalised, will provide the approved framework for housing, employment, and other key infrastructure sites up to 2030.

Following directly on from the Local Plan Strategy adopted in 2017, the SADPD provides detailed policies to guide new development, including housing – and also allocate a limited amount of new development, mainly within the smaller towns and larger villages.

The majority of development needs have already been provided for through the Local Plan Strategy.

The sites in the SADPD will be non-strategic – generally sites of fewer than 60 homes or two hectares (five acres) in size. Some will be focused in key employment areas in principal towns or in smaller key centres.

When adopted, the SADPD will replace the old policies of the three former borough local plans, covering Macclesfield, Congleton and Crewe and Nantwich, dating back
to 2004, and address current planning issues – such as climate change mitigation, housing for older people and improving the quality and variety of new homes.

Councillor Toni Fox, Cheshire East Council cabinet member for planning, said: “Having reviewed the options, we recognise the need to have a robust and up-to-date planning framework to avoid a repeat of the unplanned and speculative developments that arose in this borough in recent years. To reflect the changed government planning guidance, we are putting in place a raft of fresh planning policies that will better equip us to shape and manage sustainable development of the borough.

“This plan takes account of consultation responses to the draft document published last September and I’m pleased to say that extra effort has been made, since then, to engage with town and parish councils about the various proposals.

“As well as updating our planning policies, the SADPD identifies new development areas to meet the needs of certain settlements and particular sections of our communities. Among these are plans for fresh residential sites for Gypsies and Travellers and a new transit site to provide safe and regulated accommodation for those passing through the borough.

“In some locations, small allocations are proposed in the greenbelt. This is necessary to meet localised needs in those villages and to ensure no further greenbelt changes are made until at least the 2040s.

“Completion of the site allocations plan is an important step towards securing a strong and resilient basis for planning in Cheshire East, including maintaining a five-year supply of housing land. We want to be able to review our Local Plan in future from a position of strength – without risking a planning free-for all.”

In 2018/19 a record 3,062 new homes were completed in Cheshire East. As well as providing accommodation for families and individuals this total reduces past housing backlogs and helps the Cheshire East Council demonstrate a five-year supply of housing.

Cllr Fox added: “Despite such healthy home building, our five-year supply continues to be challenged by certain sections of the development industry, bent on promoting sites outside of the Local Plan.

“The current Local Plan target of 1,800 homes per year is reflective of past economic ambitions and is almost 50 per cent higher than the government’s own calculation of housing need for the borough using their new methodology.

“We want to move promptly to a position whereby our five-year supply targets are closer aligned with the national methodology – and so we will be looking to assess which parts of Local Plan Strategy need to be reviewed and updated.

“To do this, we need to move on with the rest of the Local Plan and so publish the SADPD for formal consultation. This will allow the plan to progress to external examination, where all parties can seek independent scrutiny.”

Press release 1 dated 16 July 2019
Press release 2

Cheshire East Council acts to strengthen its planning framework

6 August 2019

Cheshire East Council is to move forward on the next phase of Cheshire East’s development plan.

The site allocations and development policies document (SADPD), which forms the second part of the council’s Local Plan, was considered by members of the authority’s cabinet today.

Members agreed to move towards the next round of public consultation on the draft document which, once finalised, will provide the approved framework for housing, employment, and other key infrastructure sites up to 2030.

Following directly on from the Local Plan Strategy adopted in 2017, the SADPD provides detailed policies to guide new development, including housing – and also allocates a limited amount of new development, mainly within the smaller towns and larger villages.

The majority of development needs have already been provided for through the Local Plan Strategy.

The sites in the SADPD will be non-strategic – generally sites of fewer than 60 homes or two hectares (five acres) in size. Some will be focused in key employment areas in principal towns or in smaller key centres.

When adopted, the SADPD will replace the old policies of the three former borough local plans, covering Macclesfield, Congleton and Crewe and Nantwich, dating back to 2004, and address current planning issues – such as climate change mitigation, housing for older people and improving the quality and variety of new homes.
Councillor Toni Fox, Cheshire East Council cabinet member for planning, said: "This plan takes account of consultation responses to the draft document published last September and I'm gratified that extra effort has been made in recent months to engage with town and parish councils about the proposals.

"Having reviewed the options, we recognised the need to have a robust and up-to-date planning framework to avoid further unplanned and speculative developments that took place in our borough in recent years. To reflect the changed planning guidance from Whitehall, we are putting in place a raft of refreshed planning policies that will better equip us to shape and manage sustainable development in Cheshire East.

"As well as updating our planning policies, the SADPD identifies new development areas to meet the needs of some settlements and particular sections of our communities. Among these are plans for fresh residential sites for Gypsies and Travellers and a new transit site to provide safe and regulated accommodation for those passing through the borough.

"In some locations, small allocations are proposed in the greenbelt. This is necessary to meet localised needs in those villages and to ensure no further greenbelt changes are made until at least the 2040s.

"Completion of the site allocations plan is an important step towards securing a strong and resilient basis for planning in Cheshire East, including maintaining a five-year supply of housing land. We want to be able to review our Local Plan in future from a position of strength – without risking a planning free-for all."

In 2018/19 a record 3,062 new homes were completed in Cheshire East. As well as providing accommodation for families and individuals, this total reduces past housing backlogs and helps the council demonstrate a five-year supply of housing.

Cllr Fox added: “Despite increased home building, our five-year supply continues to be challenged by sections of the development industry, determined to promote sites outside the Local Plan. The current Local Plan target of 1,800 homes per year is reflective of past economic ambitions and is almost 50 per cent higher than the government’s own calculation of housing need for the borough using their new methodology.

“We want to move promptly to a position where our five-year supply targets properly reflect the revised approach towards identifying housing requirements using the national methodology – and so we will be looking to assess which parts of Local Plan Strategy need to be reviewed and updated."
“To do this, we need to move on with the rest of the Local Plan and so publish the SADPD for formal consultation. This will allow the plan to progress to external examination, where all parties can seek independent scrutiny.”

Press release 2 dated 06 August 2019

Press release 3

Cheshire East consults public on next phase of Local Plan

19 August 2019

People are being invited to comment on the next phase of Cheshire East’s development plan.

The draft site allocations and development policies document (SADPD), which forms the second part of the council’s Local Plan, once finalised, will complete the approved framework for housing, employment and other key infrastructure up to 2030.

The document sets out detailed planning policies to guide decisions on planning applications as well as identifying new sites for small-scale developments. The majority of development needs have already been provided for through the Local Plan Strategy.

Councillor Toni Fox, Cheshire East Council cabinet member for planning, said: “The current version of the SADPD document follows two previous rounds of public consultation and extensive engagement with town and parish councils during 2017 and 2018.

“We want to ensure that everyone who wants to comment on this plan is able to do so as simply and easily as possible. For that reason we have a range of ways
available for people to view the document and to submit their comments as part of the consultation process.”

The document is available online and residents can comment directly via an online consultation portal on our website or simply type ‘Cheshire East site allocations plan’ into a search engine and follow the links.

Hard copies of the consultation documents and supporting reports will be available at the council’s offices at Macclesfield Town Hall, Westfields in Sandbach and Delamere House in Crewe. The main consultation documents are also available at local libraries during their normal opening hours.

Response forms will be available at all of these venues which can be posted back to:

Strategic Planning, Cheshire East Council, 1st Floor Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ

Alternatively, responses will also be accepted by email to localplan@cheshireeast.gov.uk. These should include attachments of completed consultation forms. The deadline for receipt of comments by the council is 5pm on 30 September.

The council’s strategic planning team is available to answer any questions about the consultation and provide assistance to anyone wishing to comment on the SADPD document via the above email address or by phoning 01270 685893.

Press release 3 dated 19 August 2019
Appendix 5: Social media posts

Cheshire East • 06/08/2019
Council strengthens planning framework in next phase of borough-wide development plan. See: crowd.in/HEfzrP

Cheshire East • 06/08/2019
We are moving forward with the next phase of our development plan which will provide guidance on new developments in the borough. Read more in our latest press release bit.ly/2YPElx7

Cheshire East Retweeted
Cheshire East Co... • 06/08/2019
Tegg's Nose Star Party – Public Stargazing - Saturday 17th August -

Cheshire East • @Ches... • 3h
Have your say on the next phase of Cheshire East’s development plan up to 2030. The site allocations and development policies document consultation is open for your comments. For more info, and to take part in the online consultation, follow the link: bit.ly/2NF0UJf

Cheshire East • @Ches... • 1h
A public engagement event is held at Macclesfield Masonic Lodge
Appendix 6: Screen shots from the consultation portal

Screen shot from SADPD consultation portal page (taken 19 August 2019)
Sustainability Appraisal (Publication Draft SADPD)

The Sustainability Appraisal assesses the extent to which the Site Allocations and Development Policies Document will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives. It has been published alongside the Publication Draft SADPD to invite representations before the SADPD and all its supporting documents are submitted for examination by an independent planning inspector.

Consultation document

The Sustainability Appraisal is available to read online on this consultation portal (please click the 'read and comment on document' button below). PDF versions of the Sustainability Appraisal and a Non-technical summary can also be downloaded here:

- PUB 03 Publication Draft SADPD Sustainability Appraisal
- PUB 03a Publication Draft SADPD Sustainability Appraisal Non-technical summary

Submitting comments

This online consultation portal is our preferred method for submitting responses; please click the 'read and comment on document' button below to get started. Alternatively, you can respond by email or by post if you prefer. To respond by email or by post, please complete one Part A Representations Form (Personal Details) and then a separate Part B Representations Form for each representation you wish to make. The return address details are included on the Part A representations forms.

Whichever method is used, all representations must be received by the council by 5pm on Monday 30th September 2019.

The representations form is adapted from the Planning Inspectorate’s model form and we have also published a separate guidance note to explain the terms used and to assist in making effective representations.

Your personal data will be processed in line with our Strategic Planning Privacy Notice and your name, town and comments will be published and made available to view on this consultation portal.

As required by the Town and Country Planning (Local Planning) (England) Regulations 2012, we have also produced a formal “Statement of the Representations Procedure”

Other documents

This page is the consultation on the Sustainability Appraisal. To comment on the SADPD itself or the Habitats Regulations Assessment, please see the following pages:

- Publication Draft Site Allocations and Development Policies consultation
- Habitats Regulations Assessment consultation

http://www.cheshireeast.gov.uk/
Habitats Regulations Assessment (Publication Draft SADPD)

The Habitats Regulations Assessment considers the impact of the Site Allocations and Development Policies Document on internationally-designated nature conservation sites. It has been published alongside the Publication Draft SADPD to invite representations before the SADPD and all its supporting documents are submitted for examination by an independent planning inspector.

Consultation document

The Habitats Regulations are available to download here:

- PUB 04 SADPD habitats Regulations Assessment (publication version)

Submitting comments

The online consultation portal is our preferred method for submitting responses; please click the "View and comment" button below to get started. Alternatively, you can respond by email or by post if you prefer. To respond by email or by post, please complete one Part A Representations Form (Personal Details) and then a separate Part B Representations Form for each representation you wish to make. The return address details are included on the Part A representations forms.

Whichever method is used, all representations must be received by the council by 500pm on Monday 26 September 2019.

The representations form is adapted from the Planning Inspectorate's modern form and we have also published a separate guidance note to explain the terms used and to assist in making effective representations.

Your personal data will be processed in line with our Strategic Planning Privacy Notice and your name, town and comments will be published and made available to view on this consultation portal.

As required by the Town and Country Planning (Local Planning) (England) Regulations 2012, we have also produced a formal "Statement of the Representations Procedure".

Other documents

This page is the consultation on the Habitats Regulations Assessment. To comment on the SADPD itself or the Sustainability Appraisal, please see the following pages:

- Publication Draft Site Allocations and Development Policies consultation
- Sustainability Appraisal consultation

View and Comment

Event Information

Access: Login required
Status: open (From 19/8/19 07:00 to 30/09/19 17:00)
Privacy: If you take part, your name may be displayed, your answers may be displayed, your town/city may be displayed
Description: The Habitats Regulations Assessment considers the impact on internationally-designated nature conservation sites.
Organisation: Cheshire East Council
Contact Name: Spatial Planning Team
Contact Email: localplan@cheshireeast.gov.uk
Contact Telephone: 01244 300300
Other Contact: Westfield C/O Municipal Buildings Earle Street Crewe CW1 2BJ
Appendix 7: Consultation response forms

Cheshire East Local Plan
Publication Draft Site Allocations and Development Policies Document: Representations Form

Cheshire East Council has published the Site Allocations and Development Policies Document (SADPD) to invite representations before it is submitted for examination by a planning inspector. The purpose of the examination is to consider whether the plan complies with all legal requirements and is sound. The inspector will consider all representations on the SADPD that are made by the closing date.

There are a number of supporting documents proposed to be submitted alongside the SADPD. All of the proposed submission documents can be viewed at www.cheshireeast.gov.uk/localplan and inspected at:

- Westfields, Middlewich Road, Sandbach CW11 1HZ;
- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ; and
- Macclesfield Customer Service Centre, Town Hall, Macclesfield SK10 1EA.

In addition, the SADPD, Sustainability Appraisal, Habitats Regulations Assessment and selected supporting documents (including the policies map) are available to view at public libraries in Cheshire East.

You can use this form to submit representations on any of these documents:

- The Publication Draft SADPD has been prepared to support the policies and proposals of the Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations.
- The Sustainability Appraisal assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.
- The Habitats Regulations Assessment considers the impact on internationally-designated nature conservation sites.

You can also use the form to make representations on any of the other supporting documents, but it would be helpful if you would relate these representations to the resulting paragraph, policy or site in the SADPD.

Submit your views
The council’s online consultation portal is our preferred method of submitting responses, but you can also respond by email or in writing using this representations form.

Online: Via the consultation portal at www.cheshireeast.gov.uk/localplan or scan this QR code on your smartphone or tablet

Email: To localplan@cheshireeast.gov.uk

By post: Strategic Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ

Please make sure that your comments reach us by 5pm on Monday 30 September 2019. We are not able to accept anonymous comments and you must provide us with your name and contact details. Your personal data will be processed in line with our Strategic Planning Privacy Notice, which is available on the council’s website. Your name, town and comments will be published and made available to view on the consultation portal.

This representations form is adapted from the Planning Inspectorate’s model form. We have also published a separate guidance note to explain the terms used and to assist in making effective representations.
Cheshire East Local Plan
Representation Form

Name of the Local Plan to which this representation relates: Site Allocations and Development Policies Document

Please return to: Strategic Planning (Westfields)
C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ or by email to localplan@cheshireeast.gov.uk

Please return by: 5pm, Monday 30 September 2019

This comment form has two parts:
• Part A – Personal details: need only be completed once
• Part B – Your representation(s): please fill in a separate sheet for each representation you wish to make

### Part A: Personal Details

<table>
<thead>
<tr>
<th>1. Personal Details*</th>
<th>2. Agent’s Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>* If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) in column 1 but complete the full contact details of the agent in column 2.</td>
<td></td>
</tr>
<tr>
<td>Title</td>
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<td>First Name</td>
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<td>Last Name</td>
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<tr>
<td>Email Address (where relevant)</td>
<td></td>
</tr>
<tr>
<td>Your Reference No. (if known)</td>
<td></td>
</tr>
</tbody>
</table>

Please complete a separate Part B form for each representation that you would like to make. This response form provides enough space for two representations but please copy and attach further part B forms if required. For further assistance in making representations please contact the Strategic Planning Team at localplan@cheshireeast.gov.uk or by telephone on 01270 685893.
Part B: Representation

Please use a separate sheet for each representation. This form is adapted from the Planning Inspectorate's model form. We have also published a separate guidance note to explain the terms used and to assist in making effective representations.

Name and Organisation: ____________________________  Office Use Only:

To which document does this representation relate? (please tick one box)

☐ Publication Draft Site Allocations and Development Policies Document (SADPD)
☐ Publication Draft SADPD Sustainability Appraisal
☐ SADPD Habitats Regulations Assessment (publication version)

To which part of the document does this representation relate?

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Policy</th>
<th>Site</th>
<th>Policies map</th>
</tr>
</thead>
</table>

Q1. Do you consider the SADPD is:

(1) Legally compliant  ☐ Yes  ☐ No
(2) Sound  ☐ Yes  ☐ No
(3) Compliant with the Duty to co-operate  ☐ Yes  ☐ No

Q2. Please give details of why you consider the SADPD is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the SADPD or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet if necessary)
Q3. Please set out the modification(s) you consider necessary to make the SADPD legally compliant and sound, in respect of any legal compliance or soundness matters identified at Q4 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the SADPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q4. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

☐ No, I do not wish to participate in hearing session(s) ☐ Yes, I wish to participate in hearing session(s)

Q5. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature ___________________________ Date ___________________________
Part B: Representation

Please use a separate sheet for each representation. This form is adapted from the Planning Inspectorate’s model form. We have also published a separate guidance note to explain the terms used and to assist in making effective representations.

Name and Organisation: ____________________________

To which document does this representation relate? (please tick one box)

☐ Publication Draft Site Allocations and Development Policies Document (SADPD)
☐ Publication Draft SADPD Sustainability Appraisal
☐ SADPD Habitats Regulations Assessment (publication version)

To which part of the document does this representation relate?

Paragraph   Policy   Site   Policies map

Q1. Do you consider the SADPD is:

(1) Legally compliant  ☐ Yes  ☐ No
(2) Sound  ☐ Yes  ☐ No
(3) Compliant with the Duty to co-operate  ☐ Yes  ☐ No

Q2. Please give details of why you consider the SADPD is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the SADPD or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet if necessary)
Q3. Please set out the modification(s) you consider necessary to make the SADPD legally compliant and sound, in respect of any legal compliance or soundness matters identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the SADPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q4. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

☐ No, I do not wish to participate in hearing session(s)  ☐ Yes, I wish to participate in hearing session(s)

Q5. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature ___________________________ Date ___________________________

Printed consultation response form
Spatial distribution and settlements

Policy PG 8

These comments are for this policy (Policy PG 8)

Warning: your session may timeout after an hour, to avoid any data loss please use the Save as draft button at the bottom of the page.

The Publication Draft SADP has been published to invite representations before it is submitted for examination by a planning inspector. The purpose of the examination is to consider whether the plan complies with all legal requirements and is sound. The inspector will consider all representations submitted by the closing date of 30 September 2019.

This representations form is adapted from the Planning Inspectorate’s model form. We have also published a guidance note to assist in making effective representations.

Your personal data will be processed in line with our privacy notice and your name, town and full response will be published and made available to view online.

Please add your representation below. Once submitted, you will be able to add further representations if you wish.

Q1

Do you consider the SADP is:

Yes

(1) Legally compliant

No

(2) Sound

(3) Compliant with the Duty to co-operate

Q2

Please give details of why you consider the SADP is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness matters identified at Q4 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the SADP legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.
Supporting information

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

If you have any supporting information that is essential to support your representation (for example a map, photograph or report), please choose the file here. Your chosen file will upload when you submit your comment.

Upload:
Browse...
Title

Q4

Please note: While the response to this question will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐ No, I do not wish to participate in hearing session(s)  ☐ Yes, I wish to participate in hearing sessions

Q5

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Thank you for using the consultation portal. Please make sure you submit your representation before 5pm on Monday 30 September, using the ‘submit’ button below. Once processed by the council, submitted representations will be available to view on the consultation portal. There may be a delay before your representation is processed dependent on the volume of representations submitted.

There are no more questions. Please click Submit to finish and wait for the confirmation message. Once submitted you will no longer be able to modify your answers. Thank you for your time.

If you are logged in, you can save your form if you are not quite finished and would like to come back to it later. You will be able to see all unsaved forms in "Your Account" and submit or edit them at any time.

Cancel if you want to disregard the answers/changes you have made since your last save.
Appendix 8: Consultation guidance note

Cheshire East Local Plan
Publication Draft Site Allocations and Development Policies Document: Guidance Note

1. Introduction

1.1 Cheshire East Council has published the Site Allocations and Development Policies Document (SADPD) to invite representations on it before it is submitted for examination by a Planning Inspector. Under the Planning and Compulsory Purchase Act 2004 (PCPA), the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made by 5:00pm on Monday 30 September 2019.

1.2 To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. We cannot accept anonymous representations and you must provide us with your name and contact details when making representations. Personal data will be processed in line with our Strategic Planning Privacy Notice, which is available on the council’s website. Representations will be published on the council’s consultation portal alongside the name and town of the representor. The council will also make sure the names and addresses of those making representations can be made available and taken into account by the Inspector.

2. Planning Inspectorate Guidance

2.1 The scope of the examination is set by the provisions of the PCPA. The following guidance is adapted from the Planning Inspectorate’s guidance note to assist in understanding the terms used.

Legal Compliance and Duty to Co-operate

2.2 You should consider the following before making a representation on legal compliance:

- The plan should be included in the council’s current Local Development Scheme (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the council proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the council’s website and available at its main offices.

- The process of community involvement for the plan in question should be in general accordance with the council’s Statement of Community Involvement (SCI). The SCI sets out the council’s strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.

- The council is required to provide a Sustainability Appraisal (SA) report when it publishes a plan. This should identify the process by which the SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
• The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended (the Regulations).

2.3 You should consider the following before making a representation on compliance with the duty to co-operate:

• Section 33A of the PCPA requires the council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The council will be expected to provide evidence of how they have complied with the duty.
• Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

2.4 The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

• Positively prepared – providing a strategy which, as a minimum seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
• Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
• Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
• Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

2.5 If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

• Is the issue with which you are concerned already covered specifically by national planning policy?
• Is the issue with which you are concerned already covered by another policy in the Local Plan Strategy?
• If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
• If the plan is unsound without the policy, what should the policy say?

General advice

2.6 If you wish to make a representation seeking a modification to a plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 2.4 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

2.7 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the
2.8 Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather than a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

2.9 Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

3. Making Representations

3.1 The council has also produced the following guidance to assist in making representations effectively.

Published Documents

3.2 The following consultation documents have been published for representations:

- The Publication Draft SADPD has been prepared to support the policies and proposals of the Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations;
- The Sustainability Appraisal assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives; and
- The Habitats Regulations Assessment which considers the impact on internationally-designated nature conservation sites.

3.3 There are also number of supporting documents (listed in Appendix A of the SADPD) proposed to be submitted alongside the SADPD. All of the proposed submission documents can be viewed at www.cheshireeast.gov.uk/localplan and inspected at:

- Westfields, Middlewich Road, Sandbach CW11 1HZ;
- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ; and
- Macclesfield Customer Service Centre, Town Hall, Macclesfield SK10 1EA.

3.4 In addition, the SADPD, Sustainability Appraisal, Habitats Regulations Assessment and selected supporting documents (including the policies map) are available to view at public libraries in Cheshire East.

3.5 You can also submit representations on any of the supporting documents, but it would be helpful if you would relate these representations to the resulting paragraph, policy or site in the SADPD.
Submitting Representations

3.6 The council's online consultation portal is our preferred method of submitting responses, but you can also respond by email or in writing using the representations form available online at [www.cheshireeast.gov.uk/localplan](http://www.cheshireeast.gov.uk/localplan) or from libraries and the locations listed above in paragraph 3.3.

<table>
<thead>
<tr>
<th>Online: Via the consultation portal at <a href="http://www.cheshireeast.gov.uk/localplan">www.cheshireeast.gov.uk/localplan</a> or scan this QR code on your smartphone or tablet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Email: To <a href="mailto:localplan@cheshireeast.gov.uk">localplan@cheshireeast.gov.uk</a></td>
</tr>
<tr>
<td>By post: Strategic Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CV1 2BJ</td>
</tr>
</tbody>
</table>

3.7 Please make sure that your comments reach us by 5pm on Monday 30 September 2019. We are not able to accept anonymous comments and you must provide us with your name and contact details. Your personal data will be processed in line with our Strategic Planning Privacy Notice, which is available on the council's website. Your name, town and comments will be published and made available to view on the consultation portal.

Discrimination

3.8 When making representations, please be mindful that the full representation will be published, alongside your name and town. Under the Equality Act 2010, the council has a duty to foster good relations between different community groups, eliminate discrimination and advance equality of opportunity. As such, the council should not publish any statement about any particular community group that could be discriminatory, racist or offensive (or misinterpreted to be discriminatory, racist or offensive).

3.9 Representations that may be considered discriminatory, racist or offensive include generalisations, stereotypes or negative perceptions of race, ethnicity or culture. Where a representation is identified as potentially containing discriminatory, racist or offensive content, the Head of Strategic Planning is the designated officer to determine whether the representation is discriminatory, racist or offensive. If it is, the author will be invited to amend and re-submit their representation prior to the close of consultation to focus on planning issues including the tests of legal compliance and soundness.

3.10 Representations that are deemed to be offensive, abusive, insulting, threatening or inciting racial hatred are matters for the police.

Next Steps

3.11 Following the consultation on the Publication Draft SADPD, the council will consider all the representations made and produce a summary of the main issues raised. The decision to formally submit the SADPD to the Secretary of State will be considered and made by a meeting of the full Council following the close of the period to make representations.

Further Information

3.12 Further information, assistance with submitting representations, and paper copies of all proposed submission documents can be requested from the Strategic Planning Team by email [localplan@cheshireeast.gov.uk](mailto:localplan@cheshireeast.gov.uk) or telephone 01270 685893. Please note that a reasonable charge will be made to cover printing and postage costs.
Appendix 9: Summary of key issues

Chapter 1: Introduction / general issues

Summary of key points:

- Concerns were raised regarding the consultation process, including:
  - The online consultation may not be accessible to communities with low levels of literacy; the online-only consultation excludes elderly people.
  - It only allows objections to be recorded; there is no way of registering support for the non-inclusion of further site allocations in particular settlements.
  - The consultation period was unreasonably short as many town and parish councils do not meet in August and this is also a time of holidays.
  - The form is complicated and no guidelines or FAQs were published to assist people to complete it.
  - There was little publicity around the consultation.

- The SADPD has been prepared in the absence of a strategic spatial strategy for minerals. LPS Policy SE 10 requires the SADPD to address minerals issues; it does not comply with the NPPF (¶¶204 & 208) as minerals are not afforded adequate protection. The SADPD risks the unnecessary sterilisation of nationally-significant mineral resources.

- It is considered that the SADPD fails to address the impacts of fracking on local communities, particularly with regards to environmental safeguards and traffic generation.

- A number of responses were received seeking to retain existing saved policies and designations from legacy local plans, including:
  - MBLP policy H12 ‘Low density housing areas’;
  - Areas of special county value for landscape;

- Some responses consider that the proposals in the SADPD conflict with particular made neighbourhood plan policies, including:
  - The Bollington Neighbourhood Plan;
  - The Disley Neighbourhood Plan.
  - The Hulme Walfield and Somerford Booths Neighbourhood Plan.

- Concern is raised that the SADPD seeks to meet housing numbers prescribed in the LPS, rather than the lower numbers set out in the national methodology. It is also considered that the SADPD underestimates the contribution that will be made from windfall sites.

- A number of detailed issues were raised in respect of the plan viability assessment:
Gross development value: it is considered that the 'high' value locations should be split into 'lower high' and 'upper high'; Shavington should be considered a 'low' value location; a cautious approach to gross development values should be adopted; values in the prime area are considered excessive; the gross development value assumptions for each location should be revised based on evidence supplied.

Benchmark land value: The benchmark land value for greenfield sites (assuming 70% net developable area) is below the benchmark land value for brownfield sites; the landowner premium has been applied on a gross basis, when it should be on a net acreage basis to reflect site specific constraints; the landowner premium has been applied consistently across the borough without taking account of the gross development value of the location; the reference to assumptions in the 2017 Keppie Massey report is flawed as the report pre-dates the CIL examination which resulted in a reduction in CIL charges and the report is also more than two years old; a cautious approach to benchmark land values should be adopted; the benchmark land values should be revised based on evidence supplied; brownfield land values should reflect an industrial value plus 20%.

Costs: The assessment should take account of additional construction costs related to external works; it is considered that a separate allowance for professional fees on abnormal costs should be made; the allowances for abnormal costs are inadequate; opening-up costs should be factored-in; whilst VAT can usually be recovered from brownfield site acquisitions, it does have the effect of increasing the stamp duty payable, which should be taken into account; an additional allowance for costs arising from the requirements of the Design Guide SPD should be added; the assessment does not take site surveys, planning consultancy fees or planning application fees into account; site assessment and promotion costs should be considered; the cost of garages should be factored-in; a schedule of likely S106 contributions should be included; the cost of development finance is considered to be set too low; the allowance for Cat 2 and Cat 3 dwellings (under the National Described Space Standards) should be increased; the cost per electric vehicle charging point is too low; the assessment should allow for increased off-site abnormal costs arising from the provision of electric vehicle charging points; the attributed cost for district heating networks is not based on evidence.

All strategic sites should be individually tested.

The housing mix set out in policy HOU 1 will result in a lower floorspace/site area density than the range typically expected, therefore sites will not be used as efficiently as possible and meaning less value can be generated from the land.

The assumed level of developers’ profit of 17.5% is considered punitive and the market reality is that most will require a return of 20-25%.

A continued increase in housing will add pressures to primary care and the clinical commissioning groups would welcome advance notice of new housing developments.
A number of comments were submitted in relation to the policies map, including:

- Specific sites that should be shown as allocated on the policies map;
- Specific sites that should be shown as included within settlement boundaries on the policies map;
- Specific sites that should be shown as not within the Green Belt on the policies map;
- Specific sites that should not be shown as within the Strategic Green Gap on the policies map;
- Ecological networks (referred to in policy ENV 1) should be shown on the policies map;
- Specific areas of protected open space should not be shown as such on the policies map.
- The annotation for the Poynton Relief Road refers to policy INF 8 instead of INF 6;
- The policies map should more closely align with the LPS policies map in respect of sites LPS 26; LPS 27; LPS 46; and LPS 53.
- The policies map does not include any references to minerals and does not show the saved policies from the Cheshire Minerals Plan.
- The policies map should be fully integrated with the LPS adopted policies map so they can be read as one.
- The area to which policy GEN 5 (Aerodrome Safeguarding) applies should be shown on the policies map.
- The Manchester Airport Public Safety Zone should be shown on the policies map.
- The retail allocation within the Congleton Local Plan (under policy DP4) should be shown on the policies map.

Chapter 2: Planning for growth (general issues)

Summary of key points:

- It is stated that the LPS was only found sound on the basis that the SADPD would allocate further sites and the plan would be subject to early review to account for the fact that the plan did not consider the implications of HS2. The SADPD does not plan positively for growth.

- The housing supply plus proposed allocations are not considered to be sufficient to meet identified needs. The supply is overly reliant on large scale sites, which poses deliverability risks particularly in the short term. The overall provision of housing should be increased, particularly on small sites.

- The SADPD should continue to apply the flexibility factor for LSCs as required by the LPS Inspector’s report. Over-provision in principal towns and KSCs does not justify a lack of flexibility in LSCs. The 36,000 dwellings requirement is a minimum and should not be treated as a ceiling. The council has failed to properly consider the flexibility issue through the sustainability appraisal; removal of the flexibility factor will not ensure that the housing land
requirement is deliverable over the plan period; it is not an appropriate strategy in the context of NPPF ¶59 which seeks to boost housing supply.

- The removal of the flexibility factor for LSCs will deliver only a marginal oversupply that does not provide any flexibility in the event that some committed or allocated sites either fail to come forward or deliver fewer dwellings than envisaged. It is inconsistent with the LPS evidence base and the conclusions of the examining inspector. It will increase impetus on settlements at the upper and lower end of the settlement hierarchy to deliver additional dwellings. It fails to ensure that an appropriate scale of development is provided in all of the LSCs to support sustainable and inclusive communities comprising a range of households, including affordable and family housing. It means that locally-arising needs on the north of the borough will not be met, contrary to 8.30 of the LPS. It will fail to significantly boost the supply of new housing as required by the NPPF.

- The council should not rely on principal towns and key service centres exceeding their expected level of development, as there are a number of strategic sites that may not deliver as anticipated.

- Whilst the overall plan flexibility increased from 9.9% in 2016 to 12.6% in 2017, it decreased to 11.7% in 2018. There is no guarantee that supply flexibility will increase further through the plan period as claimed, and it may actually reduce.

- Increased flexibility is a reflection of market demand which should not be suppressed, given the objective to boost housing supply and given the shortfall in housing completions since the start of the plan period.

- Based on the 2019 figures, 91% of the overall LSC housing requirement figure has been built or committed in the first nine years of the plan period. Eleven years of the plan period remain and only 300 additional houses are required in LSCs. In the period 2016-19 windfall permissions in the LSCs have delivered an average of 191 houses per year. Even allowing for a slowdown in future windfall sites coming forward, the housing target is likely to be achieved within the next 2-3 years without further allocations.

- Further land for residential development around Crewe should be identified to ensure the requirement is met if existing commitments and allocations do not deliver as expected.

- Sites should be allocated in the other settlements and rural areas as the housing requirement is a minimum figure and there is no guarantee that commitments in these areas will be delivered. Reliance on neighbourhood plans to allocate sites is not an effective strategy and there is no requirement for them to do so.

- The SADPD should disaggregate the housing requirement figure for the other settlements and rural areas, at least for the designated neighbourhood area in accordance with NPPF ¶65.
Housing sites should be allocated in OSRA to provide a realistic prospect of meeting the overall housing requirement; to assist in achieving and maintaining a five year housing land supply; to accommodate dwellings envisaged on larger strategic sites but which will now not be delivered during the plan period; to provide flexibility in the event that HS2 comes to Crewe by 2027; to assist with the requirement to identify 10% of the housing requirement on sites of 1 ha or less; to boost the supply of housing generally and because the requirement should be regarded as a minimum.

- The LPS (¶8.34) is clear that allocations in OSRA will be made through the SADPD and / or neighbourhood plans.

- The decision not to disaggregate the housing requirement for OSRA is contrary to NPPF ¶65 which requires strategic policies to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Without disaggregating the figure, it is not possible to know whether the 2,950 figure is being met appropriately across the borough and whether the specific needs of specific settlements are being met.

- The flexibility factor for OSRA should be re-instated. Table A.4 of the adopted CELPS proposed a flexibility of 428 dwellings (i.e. 15%). Therefore, according to the adopted CELPS, 470 dwellings were required in the OSRAs at 31st March 2018 (i.e. 42 plus 428).

- Insufficient land is allocated to meet the housing requirement over the plan period; there is not enough flexibility in the trajectory; the council is currently unable to demonstrate a five year supply of deliverable housing sites.

- The objectively-assessed need for Cheshire East includes an element of C2 bedspaces which includes a requirement for older person’s accommodation of 2,180 dwellings but this figure is not set out in the LPS or SADPD. Up to 2018, there have been 303 C2 completions against a requirement of 872 over the same period. This leaves a minimum of 1,877 bedspaces/units to be delivered in the remaining 12 years. There have been only 15 completions in the rural areas and no completions in rural areas in the north of the borough. There is a need for additional C2 bedspaces to meet the requirement. Only one LPS strategic site (LPS 33) includes a specific requirement for C2 and there is significant uncertainty whether C2 uses can be delivered in the plan period.

**Policy PG 8 ‘Spatial distribution of development: local service centres’**

**Summary of key points:**

- The plan has made the presumption that an aging population is not mobile and has no willingness to move out of their area to access greater and more convenient services.
Mobberley Primary School is full and Disley Primary School is oversubscribed.

There is no justification for the embargo on future housing permissions in Bunbury, Goostrey, Haslington, Holmes Chapel, Mobberley, Shavington and Wrenbury, and no policy to support it.

There is a lack of published, up to date evidence, which undermines the housing policies in the SADPD and allocations in the Green Belt LSCs and Audlem.

The 2019 Housing Completions and Commitments figures confirm that the overall requirement of 36,000 houses, and the 3,500 houses required in the LSCs are likely to be met without incursions into the Green Belt.

The 200 houses planned for the Green Belt in the SADPD can be provided for by windfall sites in the immediate future, and well before 2030.

Exceptional circumstances have not been demonstrated for the release of Green Belt in Bollington, Disley and other areas of the Borough.

The housing figure for Bollington is more than 50% higher than any other of the northern LSCs and is not compatible with sustained development.

No account has been taken of the historical rate of development in Bollington in the previous 10-year period 2001-2011.

Green Belt should be treated as a special case in the options.

There is no attempt to identify the locally arising needs of Bollington and there is no justification for the figure of 390 dwellings chosen.

There is no proper strategic approach to linking the proposed spatial distribution of development in the LSCs to the proposed Draft Economic Policy.

The housing figure for Bollington should be reduced to 330 to 350 in accordance with the Bollington Neighbourhood Plan updated Housing Needs Assessment.

The methodology is flawed, there is no logical basis for the distribution figures and they exceed any reasonable interpretation of the Local Plan requirement (Para 8.30) for some modest growth in housing and employment to meet locally arising needs.

No account has been taken of required links to employment, reducing out-commuting, protecting the environment, or that Bollington has the highest density of housing amongst the LSCs of 5.92dpa.

The SADPD is in conflict with Bollington Neighbourhood Plan Policies HO.P1, HO.P2, HO.P3, HO.P4, V1 and EGB.P1.
• There is no recognition that there are no sewage networks in many rural areas, for example PRE 2 and PRE 3 are not connected to sewage networks.

• It is not recognised that the National Health GP services in Prestbury are an offshoot of the Alderley Edge Medical Practice, serviced by the same over-subscribed doctors.

• The Local Landscape Areas to the north west, south and south east of the built areas of Prestbury are not flagged up.

• Prestbury Parish has two Conservation Areas – one in the village centre and the second at Butley Town.

• The table of services used to determine the Option 3 figure for Prestbury is out of date.

• The statistics used in the settlement profiles are out of date.

• The evidence base does not adequately justify why further development is to be limited in locations such as Haslington under the Hybrid Option, rather than planning for higher growth in accordance with the Constraint Led Option.

• The preferred approach results in more development in the Green Belt or on sites that have a range of constraining factors; the approach does not accord with the NPPF which seeks to direct development away from more sensitive areas where possible.

• Concern regarding the capacity of local services and air quality in Disley, traffic, pollution, access to services in Bollington.

• Concern that there is no definition of “in the order of”; some certainty of any additional numbers should be clearly defined and the words amended to read “no more than”.

• Major developments in Tytherington generate substantial numbers of children for Bollington schools and associated traffic.

• Concern regarding the impact additional housing requirements in Bollington will have on drainage and flood management, taking into account the flooding event in July 2019.

• The 1,735 windfall allowance would be better addressed through making specific allocations in the OSRA.

• The distribution of housing amongst the LSC’s will not meet the needs of the individual settlements; there is an unbalanced distribution between the northern and southern settlements.

• Mobberley’s housing figure should be increased to 200 dwellings, for example.
• The LPS and SADPD have not fully addressed the implications of HS2; Crewe’s housing figure (7,700 dwellings) is not sufficient to meet the housing needs to fully capitalise on the demand from HS2 investment.

• The housing delivery figures identified in the Draft Crewe Hub Area Action Plan Housing Study Report should form the housing growth target for Crewe if the full potential of HS2 is to be realised.

• The housing figure for Alderley Edge is disproportionately low and is not commensurate with its scale and function.

• The assessment for Alderley Edge under Option 4 is flawed as the settlement is not so environmentally constrained and could deliver development; this skews the Option 7 analysis.

• The SADPD should not be constrained by the figure of 3,500 dwellings, which is a minimum figure, and should make sure that each of the LSCs receives sufficient development to meet its local needs and priorities.

• Option 7 does not encourage development and growth in some of the most sustainable settlements in the borough or where there is a pressing requirement to deliver new housing to help address a large, and widening, affordability gap

• Concern that the flexibility built into the LPS for the distribution of development at the LSCs is lost through the SADPD.

• There is no evidence to support the assertion that housing development in one settlement will benefit another. This is particularly the case in respect of affordability and settlement/service vibrancy and vitality.

• The increase in supply necessary to provide flexibility at the LSCs remains insignificant at a Borough-wide level and would not result in unsustainable patterns of development.

• A buffer of at least 7.1% should be provided for the LSC’s, particularly Holmes Chapel.

• Clear and robust justification is needed as to the Council’s change of approach to Goostrey and Mobberley.

• Constraints identified in Option 4 are unlikely to affect the whole of Alderley Edge and will be site specific – development could be mitigated to avoid having an impact on certain factors.

• The housing requirements in each LSC should be expressed as a minimum.

• A 10% slippage allowance should be applied to the remaining commitments in Holmes Chapel.
• The approach relies on the disaggregation of a potentially ever diminishing residual requirement from the minimum requirement for the LSCs; this could risk the SADPD failing to allocate sufficient development to those Green Belt settlements at the time of adoption.

• Development should be apportioned based on a bottom-up assessment of what the LSCs needs are, taking into account demographic changes and their effect on maintaining the population of each LSC as a minimum, outstanding affordable housing needs, and trends of decline of local services or facilities that should be addressed through additional development.

• That Goostrey is now expected to meet its own housing needs is contrary to para 8.34 of the LPS.

• Disley’s housing requirement should be higher – at least 300 dwellings.

• There is no justification to reject Options 1 and 2 on Green Belt grounds as it has been established through the LPS that there are exceptional circumstances for Green Belt release.

• It is unclear how the figures for Bollington and Disley have been arrived at.

• A flexibility of 10% should be applied to Disley.

• The figure for Bollington should be higher – at least 500 dwellings.

• The contracting working age population and shortage of family-sized accommodation identified in the Housing Topic Paper (2016) for the Bollington Neighbourhood Plan have not been addressed through the SADPD.

• Goostrey should be allocated a greater level of development.

• There is an absence of evidence on the impact that further development would have on Jodrell Bank Observatory across the whole of the consultation zone

• The SADPD should allocate land for 3,335 dwellings as per Table 8.2 and para E.6 of the LPS and the expectation of the LPS Inspector to provide flexibility, choice and consistency with the LPS.

• The allocation of only 665 dwellings means that the Local Plan as a whole will not have considered its strategy of only allocating sites of a strategic size against the reasonable alternative of allocating smaller sites instead of or in addition to those strategic sites.

• The overall approach taken in the LSCSDDR [PUB 05] does not reflect the aim of the LPS, which emphasises the importance of making sure that the places where development takes place have good access to jobs, services and facilities.
• The figure for Alderley Edge should be increased to 300 dwellings, with a corresponding reduction in Bollington’s figure to 340 dwellings.

• The approach taken disaggregates a larger amount of development to settlements which perform less well in terms of access to services and facilities.

• The housing figure for Alderley Edge should be reviewed in light of the potential impacts upon the Green Belt and the setting of the village.

• The reduced requirement for Prestbury for 115 dwellings is not evidenced and will not allow Prestbury to meet its basic housing demands during the Plan period; it should be increased to 130 dwellings, for example/broadly align with Chelford and Disley as a minimum.

• It is not clear why sites are being allocated in the LSCs for 3,500 houses when housing figures show that the authority is on course to deliver its housing numbers without further allocations.

• The approach of the LPS to deliver development towards the LSCs should not be replaced through an over-delivery in higher order settlements. There is no evidence to say that this approach would support and meet LSC housing needs.

• There is a need to make sure that settlements in the Green Belt have their needs met predominantly through allocations in SADPD, where settlements cannot rely on windfall development to meet their development needs.

• The adoption of the NP should not be used as an opportunity to limit or stifle the growth of Bollington, particularly when the LPS envisages growth to the LSCs in any event.

• A re-assessment of growth levels across Green Belt villages should be undertaken, and PG 8 updated to apportion specific growth figures to OSRA that have been subject to limited levels of growth (often zero) and where it is not possible to allocate instead to the most appropriate nearby settlement.

• Aircraft noise can represent a constraint to new development, however, it is not as severe the Council or its advisers, Jacobs, have characterised it.

• The OSRA figure should be disaggregated.

• The sustainability and accessibility credentials of Shavington have been underplayed; the housing figure should be increased to 400 dwellings, and it does not have regard to the close relationship with Crewe.

**Policy PG 9 ‘Settlement boundaries’**

**Summary of key points:**
• The settlement boundary should be amended or extended in the following locations:
  o Macclesfield
  o Crewe
  o Alsager
  o Congleton
  o Knutsford
  o Sandbach
  o Wilmslow
  o Alderley Edge
  o Audlem
  o Bollington
  o Bunbury
  o Holmes Chapel
  o Prestbury
  o Shavington
  o Wrenbury

• The settlement boundaries should relate to the town / parish boundaries. The precept for these residents goes to the local town and parish council.

• Sites at locations within the ‘other settlements and rural areas’ tier of the settlement hierarchy should be recognised as a settlement and identified on the policies map, for example:
  o Bucklow Garage
  o Wybunbury
  o Church Minshull
  o Winterley
  o Hough
  o Hankelow
  o Worleston
  o Higher Hurdsfield
  o Brereton Green
  o Cranage

• Not providing settlement boundaries for OSRA is contrary to LPS, in particular paragraph 8.34 and footnote 34 of the LPS.

• Representations received in support of the settlement boundary analysis contained in settlement report(s).

• Representations received in support of the statement ‘open countryside is defined as the area outside of any settlement with a defined settlement boundary, where LPS Policy PG6 Open Countryside will apply’ in policy PG9.

• Representations received in support of draft Policy PG 9, which confirms that, within the settlement boundaries defined on the adopted Policies Map, ‘development proposals (including change of use) will be supported where
they are in keeping with the scale, role and function of that settlement and do not conflict with any other relevant policy in the local plan.

- Representations received in support of draft Policy PG 9 (“Settlement boundaries”), the footnote to which states: “where neighbourhood development plans define a settlement boundary, the council will apply the most recent settlement boundary, where relevant.”

- The detailed settlement boundary (including detailed Green belt Boundaries) should be reviewed as part of this SADPD. In Green Belt locations, why is the settlement boundary review limited to stage 1 only?

- The settlement boundaries proposed for the LSCs have not been sufficiently adjusted to enable allocations or additional windfall development. Settlement boundaries should be flexible to adapt to rapid change and seek opportunities to meet the development needs of their area. Lack of flexibility / contingency in approach.

- Settlement boundary methodology should not limit consideration to sites with commitments / completions adjoining the settlement. The assessment does not allow for sites that have a high level of containment or a strong functional relationship with the existing settlement.

- The use of ‘out of date’ housing figures in respect of commitments and completions makes this policy unsound.

- Appendix B in PUB 06 details responses to the initial consultation, there does not appear to be any trail to suggest that certain responses have been considered or amendments made to the draft documents.

- The policy should be amended to be flexible enough to be able to accommodate new development outside of settlement boundaries, to allow the Council to quickly address any issues of shortfall in housing supply against the plan requirement. A criteria based policy can achieve this. Provided Harborough Local Plan policy as an example.

- Edit explanatory paragraphs of Policy PG 9 to better clarify the role of the neighbourhood plan in the interests of effective and consistent plan making.

### Policy PG 10 ‘Infill villages’

**Summary of key points:**

- The approach would unnecessarily restrict any new additional dwellings being built in smaller settlements not identified under this policy and contrary to NPPF ¶78.

- The approach is contrary to the NPPG (009 ID:67-009-20190722) “The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in
delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness..."

- It is considered that Little Bollington should be identified as an infill village.
- The policy states that infill villages do not have a settlement boundary but the Settlement and Infill Boundaries Review sets out proposed new boundaries for these villages.
- The defined infill boundaries include land with planning consents but do not account for future growth. The boundaries are drawn tightly, allowing very few (if any) opportunities for infill development, restricting windfall development in locations that the council is reliant on to meet the requirements. The boundaries do not include the sites submitted as part of the call for sites exercise.
- The policy is considered too restrictive and will act to prevent otherwise sustainable development coming forward.
- The policy should apply equally to considered growth of small Traveller sites in these areas and consideration for Traveller site development should not be constrained by Green Belt policy. Gypsy and Traveller sites should be considered a 'use appropriate to a rural area' under LPS Policy PG 6.
- NPPF ¶145e allows for limited infilling in villages on the basis that this type of development does not harm the purpose of Green Belt. The methodology to select the infill villages is mainly based upon the sustainability of the location which has no direct relevance to Green Belt policy. The suitability of a site for limited infilling should not be prescribed through the local plan and infill proposals should be assessed on a site by site basis.
- The policy does not allow the plan to be sufficiently flexible to adapt to rapid change as required by the NPPF (¶11a) and settlement boundaries should be extended to include additional deliverable sites.
- Case law has established that whether a settlement is a 'village' for the purposes of NPPF ¶145 is a matter of planning judgement dependent on a range of factors and can only properly be made on a case by case basis.
- The draft policy seeks to downgrade established settlement boundaries around existing settlements to allow infill only development or in some case deleting the settlement boundaries altogether – claiming that the built form of these settlements is now open countryside, which is surprising given that existing settlement boundaries were defined when development needs were much lower.
- There is no justification for limiting development to infilling; other forms of development such as rounding off may be acceptable.
An assessment as to whether a development constitutes infill development should not be prescribed by the local plan process and can only be made ‘on the ground’ with due regard for site specific circumstances.

The strategy for development in the other settlements and rural areas is inconsistent with LPS Policy PG 2 which allows for “proportionate development” in the other settlements and rural areas.

LPS Policy PG 2 supporting information states that site allocations in the other settlements and rural areas will be brought forwards through the SADPD and/or neighbourhood plans. The council is relying solely on neighbourhood plans to deliver any future housing growth in this tier of the hierarchy.

The council is departing from the approach agreed with the LPS inspector to make allocations in rural areas; this is on the basis that they have allocated too many houses in the upper tiers of the settlement hierarchy. This is despite there being a persistent undersupply of new homes.

The removal of the flexibility factor and reliance entirely on windfalls means that it is unlikely that the OSRA requirement will be met during the plan period as it relies on 100% of commitments to be delivered.

Infilling should also include small groups of buildings and rounding off.

It is considered that Worleston should have a settlement boundary. Failing that, it should have an infill boundary.

Higher Hurdsfield is within the open countryside and the national park fringe. Infill development would be deleterious to the character of the village and concerns arise of the potential to expand beyond the existing boundary of the area.

The Styal infill boundary should be extended to include detached outbuildings in the curtilage of 1 Hollin Lane.

Winterley should have a settlement boundary rather than an infill boundary.

Land off Crewe Road, Winterley should be included in the infill boundary.

Marton should be classed as an infill village.

The Settlement and Infill Boundaries Review [PUB 06] does not provide sufficient reasoning for discarding any settlements with a population of less than 500.

Land at the corner of Castle Road and High Street, Mow Cop is significant in terms of the setting of Mow Cop and should be excluded, recognising the setting of Mow Cop both in landscape and heritage terms.
Broomedge should be considered in the Settlement and Infill Boundaries Review [PUB 06]; whilst the village boundary is within Warrington Borough, it is clear that an integral part of the village is located within Cheshire East.

There is no justification for the change to the Gawsworth infill boundary and it should remain the same as in the Macclesfield Borough Local Plan 2004.

Church Minshull should have a settlement boundary and that boundary should include land opposite Weaver View at Over Road.

Burleydam has a number of services and facilities, public transport, and a coherent spatial form and should be defined as an infill village; its omission implies that no further development will be allowed in Burleydam for the remainder of the plan period to 2030.

The infill boundary for Church Minshull should include the whole of the curtilage of Frog Manor.

There is no justification to make Wychwood Village an infill village. The original design concept was as open space intertwined with small hamlets of dwellings and should not be altered. The S106 agreement prevents further dwellings. Designation as an infill village invites challenges to develop the land around the settlement.

Wybunbury and Hough are already included in Table 8.3 of the LPS so do not need to be included in Policy PG 10.

The approach is similar to the ‘sustainable villages’ approach in the LPS which was regarded as unsound.

Bucklow Hill should have a defined settlement boundary under Policy PG 9, but if not it should have a defined infill boundary.

Detailed amendments to the Higher Poynton boundary requested.

Concern that the Pickmere boundary covers too large an area and may lead to infill development outside the boundary, in the Green Belt.

The Wybunbury boundary should include land between Sally Clarke’s Lane and the brook.

**Policy PG 11 ‘Green Belt boundaries’**

**Summary of key points:**

- It is considered that the housing requirement for local service centres can be met without amendments to Green Belt boundaries given the high level of completions and commitments to date. The small remaining requirement is likely to be met from small developments coming forward as brownfield, infill or windfall sites. No consideration has been given to development that has
taken place in the plan period to date and in the previous 10 year period. There is no requirement to release Green Belt in Bollington.

- It is considered that spatial distribution of development to local service centres does not adequately consider Green Belt issues. The figure for Bollington is considered to be too high. The exceptional circumstances required to alter Green Belt boundaries have not been demonstrated, given that there are alternative options for accommodating development outside of the Green Belt.

- The SADPD proposed to release land from the Green Belt in Bollington that has been assessed as making a ‘significant contribution’ to the purposes of Green Belt, when alternative non-Green Belt or lower contribution Green Belt sites are available elsewhere.

- It is understood that the 2019 housing figures show that more than sufficient land has already been provided to exceed the overall housing requirement figure in the LPS including an allowance for 10% flexibility; indicating that there is insufficient justification to release further Green Belt land for development or for safeguarded land.

- It is considered that information on the compensatory improvements to the environmental quality and accessibility of the remaining Green Belt is lacking.

- The approach to Green Belt boundaries is considered not to comply with the NPPF (¶140). The current Green Belt boundary for smaller settlements was considered against the guidance set out in PPG (1988) and the NPPF has significantly amended the guidance in respect of villages located within the Green Belt. Previously, the decision to include a village in the Green Belt (‘washed-over’) or exclude it (‘inset’) was based on degree of new development that was to be allowed. In contrast, the NPPF requires this decision to be based on whether or not the village has an open character that makes an important contribution to the openness of the Green Belt. Retaining villages within the Green Belt where that are not open in character or the village does not make an important contribution to openness is contrary to NPPF ¶140 as well as ¶139 which confirms that Green Belt boundaries should not include land which it is unnecessary to keep permanently open. It would also be at odds with NPPF ¶¶83 and 84 which require policies to support a prosperous rural economy. The evidence base should include an assessment to determine the contribution that each village makes to the openness of the Green Belt. In particular, the village of Ashley should be inset from the Green Belt.

- It is suggested that the lack of brownfield land and the development requirements of Knutsford present the exceptional circumstances to justify further Green Belt boundary alterations around Knutsford.

- The SADPD fails to address the Green Belt boundary anomaly that exists around the Parkgate, Knutsford site which is based on the 2004 Macclesfield Local Plan Green Belt boundary. This does not represent a logical boundary, nor does it utilise physical features that are readily recognisable as a defensive and permanent boundary.
Further amends to the Green Belt around Wilmslow should be made to allocate non-strategic sites because the LPS states that further non-strategic sites may need to be removed from the Green Belt through the SADPD. The flexibility factor for Wilmslow is considered to be too low and there has been no opportunity to allocate non-strategic sites.

Safeguarded sites should not be included in the list if sites removed from the Green Belt because they are also referred to in Policy PG 12.

It is considered that an additional Green Belt site will be required in Prestbury to deliver the housing figures set out in Policy PG 8.

The housing figures used to inform the SADPD are considered to be out of date and inaccurate. 2019 figures were released on the date of consultation starting.

Market signals should be taken into account but no consideration has been given to the Housing Delivery Test 2018 which showed that Cheshire East was delivering twice as many houses as required between 2015/18. The record number of new completions (3,062) in 2018/19 is even more significant. It is reasonable to expect the 200 homes proposed on Green Belt sites to be met from windfall sites in the local service centres.

Based on 2019 figures, Prestbury has 72 commitments and completions. Adding in the 10 proposed at PRE 1 gives 82. Based on the current run-rate of 8 new houses per year, Prestbury will achieve its total requirement of 115 in 2024 (or 2023 if including PRE 1) and there is no need for Green Belt release.

It is considered that the Prestbury settlement boundary should be reviewed to include areas in the Green Belt that make no meaningful contribution to Green Belt purposes.

Green Belt policy should acknowledge that brownfield sites in the Green Belt can be suitable for development to account for NPPF ¶145g.

An amendment should be made to the Green Belt around Handforth because the NPPF (¶136) allows non-strategic policies to make detailed amendments to Green Belt boundaries.

Further Green Belt sites should be allocated around Alderley Edge to account for flexibility.

An area of protected open space to the south of Macclesfield should be included within the Green Belt.

The SADPD is the second part of the Green Belt review and should include a review of smaller Green Belt parcels against the purposes of Green (irrespective of the need for allocations) to determine whether there was land that no longer fulfils the purposes of Green Belt. NPPF (¶139) is clear that
plans should not include land which it is unnecessary to keep permanently open.

- It is considered that sites in Poynton may not deliver as expected and further Green Belt sites are required.

- Release of Green Belt is not in accordance with the Bollington Neighbourhood Plan policy HO.P2 ‘Housing location’ which states that development on Green Belt land as designated in 2015 is inappropriate and will only be permitted where covered by very special circumstances of LPS Policy PG 3.

- The council has downgraded the Green Belt contribution of a number of sites from that awarded to them in the Green Belt Assessment Update 2015.

- Further employment land is required in Alsager and exceptional circumstances exist to justify making Green Belt alterations.

- A number of issues were raised in respect of specific Green Belt sites where it is considered either: that the site should be released from the Green Belt and allocated for development; or alternatively where the site should remain in the Green Belt.

**Policy PG 12 ‘Safeguarded land boundaries’**

**Summary of key points:**

- It is considered that the safeguarded land (and more) is required for development in this plan period. More housing land to meet development needs plus more safeguarded land will provide greater flexibility and secure the longevity of the Green Belt boundary.

- The SADPD was prepared using 2018 data and no account was taken of market signals, including the Housing Delivery Test 2018 measurement which showed that Cheshire East was delivering twice as many houses as required between 2015 and 2018. Even more significant was the record number of net house completions in 2018/19 (3,062). It is reasonable to expect that the 200 houses provided by the 8 sites in the Green Belt will be met in the immediate future from windfall sites. Therefore all the safeguarded sites should be deleted.

- The approach to safeguarded land should be to provide a pool of reserve sites which could come forward should other sites in the supply not be able to deliver. These sites should be distributed to reflect the adopted spatial strategy and not just in the northern part of the borough,

- The emphasis should be on meeting longer term development needs. There are significant growth proposals in Crewe and Alsager falls within the core growth area. The SADPD should prepare for this direction of growth and ensure sufficient land is available to maximise potential.
• It is considered that aircraft noise should not prevent Mobberley from being recognised as a suitable location for new housing. The level of safeguarded land to be provided in Mobberley is considered to be low due to the low of housing proposed.

• The re-allocation of Bollington’s safeguarded land to Chelford is not justified and provision in Mobberley would be a more sustainable option.

• The approach to providing Bollington’s safeguarded land in Chelford does not address the particular issues of Bollington. The settlements share no particular linkages and this would not support Bollington’s role in the settlement hierarchy.

• It is considered that the additional safeguarded land in Chelford should be re-allocated to Alderley Edge as it is a more sustainable settlement with three trains per hour to Manchester (instead of one at Chelford).

• It is not clear why the 24ha of safeguarded land identified for local service centres in the first instance has been reduced to 13.6 ha.

• A number of issues were raised in respect of specific sites.

Policy PG 13 ‘Strategic green gaps boundaries’

Summary of key points:

• The Settlement and Infill Boundaries Review (PUB06) and Strategic Green Gap Boundary Definition Review (PUB08) fail to assess reasonable alternative sites other than those that have been allocated or committed. Therefore, no consideration has been made to existing sites and the relationship to the physical form of the built environment. Policy PG13 is therefore considered unsound on this basis.

• The assessment should be reviewing the Green Gap to enable land which does not contribute to the Gap to be excluded.

• The assessment in FD08 does not robustly assess the Green Gap but rather only takes account of permitted schemes.

• The policy is not considered to be effective, positively prepared, justified or consistent with national policy. To make the policy sound, the proposed policy should also be amended to allow for the alteration of the green gap between Crewe and Haslington where needed, for example, when the supply of houses falls below 5 years.

• The Council’s approach of following, as closely as possible, the extent of the hatched areas (Figure 8.3 LPS) is fundamentally flawed. Those boundaries were not considered or examined by the Inspector in the preparation of the LPS.
• It is therefore entirely correct that the detailed boundaries must consider whether the detailed boundaries fulfil the objectives of Policy PG5. The Council’s argument against this point is illogical and demonstrates that it has approached the issue incorrectly.

• Any adherence to the boundaries defined in Policy NE4 of the Crewe and Nantwich Local Plan or indicated on Figure 8.3 of the CELPS can only be justified where the objectives of Policy PG5 are fulfilled.

• Unclear of the necessity for Policy PG13 as it appears to just refer to and repeat the policy contained in the LPS.

• Policy PG13 refers to the detailed boundaries of the Strategic Green Gaps in LPS policy PG5.

• On the proposals map, it is suggested a different colour is used to identify these gaps. Certainly when viewed on screen, it is difficult to appreciate the subtly various shades of green, especially given that open countryside, green gap, Green Belt and protected open spaces all overlap.

• Recent appeal decisions concluded that harm would be limited, therefore it is justifiable to release further sites from the Strategic Green Gap.

• Remove the following sites from the Strategic Green Gap and allocate them as suitable for housing:
  - Land off Oakleaf Close, Shavington as it no longer meets the purposes of including land within the strategic gap, Allocate for housing in Shavington.
  - Land south of Bradeley Hall Farm which represents a suitable and sustainable location for development and will not result in the coalescence of Crewe and Shavington nor impact on the function of the green gap in this area. To make the policy sound, the proposed policy should also be amended to allow for the alteration of the green gap between Crewe and Haslington where needed, for example, when the supply of houses falls below 5 years.
  - Land at Hunters Lodge, Crewe represents a suitable and sustainable location for development and will not result in the coalescence of Crewe and Shavington nor impact on the function of the green gap in this area.
  - Land north of Cheerbrook Road, Willaston (Site 210 in PUB45) east of the Nantwich Bypass.
  - Two adjoining sites west of Crewe Road, north of the settlement of Shavington.
  - Land south of LPS 8 South Cheshire Growth Village.
  - Land at Newcastle Road, Willaston.
  - Land to the north of Sydney Road, Crewe.
  - Land east of Crewe Road and immediately north of the A500 should be allocated.
Land associated with Shukers Farm, would form a logical extension of Haslington close to the sustainable facilities of the village, such as the school and cricket club.

Land south of Park Road Willaston.

Policy PG 14 ‘Local green gaps’

Summary of key points:

- Local green gaps appear to be local green space (LGS) by another name.
- Support the principle of neighbourhood plans defining local green gaps; however this must be on the proviso that they meet the stringent tests set out in paragraph 100 of NPPF19. Any local green gap designation would have to be justified by robust evidence and be clearly shown to meet the tests set out in national policy and guidance.
- Could the policies PG13 and PG14 relating to Green Gaps clarify if they override the provisions of ENV10 Solar Energy and RUR6 Outdoor sports facilities, i.e. would an RUR6 sports facility be prohibited or permitted in an area covered by PG14 Local Green Gap.

Chapter 3: General requirements (general issues)

Summary of key points:

- No key points raised.

Policy GEN 1 ‘Design principles’

Summary of key points:

- Site allocations in the SADPD do not comply with this policy.
- There is a potential absence of any detailed design guidance carried forward from legacy local plans following the adoption of the SADPD.
- Additional references to climate change and arrangements for recycling and waste management including storage and collection are supported.
- Policy could be further clarified with more made of the adopted Cheshire East Design Guide and ‘sense of place’.
- United Utilities supports the inclusion of Policy GEN 1 to provide guidance for development. However, our preference would be to include the following additional text, which is relevant to the design of all development: ‘the design of new development should ensure that there is space within the development layout to incorporate sustainable drainage with multi-functional benefits and include water efficiency measures for new buildings and their layouts to reduce the impact of the development as part of a high quality green and blue water environment.’
- These criteria 'must' be met - or at least 'these criteria are expected to be met' - rather than 'should' be met

- Point 11 of the policy is very weak in expressing the need to build long-term sustainability into design. No mention is made of energy conservation, rainwater harvesting, levels insulation, solar gain, energy generation and carbon reduction in construction and in occupation of the properties.

- Policy GEN 1 'Design Principles' would overlap with adopted LPS Policy SD 1 ‘Sustainable Development in Cheshire East’ - it's inconsistent with national policy and should be removed from the Plan to ensure the SADPD meets the test of soundness.

- Add 'Parish Councils' to the bodies with which Developers should consult in para 3.4

- Environment Agency - Policy GEN 1 would be strengthened by ensuring the inclusion of a principle which states development proposals should; ‘Interact positively with the natural environment – incorporating measures to ensure proposals enhance habitats and natural features on and within the vicinity of the development site. Where enhancement cannot be provided, preference should first be given to ensuring that impacts upon the natural environment are avoided. If enhancement or avoidance cannot be achieved then any negative impacts caused by the development to the natural environment should be appropriately mitigated against’.

- Policy needs to have a commitment that all new buildings must meet a specified high level of environmental design.

- Add to point 5 - with lifelong design for easy adaptation and easy access to local shops with appropriate food outlets.

- Add to point 8 - and provide two car parking places per property along with a prohibition of parking on the pavement. Include provision for adequate spaces for charging plug-in and other ultra-low emission vehicles.

- Add to point 10 - including the provision of cycling/pedestrian routes to local town centres, schools and workplaces.

- GEN 1 is quite a wide ranging design policy that is a ‘catch all’ type policy. It is too vague and does not provide a clear, unambiguous approach. It may lead to ambiguous decision making

- Unclear how this policy relates to the adopted Cheshire East Design Guide SPD.

- The wording of the policy does not adequately consider the step change in national guidance (NPPF 2019) to how appropriate densities for new development should be determined.
Policy GEN 2 ‘Security at crowded places’

Summary of key points:

- No key points raised.

Policy GEN 3 ‘Advertisements’

Summary of key points:

- To preserve the character of buildings and the area, hanging shop signs should be installed at a consistent height within the area and are not detrimental to the character of the building.

- Policy fails to tackle a key issue which impacts on highway safety and countryside - local authorities should ensure that distracting advertisement hoardings are not erected alongside major roads. The policy should have a commitment to remove any illegal advertisement that appears along major roads.

- Para 3.16 should be included as statement within the policy. To do so would strengthen the policy in relation to the Authority’s historic town centres, many of which are Conservation Areas and/or contain listed buildings.

- In supporting information section there should be cross referencing to Policy RET4; RET9 and ENV14.

Policy GEN 4 ‘The recovery of infrastructure costs and planning obligations reduced on viability grounds’

Summary of key points:

Forward funded infrastructure costs:

- The funding for key infrastructure projects should be delivered through CIL rather than from developers via a forwarded funding policy mechanism.

- Implementation of the policy is unclear in terms of who will be expected to pay a contribution towards forward funded infrastructure, how this will be calculated and at what point further infrastructure contributions will no longer be required as costs would have already been fully met by other consented development. The lack of a detailed mechanism / basis for calculating contributions means that it is unsound.

- There is insufficient clarity about how the forward funding element of the policy meets the planning obligations test in the Framework and the CIL Regulations.

- The infrastructure projects and sites to which the forward funding element of the policy applies are not identified. This information should be available
alongside the Publication Draft SADPD with details on what the costs are for each site, together with how they have been calculated and justified.

**Planning obligations reduced on viability grounds:**

- Planning obligations need to be known and agreed at the outset with landowners so that developers can agree an appropriate price for the land. Taking account of additional obligations later is difficult to accommodate within this process both financially and legally.

- The SADPD should be supported by an evidence base which demonstrates that the policies and allocations it contains can be viably delivered.

- A policy requiring further viability assessments would be costly for the developer, contrary to national planning policy, as well as cause uncertainty and additional risk for developers.

- Some form of review mechanism is only appropriate for a small proportion of development sites (of around 500 units or more) and should not be applied to all developments where reduced planning obligations have been agreed on viability grounds.

- Review mechanisms should be limited to pre implementation reviews only for sheltered housing providers where development must be 100% complete before sales are realised, as such providers have other specific circumstances which means this proposal will negatively impact on their operation.

- The reduced viability element of the policy is too broad. The policy should establish parameters so that the relevant principles do not have to be established within the context of every affected planning decision. It should include the grounds where a material change in circumstances may be expected such as:
  
  - The passage of time until a start on site;
  - Whether the development contains separate and distinct phases; and
  - The overall scale of the site and the anticipated delivery period.

- A further requirement should be added to paragraph 3.24 to require a viability assessment associated with any land being developed by the Council to be reviewed by an independent expert and made publicly available as part of the planning application assessment.

- If the infrastructure required to support an application is not viable then the application should not proceed. Affordable housing obligations should never be reduced. Omitting important elements of development on viability grounds will not create quality and balanced communities. Public funding must not be used to support failing developers or unviable applications.
Policy GEN 5 ‘Aerodrome safeguarding’

Summary of key points:

- The draft policies map does not show the extent of the Manchester Airport operational area.

Policy GEN 6’ Airport public safety zone’

Summary of key points:

- The draft policies map does not show the extent of the Manchester Airport operational area.
- The public safety zone should be shown as a designation on the policies map.

Chapter 4: Natural environment, climate change and resources (general issues)

Summary of key points:

- The proposed site allocations in Bollington will not make best use of natural resources as they will cause significant damage with no significant benefit; no account has been taken of the green environment objectives of the Bollington Neighbourhood Plan.
- Some of the policies duplicate requirements already included in the adopted LPS.
- Concern regarding lack of enabling development criteria in the draft SADPD.
- Environment Agency - Satisfied that this draft plan includes an effective list of policies (further comments made under each policy); there has also been comments made and involvement in preparation of Green and Blue Infrastructure Plan.

Policy ENV 1 ‘Ecological network’

Summary of key points:

- SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data
- Policies ENV1, 2 and 6 do not adequately reflect the NPPF and the Chancellor’s 2019 Spring Statement.
- Policy welcomed and will aid the nature recovery network (NPPF footnote 57 and 25 Year Environment Plan
• Further guidance needed on how policy will be implemented (probability that mandatory 10% Biodiversity Net Gain will be required for all development) – policy needs to set out how the potential for greater impacts of development within the Ecological Network will be mitigated and measured – suggest the use of a ‘strategic position multiplier’ when undertaking Biodiversity Net Gain calculations.

• Regarding local wildlife corridors in Neighbourhood Plans suggest that for clarity the following sentence is added: ‘Development that impacts wildlife corridors identified through the Neighbourhood Planning policies should be avoided provided this doesn’t conflict with the Local Plan Strategic Policies’ (as set out in the guidance in paragraphs 29 and 30 NPPF 2018)

• Policies Map does not show regions of high/medium habitat distinctiveness as shown in the Bollington Neighbourhood Plan

• A proper explanation of each aspect of the ecological network needs to be set out with clear expectations of how development can meet the requirements of the policy.

• Clear explanation should be provided to clarify how parts of the ecological network have been defined

• Policy should provide “an example site” which shows how the measures of the policy could be incorporated into a typical development

• Concern that policy will stifle development; proposals to be considered on a case by case basis

• Concern that policy is onerous and requiring ecological enhancement above what required by national policy

• Support for policy for the protection it will give to ecologically important sites

• Stronger policy needed to achieve inter-connectivity of sites which are of ecological, landscape or amenity importance (in relation to sites in Congleton)

• Effective policy but suggest reference in ecology section to threat posed by invasive non-native species and measures that can be used to combat this threat

• Add to Figure 4.1 all meres and mosses within the Borough

• Policy ENV1 overlaps with LPS policy SE3 Biodiversity and Geodiversity and should be removed from the plan

• Support for policy but suggest need reference to major development projects such as HS2a and fracking
• Incorporation and reference of NIA Meres and Mosses area in south of Borough

• Ecological network should be clearly and easily identifiable (problems with viewing interactive map); click on area and policies come up – but difficult to interpret how sites are affected; local plan designations should be shown clearly on the policy maps

• No justification for providing restrictive land designations which assume that land is of ecological value (no detailed site specific assessments and field surveys)

Policy ENV 2 ‘Ecological implementation’

Summary of key points:

• SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data

• Policies ENV1, 2 and 6 do not adequately reflect the NPPF and the Chancellor’s 2019 Spring Statement.

• Support for policy but consider that the wording of point 1 is outdated – all development will be required to achieve Biodiversity Net Gain (as set out in the Chancellor’s Spring Statement 2019)

• For clarity the policy should state the amount of Biodiversity Net Gain (BNG) required for each development (mandatory BNG may be 10%)

• Spreadsheets referred to in guidance point 4.13 have been superseded by biodiversity calculator spreadsheets produced by Defra (Biodiversity metric version 2.0)

• Proposals for development must deliver an overall net gain for biodiversity; the proposed allocated sites in Bollington cannot do this

• Policy premature in advance of legislation setting any specific parameters

• Do not consider the requirement to deliver net gains across all developments to be consistent with national policy; may impact on the delivery of sites; policy too onerous (some representations suggest deletion of part 1 and part 3(iv)); alternative wording suggesting encouraging biodiversity improvements in and around development; should clarify whether a separate site in the local area/Borough could be used for biodiversity gains

• Support for policy in the protection it gives to ecologically important sites

• Policy does not define how the management/maintenance of habitats will be monitored to ensure ongoing success
• Stronger policy needed to achieve inter-connectivity of sites which are of ecological, landscape or amenity importance (in relation to sites in Congleton)

• Tree replacement should count towards net environmental benefits

• Support for policy – suggested additional wording:

• Compensation should be delivered on an equivalent (like for like) basis

• Further detailed wording on ecological assessments suggested as well

• Support for policy but suggest need reference to major development projects such as HS2a and fracking

• Support for policy but more detailed requirements needed such as Swift bricks, hedgehog highways etc.

• Policy needs to be consistent with delivery of sustainable development and delivery of climate change targets e.g. low-carbon generation schemes and other technologies associated with mitigating the effects of climate change should not be restricted by this policy

• Policy could make more use of data from Neighbourhood Plans

• Flexible approach to biodiversity gain is welcomed particularly recognition that there will be circumstances where a net gain cannot be achieved on site and therefore off-site provision will be sought

• Requirements of policy not tested through viability work; net gain costs to be factored into development requirements – significant implications

• Biodiversity metric calculation a subjective tool – should be used side by side with desk based assessments; present as an option rather than a requirement

• Net gain should be a recommendation rather than an obligation

Policy ENV 3 ‘Landscape character’

Summary of key points:

• Proposed allocated sites at Bollington are not compatible with this policy and the green environment objectives of the Bollington Neighbourhood Plan; landscape character detail in the Neighbourhood plan ignored in the site allocation proposals; concern regarding potential conflict – policy and site allocations.

• Local Landscape Designation Peak Park Fringe around the Sutton area should be extended up to the A523 London Road as this area between the canal and the main road provides open views of the Peak District and provides a setting for the town
• Land north and south of Prestbury Lane should be included in the Local Landscape Designation due to the importance of this area to the landscape setting of Prestbury

• Concerns regarding conflict between aims of policy and some SADPD allocations (e.g. Bollington, Prestbury, Disley)

• Policy ENV3 overlaps with LPS policy SE4 the Landscape and should be removed

• Peak Park Fringe boundary around Mow Cop should be amended (Odd Rode PC outline detailed amendments to boundary)

• Need for reference to major development projects such as HS2a and fracking

• More robust wording needed regarding the importance of Neighbourhood Plan Policies related to Landscape Character and Quality of Place

• Detailed representations around the application of Local Landscape Designations and adopted LPS Policy SE4 and ENV3; suggest that each LLD should have its own bespoke policy or LLDs should be removed from the proposals map.

• Comments regarding Bollin Valley LLD (welcome creation of new LLD for the parkland area); Bollin Valley LLD should be removed (due to absence of designation in Trafford); Yarwood Heath Farm in its entirety should come out of the LLD; detailed comments regarding Rostherne/Tatton Park LLD also

Policy ENV 4 ‘River corridors’

Summary of key points:

• Support for policy but need protection of significant brooks and river tributaries that provide irreplaceable wildlife corridors

• Support for policy but would welcome additional recognition that many waterbodies in Cheshire East are failing their ecological objectives (water quality and hydromorphological concerns); policy should highlight opportunities as to how riparian developments have the ability to provide improvements – to provide valuable new assets for people and wildlife alike (detailed information provided regarding development guidelines)

• Policy ENV 4 - Sub Point 3 – this should be altered to read "promoting sustainable access with consideration given to the natural environment and flood risk" - (because of buffer zone constraints).

• Need reference to major development projects such as HS2a and fracking

Policy ENV 5 ‘Landscaping’

Summary of key points:
All developments should provide a landscaping scheme – words “where appropriate” should be removed from the policy

Add new points regarding mitigating impact on local air quality and inclusion of cycle/pedestrian routes to local town centres, schools and workplaces

Support for policy but suggest add reference to need for new landscaping to be shaped by the outcomes of ecological assessments

Policy ENV 5 Sub Point 6 – should be altered to read “makes satisfactory financial and resource provision for the maintenance and aftercare of the scheme, to ensure it reaches maturity and thereafter”.

Policy ENV5 overlaps with LPS Policy SE4 The Landscape and should be deleted

Suggest addition of following sentence: ‘Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge as part of a high quality green and blue water environment. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge.’

Reference to projects that will impact on landscape needed e.g. HS2a plus usefulness of Neighbourhood Plan Data

Policy ENV 6 ‘Trees, hedgerows and woodland implementation’

Summary of key points:

SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data

Policies ENV1, 2 and 6 do not adequately reflect the NPPF and the Chancellor’s 2019 Spring Statement.

Concerned that policy will not adequately protect priority habitat woodland from the effects of adjacent development for example root damage, air pollution etc.). Policy should stipulate that a minimum buffer of 15m is required around all areas of priority woodland and ancient woodland. Advice taken from Government website

Policy should specify that buffer zones around ancient or veteran trees should be at least 15 times larger than the diameter of the tree and 5m from the edge of the tree’s canopy. Advice taken from Government website

Requirement of three replacement trees for the loss of every tree too onerous and not justified; may limit development potential of sites in the SADPD

One for one replacement should be default position
• Policy not considered in Council’s Viability Assessment June 2019

• Reference to CAVAT and DEFRA compensation metrics should be removed

• Policy should promote tree replacement planting that is site and project appropriate

• Redraft to state that any loss of protected hedgerows should be offset by mitigation; further guidance needed on balance to achieve re replacement and offsetting and unavoidable hedgerow loss

• Policy should be amended to simply state that net environmental gains should be sought; tree planting one of the measures to improve the environment; tree replacement part of overall assessment of biodiversity enhancement

• Support for policy – CEC officers or qualified persons appointed by CEC should be involved in the application of the policy

• Add additional criterion: Include provision for the development of “Forests for the Future” at the developer’s expense

• Point 7 should terminate at “retained” so that there is no scope for removal of important hedgerows

• AIA not required in all cases so words “where relevant” should be added

• Delete reference to 3 for 1 requirement; policy overlaps with LPS Policy SE5 Trees, Hedgerows and Woodland and should be deleted

• Need reference to a pro-active strategy for woodland development; need for more woodland planting to improve carbon capture and mitigate the carbon footprints of the developments themselves; more needs to be made of retention and protection of trees and hedgerows

• Further detail on replacement trees requested e.g. size etc.

• Policy considered too onerous (various wording changes suggested adding words “where appropriate/possible/relevant” or substituting “should” instead of “must”)

**Policy ENV 7 ‘Climate change mitigation and adaptation’**

**Summary of key points:**

• Given the recent declaration by the UK Government of a climate emergency in the UK and also by the local council, all future developments must demonstrate effort to reach zero carbon contribution both during build and subsequent occupation.
• All major housing schemes on former Green Belt should be required to achieve a reduction in energy use compared to standard new build construction. The suggested reduction would be a 19% reduction in target emissions rate as calculated in the Building Regulations Approved Document Part L1A. At least 50% of the reduction should be achieved through building fabric efficiencies and the remainder achieved through renewable energy technologies.

• Passivhaus ‘eco housing’ schemes should be strongly supported.

• Any new housing developments should make provision for electric vehicles.

• New housing development should demonstrate best practice in terms of sustainable design.

• This policy should be the first policy in the environmental section of the SADPD and all other policies should be linked to it.

• It should also start with ‘development proposals must incorporate etc.’

• United Utilities is supportive of the inclusion of the 10th criteria under Policy ENV 7 (Climate Change Mitigation and Adaptation).

• Policy ENV 7 should promote and facilitate emerging energy technologies. The site allocations section of the SADPD should consider allocating appropriate areas for strategic renewable energy/storage ‘hubs’. Sites promoted for allocation at Warmingham.

• Environment Agency - We would recommend inclusion of the following; “there should be the assessment of opportunity to restore or enhance canalised, culverted, heavily modified or previously poorly developed waterbodies, as this will have the ability to create a more climate change resilient waterbody, and greater capability to create a multifunctional green infrastructure asset”.

• With reference to point 5, further definition is required for sustainable travel following reductions in bus services and the public's lack of desire to use public transport services.

• Words 'where appropriate' or 'where possible' must be added to the policy, as not all development is of a nature which could support (or is of a nature where it would be appropriate to consider) the introduction of measures pursuant to climate change resilience. The emerging policy should reflect any potential difficulties in meeting requirements, having regard to the need for project feasibility and viability.

• The policy is inconsistent with national guidance. The only additional technical requirements exceeding the minimum standards required by Building Regulations that can be sought are the optional technical standards as detailed in the PPG.
Policy ENV 8 ‘District heating network priority areas’

Summary of key points:

- The policy should remove the reference to “large scale” to accommodate and encourage schemes on other beneficial sites.

- Make some reference within the policy to ground source heat pumps in the policy or in the explanatory paras following.

- Support the caveat in policy ENV8 which makes reference to the requirement is not feasible or viable.

Policy ENV 9 ‘Wind energy’

Summary of key points:

- Peak District National Park Authority - the re-enforcement of paragraph 4.60 by ENV9 1 (i) is supported and we consider the policy to be legally compliant, sound and compliant with the duty to co-operate.

- Peak District National Park Authority - welcomes the precautionary approach (in para 4.60) to wind turbine development in the identified Peak District Fringe. This demonstrates that the council takes seriously its duty to have regard to the duty on public bodies enshrined in Section 62 (2) of the Environment Act 1995. The setting of the National Park is an important asset. Whilst ‘the fringe’ is identified for the purposes of restricting wind turbine development, the Authority would encourage caution for all forms of development in this area and encourage use of the Landscape Strategy to assist in decision making.

- Restriction on wind energy is extreme and inconsistent with CEC declaring a climate emergency. The policy should limit restrictions to those set out in the NPPF.

- Endorse the provision and development of alternative, renewable energy sources, provided they adhere to the criteria and safeguards as outlined in each of these policies.

- Criteria 2 should include clarity on its wording to ensure that it is consistent with national policy aims of sustainable development. The policy should also clarify what is meant by 'local community' in such circumstances outlined in Q2. The policy wording should be relaxed within criterion 2 so that it does not hinder the potential for locally and nationally beneficial schemes in addressing climate impacts from being brought forward during the plan period.

- ENV9 Policy strongly supported but some strengthening of the wording in para 3 is sought. As currently worded, it encourages the proposer to include meeting the criteria specified instead of making it a necessary condition that they be met or offer the justification for their exclusion. If this was amended
para 2 would be redundant. In any case, it is doubtful how 'the agreement of the community' could be established and, even if it was, whether it could be legally binding if all the other criteria are satisfactorily met.

- Manchester Airport - To strengthen the policy wording, at point 1(iv) please replace the text “…Proposals should not have an impact on aircraft safety…” with “…Proposals should not have a detrimental impact on air traffic safety…”

- The policy should make specific reference to visitor accommodation, tourism and visitor attractions.

- The policy should state that the visual impact assessment is based on best practice and this will ensure, amongst other aspects, that the impact of the proposals can be properly assessed including the impact on heritage assets, as a key receptor.

**Policy ENV 10 ‘Solar energy’**

**Summary of key points:**

- Support the provision of alternative sources of energy subject to the safeguards set out in these policies.

- Object to the reference within criterion 1 that solar farm/arrays should be sited on previously developed land wherever possible. Paragraph 117 of the NPPF states that, in making effective use of land, strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of PDL. However, to require opportunities for solar development to effectively ‘rule out’ all PDL before looking towards non-PDL imposes a significant risk that opportunities would be missed in attempts to meet our current climate change targets.

- Higher yielding development can effectively ‘squeeze’ out any opportunities for development such as a solar farm on PDL.

- Paragraph 7 is supported [photovoltaics etc]. The section omits the role of the layout of new developments to take best advantage of orientation of a roof or roofs towards the sun. Evaluation of planning applications should give weight to the alignment of buildings in the proposed layout to take best advantage of solar gain.

- Manchester Airport - to strengthen the policy wording and to be consistent with our recommendation for the wording of policy ENV 9, criteria no. 5 should be amended to say, “Proposals should not have a detrimental impact on air traffic safety …”. It should also be noted that this is a requirement for all installations that fall outside of the permitted development regime.
Policy ENV 11 ‘Proposals for battery energy storage systems’

Summary of key points:

- Support the provision of alternative sources of energy subject to the safeguards set out in these policies.

- Regarding the first consideration in Q2 on the policy requiring schemes to be located on previously developed land and/or existing industrial areas, it is recognised that the criterion references “wherever possible”, but we suggest that, unless the Council proposes to advance the allocation of appropriate sites for renewable energy hubs and storage facilities (see comments in respect of Policy ENV 7), then criterion 1 should be deleted and left to the application to justify its location. This approach would ensure the plan is justified in adopting the most appropriate strategy when considered against alternatives.

- To ensure the plan is considered ‘sound’, the Council should consider the inclusion within the SADPD of an appropriate allocation of sites for the development of renewable energy ‘hubs’ and energy storage facilities. Site(s) promoted at Warmingham.

Policy ENV 12 ‘Air quality’

Summary of key points:

- Policy would overlap with adopted LPS Policy SE12 Pollution Land Contamination and Land Instability.

- Could it be expanded to include a strategy to address existing AQMA’s such as those in Sandbach? Given that any additional development close to an AQMA will add to traffic flows and pollution levels, all development should contribute towards measures in the appropriate air quality action plan.

- Policy should be amended to:
  - State that the air quality assessments are undertaken by CEC or by appointment of it, funded by the developer.
  - All air quality assessments are considered for all developments, and not just those on a ‘large’ scale.

- Policy is weak because it does not take sufficient account of a major contribution to poor air quality – Manchester International Airport.

- The policy only seems to consider the cumulative effects in relation to other developments. It is also unclear what is required for effective mitigation. What is the evidence that Air Action Plans have reduced made any difference to air quality in AQMAs already in existence, other than through external changes in patterns of travel or car use locally?
- It is recognised that rising house numbers, car numbers and congestion will have significant air quality implications especially in more urban areas. However it must also be noted that rural locations are increasingly at risk and this has not been as well recognised. The policy needs to be sufficiently ‘flexible’ to address new AQMAAs as soon as and wherever they arise. Include these additions in section ENV12: 4.71

- Policy is weak, and does not comply with EU air quality legislation which has been reflected in equivalent UK legislation. No proposed development in Cheshire East has been refused on air quality grounds whatever limited mitigation is offered. As a result we have ever more AQMAs being declared and an air quality action plan which is a byword for inaction and ineffectiveness.

- No development should be permitted that may cause deterioration in air quality, however small, in any declared AQMAs.

**Policy ENV 13 ‘Aircraft noise’**

**Summary of key points:**

- Policies should apply on night-time aircraft noise limits.

- The policy should set noise limits within outdoor space at educational developments.

- The policy is strongly supported. Gardens under flight paths cannot be double-glazed.

- The clarity that policy ENV 13 provides is welcomed.

- Noise risk itself should not determine whether a development is acceptable as consideration should also be given to acoustic design and other environmental, social and economic objectives.

- The policy is not reflective of national guidance and is overly restrictive, going far beyond the requirements of UK legislation. It runs counter to the need to provide additional housing in otherwise suitable and sustainable locations. It provides no flexibility for mitigation measures.

- The policy wrongly sets the levels of Significant Observed Adverse Effect Level (SOAEL) and Unacceptable Observed Adverse Effect Level (UOAEL) – the effect of which is to wrongly calibrate the threshold levels in terms of mitigation and compensation. There is evidence, including in appeal decisions by the Secretary of State, to support the case for 63 decibels (LAeq,16hrs) being the threshold of SOAEL for aviation noise. 63 decibels (LAeq,16hrs) should not be applied as UOAEL and as a cut-off point above which residential development would be unacceptable. The presumption against residential development between 60 and 63 decibels (LAeq,16hrs) is also unjustified. The correct approach towards development in locations falling
between 54 and 63 decibels (LAeq,16hrs) is to “mitigate and reduce to a minimum”.

- There is no need to have different SOAEL values for internal conditions and outdoor amenity spaces.

Protecting outdoor amenity spaces to achieve a LOAEL of 54 dB LAeq,16 hrs can be impractical

**Policy ENV 14 ‘Light pollution’**

**Summary of key points:**

- With reference to point 3, the words ‘as possible’ should be removed to promote the universal use of energy efficient lighting.

- The policy contains vague statements that can be improved upon.
  - “minimum required…” who decides?
  - “light spillage will be minimised…” The light fittings should be designed to be shaded to prevent spillage into neighbouring areas.
  - The policy should include a requirement that lighting should be sensor controlled where reasonably practical to achieve minimisation of pollution, energy efficiency, loss of amenity etc.
  - Floodlighting of buildings and trees, especially in dark rural locations, should be prohibited (excepting 1st Dec to 6th Jan).

- Shows no commitment to a Dark Skies policy; it does not specify ‘full cut-off’ street lighting which eradicates virtually all of the light spillage in the sky; nor does it seek to reduce the intrusive ‘security’ lighting on private residences by insisting on PIR control on new developments.

- The policy does not recognise the fact that in rural areas where there is limited or no street lighting, the impact of light pollution is immediate. It may be that paragraph 4.85 of Policy ENV15 offers some assurance but a more overt recognition of the material differences between urban and rural light pollution would reduce potential future conflicts.

**Policy ENV 15 ‘New development and existing uses’**

**Summary of key points:**

- Whilst the policy is justified and consistent with national policy, further clarification on how this policy could be applied and enforced would be welcome. It is unclear how this would be achieved on third party land, presumably through legal agreements but clarification would be welcomed to ascertain how this impact on the delivery of sites (particularly in terms of elongated timescales).
• The supporting text makes reference to the NPPF’s Agent of Change Principle however it is considered that this principle should be explicitly referenced within the policy itself.

• Request that the wording of Policy ENV 15 is revised by including the following: “…submit appropriate information to demonstrate that the proposed development will be acceptable and, if necessary, provide suitable mitigation measures, without any change or impact on the existing business/ facility. Development proposals…”

• The policy is unclear because it does not adequately define “existing facilities”, and does not indicate how proposals will be dealt with when the effect of mitigation would be to create conflict with other policies and human rights. Policy needs to make clear:
  o That it applies to new development likely to be a receptor for pollution from nearby road traffic particularly in AQMAs (i.e. that roads are “existing facilities”).
  o That mitigation will not result in undue loss of amenity for future occupants by explicit cross reference to HOU10, and by making clear that mitigation involving an absence of natural ventilation in habitable rooms is unacceptable.

**Policy ENV 16 ‘Surface water management and flood risk’**

**Summary of key points:**

• Add additional flexible wording into the policy, including ‘where possible and viable’ to provide further clarity that surface water management schemes are very much tailored to meet the specific constraints of individual sites.

• Point 2i - remove ‘where possible’ to make sure every effort is made by the developer to manage and reduce run off.

• Point 5 - remove ‘where relevant and appropriate’ to safeguard risk mitigation.

• Point 6 - amend wording to reflect that Cheshire East Council or specialists appointed by it will provide guidance on whether culverting open watercourses is necessary.

• Paragraph 4.91- the first sentence should be altered to state “… to the environment prior to sufficient levels of treatment”.

• Waterbodies face environmental pressures (reduced ability to cope with increasing climate change threats, or diffuse urban or rural pollution issues) and new development provides opportunity to further improve policy for water management. Support for an additional/amended policy that could help make a step improvement in any currently failing waterbody, through a more environmentally and multifunctional design approach.
Further detail is required in the supporting evidence to robustly protect rare and fragile ecological sites; their vulnerability is acknowledged by Natural England and the Environment Agency with particular regard to 'Diffuse Water Pollution'.

Policy ENV 17 ‘Protecting water resources’

Summary key points:

- The reference to GP3 should be updated to “the Environment Agency guidance and position statements as set out in its document entitled ‘The Environment Agency’s approach to groundwater protection’. This reference should also be included within the related documents section for consistency.

- Specific protection of ground water sources should be mentioned for those areas where licences have been granted for shale gas [fracking] exploration.

Chapter 5: The historic environment (general issues)

Summary of key points:

- Historic England suggests some textual amendments to the policies to strengthen their robustness and to ensure that they reflect the requirements of the NPPF. The Council’s assessment of the site allocations is considered suitable, in terms of the historic environment. However, reference to the Council’s two Heritage Impact Assessments is advised within individual site policies to ensure mitigation/enhancement measures.

Policy HER 1 ‘Heritage assets’

Summary of key points:

- Confusing terminology. Key descriptions should be defined in the glossary. Defined terms should be in inverted commas or in capital letters consistently. “Listed buildings” is in the glossary but also used as common English. “Heritage assets” and “Historic assets” are used interchangeably. Do they have the same defined meaning? Only ‘Heritage Asset’ and ‘Designated Heritage Asset’ are defined in the glossary. Heritage assets are described in paragraph 5.2, but a different, albeit compatible, description is used in the glossary. This lack of consistency could lead to difficulties in enforcing the policy in contentious cases.

- Historic England comments. Para 1 Proposals can affect more than one heritage asset and or affect the setting. Amendment suggested to ensure the soundness of the policy in line with the requirements of the NPPF and the 1990 Act. Amend “All proposals affecting historic assets and/or their setting must be……”

- Historic England suggests some textual amendments to the policies HER 1 Para 2: Sound (subject to text amendment)
The policy is titled ‘Heritage Assets’ to cover all types. Para 2 of the policy refers to ‘listed building’. This should be amended to include ‘heritage asset’ for consistency.

Policy HER 2 ‘Heritage at risk’

Summary of key points:

- Policy HER2 must include, (or make reference to), appropriate and robust guidelines to act as informed 'checks and balances' to ensure that the benefits of any proposed development intended to secure the future of a heritage asset are not outweighed by the disbenefits. It needs strengthening by the inclusion of the 8 criteria in the guidance published by English Heritage.

- Para 5.8 Neglect may not be 'deliberate'? Suggest either remove 'deliberate' or add a statement that indicates, whatever the cause, an investigation or enforcement action will be taken to prevent further deterioration.

- Paragraph 5.9 would like to see a commitment to an urgent review of all of Crewe’s heritage and a strategy for its future interpretation and conservation. The town has a rich industrial and architectural heritage which is rapidly vanishing, and has received little protection through the planning system to date, save for the recent Crewe Hub Area Action Plan.

Policy HER 3 ‘Conservation areas’

Summary of key points:

- No justification for arbitrarily requiring the retention of all buildings that make a positive contribution; there may be circumstances for such buildings to be demolished or substantially altered. The reference to certain conditions prior to any demolition of a building would be subject to the planning application, or conservation area consent, process and there is no requirement for such detail to be prescribed through the local plan.

- Para 2 speaks of 'a building or group of buildings'. Therefore in ii and iii there should be consistency by amending the text to read “the building/s is/are structurally unsound and its/their repair is not.....” and “alternative uses for the buildings have been investigated”.

Policy HER 4 ‘Listed buildings’

Summary of key points:

- Subsection i: “building’s architectural features”. It is recommended that the word ‘special’ or ‘significant’ be inserted to read “building’s special or significant architectural features”. Otherwise the Policy does not reflect the NPPF and the need to identify and understand significance. Subsection ii: Same as above – clarification that only the special interest/significance should be preserved.
• Policy HER4 as currently drafted is unsound. It is not positively prepared, justified, effective or consistent with the Planning (Listed Buildings and Conservation Areas) Act and therefore fails to meet the tests set out in paragraph 35 of the Framework. Modifications necessary to the policy. The policy should be amended as follows:

  o 1. Development proposals affecting a listed building or its setting will be expected to preserve the asset and its setting wherever possible.
  o 5. New development affecting the setting of listed buildings should preserve the setting, taking into account all relevant issues, including (but not limited to)....etc.

• Paragraph 4, part (iii) explains that in relation to change of use or conversion of a listed building, this will be supported where 'the proposed use is necessary to ensure the long-term preservation of the building'. This is far too prescriptive as a simple change of use of a building, in part or whole, should not have to prove that it is necessary to ensure the long-term preservation of the building. This is without justification, particularly when no external changes are required, and should be deleted. Delete paragraph 4, part (iii).

• Macclesfield Borough Plan policy B19 is clear that change of use of listed building will be permitted if 'the use would not lead to a demand for large scale extensions or for additional buildings in the grounds'. Reinstate B19 policy from Macclesfield Borough Plan

**Policy HER 5 ‘Historic parks and gardens’**

*Summary of key points:*

• Historic England Para 1. Bullet I Sound (subject to a textual amendment). The significance of an asset can be made up of a wide variety of different elements. To ensure that none are excluded, it is suggested that ‘including’ is inserted into the sentence. Amend to read “Cause no unacceptable harm to the asset’s significance, including taking into account...."

• HE suggested amendment. The title of the policy refers to ‘Historic’ parks and gardens and yet the policy only covers ‘registered’. The supporting text (Para 5.24) mentions that there are a number of non-designated heritage assets as well. So, is the intention of the policy to cover both designated and non-designated or just the former? If it is only designated, then the title should be amended to reflect this.

**Policy HER 6 ‘Historic Battlefields’**

*Summary of key points:*

• No key points raised.
Policy HER 7 ‘Non-designated heritage assets’

Summary of key points:

- The SADPD should include an appendix with detailed addresses of all Locally Listed Buildings, so that these can be readily identified.

- The revised policy wording within HER7 better aligns with this policy test but would recommend including the term ‘balanced judgement’ within this policy to ensure clear consistency with national policy.

- The increased emphasis on avoiding, minimising or mitigating the impact of development on non-designated heritage assets is welcomed. However, the policy should still make clear that where a heritage asset cannot be saved, it should be replaced by a building of equal or greater architectural quality.

Policy HER 8 ‘Archaeology’

Summary of key points:

- Clause 1 could be strengthened by substituting 'must for 'should'. Clause 3 is often not triggered either because the developer does not realise or has not investigated whether the site has archaeological significance and/ or the case officer is similarly unaware of archaeological potential in the area. Some mechanism needs to be put in place to ensure these omissions do not occur. Substitute 'must for 'should' in Clause 1.

Policy HER 9 ‘World heritage site’

Summary of key points:

- Policy SE14 ‘Jodrell Bank’ of the LPS is a restrictive policy and is not necessary and is not appropriate.

- Part 1, omitted the phrase “outstanding universal value” as it replicates national guidance. Include it in the explanatory text.

- Part 2. The policy wording should be revised to confirm that an assessment of the immediate setting of the WHS is separate to the UNESCO buffer zone which is based on the JBO consultation zone for radio inference.

- Part 2 The policy needs to be more prescriptive as to the requirements for an applicant within the buffer zone producing a heritage impact assessment. PPG

- There remains a need for an updated and more detailed policy in relation to Jodrell Bank to be included within the SADPD
• There is still no detailed policy advice and guidance on Jodrell Bank (in relation to scientific impacts), contrary to paragraph 13.163 of the LPS. This needs to be included within the next version of the SADPD.

• The SADPD should allocate land for housing in the MRA (Macclesfield Regeneration Area) supported by a strong evidence base on JBO and include criteria-based policy that is supported by the strong JBO evidence base to provide clarity on what development may be considered appropriate within the consultation zone.

• Make allocations that are based on a strong evidence base with regard JBO and take the opportunity to provide specific guidance on development within the JBO Consultation Zone.

• HE proposed amendments to support proposals that enhance or better reveals its significance and accords with the approved World Heritage Site Management Plan. Development proposals that would cause harm to the significance of the heritage asset will not be supported.

• HE suggest where development has a demonstrable public benefit and harm to the outstanding universal value is unavoidable and has been minimised, this benefit will be weighed against the level of harm to the outstanding universal value of the world heritage site.

• The Consultation Zone is very extensive, and more detailed guidance is needed in relation to how development proposals will be looked at.

• There is an urgent need for more detailed and transparent guidance to be provided by the Council in relation to Jodrell Bank which is clearly evidenced based, and which can be more easily interpreted by developers and the community alike to deliver sustainable development.

Chapter 6: Rural issues (general issues)

Summary of key points:

• The SADPD should be adapted to take into account the impacts of the LPS’s high growth strategy on the character of local areas, on wider landscapes and vistas or on environmental capacity. The rural policies focus primarily on buildings and businesses and there is no recognition of the need to retain sufficient agricultural land (including lower quality land).

Policy RUR 1 ‘New buildings for agriculture and forestry’

Summary of key points:

• It is considered that the policy will hamper and unnecessarily constrain the growth of rural businesses. It is a ‘do minimum’ approach and does not accord with NPPF para 83 which seeks to support a prosperous rural economy. The emphasis should be on enhancement and reasonable expansion.
The overly-restrictive approach means that permitted development rights will be utilised by agricultural businesses instead, to deliver the new buildings and floorspace they need. This will lead to a series of smaller, uncontrolled development that cause greater harm than a single development.

Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

The policy should be amended to require that new agricultural and forestry buildings remain in that use in perpetuity and changes of use should only be approved in exceptional circumstances.

It is considered that the wording of the policy restricts the opportunities for new entrants into agriculture where no buildings or enterprise currently exists.

**Policy RUR 2 ‘Farm diversification’**

**Summary of key points:**

- Increasing pressures on farmers and the rural economy has increased the need for farm diversification. Diversified activities provide a significant proportion of income for many farms. The policy is considered to be too restrictive and will hinder the agricultural industry’s ability to diversify. Requiring development to be necessary to support the continued viability of the existing agricultural business allows only for the minimum level of diversification which will not secure the long-term future of the agricultural business and will lead to further diversification later.

- The policy fails to recognise instances where an existing agricultural business has already ceased operations and therefore a new use for the farmstead / farm buildings needs to be found.

- For farm shops, it is considered that restricting goods to be mainly produced on site does not account for the wider supply chains often at work for farm shops, the wider economic benefits to the rural economy, or the potential to attract visitors as a leisure/tourism destination.

- Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

**Policy RUR 3 ‘Agricultural and forestry workers dwellings’**

**Summary of key points:**

- The policy is considered to be in conflict with the NPPF (¶79) which is permissive of rural workers dwellings, including those taking majority control of a farm business.
The policy should have regard to the factors in the NPPG (paragraph 10 reference ID: 67-010-20190722), particularly whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process.

The NPPF does not suggest that size restrictions should be imposed. The size of dwelling can also be related to what the enterprise can sustain, rather than an individual's income. It is considered unfairly prescriptive over the size of accommodation and does not account for the range of people who may comply with the need for on-site accommodation. Dwellings need to be of a size and scale to attract and retain labour.

The figures in the nationally described space standard are minimum figures but are being used as maximum figures for the purposes of the policy. These do not take into account non-standard accommodation required by rural workers, such as ground floor decontamination room, boot room ad farm office. Rural workers dwellings also need to accommodate relief worker(s) during absences. The table does not take into account a larger number of bedrooms required within the dwelling commensurate with the existing functional need.

Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

**Policy RUR 4 ‘Essential rural worker occupancy conditions’**

**Summary of key points:**

- The policy is considered to be unlawful as it applies unreasonable burdens on owners of properties with occupancy restrictions as compared to owners of other types of rural buildings originally permitted in exceptional circumstances that now wish to convert them to residential use.

- The term ‘in the surrounding area’ is vague and should be replaced with ‘in the locality’ which is the phrase used in model condition (no. 45) for agricultural occupancy conditions set out in the Annex to former Circular 11/95 (the Annex remains extant even though the Circular has been withdrawn).

- The owner of a dwelling subject to an occupancy condition cannot be forced to dispose of that property as a result of making a planning application. The policy requires a marketing exercise to be undertaken. However, it is unlawful under the Consumer Protection from Unfair Trading Regulations, 2008, to offer for sale (or rental) a property that is not, in fact, available to purchase or rent, but is being advertised as an “exercise” to test the market. Therefore, evidence of a marketing exercise cannot be a requirement in all circumstances.
The imposition of additional restrictions in cases where rural worker occupancy restrictions are lifted is considered to be unreasonable. National policy and the LPS allow for conversion of rural buildings to dwellings without such restrictions and permitted development rights allow for the change of use of former agricultural buildings to open market dwellings. It would be perverse if a building no longer required as a dwellings for a rural worker could not be re-used for an unrestricted dwelling when another rural building (such as a cowshed or haystore) could.

**Policy RUR 5 ‘Best and most versatile agricultural land’**

**Summary of key points:**

- It is considered that it may be difficult to mitigate the overall impact of development on best and most versatile land (under criterion 2ii), which may prevent development coming forward even where the benefits clearly outweigh the loss of the agricultural land (under criterion 2i).

- Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

- It is considered that a requirement “to demonstrate that no suitable alternative suitable site is available that would have a lesser impact on best and most versatile farmland” should be added to the policy.

- It is considered that outside of sites specifically allocated for development, proposals must avoid the loss of best and most versatile land.

**Policy RUR 6 ‘Outdoor sport, leisure and recreation outside of settlement boundaries’**

**Summary of key points:**

- Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

**Policy RUR 7 ‘Equestrian development outside of settlement boundaries’**

**Summary of key points:**

- The requirement to make best use of existing buildings is unjustified and would not enable the development and diversification of agricultural and other land-based rural businesses; or sustainable rural tourism and leisure developments which respect the character of the countryside – as required by NPPF ¶83.
• The requirement for ancillary development to be well-related to existing buildings is unjustified as there may not be any existing buildings.

• NPPF ¶¶83 & 84 are supportive of the development of rural businesses. Equestrian facilities require a countryside location and criterion 2 of the policy would prevent new equestrian businesses of any scale. There should be no requirement to assess the potential for conversion of existing buildings in the first instance.

• The requirement for buildings to be constructed of temporary materials such as timber is unjustified. Accommodation requirements will depend on the type and number of horses; welfare of the animal should be determined on a case by case basis and the policy would prohibit the provision of essential stables to the detriment of the rural economy.

• The policy should be strengthened to prevent equestrian buildings being converted to residential use only to be replaced a short time later.

• Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

**Policy RUR 8 ‘Visitor accommodation outside of settlement boundaries’**

**Summary of key points:**

• It is considered that the policy should allow for new-build hotels and guest houses as there may be a number of instances where these could meet specific localised needs (not related to links with the countryside) in locations outside of settlement boundaries. Examples include hotels on out of centre business parks, demand arising from key transport infrastructure such as airports or HS2, or as part of roadside facilities to serve motorists. Hotels are already subject to a sequential test which sees them directed to town centres where possible.

• The policy should be less prescriptive, using terms such as ‘appropriate scale’; ‘cannot best be met’; and ‘not generally’.

• It is not clear why proposals should be restricted to small scale and larger facilities may be appropriate. ‘Development appropriate to the location and setting’ would be more appropriate.

• There should not be a test requiring existing buildings to be considered in the first instance as this is contrary to the NPPF and LPS Policy PG 6.

• The restriction for development to be limited to the minimum level required for the operation of the accommodation is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.
The policy makes no reference to supporting existing visitor accommodation.

Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

Policy RUR 9 ‘Caravan and camping sites’

Summary of key points:

- It is not clear why proposals should be restricted to small scale and larger facilities may be needed and acceptable, subject to the location and details of the site. Only allowing for small scale facilities may undermine the council's objective to establish Macclesfield as the gateway to the peak.

- There should not be a test requiring existing buildings to be considered in the first instance, as this is contrary to the Framework and LPS Policy PG 6.

- The restriction for development to be limited to the minimum level required for the operation of the facility is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.

- Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

Policy RUR 10 ‘Employment development in the open countryside’

Summary of key points:

- It is considered that the policy should refer to a wider range of employment uses in open countryside locations. Under the NPPF, all types of businesses in rural areas should be encouraged, some of which may not be small scale. Business and logistics parks are often located near road infrastructure in the open countryside, providing significant local employment opportunities. Similarly, emerging technologies to tackle climate change (e.g. energy storage and other battery storage opportunities within existing and new cavities following salt extraction) should not be prevented by a restrictive policy.

- By limiting the scale and types of employment development allowed, the policy is inconsistent with the framework, which clearly sets out that planning policies should enable the sustainable growth and expansion of all types of business in rural areas. It is also inconsistent with LPS Policy PG 6 which allows for development that is essential for the expansion or redevelopment of an existing business – not requiring it to be small scale or appropriate to a rural area.
There should not be a test requiring existing buildings to be considered in the first instance, as this is contrary to the Framework and LPS Policy PG 6.

The restriction for development to be limited to the minimum level required for the operation of the business is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.

The requirement for new buildings to be appropriate to their intended function and not designed to be easily converted to residential use in the future should not rule out the development of buildings that are of permanent and substantial construction. The wording is unjustified and subjective, meaning that any proposal would be subject to an arbitrary and unnecessary judgement over whether it might at some point potentially be converted to residential use. The issues should be dealt with by removing specific development rights through an Article 4 Direction.

Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

Historic uses of a site should not be used as justification for new and fundamentally different businesses moving in that are not appropriate to a rural area.

**Policy RUR 11 ‘Extensions and alterations to buildings outside of settlement boundaries’**

**Summary of key points:**

- Inappropriate development is, by definition, harmful to the Green Belt but the same presumption against development does not apply in the open countryside and the two policy designations should be separated in this regard.

- The test of openness is not included in the NPPF ¶145c and should be removed from the policy.

- It is considered that an increase in buildings height is part of the consideration of bulk, mass and prominence and essentially the visual dimension as referenced in case law. To usually consider increases in height as disproportionate is not justified.

- The restriction that means any extension greater than 30% of original floorspace comprises inappropriate development in the Green Belt is considered to be unjustified and whilst 30% has historically been used by a number of councils, the NPPF includes no such threshold and the assessment of whether an extension is disproportionate requires consideration on a case by case basis.
Case law has established that an assessment of the openness of the Green Belt should not be confined to quantitative impacts and the NPPG confirms that openness is capable of having both spatial and visual aspects. Therefore it is wrong to specify certain percentage uplifts to define what is disproportionate and an assessment of what is disproportionate should be carried out on a case by case basis.

Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

**Policy RUR 12 ‘Residential curtilages outside of settlement boundaries’**

Summary of key points:

- The curtilage of a property can only relate to an area in residential land use. It is a factual determination which can change in an instant, for example by the removal of a fence. This policy should only concern garden extensions which represent a change of use of land.

- A ‘reasonable sitting out area’ should be defined in terms of size, orientation and impact on wider character and amenity of the area. It should not be left to subjective determination.

**Policy RUR 13 ‘Replacement buildings outside of settlement boundaries’**

Summary of key points:

- The term ‘materially larger’ only applies to Green Belt and is not a relevant concept in the open countryside.

- Under criterion 1(ii), it is considered that the tests of impact on the rural character of the countryside duplicate the assessment of ‘materially larger’ and should be deleted.

- Under criterion 2, all factors may affect whether a building is materially larger; therefore it is not appropriate to say that increases in height or footprint will usually be considered to be materially larger.

- The NPPF provides no prescriptive threshold of what is materially larger and the policy should allow for planning judgement on a case by case basis.

- The percentage increase in size for replacement properties in the Green Belt should be amended to reflect NPPF ¶145g to allow for development where there is not a substantial impact on openness where there is affordable housing provision to meet local needs included on site. A greater percentage increase should be allowed where affordable housing is provided.
Case law establishes that materially larger cannot be defined by a simple consideration of an increase in floorspace. It hinges on factors that go beyond size alone and in addition to spatial considerations; perceptual considerations also form part of the assessment.

The percentage ceilings are not justified or supported by evidence. If a figure is considered necessary, then it should be no less than 30% to be consistent with the policy for extensions.

Case law has established that an assessment of the openness of the Green Belt should not be confined to quantitative impacts and the NPPG confirms that openness is capable of having both spatial and visual aspects. Therefore it is wrong to specify certain percentage uplifts to define what is materially larger and assessments should be carried out on a case by case basis.

By using floorspace to determine the increase in size ignores other dimensions of size such as height, volume, footprint, width and depth.

Case law has established that the term ‘building’ in NPPF 2012 ¶89 (now ¶145) can also include ‘buildings’ and should not mean only a singular building. Case law has established that outbuildings may be incorporated into such calculations subject to site specific circumstances.

The statement that the existing building is as it exists when making a planning application implies that any fall back position will not be taken into account. This is a material consideration that should be taken into account and the policy should not pre-determine what matters are material considerations.

No all householders wish to have a garage and where there is no such existing provision, it is unreasonable for an applicant to trade living space for a garage in a replacement dwelling.

Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.

Policy RUR 14 ‘Re-use of rural buildings for residential use’

Summary of key points:

- It is considered that the policy is inconsistent with the NPPF as it only allows for the re-use of rural buildings for residential uses when no such restrictions apply in the NPPF.

- It is not clear what purpose is served by restricting the conversion of outbuildings, as such development may comprise sustainable development and contribute to housing supply.
• The statement that modern agricultural buildings are generally not capable of conversion to residential use is not supported by evidence and inconsistent with national policy. There are a number of planning appeals where the conversion of modern agricultural buildings has been allowed.

• It is considered that the policy should be strengthened to only allow conversion of agricultural or equestrian buildings where there is no realistic other use.

• Where an agricultural or equestrian building is converted to residential use, the policy should confirm that a replacement of the converted building will not be allowed for a minimum period of 10 years.

Chapter 7: Employment and economy (general issues)

Summary of key points:

• The SADPD should include exceptions policies for proposals relating to the television and film industry.

• Fast and reliable digital infrastructure should be a priority to support home based businesses.

• Quality public realm improvements are important to support local businesses.

• Visitor accommodation in Alderley Edge should be maintained as there is an unmet need.

• It is considered that the SADPD takes no account of the need to support employment in LSCs.

• The SADPD is not aligned with the draft economic policy, which seeks to build on opportunities arising from HS2, the M6 corridor and links to Manchester Airport. Therefore, it is considered that only modest housing development should be provided in LSCs in the northeast of the borough.

Policy EMP 1 ‘Strategic employment areas’

Summary of key points:

• Radbroke Hall is listed as a strategic employment area in the policy but is not shown as such on the policies map.

• It is considered that the British Salt factory in Middlewich should be included in the list of strategic employment sites listed.

Policy EMP 2 ‘Employment allocations’

Summary of key points:
• It is considered that the policy should require any application for non-compliant non-employment use to be accompanied by detailed evidence.

• The policy should require clear evidence that ancillary (non-employment) uses are essential for the delivery of a wider employment scheme.

• It is considered that there is a need for further employment sites in Knutsford, which will necessitate a further review of Green Belt boundaries around the town.

• Site EMP 2.1 conflicts with one of the proposed Southern Link Road Bridge route options suggested within the Crewe Hub AAP Development Strategy and Further Options document.

• As required by the LPS and NPPF, the employment land supply must consist of viable sites. If a site is not viable then it should not form part of the employment land supply. Detailed viability assessments show that site EMP 2.5 cannot be viably developed for employment uses; a view endorsed by the inspector and Secretary of State at the public inquiry held into the proposals for retail development at the site. It is considered that the evidence does not fully consider contamination issues; overestimates the market interest in the site; and does not properly consider the viability issues.

• Land at Radway Green Alsager should be allocated for B1, B2 and B8 uses under this policy.

• Land adjacent to the Highways England M6 Smart Motorways Programme Junction 16-19 Site Compound should be allocated for employment use.

• There are questions as to whether the employment land supply in Crewe is genuinely available, viable, attractive to the market and ultimately capable of delivering the required quantum of employment land over the plan period. The SADPD should allocate further sites in Crewe including land at Newcastle Road, Willaston.

• The employment development site on London Road, Holmes Chapel at the old Bengers / Fisons site should be allocated as employment land as it has an extant permission for commercial / industrial use.

• The former Manchester Metropolitan University campus in Crewe should be allocated for higher educational uses or B1 (office) and ancillary facilities such as a conference centre and hotel.

• Additional employment land is required in Alsager and the land at Fanny’s Croft should be allocated for employment (B1) purposes.

• The policy should cross-refer to policies ENV 1 and ENV 2 and confirm that substantial areas of habitat creation will be required for site EMP 2.6.
Chapter 8: Housing (general issues)

Summary of key points:

- The objectively assessed need for Cheshire East includes an element of C2 bedspace provision. From 2010-2018, there has been a total of 303 C2 completions against a requirement over the same period of 872, a shortfall of 569. Only one of the strategic sites allocated in the LPS includes a specific requirement for the delivery of C2 bedspaces - The North Cheshire Growth Village at Handforth East (LPS33). The population in older age groups is projected to increase substantially between 2018 and 2030. There is a significant identified need for C2 accommodation, and also a significant need for specialist housing for older persons. Specific sites for C2 accommodation should be allocated in the SADPD.

- SADPD should allocate more housing to:
  - Provide a realistic prospect of meeting the overall housing requirement. Many sites, including the strategic sites allocated within the CELPS have not come forward as they were expected to in the LPS housing trajectory.
  - The SADPD should provide a housing trajectory.
  - Ensure that the Council can demonstrate and then maintain a deliverable five year supply of housing land on adoption and throughout the plan period.
  - Ensure that the SADPD is consistent with the CELPS, including the evidence upon which the CELPS Inspector based his conclusions.
  - There is a commitment in the LPS to allocate land for 3,335 dwellings. Table 8.2 of the LPS (page 55) states that the: “contribution to be made through the Site Allocations and Development Policies Document” is 3,335 dwellings. Paragraph E.6 of the LPS (page 445) also explains that the SADPD “will allocate a further 3,335 [dwellings] over the plan period.
  - The LPS only considered the allocation of sites which were 5ha or 150 dwellings or more. Smaller sites are to be assessed and allocated through the SADPD. The Inspector examining the LPS accepted the Council’s approach on the basis that smaller sites would be considered through the SADPD. Paragraph 162 of the Inspector’s report states: “Developers and landowners will have the opportunity to put forward smaller “non-strategic” sites when the SADPDPD is prepared.
  - The Local Plan as a whole will not have considered its strategy of only allocating sites of a strategic size against the reasonable alternative of allocating smaller sites instead of or in addition to those strategic sites.
  - To meet the requirement in national policy to identify 10% of the housing requirement on sites of 1 ha or less.
  - To acknowledge the continuing need to boost the supply of housing generally and because the requirement should be regarded as a minimum.
  - To provide flexibility in the event that HS2 is committed to come to Crewe.
• The SADPD should:
  o disaggregate the housing requirement figure – at least for the designated neighbourhood areas in accordance with paragraph 65 of the NPPF.
  o apply the flexibility factor to the OSRAs as set out in the CELPS; and consider allocating land to meet housing need.
  o The SADPD should allocate housing in LSC as no flexibility is being provided for the 3,500 figure. This is contrary to the approach set out in the Local Plan Strategy.

• There is a need to provide housing for first time buyers and the SADPD should include an entry-level exception site policy, as required by NPPF ¶71.

Policy HOU 1 ‘Housing mix’

Summary of key points:

• This policy is too restrictive.

• Reference should be made in this policy to the requirements of Neighbourhood Plans.

• The policy needs to be applied flexibly and the role of other indicators including market indicators, density, viability and other site specific matters recognised.

• The evidence required to support the housing mix should be proportionate to the development. Current requirements of the policy (i.e. housing mix statement) appear onerous. Collection of evidence required likely to be time consuming and require different specialists.

• Objections to part 3 of the policy. Wording may need to be revised if changes are made to policy HOU 6 ‘accessibility, space and wheelchair standards’.

• The word ‘demand’ should be added to the second sentence of the point 1 of the policy for consistency.

• We note that Criterion 1 Sub Paragraph (i) is to be treated as a starting point. This is essential because the Cheshire East Residential Mix Assessment 2019 is in any event a Borough wide snapshot of need over the period 2018 – 2030.

• Reference to Table 8.1 should be removed from the policy wording and placed in the ‘supporting information’.

• In respect of Criterion 1 Sub Paragraph (ii), it is unclear if the words ‘local housing market’ are referring to the Borough wide market or the settlement or location in which the site is located. The wording should be amended accordingly as Criterion 1 Sub Paragraph (i) deals with the Borough wide picture.
• Reference to self and custom build provision should be deleted from the policy.

• The duration of the planning process from preparation of a bid price for a site by a purchaser, to grant of consent and purchase of the site and selling houses can be 2-3 plus years. The prescriptiveness of this policy stifles the developer’s ability to alter the mix to meet market demand through the process.

• What is the definition of ‘major’ to which this policy would be applied?

• The Tarporley Neighbourhood Plan and Poynton Neighbourhood Plan sought to introduce a housing mix policy and the Inspectors at both examinations removed the policies.

• To be effective, there is a need for the evidence regarding housing need is kept up to date, both at borough wide and local level. The onus should not be on the developer to ensure that this evidence is collated.

• A large proportion of its supply is already fixed in that it benefits from planning permission. The Council’s powers to meet diverse housing needs are limited. The Council should consider allocating specific sites through the SADPD for specialist housing needs not already being met by the existing committed supply.

• The indicative mix for market housing set out at Table 8.1, and referred to within the policy, is not justified by the evidence base.

• Table 8.1 – no indication of how the figures for market housing have been arrived at other than reference to the ORS housing model. It is not clear whether this is a demographic assessment only, or whether it factors in key issues that affect the market such as demand and trends.

• An expectation that the mix in Table 8.1 is followed suggests a ‘one size fits’ all approach, whereas the wording should also refer to the importance of the local housing market and the physical context of the site.

• The Council’s approach also ignores the business models of the developers which it relies upon to deliver its housing land supply

• Lack of clarity in the wording of the policy – does not indicate the weighting to be applied to different factors in the policy.

• Object to the wording of the explanatory text [§8.5] that precedes Table 8.1, which states: “It is expected that development achieves in the order of the housing mix, type and tenures set out in Table 8.1 Indicative house type tenures and sizes”. The wording does not reflect the wording of Policy HOU1 which identifies Table 8.1 as “a starting point for analysis”.

• This policy is not consistent with NPPF paragraphs 31 / 35(b) and therefore is not sound.
The proposed private housing mix in Policy HOU 1 negatively impacts on overall developable area, therefore reducing the achievable value and resultant land value on a site.

Such applications must already be accompanied by a Design & Access Statement. Applications must also currently include an Affordable Housing Statement. There is thus clear scope for overlap in the information to be provided. Having regard to Planning Practice Guidance, we do not agree that this would be a proportionate approach to the information requested in support of planning applications (ID: 14-038-20140306).

Policy HOU 2 ‘Specialist housing provision’

Summary of key points:

- The wording should give emphasis to the role of neighbourhood plans and local market signals in provision of this type of housing.

- A market for smaller properties could enable elderly residents to downsize and allow larger family homes to return to the market.

- A cluster of dwellings to enable mutual contact and support e.g. Dixon Drive in Chelford - appeals to their current and potential residents.

- Specialist provision is essential in order to meet identified local need.

- The SADPD document does not allocate land for specific categories of residential development. Policy and guidance at a national, and local, level has identified the significant need for retirement living housing; and the previous under supply of suitable sites and dwellings. It has therefore ignored the NPPF (February 2019) and updated PPG (July 2019). The Cheshire East Local Plan acknowledges (para 4.15 and strategic priority 2) that it needs to prepare for an increasingly older population. The provision of homes for older people is part of housing requirement. The current draft plan does not appear to address this.

- The policy should be reworded to specifically encourage such housing. We would suggest that the Policy is either replaced or prefaced as follows: “The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council will, through the identification of sites, allowing for windfall developments, and or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”

- Cheshire East has strategies and programmes that acknowledge a significant need to provide housing:- 'Ambition for All' - the Sustainable Community Strategy 2010; Ageing Well in Cheshire East Programme; Cheshire East Housing Strategy 2018-2023 (2018, Cheshire East Council). It is not considered sufficient to simply request that specialist accommodation be
adaptable; and therefore capable of catering for older persons to remain at home. This fundamentally misses a large section of the community.

- The nature of the ‘site selection process’ in the SADPD needs to be considered as locations for retirement living are different to that for general needs housing.

- Part 1 of HOU 2 is misconceived and will undermine the main objective of this policy which is to support the provision of supported and specialist housing. The type of specialist accommodation traditionally delivered is 'specialist' and secured by condition or S106 agreement to be retained for the use of those 50/60 years of age or above. It would be inappropriate for the accommodation to be designed to be readily adaptable back to family housing.

- We have undertaken viability testing which shows that the currently adopted thresholds for affordable housing would be unviable for specialist accommodation for older people. The development of retirement housing is a specialist and the assessment of viability has to take into account the particular costs associated with it. Considered the financial modelling undertaken by HDH in order to assess whether the target percentage for retirement housing are realistic and deliverable in line with the requirements of NPPG (Viability paragraph 002). There are a number of issues we have with the modelling undertaken which shows that there should be a separate affordable housing target for retirement housing.

- Object to the criteria required in HOU2 (3). It would appear to suggest that anything that is self-contained is counted as a dwelling. This is incorrect. For clarity this criterion should be amended to state that any use class C3 proposal for specialist, elderly persons accommodation should provide affordable housing, while any C2 proposal should not.

- Where will the need for specialist accommodation be identified and will it be the applicant who will have to demonstrate this need or whether the Council intend to identify a need for each settlement. The supporting text to this policy, whilst referencing the Cheshire East Residential Mix Assessment (2019), does not provide any clarity on this matter.

- Para 61 of the NPPF - The revised NPPF continues to identify older people as a specific group whose housing needs should be assessed and reflected in planning policies. An understanding of how the ageing population affects housing needs is something to be considered from the early stages of planning through to decision-taking”. Allocations should be made for suitable sites for older persons accommodation.

**Policy HOU 3 ‘Self and custom build dwellings’**

**Summary of key points:**

- The principle of delivering more self and custom build housing (SACBH) is supported as this is in line with national planning policy.
• Reference should be made to the legal definition of SACBH.

• The policy will not ensure that the price of sites is kept low enough so that they can be delivered by Community-led housing schemes.

• Objections were made to Criteria 2 (developments of 30+ homes should provide a proportion of serviced plots, consistent with the latest available evidence of demand) for the following reasons:
  o Provision of SACBH can/should only be ‘encouraged’. See NPPG Para: 025 Reference ID: 57-025-201760728 (bullet 3).
  o Current demand is unknown as the council has not published its register.
  o The council should not rely on this policy to fulfil its demand for serviced plots.
  o It could cause delays if plots are marketed and delivered individually.
  o There will be limited demand for plots on large schemes.
  o It would result in lower densities.
  o Likely to create numerous practical/management issues (e.g. quality, insurance, maintenance, construction logistics).
  o It would make schemes unviable.
  o Overall housing delivery will not be boosted; it simply replaces one form of housing for another.

• The policy is weak and likely to be ineffectual. As it is a legal requirement to deliver plots, SACBH should be considered as an exception to usual policy requirements.

• Criteria 2 should specify that if plots are not sold within a 12 month period, they can be reverted back to control of the developer and sold as regular market housing.

• Demand should be met through site allocations. The following sites should be allocated for SACBH:
  o Whitchurch Road – Bunbury Heath
  o Withinlee Road - Prestbury
  o Belmont Avenue – Sandbach
  o Hind Heath Road – Sandbach

**Policy HOU 4 ‘Houses in multiple occupation’**

**Summary of key points:**

• The policy should state that if there is clear evidence of HMO concentrations that Article 4 Directions will be used.
Policy HOU 5 ‘Gypsy, Traveller and Travelling Showpersons provision’

Summary of key points:

- Welcome the attention given in the SADPD to Gypsy, Traveller and Travelling Showperson provision.

- This policy should relate only to those sites identified in the Gypsy and Traveller Accommodation Assessment 2018 and Policy SC7 of CELPS and should clearly state that applications for sites elsewhere in the Borough will be resisted.

- The policy should also include additional criteria relating to local amenity, screening, numbers of units on site and occupancy conditions.

- Site selection report (PUB 14) comments: In section 6.3 says recommendations provide sufficient pitches only to 2023 not to the end of the planned period. Ensure that the search for potential new sites continues after this phase of the SADPD process is complete to provide the required number of pitches for the period 2023 - 2030.

- Site selection report (PUB 14) comments: Many of the potential sites in the East of the borough are screened out before any site selection methodology is applied. Most are on the basis of having been screened out in the previous Macclesfield Borough or Congleton Borough local plans assembled some twenty years ago. This is not appropriate.

- Site selection report (PUB 14) comments: Most of the 'red' assignments to criteria are not 'deal breakers' and so should really be considered as 'deep orange'.

- Site selection report (PUB 14) comments: Different criteria or at least different weighting should apply dependent on whether the site is being considered as a transit site or a permanent site. A specific site selection process should be carried out for a transit site.

- Site selection report (PUB 14) comments: It is unclear when assessments of accessibility are made whether road schemes such as the Middlewich Eastern bypass are taken into account.

- Objections received to site G&T 5 ‘Cledford Hall’ and TS 1 ‘Lorry Park’.

- Support for the provision of a transit site in the borough.

- Objection to Policy HOU5. Policy HOU5 refers only to the “known” need for 32 pitches between 2017 and 2032. As such it does not take into account of any of the additional need of up to 22 pitches which the most recent GTAA identifies may arise from Gypsy and Traveller households whose status is currently “unknown”. In our view this approach is unsound. Whilst the GTAA
advise that the ORS 10% national average be used to guide the likely number of 'unknown' households which meet the definition, we would note that this statistic is unsound, and ORS have in fact since acknowledged that the 10% figure is no longer being used and that the current ORS statistic is 25% (Havering Council approach given as an example). Furthermore, as noted at paragraph 7.28 of the GTAA, the proportion of households that meet the definition in Cheshire East is 67%, significantly higher than the ORS national average. As such, in our view, not taking account of any of the need arising from “unknown” households will clearly result in a significant underestimate of need in the area, and a consequent lack of 5 year supply.

• Objection to Policy HOU5. The draft SADPD does not set out how the need arising from Gypsies and Travellers who do not met the PPTS definition will be met. The GTAA correctly states, at paragraph 1.11 that: In general terms, the need for those households who do not meet the planning definition will be addressed as part of general housing need and through separate Local Plan Policies (including those authorities that have adopted plans, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN). However, to the best of our knowledge, no specific reference is given in the SADPD as to how this need will be addressed. Given the legal requirement to provide culturally appropriate accommodation for those ethnic Gypsies and Travellers who no longer meet the PPTS definition, the difficulties in so doing and the significant differences from providing bricks and mortar accommodation, we would suggest that the SADPD should include some reference to the approach the LPA is intending to adopt to meet this need

• The evidence on which the policy is based is not robust. In our view the figures arrived at in the GTAA are likely to underestimate need in the area for the following reasons:
  o Unsatisfactory survey pool
  o Unclear approach to waiting lists
  o Inconsistent and unsound approach to household formation rates
  o 10% national average of unknown households

Policy HOU 6 ‘Accessibility, space and wheelchair housing standards’

**Summary of key points:**

• Insufficient justification to introduce wheelchair adaptability standards

• The 2018 Housing Optional Technical Standards Report (FD 49), at Table 4, indicates that the Cheshire East rate of ill health benefit claimants is below the national average. Census long term illness data also indicates that Cheshire East has lower than the national average requirements. This evidence does not point towards a clear justification to introduce higher accessibility standards in the Cheshire East context.
• The Goostrey Neighbourhood Plan already requires 100% (rather than SADPD 30%) of new dwellings to be built to Lifetime Homes Design Guide (which is equivalent to M4 (2)) Change Policy HOU6 to say that "100% of housing developments should comply with "requirement M4 (2) Category 2 of the Building Regulations regarding accessible and adaptable dwellings.

• Reword the policy to set these levels as minima and encourage the construction of a higher proportion of buildings to meet the criteria.

• The Planning Practice Guidance ('PPG') sets out the circumstances in which LPAs may set policy standards for accessible dwellings. It also identifies other requirements for policy including the need to consider site specific factors such as vulnerability to flooding and site topography.

• The Cheshire East Residential Mix Assessment 2019 uses proportions taken from the English Housing Survey to estimate that there were around 1,280 households needing to move to a more suitable home due to a disability or another long term health problem in 2018. Figures 25 then goes onto identify the existing household that are likely to develop health problems that affect their housing need and additional households likely to develop problems. However, these households do not appear to have been considered against the same proportional considerations as the current households, to determine if their current home would be suitable for their needs or whether it could be adapted. Consideration should also be given to the increased proportion of homes built to the M4 (1) standards and the contribution of other forms of specialist accommodation.

• The evidence base document PUB52 Local Plan Site Allocations and Development Policies Viability Assessment raises concerns about the impact of the combined effect of the proposed policy requirements on residential viability, for certain development categories. This would apply to the lower value areas of Crewe and Middlewich, which are nevertheless expected to contribute a significant proportion of the housing requirement, together with brownfield and mixed-use sites. We note that the Council will consider relaxing the standards for accessibility and wheelchair adaptability where step free access cannot be achieved or is not viable. However, the emphasis in national guidance is now on ensuring that policies are viable at the plan-making stage rather than in the course of individual applications.

• Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. However, the PPG also makes clear that: Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (Paragraph: 009 Reference ID: 56-009-20150327) The policy proposes blanket provision of M4 (3) over all forms of development without recognition of this guidance. It therefore runs directly contrary to the PPG.
• The most effective way to provide sufficient housing to meet M4 (3) category requirements in the correct locations would be to increase the proportion of this type of accommodation in specialist housing for older people.

Nationally Described Space Standards

• NDSS - The Nationally Described Space Standards (‘NDSS’) as introduced by Government are intended to be optional and can only be introduced where there is a clear need and they retain development viability. CEC has not provided the robust justifiable evidence necessary to introduce the NDSS as a policy requirement in line with the PPG.

• NDSS - The Nationally Described Space Standards Justification Paper (June 2019) has considered 110 applications submitted between 2015 and 2018, totalling 694 homes. It is not evident from the information provided what ‘need’ there actually is for properties built to the standards there is no evidence that smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area.

• The NDSS can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice.

• Recommend that the a transitional period is included within the policy, whilst some developers will be aware of the introduction of NDSS, this may not apply to all and consideration will need to be given to the lead in times particularly between land value negotiations and an application being submitted.

• NDSS - The suitability of existing housing stock has not been properly assessed against the future requirements identified.

• NDSS - there is a discrepancy between the evidence provided in the Justification Paper and the Council's Viability Report which states that an analysis of the sizes of units currently for sale in the CEC area indicates that most units are currently above these sizes. The Justification Report suggests that the opposite is the case and the sizes of unit assessed in the viability report may not therefore provide a true reflection of house sizes across the borough. It is not therefore clear whether the impact of potentially larger dwellings on affordability and land supply have been properly considered

Policy HOU 7 ‘Subdivision of dwellings’

Summary of key points:

• The policy should reference sustainability policies

• There should be additional policy on aggregation of two or more properties into a single dwelling.

• Cycle storage could be made a requirement.
Policy HOU 8 ‘Backland development’

Summary of key points:

- The housing density on a backland site should not be higher than in the surrounding area.
- The policy should reference sustainability policies.
- The policy should contain firmer commitments. It is not clear what is meant by some of the wording or who will judge whether proposals are in accordance with the criteria. The policy should state that applications will only be considered where public benefit outweighs harm.
- Backland development leads to overdevelopment of sites, urban cramming, overlooking and loss of amenity.

Policy HOU 9 ‘Extensions and alterations’

Summary of key points:

- Amend policy wording to say that ‘....extensions and alterations will be supported only when they meet the following requirements.....’
- Add a fourth criterion: '4. The space between neighbours must not only meet the Authority's standards but be sufficient to avoid a 'terracing effect' when seen in relation to its neighbours.'

Policy HOU 10 ‘Amenity’

Summary of key points:

- Add new point 6. Proposals must provide two car parking spaces per property.
- Add new point 7. Proposals must include provision for adequate spaces for charging plug-in and other ultra low emission vehicles.
- The explanatory paras should draw attention to neighbourhood plan policies that specifically identify and protect open spaces.

Policy HOU 11 ‘Residential standards’

Summary of key points:

- The policy is too prescriptive; there should be a more localised, site by site approach to design and residential standards
- Amend 1(i) to read “unless the nature, design and layout of the scheme and its relationship …”, as different types of housing can influence the impact of relationships to adjoining properties.

- One set of residential standards should be set for the whole Borough and be in line with those in the Cheshire East Design Guide.

- Outline in further detail how the standards are to be implemented alongside the Cheshire East Residential Design Guide, particularly in the instance where alternative standards may be deemed more appropriate on a site by site basis.

- Insert the requirement for ‘generally’ in part (2) as with part (1);

- New point (3): Explicitly cross-reference the Design Guide SPD and support for innovative design led approaches that may justify reduced distance standards.

- Paragraph 8.46 - remove the minimum requirements to existing properties.

- Point 1 - remove ‘generally’ so the standards apply to all developments.

- 14m of separation between habitable and non-habitable rooms between dwellings is too great as it hinders designers with the efficient use of sites; 12m is a generally accepted industry standard.

- The policy should specify if the separation distance between habitable and non-habitable rooms applies to a blank gable.

- 18m separation distance between front elevations does not allow for variation in streets widths as set out in Manual for Streets.

- The increased levels of car ownership in the rural areas and the demand for car parking over and above the Council’s outdated standards has not been addressed.

- The construction of garages and car parking spaces on new housing developments that do not accommodate the average family car has not been addressed.

- The requirement to place new houses side by side, front to front, or rear to rear with existing properties is not mentioned.

- The differences in land levels should be on a sliding scale, on a pro rata basis from the figures given, otherwise developers can circumvent the requirements by proposing a 1.9m land level difference.

**Policy HOU 12 ‘Housing density’**

**Summary of key points:**
The target of at least 30 dwellings per hectare will provide for the efficient use of land and is consistent with the guidance contained in paragraph 123 of the NPPF.

Supportive of policy HOU 12 as drafted, which does not seek to introduce maximum density requirements on all developments without significant flexibility.

The Council needs to ensure the policy remains flexible enough for instances where it is not appropriate for development schemes to meet this minimum density requirement. The Policy should be amended to allow for flexibility and include additional factors such as market aspirations and viability considerations.

The Macclesfield Borough Local Plan (Jan 2004) recognised the diversity of the character an appearance of its residential areas by identifying those which needed particular protection because they were under threat from housing development which would radically change their character. Policy H12 identified Low Density Housing Areas in Alderley Edge, Knutsford, Poynton, Prestbury and Wilmslow, and set out a policy which has been successful in retaining their character and appearance. Policy H12 and the relevant boundaries to which the policy relates should be carried forward, and extended to cover other Low Density Housing areas in other towns and villages in Cheshire East. Remove 'local service centre' from Policy HOU12 para 2i or change it to exclude the smaller rural LSC's.

The policy is too prescriptive for sites within the existing settlement boundaries or close to existing or proposed transport nodes as it may not be possible to achieve higher densities in these locations due to design or site specific issues. Housing density should be considered on a site by site basis.

The policy attempts to set an average density for housing across the entire local authority area. It is therefore in contravention of Policy GEN 1 in the SADPD which promotes “appropriate character, appearance and form in terms of scale, height, density, layout grouping…” etc.

It is our experience that the application of the Cheshire East Design Guide, which we objected to on the basis of it being land hungry, restricts the ability to achieve housing density in line with Policy HOU12 and restricts the ability to make the best use of land.

With reference to point 1, we seek that the word ‘generally’ is removed to preclude the density of 30 dwellings per hectare from being exceeded.

The current site allocations for Crewe are delivering an average density of 20.9 dwellings per ha. Therefore a proposed density of 30 dwellings per hectare does not correspond with the current site allocations.

Additional evidence should be supplied to justify the proposed net density, and without this the policy should not be proposed further.
• To impose a net density of at least 30 dwellings per hectare across a borough the size of Cheshire East, that varies from compact, industrial terraces to highly rural locations, is inappropriate.

• The role of neighbourhood plans should be recognised in the policy wording.

Policy HOU 13 ‘Housing delivery’

Summary of key points:

• We are supportive of measures to increase the efficiency of completing S106 Agreements. However, this is a two-way process. A significant amount of time would be saved if obligations were evidenced and clearly set out in response to the tests set out under Regulation 122 of the Community Infrastructure Levy Regulations (2010).

• Stretched resources of the Council which, from experience, can result in considerable delay to the completion and execution of S106 agreements.

• Given the provisions of paragraph 76 of the NPPF, Part 4 (i) of the policy is not considered necessary. It is therefore considered that if the LPA are to pursue such a policy, that the policy is expanded or clarified and evidence based to take account of local or site specific circumstances.

• Welcome the support for the sub-division of large sites acknowledging the complexities of delivering new homes on large strategic sites and the ability of this to help bring forward sites in a timely manner.

• The imposition of shorter time limits for sites (including strategic sites) could hamper the delivery of new homes. Larger scale strategic sites give rise to a much more complex and range of issues which need to be dealt with through conditions, or through future reserved matters submissions. Work can take time and can be affected by changes to the economy, site conditions, planning conditions / obligations or changes to funding.

• Delay in the determination of applications can be as a result of factors outside of control of applicant and LPA such as failure of statutory consultees to provide a response within the required timescales.

• This policy should be tailored to state that if shorter time periods are to be imposed, they will need to be agreed with the applicant in writing; prior to the issue of a decision.

• No explanation is provided in the Policy as to how such an approach would be enforced and monitored.

• The SADPD should also state that neighbourhood plans are an appropriate means of co-ordinating delivery.

• The wording should proactively commit the Council to working in partnership with developers to support housing delivery in fulfilling its own responsibilities.
The policy might also recognise the effectiveness of efficient pre-application engagement, and putting in place a Planning Performance Agreement where this would help with managing the process and agreeing any dedicated resources for progressing the application.

- Policy should be refocused to avoid onerous pre-commencement planning conditions and agreeing this in advance of granting planning permission with the Applicant/Agent (as now required by the Town and Country Planning (Pre-Commencement Conditions) Regulations 2018);

- Policy should be refocused to promote flexibility in the application of planning policy requirements, including the Cheshire East Design Guide, enabling renegotiation, where it is evidenced that policy requirements are not deliverable or viable;

- Policy should be refocused to offsetting infrastructure/policy requirements until later in a development, where appropriate; and

- Policy should be refocused to permitting revisions to plans, where necessary, within the statutory timescales.

- Recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. It is requested that HOU 13 is modified once it has been informed by detailed and robust evidence, to provide at least 10% flexibility for the plan overall, and to ensure sufficient contingency for each settlement in line with the requirements of the LPS.

- Proposed that a site at Cledford Lane, Middlewich should be safeguarded for housing development during the later stages of the plan period.

- It is also requested that the policy should be modified in order to allocate Land off Fanny’s Croft, Alsager as a sustainable and well-located, mixed use site to include residential and employment use.

**Policy HOU 14 ‘Small and medium-sized sites’**

**Summary of key points:**

- Necessity of the policy is questioned as it does not set out any policy requirements.

- The policy should reflect NPPF ¶145 (g) which allows for redevelopment of brownfield sites within the Green Belt which do not have a greater impact on openness.

- The policy should be more flexible and not limited to sites of up to 30 dwellings.

- The policy should clarify that it does not apply to subdivisions of larger sites.
The policy does little to actively encourage smaller sites.

Chapter 9: Town centres and retail (general issues)

Summary of key points:

- It is claimed that the plan seeks to support the role and function of town centres through this period of change, particularly by concentrating on core areas and activities. It does absolutely nothing sensible to support the retail sector in Bollington. Reference to a specific planning application made.

Policy RET 1 ‘Retail hierarchy’

Summary of key points:

- Object to the identification of neighbourhood parades within the defined hierarchy as such facilities do not accord with the NPPF and its definition of ‘town centres.

- Dean Row Road (Summerfields Centre, Wilmslow) should be included within the schedule of Local Service Centres. It better reflects its offering and role.

- Support for the role of Sandbach and Knutsford as Key Service Centres in the retail hierarchy.

- The Local Planning Authority’s decision to amend the boundary of the designated Employment Site: Hurdsfield Industrial Estate. This amendment is supported, where it de-allocates the area of land to the south as this is now coming forward for retail development under the outline planning permission 15/5676M and current reserved matters submission 19/3439M. It would be appropriate and proper to allocate this area of land, alongside the adjacent Tesco superstore, as a Local Centre.

- Reference to the North Cheshire Garden Village and the South Macclesfield Development Area should be added to the Local Centre tier of the retail hierarchy. ¶85 (a) and (c) of the NPPF - planning policies should define and create a network of centres, including the creation of new centres.

- Requested boundary amendments to Poynton town centre to align with those in the Poynton Neighbourhood Plan.

Policy RET 2 ‘Planning for retail needs’

Summary of key points:

- The SADPD as currently proposed fails to ensure that the retailing needs of Cheshire East will be met. This is especially the case in Knutsford, which is earmarked as a Key Service Centre within which there is very significant overtrading and an identified need for additional retail floorspace as recognised in the Cheshire East Retail Study Update. The failure to allocate
any sites for retail development within or around Knutsford leads to grave concerns that emerging development requirements will not be met, which may render the emerging SADPD as unsound. Alternative sites outside of the defined retail centre must therefore be explored and assessed for retailing purposes.

- The policy should be amended to specifically refer to the North Cheshire Garden Village and South Macclesfield Development Area and the delivery of future local centres in those locations.

- The Cheshire East Retail Study Update (2018) is not a secure basis on which to plan retail provision. Its original database 2015 is dated, its sample is small, and it fails to take account of the recent collapse of many high streets that previously seemed to be doing well. The conclusions which it reaches may be accurate but they now need to be tested as a matter of urgency in each of the segments of the retail hierarchy. Local knowledge and the monitoring of the retail scene by working groups of completed or 'in-progress' neighbourhood plans will be able to adjust the planned outcomes for individual towns and villages.

**Policy RET 3 ‘Sequential and impact tests’**

**Summary of key points:**

- We suggest that the wording ‘where the closest centre to development proposals’ is added to all categories in the table included in policy RET 3: Sequential and Impact tests.

- With reference to point 2 of the policy, we seek that Cheshire East Council as opposed to the developers are able to demonstrate that out of town retail developments do not have an adverse impact on town centres.

- Policy RET3 does not adequately reflect the approach required by Paragraph 87 of the National Planning Policy Framework (“NPPF”) (February 2019) which states that “applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.” To be in accordance with national planning policy, and therefore found sound, it is strongly recommended that this sentence be added to the end of Part 1 of Policy RET3.

- Part 3 of Policy RET3 needs to be amended to require an impact assessment where a proposal increases the size of an existing store to a floorspace that is over the thresholds set.

**Policy RET 4 ‘Shops fronts and security’**

**Summary of key points:**
• Para 1 ii. reads “proposals should reflect the traditional character of shop fronts and include historically accurate detailing.” It is recommended that ‘existing features of historical or architectural significance are to be retained’ is added as well as reference to policies in neighbourhood plans and design guides on shop fronts.

Policy RET 5 ‘Restaurants, cafés, pubs and hot food takeaways’

Summary of key points:

• KFC considers the policy (Point 3) to be unsound.
  
  o 400m - does this without any reference to how many may already be present, the effect of those or of any reduction. No evidence of a distance (if any) at which effects may occur is provided.
  
  o No assessment has been made on the number of hot food takeaway that might be refused as a result of this or what social, economic or environmental impacts might be.
  
  o Policy is negative in its assumptions, using the concept of ‘unhealthy food’. It assumes all hot food takeaways offer little choice and serve the same type and standard of food.
  
  o No evidence for a causal link between incidence of obesity and proximity of hot food takeaways to secondary schools and sixth form colleges.
  
  o Not all hot food takeaways, restaurants, pubs and shops provide a source of cheap, energy dense and nutrient poor foods, and the planning system is ineffective in distinguishing between those that are and those that are not.
  
  o It would be better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways (and other main town centre uses) in order to ensure a healthy retail balance, but also any concomitant public health benefits. Such an approach could be extended beyond centres.
  
  o There is significant difficulty in using distance radii in that it takes account of no real barriers, physical or perceptual. It is better to use real walk isochrones.
  
  o Policy is inconsistent with NPPF. No policies refer to dietary issues. It seeks to enable people to live healthier lifestyles but seeks to do so by creating rather than restricting choice.
  
  o PPG53 (part 52 para 6) has suggested planning authorities might consider policies which limit the proliferation of certain use classes in identified areas. It focuses on proliferation, does not specify which use classes and is intended to be area-based. Whilst it suggests that regard could be had to proximity of schools, it omits of what.

• McDonalds Restaurant considers the policy (Point 3) to be unsound:
London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity.

Inconsistent with national planning policy – contradicts paragraph 11, 80 and 81. There is also no basis for a blanket ban approach in Planning Practice Guidance.

Policy fails to acknowledge the wider benefits that restaurants can have including the benefits relevant to community health and well-being.

McDonalds offers a wide range of different foods at its restaurants displaying calorie content and key nutritional aspects. The menu includes a range of lower calorie options and in recent years McDonalds have made great efforts to reduce fat, salt and sugar content across their menu.

Policy is inconsistent, discriminatory and disproportionate. A1 retail outlets and A3 food and drink uses can also sell food that is high in calories, fat, salt and sugar. Hot food from an A3 retail unit can also be delivered to a wide range of locations, including schools.

The ban is disproportionate to the circumstances when the concern underlying the policy may arise - schools are not open for the majority of days in the year and many schools prevent children from leaving the school grounds. Attendees of sixth form colleges are between 17-18 years of age and are old enough to drive, making a 400m exclusion worthless.

Consideration should be given to the practicalities of restricting opening hours of such uses during the day. McDonalds, for example, have a wider range of customers, predominantly adults. To enforce closures at lunchtimes would have significant negative implications on proposed development and would make such ventures unviable.

Not justified by any evidence. Supporting text fails to provide a link to any evidence as to how a hot food takeaway in proximity to a secondary school, can be an obstacle to its pupils eating healthily. Para 9.19 again fails to provide evidence to support the claim that the most popular time for purchasing food from takeaways is after school.

Examinations of other plans have found similar approaches to be unsound.

There needs to be some exploration into policies that are more positive, have a reputable evidence base and that comply with the framework.

Would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals including examination of how new development can best support healthy lifestyles and tackling obesity. When a cogent evidence base has been assembled, this can then inform any appropriate policy response.
Policy RET 6 ‘Neighbourhood parades of shops’

Summary of key points:

- At a time when there is clear need for the 'high street' to diversify, the notion of restricting/limiting the ability to diversify in neighbourhood parades runs contrary to future requirements/need and also paragraph 85 of the NPPF. Delete paragraph '2' of Policy RET 6.

Policy RET 7 ‘Ensuring the vitality of town and retail centres’

Summary of key points:

- Knutsford Town Centre - recommend that the proposed Town Centre boundary be amended to include the OKA building, its associated car park and the bowling green to the rear (as per the currently adopted position). This allows for further land and flexibility to meet Knutsford’s retailing requirements.
- A new point should be added to section 3 of the policy, as follows: - c. development proposals involving residential development will only be supported where an appropriate residential environment can be achieved for future occupiers.
- Policy RET 7 should be reworded to be more flexible, in order that it is supportive of changes in town centre composition that are a reasonable response to market conditions. It is considered this is particularly relevant to (and important for) centres that are at the lower levels of the proposed retail hierarchy. Delete 3 (ii a+b). Replace with a new 3(ii) stating 'development proposals that allow a centre to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries will be supported in principle. In paragraph 4, remove the words 'in addition to criteria (3.ii.a) above'.
- Sandbach Town Centre - Objection to the extent of the primary shopping area as defined for Sandbach. Also, question why the retail allocation at Brookhouse Road, Sandbach under Policy DP4 of the Congleton Local Plan has not been carried forward.
- Policy does not mention that the direction in which prospering town centres are moving is to combine retail provision (which clearly meets demands) with other ‘experiences’ (food and drink, heritage and other attractions e.g. a street or craft market, and leisure activities). Nor does the policy mention the evening economy. Ideally, establishments contributing to the evening economy need an active daytime frontage to assert the vitality of the town centre. A degree of flexibility therefore needs to be retained in creating a balance of provision within a town centre - a balance that may change to meet new market demands. It would be helpful if the policy or its explanatory paras drew attention to these aspects.
• Alsager Town Centre boundaries should be kept as currently defined, and as set out in Map Alsager 9 of the Alsager Settlement Report.

Policy RET 8 ‘Residential accommodation in the town centre’

Summary of key points:

• The inclusion of the redevelopment of car parks is especially welcome.

• The Knutsford Neighbourhood Plan envisions a Town Centre Master Plan which includes the creation of additional parking built within new housing/retail development to increase vitality and viability in the town centre.

• An extra line should be added to Policy RET8 which makes reference to Policy RET7 in the same way that it makes reference to Policy ENV15.

Policy RET 9 ‘Environmental improvements, public realm and design in town centres’

Summary of key points:

• Each section is expressed as a desirable but optional outcome rather than planning requirements to be met. It needs strengthening.

• Proposals should include evidence of a maintenance regime in order to maintain a high quality public realm. However, no reference is made to the provision of built-in servicing infrastructure (would include such items as litter bins). Therefore, recommend including a statement: ‘appropriate infrastructure which supports the maintenance and servicing of installations in the public realm’

• The Alsager Town Centre Boundary should not be changed from the old Congleton Borough Local Plan map. Position backed up from a report by the House of Commons Housing, Communities and Local Government Committee “High Streets and Town Centres 2030” published on 21st February 2019, page 6. This position is also backed up by the NPPF, Chapter 7, Section 85. Specifically,

  o AREA 2 this area includes a) Wesley Place Church. The church not only involved in religious activities but is a venue for activities of many other groups. It adds to the social side of Alsager life. In a modern Town Centre, expanding from the retail base, this area should not be excluded.

  o AREA 3. This area includes a) Milton Park - The park fulfils the role set out in RET9. It is an attractive, vibrant area which is well used socially, daily, by a large section of Alsager people. Events are held during the year which attracts large numbers of people to Alsager. b) United Reform Church is more than just a church but a meeting place for several other organisations. c) Alsager Fire Station provides a meeting
room for groups as well as holding their own events and being the
home of the Fire station Cadet. d) Public toilets – a free to use
community asset for visitors and residents. e) Northolme Gardens – a
Cheshire East Council owned garden offering seating and views to the
Mere.
  o The surrounding streets contribute to the overall townscape
characteristics of Alsager. 63 to 91 Station Road and the Avenue are in
conservation areas. Cross Street contains some original terraces. This
area should not be removed from the Town centre as it fulfils an
important role in a modern Town Centre.

- Full account should be taken of the recommendations of the Bollington
  Neighbourhood Plan and discussions held about providing finance to
  implement them.

- Sufficient encouragement for good quality design is contained within Policy
  GEN1 (Design Principles) and even Policy SE1 (Design) of the Cheshire East
  Local Plan Strategy and, hence, this policy appears superfluous and should
  be removed

**Policy RET 10 ‘Crewe town centre’**

**Summary of key points:**

- The policy should include specific reference and commitment to both a public
  realm strategy and a heritage strategy for Crewe Town Centre.

- An additional sentence should be added to Para 6(i) to make it clearer that
  additional green spaces, and the use of features such as green walls will be
  supported

**Policy RET 11 ‘Macclesfield town centre and environs’**

**Summary of key points:**

- The policy reflects the zones and aims of the Macclesfield Town Centre
  Strategic Regeneration Framework – the SRF provides more detail; suggest
  that if the SRF becomes an SPD that the inclusion of this policy in the
  PDSADPD is superfluous and should be removed from the Plan

- Would welcome as part of the regeneration in the Sunderland Street Areas
  that more attention is paid to the River Bollin as a key green infrastructure
  asset (at the moment in a poor environmental state in this area) ( A range of
  measures suggested)

- Objection is raised to the omission of the Christ Church area from the list of
  Macclesfield town centre character areas and the text of RET11 and therefore
  from the list of priority areas for regeneration. The existing boundary to the
  west of Churchill Way (as shown on the Saved Town Centre Proposals Map
  in the Macclesfield Borough Local Plan 2004) should be retained so as to
include the whole of the Christ Church Conservation Area. (July 2019 NPPG references included in justification for Christ Church Residential Area to remain in Town Centre – residential can add to the vitality of town centres) (Roe-naissance Project Macclesfield’s Representation also calls for the need for a new Conservation Appraisal, discusses regeneration, the HARP project, the role of housing and compares Christ Church in Crewe with Christ Church in Macclesfield.)

- A new title headed Christ Church area should be added to the list of Macclesfield town centre character areas and the following text added: “The revitalisation of the area for town centre housing will be encouraged. Redevelopment of existing non-residential uses for new housing will be permitted. The re-use of Christ Church and its grounds for a range of uses (to include cultural, leisure, entertainment, community or other town centre uses) and which respect its Grade II* listed building status will be encouraged. The church is an imposing townscape and heritage feature and forms an essential part of this part of the town centre.”

- Comments made to the Macclesfield TC Strategic Regeneration framework must be taken into consideration

- Concern about any possible residential proposals and relationship to Royal Mail landholding (criterion 8 –Jordangate east); suggest alternative wording: “In Jordangate east, redevelopment proposals for residential development will be supported to take advantage of the central location and rural views to the east, provided it can be demonstrated how it integrates effectively with existing businesses and an appropriate residential environment can be achieved.”

Chapter 10: Transport and infrastructure (general issues)

Summary of key points:

- The transport and infrastructure policies do not consider key supporting infrastructure such as airport, park-and-ride and motorway service facilities and are not in accordance with the NPPF, e.g. ¶ 104e and footnote 42.

- Need to consider the important role that Manchester Airport, the Mid Cheshire Rail Line, Motorway Service Areas and other large-scale projects such as new infrastructure have to play in the development context of Cheshire East and look to allocate sites for these purposes.

- The SADPD needs a replacement policy for Crewe & Nantwich policy TRAN12 in respect of roadside facilities. The development of roadside facilities must be properly planned for in accordance with NPPF ¶11, including roadside facilities serving the A500.

- No account is taken of proposals in the Bollington Neighbourhood Plan for improvements to transport and infrastructure.
Policy INF 1 ‘Cycleways, bridleways and footpaths’

Summary of key points:

- Part 2 is too onerous and may unduly constrain the delivery of development land by requiring diversions to provide clear and demonstrable benefits for the wider community. As such, it is unsound as it is not effective. The wording of Policy INF 1 Part 2 should be revisited and amended to support diversions that are necessary to facilitate development and/or where public benefits are delivered if feasible and viable. This change will assist the delivery of development land making the SADPD effective.

- In the application of Part 2 of this Policy, the Council should be mindful that the diversion or stopping up of a public footpath, bridleway or other public road is subject to a separate process to planning. As such, given the associated risk of the planning application process, it will often be the case that this process is not entered into by an Applicant until after a planning application has been granted or there is a resolution to grant planning permission.

- The reference to the diversion of canal towpaths should be removed from criterion 2 as diversion of a canal towpath would not be acceptable in any circumstance.

- Under criterion 4, development proposals should also provide links to canal towpaths where feasible.

Policy INF 2 ‘Public car parks’

Summary of key points:

- The whole issue of traffic safety and parking in Bollington requires serious attention.

Policy INF 3 ‘Highway safety and access’

Summary of key points:

- Add the following requirement: not significantly reduce the safety of road users or pedestrians in the vicinity of and approaches to the development and, wherever possible, they should increase safety. The likely effects on highways and pedestrian safety should be analysed in a report produced by CEC, or where they have a pecuniary interest, by an independent assessor.

- With reference to point 1. vi., add the need for charging points in the town centre locations where residents do not have off-street parking.

- Add new point 3 - provide two car parking spaces per property along with a prohibition of parking on the pavement.
• The whole issue of traffic safety and parking in Bollington requires serious attention. The SADP needs to be seen to be taking account of the recommendations of the Bollington NP as described in policies MA.P1 and MA.P2 with respect to traffic safety and parking.

• INF3 requires strengthening. The planning criteria cited must be mandatory. These are not options. Travel Plans must also be mandatory as part of the justification for development. If they are ineffective permission should be refused. Policy should be amended to spell out what is expected of Travel Plans and reject those that do not show the efficacy of the public transport services.

• The plan contains no policies regarding the provision of electric car charging points on every new development notwithstanding the Governments stated objective to support a shift to electric vehicles over the next 20 years.

• No action has generally been forthcoming for improvements to local traffic routes as a result of new development. If some action is not done congestion and road accidents will ensue and cause social problems in the near future.

Policy INF 4 ‘Manchester Airport’

Summary of key points:

• Development proposals at Manchester Airport should be critically considered instead of ‘usually permitted’.

• The policy does not mention the control of drone activity adjacent to the airport or under the flight paths.

Policy INF 5 ‘Off-airport car parking’

Summary of key points:

• A table of the airport car parks and the lawful off-site car parks should be included in the plan with their approved capacity. In the absence of such, it will not be possible for potential future operators to be able to determine whether demand is met. No evidence is provided to justify the requirement to demonstrate that demand regularly exceeds supply. It is not clear whether monitoring is carried out to be able to assess the position.

• The current Manchester Airport surface access plan aims to provide car parking on site, therefore the delivery of off-airport car parking cannot be in accordance with criterion 2.

• The policy should identify locations / areas of search considered suitable for off-airport car parking.

• The requirements in terms of Green Belt effectively introduce a sequential approach and it is not clear how the council would assess proposals in terms of openness.
• There should be a clear definition of what “forecast to do so in the near future” means.

Policy INF 6 ‘Protection of existing and proposed infrastructure’

Summary of key points:

• Making provision to connect the Poynton Relief Road to safeguarded land LPS 52 and the Woodford Garden Village in Stockport will allow for comprehensive site delivery, help boost economic growth and reduce impact on local communities.

• The Wilmslow – Manchester Airport Bus Rapid Transit Scheme should be added to the list of protected infrastructure – improved connectivity to the airport should be supported to facilitate economic growth and development. Further opportunities should also be explored, such as tram-train links to the airport.

• Manchester Airport should be recognised under this policy as key infrastructure whose operation should not be impaired.

• Without improved infrastructure, any future development in Bollington will damage the health of Bollington residents.

• The proposed site allocations in Bollington will adversely affect the existing infrastructure.

Policy INF 7 ‘Hazardous installations’

Summary of key points:

• No key points raised.

Policy INF 8 ‘Telecommunications infrastructure’

Summary of key points:

• Cheshire East Council, should develop a strategic plan for the siting of infrastructure for future infrastructure requirements. A strategic plan for future telecoms infrastructure is particularly important given the imminent roll out of 5G communications.

• Replace current text “there will be no interference with air traffic services” with “there will be no detrimental impact on air traffic safety”. The Safeguarding Authority for Manchester Airport will assess Telecommunications Infrastructure planning applications and Prior Notification Permitted Development proposals to consider their impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a visual hazard;
interference with communication systems including RADAR systems and ground to air communication by its radio frequency or microwave link path and whether its construction will present any hazard to flight safety."

- INF 8 should contain specific guidelines with respect to the impact of telecommunications infrastructure upon heritage assets. ‘Policy INF 9 ‘Utilities’

**Policy INF 9 ‘Utilities’**

**Summary of key points:**

- Draft Policy INF fails to differentiate between types of development,. The word ‘major’ should be added in paragraph 1.

- With reference to point 2, remove the word ‘generally’ to prevent existing utilities from being impacted.

- Developers seeking to build in rural areas should submit reserved matters applications from the outset in order that fiscal viability can be ascertained BEFORE approval is given.

- Consider the introduction of ‘reserved matters only’ applications in rural areas where Utilities provision is a significant risk to the fiscal viability of the development.

**Policy INF 10 ‘Canals and mooring facilities’**

**Summary of key points:**

- The promotion of a mooring facility serving the Shropshire Union Canal and its associated branches is not possible within the settlement boundaries. It is requested that criteria (i) is removed which requires proposals for permanent moorings to be located in a settlement boundary, or the criteria is amended to allow mooring facilities in the open countryside, where other criteria in the policy are met and there is a need for such facilities.

- Even if there was a suitable location along the Shropshire Union Canal and associated branches, it is unlikely that a mooring/marina use (requiring a large footprint) would be viable within the settlement boundary as higher value uses such as residential development would be favoured especially along canal frontages.

- The policy conflicts with emerging Policy PG 9 which states that within settlement boundaries, development proposals (including change of use) will be supported where they are in keeping with the scale of that settlement." An Infrastructure development (such as permanent mooring facility) is unlikely to be in accordance with PG 9 and may not be suitable within the settlement boundary.
• It would not be practical for development of Site MID 2 to comply with Criterion 1, vi or vii of Policy INF 10 and Criterion 3 of Policy MID 2 which requires the preservation of hedgerows around the site. Criterion i, vi and vii of the policy should be amended as follows:
  o i where possible, seek to provide an active frontage….
  o vi where possible, integrate the waterway, towpath and
  o vii where possible, optimise views to and from the waterway

• It would be helpful if a further clarification paragraph could be added to the Supporting Information text: “Where a site is allocated for development adjacent to the canal network the site specific requirements set out within the relevant policy for that site will take preference over the generic requirements set out in Policy INF 10”.

Chapter 11: Recreation and community facilities (general)

Summary of key points:

• Need reference in policies that Neighbourhood Plans may contain sports facility needs and opportunity assessments

Policy REC 1 ‘Green/open space protection’

Summary of key points:

• Strong support for policy

• Support for policy – suggest addition of explanation regarding the definition of open space – “please see glossary for definition of green and open space”

• Policy should be amended to refer to open space only - not green/open space

• Policy positively written as broadly conforms with objectives within NPPF paragraph 97

• Requested that the open space status of land to the rear of 43 London Road, Poynton is removed as the site has no recreational value, no amenity value and is surplus to open space requirements in Poynton. The site is wholly in private ownership and is not accessible to the general public plus there is sufficient publicly accessible open space within the immediate locality.

• Objection to the designation of land bound by Brook Street, Hollow Lane and Mobberley Road as green/open space – site not designated as Local Green Space; no public views; TPO and conservation area status provide sufficient protection

• First part of policy should be deleted; second part of policy additional criterion recommended regarding community benefits of development (representation made in regard to Dyers Mill pond, Bollington and development proposals)
• Seek amendment to boundary of an open space where part of it is now a car park – area therefore needs to be reduced in size (Barclay’s Bank plc ownership)

• The sports courts at Total Fitness within the LPS33 Allocation should not be shown as protected open space as they are private sports courts

• The Kings School Cricket Pitch at Cumberland Street Macclesfield should remain as a designated open space – considerable information presented concerning the development pressures affecting this site – historic open space in the centre of Macclesfield

• Request for amendment of open space designation at land at Waterworks House, Dingle Lane, Sandbach – extant permission for 12 houses (16/3924C); request that proposals map is amended to exclude the proportion of the site proposed for development

• Suggestion that policy is weak as fails to recognise the identification of green spaces in neighbourhood plans

• Current reference to neighbourhood plans needs further clarification: “Neighbourhood plans will have most likely a greater level of detail on green/open space and designated local green spaces in their area”. (e.g. 2 lapsed football sites mentioned and Knutsford Sport Vision Action Plan)

• Policy should state that where an area of open space has been shown to offer limited or no public benefit, development should be supported subject to compliance with the other policies of the plan

• Land at Goddard Street, Crewe should no longer be designated as open space – proposals for around 74 dwellings being progressed for site (was a sports and social club – closed in 2007) (detail in representation around history of site and development proposals)

• Policy should request more green space

• Open space designation should be removed from two parcels of land at Pownall Park, North of Gorsey Road, Wilmslow (recent permission for 4 dwellings May 2019 LPA ref 19/1067M) (Detail in representation regarding history of two plots)

• No further comments (Sport England)

Policy REC 2 ‘Indoor sport and recreation implementation’

Summary of key points:

• The policy needs to be amended to clearly distinguish between the types of housing development to which the policy requirements would apply
• Policy should be modified so that a contribution is only required if there is an identified deficiency or where development would lead to a deficiency

• Contributions should not be required simply for upkeep/maintenance

• Further clarification is required on the policy’s relationship with CIL payments

• Applicants should be directed to read the sports assessments in the Council Local Plan and where applicable Neighbourhood plans to demonstrate that they are providing the necessary facilities to make their development sustainable.

• Suggested amended wording for 11.7: Where development proposals are of a particularly large scale, or where they would involve the loss of existing indoor sports and recreation facilities, applicants are required to demonstrate how they are providing the required new and or replacement sports and recreation facilities.

• Neighbourhood plans should be referenced for any sports facility assessment evidence

• Particular support for part 2 of the policy regarding contributions and their relationship to nearby facilities

• Include reference to the consideration of the pooling of contributions

Policy REC 3 ‘Green space implementation’

Summary of key points:

• Policy should be amended to refer to open space rather than green space

• The policy needs to be amended to clearly distinguish between the types of housing development to which the policy requirements would apply

• Clarification on what has informed the 20 year term on strategic open space to be transferred to the Council. Typically the maintenance of open space will be undertaken by the developer during the construction phase, with management responsibilities subsequently transferred to a Management Company to maintain the open space for the lifetime of a development. Important that the policy is written in this context.

• Support for clarification of contributions regarding outdoors sport (part 4 of policy)

• Object to requirement that major employment and other non-residential developments provide green space – overly restrictive

• Consider policy to be too inflexible regarding off-site provision
• Wording has failed to adequately draw attention to Neighbourhood plan policies and evidence in relation to sports.

• Support for policy but could be expanded to include the provision of more local green space together with improvement of links

• Support for flexibility of policy particularly in regard to off-site provision

Policy REC 4 ‘Day nurseries’

Summary of key points:

• Reference to outdoor space – proposals will be subject to the environment noise and air pollution polices.

Policy REC 5 ‘Community facilities’

Summary of key points:

• The policy should include reference to the support for continued growth and development of educational facilities within the Green Belt.

• On the whole, every community facility makes a positive contribution. All community facilities should be retained whether they make a positive contribution or not.

Chapter 12: Site allocations (general issues)

Summary of key points:

• A number of sites were submitted. These are reported in the sections for each settlement (principal towns, key service centres and local service centres) and for the other settlements and rural areas.

• Maximising the housing supply requires the widest possible range of sites by size and market location; a sufficient range of sites is needed to provide enough sales outlets to enable delivery to be maintained. Further allocations are needed so that the council can demonstrated and then maintain a deliverable five-year supply of housing land.

• The plan should over-allocate sites to provide flexibility and contingency for instances where sites do not come forward as envisaged.

• Additional smaller sites should be allocated in the principal towns and key service centres to enable different scale and type of housebuilders to develop in these locations and increase the ability to deliver much needed housing. It is considered that the supply is overly-reliant on large sites, which poses delivery risks in the short term. The NPPF requires 10% if housing allocations to be on small sites.
• Smaller sites were not considered through the LPS and therefore further allocations of smaller sites should be made in principal towns and key service centres.

• Further site allocations are required to provide flexibility in the event that HS2 is committed to come to Crewe by 2027.

• Where site allocations require a buffer to a watercourse, this should be clarified to state that it is a minimum 8 metre buffer zone measured from bank top. The buffer zone should preferably be free of all forms of development and function as a beneficial green infrastructure asset (site conditions permitting). Where developments propose the inclusion of built development within an 8-metre buffer zone e.g. a footway, consideration will need to be given to whether the inclusion is appropriate and/or acceptable on a case by case basis.

• Where ground investigations are stated as a requirement reference should be made that the appropriate level of ground investigation must be undertaken and where required that a remediation strategy is devised and implemented.

• Developers of greenfield sites should contact United Utilities at the earliest opportunity to discuss options regarding water supply and sewerage infrastructure networks.

• Development on brownfield sites should reduce surface water flow to the combined sewer network by discharging surface water to more sustainable options, such as a watercourse.

• Additional site allocations should be made to support the delivery of self-build and custom-build housing.

• Site allocations for C2 older persons accommodation are required.

• The LPS committed the SADPD to making site allocations in the other settlements and rural areas but not allocations are proposed.

• Site allocations are required in the other settlements and rural areas to enable the delivery of affordable housing.

• The council must be more ambitious about brownfield land regeneration to prevent unnecessary greenfield development.

• Each site allocation policy should require that development proposals ‘Include surface level sustainable drainage for the management of surface water which has multifunctional benefits. The expectation will be that only foul flows communicate with the public sewerage system’.

• New proposed development site allocations are not considered to be of a significant scale at an individual level and the geographic location of these sites throughout the authority area is unlikely to have the potential to generate noticeable increase in traffic impacts at the Strategic Road Network. However,
there is a need for growth proposals set out within the LPS and SADPD to be understood at a cumulative level to establish associated highway impacts at the Strategic Road Network.

Crewe (general issues)

Summary of key points:

- Several sites submitted for consideration:
  - Land south of Bradley Hall Farm, Crewe (housing)
  - Land to the rear of Hunters Lodge Hotel, Crewe (housing)
  - West Crewe Sustainable Urban Extension (housing)
  - Land north of Cheerbrook Road, Willaston (housing)
  - Land north of Sydney Road, Crewe (housing)
  - Land at Newcastle Road, Willaston (roadside facilities/ employment uses)
  - Land at Cattle Arch Farm, Maw Green Road (housing)
  - Land south of Park Road, Willaston (housing)
  - Land off Moss Lane, Bradfield Green (housing)
  - Land at Goddard Street, Crewe (housing)
  - Land north of Old Newcastle Road, Willaston (housing).

- Housing supply in Crewe is reliant on large scale sites allocated in the Local Plan Strategy. The SADPD does not allocate any further sites within the town. There is a risk that these sites will not come forward in the short term. Greater choice and flexibility is required in terms of size and location to provide certainty that the housing requirement will be met.

- Insufficient land has been allocated around Crewe to reflect settlement’s position at the top of the settlement hierarchy.

- The housing figures set out within the adopted and emerging policies are a minimum.

- The identification of further land for new homes will help to support the Councils economic growth and regeneration aspirations for the settlement – including the ‘All Change for Crewe’ and High Growth City regeneration initiatives. Crewe town centre has been identified as a focus for regeneration.

- Benefits from HS2 should be maximised.

- Homes provided within the Crewe Hub Area Action Plan Area would not meet the needs of all of the existing population of Crewe and those who will be attracted to the area, as a result of the HS2 station development. The Council will need to consider other options to ensure that enough land is made available around Crewe to support its sustainable growth and to meet development requirements.

- While there is no need for the allocation of additional employment sites, two further employment sites are proposed in the SADPD. The allocation of
additional housing sites would help to support this local investment by providing new homes for the additional workforce generated by these proposals

- The Council will be required to undertake a review of the LPS by 2022 to consider whether it needs to be updated. In advance of the Local Plan review, the Council should be identifying opportunities for development around Crewe so that it can take full advantage of capturing growth around the town. These can then be factored into a review of the Plan and can start coming forward in time for the arrival of HS2 services.

- An assessment should be carried out of the need for roadside facilities.

- The proposed settlement boundary does not utilise existing physical features to form logical rounding.

Site CRE 1 ‘Land at Bentley Motors’

Summary of key points:

- The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

Site CRE 2 ‘Land off Gresty Road’

Summary of key points:

- The Gresty Brook corridor is an important ecological network known to support protected species. Any new development should be supported by an ecological assessment, which complies with industry good practice/guidance, and ensure key ecological receptor and current WFD failing waterbody (Wistaston Brook) is positively integrated into any future riparian development.

- The site promoter has raised a number of issues with regards to the wording of the policy. These include:
  
  o The only route for foul drainage route is through the area of woodland which the policy seeks to maintain. The criteria should be revised to allow for additional flexibility to ensure that drainage can be delivered;
  o The policy requirement to have regard to the setting of Yew Tree Farm, a non-designated heritage asset is not required and should be deleted;
  o The area of the 8 metre undeveloped buffer zone adjacent to Gresty Brook may be required for a SuDS scheme so additional flexibility is requested in the policy wording;
  o There are limited opportunities to improve walking and cycling routes. Gresty Road is narrow and includes a footway on the opposite side of the road to the proposed site access.
  o Alternative wording is suggested.
• The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

Macclesfield (general issues)

Summary of key points:

• Promotion of 2.2ha of land (in the green belt) at the Tytherington Club for residential development – land could be allocated in preference to the proposed housing sites identified in the Draft Plan; or some or all of it could be allocated if upon examination not all the committed, allocated or proposed sites come forward

• Churchill Way car park in Macclesfield Town Centre should be allocated for mixed use development (if not site will remain as previously developed land within Macclesfield Town Centre but outside the Primary Shopping Area and without any formal allocation).

• Welcome amended boundary for the designated employment site: Hurdsfield Industrial estate; this area (land north of Black Lane, Macclesfield) that is no longer part of the employment area should be designated as a local centre along with the adjacent Tesco site – due to the forthcoming retail plans for the Black Lane site (LPS ref 19/3439M)

• Land at Lark Hall, Macclesfield should be released from the Green Belt to deliver a small development of up to 50 homes (detailed reports attached supporting green belt release in addition to sites proposed in the SADPD)

• Land at Macclesfield Rugby Club, Priory Lane, Macclesfield should be allocated for development (previous application refused Feb 2018 for 76 dwellings to fund replacement facilities – LPS ref 16/6237M) (detailed supporting information regarding housing supply and site specific details regarding the Rugby Club); allocate whole site – residential development at frontage and rugby club at rear or just the areas proposed for residential development; site could be removed from the Green Belt

• Land to east of Pexhill Road, Macclesfield (3Ha) part of safeguarded land LPS19 – additional land needed so this site could be brought forward now within the plan period – could deliver 70 dwellings (detailed information regarding housing supply and details of site)

• Large strategic sites in Macclesfield could have delivery issues; land at Gawsworth Road, Macclesfield within LPS19 Safeguarded Land could be brought forward now for delivery to assist with housing numbers

• Removal of new Kings School Site at Fallibroome Farm and Derby Fields Facilities from the Green belt or inclusion of a specific site policy to allow the school to undertake work relating to its specific operation as a school without having to demonstrate special circumstances for each proposal
• Land south of Blakelow Road – amended green belt boundary proposed in this area (raised under PG 9)

• The area of Protected Open Space between LPS 17 and the Macclesfield Canal should be covered by the Green Belt notation, and the Green Belt boundary be realigned to the boundary built up section of LPS 17, the Gaw End Lane Strategic Housing Site. (Logged under PG 11)

• Support Lyme Green Settlement being shown as outside the settlement boundary. (Logged under PG 11)

**Alsager (general issues)**

**Summary of key points:**

• Several sites put forward for consideration:
  
  o Heath End Farm, Alsager (CFS 380, FDR 2737, PBD2412), greenfield, 300 dwellings.
  o Linley Lane, Alsager (CFS 218, PBD1639), greenfield, Green Belt
  o Land off Linley Lane, Alsager (CFS 295, PBD1478), greenfield, Green Belt, 230 dwellings
  o Land at Close Lane, Alsager (PBD1144), 34ha, greenfield (new site for residential), 1,020 dwellings at 30 dph
  o Land to the east of The Plough, Alsager (CFS 408,PBD1253), greenfield, 50 dwellings
  o Land at Manor Farm, off Dunnocksfold Rd, Alsager (FDR 1338, PBD886), greenfield, 40ha
  o Land off Fanny’s Croft, Alsager (CFS 406, FDR2800, PBD250), greenfield, Green Belt
  o Land at Radway Green (PBD1109), existing employment land, 10.4ha

• The housing supply, alongside proposed allocations, is not considered to meet Objectively Assessed Needs.

• The supply is too reliant on the delivery of large scale housing sites which poses deliverability risks particularly in the short term; there is insufficient flexibility.

• The balance of 0 dwellings gives little leeway in making sure that housing needs are met in the short term; some of the commitments or allocations may not come forward as expected.

• The plan does not accord with Paragraph 68 of the NPPF, which stipulates that small and medium sized sites make an important contribution to meeting the housing requirements of an area.

• There is a heavy reliance on existing planning permissions for housing in Alsager and for these to be implemented and brought forward.
The Alsager Settlement Report [PUB 22] does not explain why it has not brought forward the only site being proposed for employment allocation, which was not sifted out, which is counter to Paragraph 5 of the Site Selection Methodology Report [PUB 07].

The employment land requirements for Alsager have not been met.

The site size for the employment land for CFS 406/FDR2800 in Table Alsager 8 of [PUB 22] is incorrect - it should be 2.38 hectares (net: the wider site is 5.65 hectares).

**Congleton (general issues)**

**Summary of key points:**

- Changes are requested to the development guidelines for sites LPS27 and LPS29 in the Local Plan Strategy including
  - Regard to the inter-connectivity of sites which are of ecological, landscape or amenity importance.
  - That the strategic proposals should clearly state the importance of an integrated network of footpaths, cycle ways and bridleways.
  - The SADPD should:
    - a) Facilitate far stronger links between identified areas of ecological and wildlife importance, for the Dane Valley and Westlow Mere
    - b) Identify a clear desire to promote a comprehensive and integrated network of rights or way and public access areas
    - c) Promote the concept of protective ‘buffers’ of land between key areas
    - d) Expectation that any link between Sites LPS27 and LPS29 should be made explicit in the SADPD proposals.
    - e) Pedestrian / cycleway linkage rather than vehicular access onto Giantswood Lane
    - f) Provide guidance for community uses on LPS 29 including - the provision of the new school and associated localised retailing should be made in an accessible location capable of serving adjacent developments. Contributions should be made to health infrastructure.

- The Council is dependent on several large-scale sites and the delivery of the Congleton Link Road to deliver the majority of housing in Congleton which poses deliverability risks particularly in the short term.

- As set out within National Planning Policy (NPPF), plans should be sufficiently flexible to adapt to rapid change (paragraph 11a). As drafted, the Plan does not provide this flexibility through limiting housing numbers within Congleton. Planned housing trajectories should be realistic, accounting for and responding to lapse rates, lead-in times and sensible build rates. To enable this, the approach of allocating more sites rather than less should be taken.
Site promoted at:-
  o Belbro Farm, Congleton
  o Macclesfield Road, Congleton
  o Sandbach Road, Congleton
  o Waggs Road, Congleton
  o Land off Chelford Road, Somerford

Site promoted at:--Land at Viking Way / Barn Road (3 separate site submissions)

Not enough employment land being directed to Congleton

Concerned over the perceived shortfall in playing field provision within the town to cater for its existing and future population

Site CNG 1 ‘Land off Alexandria Way’

Summary of key points:

- The SADPD is unsound because the supporting policy map does not contain 2019 Local Wildlife Site spatial data and is therefore out of date.

- The following spatial environmental policies will apply: Ecological network (core area, restoration zone) ENV 1. To ensure that the plan is sound it is essential policies ENV1 and ENV2 are implemented together, therefore the following should be acknowledged: “Development at this site will require increasing the size of core areas and the quality and quantity of existing or new priority habitat. Impacts to any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric”

Handforth (general issues)

Summary of key points:

- Two sites were submitted (references refer to the site’s reference in the Handforth Settlement Report [PUB 31]):
  o Knowle House (CFS349); and
  o Dean Dale Farm (CFS395).

- There is a remaining requirement of 63 dwellings in Handforth, which is calculated on the basis of the needs of that settlement and should be met despite over-delivery on other areas. The North Cheshire Growth Village will not deliver quickly and housing delivery may be less than 1,500 units as the proposed densities are high. Handforth should not be reliant on neighbouring settlements to deliver its housing needs.

Knutsford (general issues)

Summary of key points:
• The failure to allocate any additional sites within and around Knutsford will mean requirements of Knutsford will not be sufficiently met.

• Allocate land to the west of Toft Road, Knutsford for residential and/or C2 development

• Allocate land at Moorside Car Park. The site is around 0.27ha in area and is being promoted for employment use. Smaller sites should also be safeguarded for development beyond 2030

Middlewich (general issues)

Summary of key points:

• Several sites submitted for consideration:
  o Land adjacent to Watersmeet, Nantwich Road, (housing)
  o Land at Tetton Lane (housing)
  o Cledford Lagoon (mixed use development/ safeguarded land)
  o British Salt site, Booth Lane (employment);
  o Centurion Way (housing)
  o Land to the east and west of Croxton Lane.

• The Middlewich Settlement Report [PUB 36] acknowledges that there is a remaining requirement for the provision of 300 dwellings over the remaining Plan period. The SADPD only allocates three small/medium sized sites to deliver 210 homes and as such, there is a shortfall in provision.

• There is a shortfall of housing sites and this will impact on five-year deliverable housing land supply in Middlewich.

• Housing supply is reliant on the delivery of two large scale housing sites which will not be delivered in the short term.

• Greater choice and flexibility is required in terms of size and location of housing sites to provide sufficient certainty that the housing requirement will be met.

• Additional sites are proposed within the open countryside, above and beyond sites allocated in the LPS and these proposals are not sound.

• Concerns raised over the site assessment for ‘Land adjacent to Watersmeet, Nantwich Road’ (FDR860) including:
  o Evidence submitted shows that the site access is suitable for up to 4 dwellings. The site has been inaccurately appraised;
  o The net developable area lies within Flood Zone 1 only;
  o Ecology is identified as a potential constraint; however the area is an unused area of open grassland that is not suitable for agricultural purposes and it is divorced from the network of fields to the west by the River Wheelock;
The site is assessed as being on the edge of the settlement but this does not acknowledge Watersmeet and the presence of residential housing estates to the north, east and south. The site has a strong western and northern boundary with a bank of mature trees. The River Wheelock beyond that makes for a more defined and permanent settlement boundary.

Heritage concerns are raised in relation to Grade II Aqueducts over the River Wheelock and Nantwich Road but this fails to consider that there are residential properties closer to both listed structures and the Canal than new residential houses would be on the site. Additional landscaping buffers could be provided around the periphery and new housing would not have any greater impact upon the listed assets than existing residential built form. The Council has identified harm could be substantial but they have not produced a credible assessment of the harm they have identified despite undertaking a Heritage Impact Assessment of other sites within their supporting reports (PUB 48a & 48b).

- Land at 'Watersmeet, Nantwich Road' could be delivered as self-build plots to assist Cheshire East Council in addressing their recognised issues with housing delivery in Middlewich in the short term.

- Land at Tetton Lane, Middlewich is a suitable, sustainable and deliverable site that can come forwards for housing in the short term.

- Land at Cledford Lagoon should be allocated for residential led- mixed use development or safeguarded land during the later stages of the plan period.

**Site MID 1 ‘Land off St. Ann’s Road’**

**Summary of key points:**

- Site MID 1 is in a sustainable central location, but the development would result in the loss of some older properties. The mature trees on site are of character and environmental value and should be protected. Planning permission had been obtained for this site.

- The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

**Site MID 2 ‘East and west of Croxton Lane’**

**Summary of key points:**

- Loss of high grade agricultural land (Best and Most Versatile, Grade 1).

- The site is bounded by an existing housing development and by the canal so there is a logical boundary.
• Development of the site should also embody the requirements of policy INF10 and the policy should be expanded to include this reference. The site is on the towpath side of the canal and this should be considered as part of the public realm for the development with pedestrian access provided to the towpath. The development of the site should consider opportunities for surface water drainage to the canal. Paragraph 12.46 should be expanded so that the canal is considered as a receptor for contamination. Paragraph 12.47 should be expanded to consider opportunities for surface water drainage to the canal.

• The site promoter confirms the intention to lodge a detailed planning application with the Council for this site and that if allocated, the site will be delivered in full within 5 years. Concerns are raised in relation to the soundness of criteria 4 of the policy which requires improvements to the surface of canal towpath to encourage its use as a traffic-free route for pedestrians and cyclists between the site and town centre. There is no direct access to the canal from either parcel of land. The towpath is accessible from Croxton Lane (by the side of Bridge Number 172) and it runs a short distance from the northern boundary of both parcels of land. There is no evidence regarding what is wrong with the existing towpath, nor the stretch of towpath being referred to, what works are required and what are the associated costs and what proportion of the costs the proposed development is expected to fund. Any requirements set out in the Council’s Infrastructure Delivery Plan (IDP) (July 2016 Up-Date) do not relate to an improvement between Site MID 2 (which lies at the northern point of the settlement) and the town centre. Towpath improvements are covered by Column 1 of the Council’s adopted CIL Charging Schedule (Regulation 123 list). A financial contribution via a S106 agreement would not meet the various tests, namely that it is not necessary to make the development acceptable in planning terms, it is not directly related to the development and it would not be fairly and reasonably related in scale and kind.

• The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

Site MID 3 ‘Centurion Way’

Summary of key points:

• The site promoter confirms that the site is suitable, available and achievable for housing development. The site has potential to form part of wider residential or mixed-use development in the future should housing requirements change. Any comprehensive landscaping required by the policy should not have the effect of preventing the effective integration of the site with any future adjacent development, which would be contrary to the achievement of a sustainable urban form. Policy wording changes are requested.

• Encroachment into the open countryside. Lack of defensible boundaries which could lead to further speculative housing on adjacent land in the future.
• Pedestrian access to the town centre is along a very busy road (main road to the M6). Extra traffic on this road is not desirable as the situation is already grave.

• The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

Nantwich (general issues)

Summary of key points:

• As the Local Plan Part Two does not allocate any small sites for development they cannot contribute to meeting and exceeding housing delivery within Nantwich. This policy is therefore not consistent with NPPF or positively prepared to boost housing. Broad Lane, Nantwich can greatly assist with the delivery of housing numbers within the first 5 years of the adopted Plan. The only allocated site within the settlement is a large strategic site which raises deliverability issues which could significantly impede housing delivery over the short to medium term. Therefore, the overall scale of housing growth particularly on smaller sites, should be increased so an adequate degree of flexibility can be applied to ensure the SADPD plans positively for growth. Broad Lane, Nantwich represents a suitable and sustainable site which can be delivered in the short term and should therefore be allocated for housing.

• Land at Audlem Road, Nantwich (Sites 204 PUB45). The reserved matters application for 33 dwellings was approved in February 2015 (LPA ref: 14/4588N). A further outline application to the south, 15/3868N for up to 104 dwellings (Use Class C3) and land for the expansion of Brine Leas School (Use Class D1) was dismissed at appeal in 2016 on access grounds. The site promoter considers that this can be overcome through the approved access or via an alternative as the junction for the approved development is operational and site 204 is an appropriate site for allocation to address the shortfall in the Nantwich area due to the lack of delivery on Kingsley Fields. A second parcel of land off Audlem Road (Ref 207) is also submitted for consideration which when combined with the above site would form a logical extension to Nantwich. It is noted that both Sites 204 and 207 were not sifted out at the Stages 1 and 2 and therefore are ideally placed to meet development needs.

• Concern that the plan needs to provide sufficient land and flexibility to meet the identified development needs of the borough. The proposed settlement boundaries (PG9) and Chapter 12 require amendment due to housing land supply issues.

• The additional land to the south of Nantwich between Peter Destapleigh Way and Broad Lane is available, suitable and achievable should the Council need to look again at any of its proposed allocations as a result of the discussion at the Examination.
**Poynton (general issues)**

**Summary of key points:**

- Several sites put forward for consideration:
  - Land at Lower Park, Poynton (CFS 639, PBD2548) (2.99ha), greenfield, Green Belt, 10-50 dwellings
  - Land east of Waterloo Road, Poynton (CFS 418, PBD2250), greenfield, Green Belt, 150 dwellings and country park
  - Land at Towers Road, Poynton (CFS 51, PBD1192), greenfield, Green Belt, 30 dwellings

- The LPS sites in Poynton are not delivering the scale of housing they were allocated for.

- There is reference to, and reliance on the delivery of significant number of dwellings in Poynton on windfall sites; this approach has not been sufficiently justified.

- The SADPD sites are unlikely to deliver the scale of housing suggested.

- The need for an additional 200 dwellings has not been proven.

- All development sites identified in Poynton need to be held back and re-assessed against the Section 19 Flood Investigation Report.

**Site PYT 1 ‘Poynton Sports Club’**

**Summary of key points:**

- Delivery of the site for housing and a replacement site in the Green Belt carries risk. There is no guarantee that the replacement site would be able to provide the type and scale of facilities needed.

- Recreational and amenity space would be lost.

- There is insufficient justification that replacement playing fields or recreational facilities will be delivered.

- There is insufficient supporting evidence to demonstrate that the proposed allocation will be delivered.

- The 10m buffer does not take into account site specifics and does not make best use of the land.

- The site should be extended to include the woodland belt on the north and eastern boundary to enable that area to be subject to overdue management and future maintenance.
• Alter the policy criterion to: 'An Arboricultural Implications Report is required to be submitted with a planning application to demonstrate minimise and mitigate impact on the trees to the north and eastern boundary'.

• In Policy PYT 1, point 3, the relocation site at PYT2 should be identified as the relocation site.

• This site was affected by fluvial flooding (from non-main ordinary watercourse) during the summer floods. It's shown on the Environment Agency's Flood Maps however, as being within Flood Zone 1.

• Concern regarding pollution, traffic and its cumulative impact.

• The site is a heritage asset and a restrictive covenant is in place.

• Any decision about this site should be curtailed until the results of the Flood Investigation Report have been published and any necessary remedial action carried out.

• The number of dwellings on the site should be restricted to a minimum.

• A Flood Risk assessment with necessary resolution should be added to the proposal.

• A condition should be added to the proposal to ensure that the development does not give rise to increased delays and added congestion at the centre of Poynton. A traffic impact assessment needs to be added to the proposal.

• Condition 5 is unclear and requires clarification with regards to meaning and implication

• Mention or provision for residents living nearby on noise and other effects of ongoing construction on the site should be added to the proposal.

• The development proposal should require that existing woodland and hedges are to be retained as part of the site development.

• The development proposal should require replacement greenspace/open space to be made available for the benefit of Poynton residents to replace that lost to the development.

• The necessity to relocate Poynton Sports club has not been demonstrated or proven.

• The SADPD should evidence prior to the adoption of the site the brownfield sites that have been considered and the reasons why they have not been deemed suitable for development.

Site PYT 2 ‘Land north of Glastonbury Drive’

Summary of key points:
• Delivery of the site for housing and a replacement site in the Green Belt carries risk. There is no guarantee that the replacement site would be able to provide the type and scale of facilities needed.

• There is insufficient supporting evidence to demonstrate that the proposed allocation will be delivered.

• Exceptional circumstances to release Green Belt land for sport and recreation have not been demonstrated.

• CEC have not demonstrated or evidenced that it has examined fully all other options for the provision of outdoor sport and recreation. It has not evidenced its methodology for selection.

• The need for a flood assessment must be added to the proposal.

• Reference to a Grampian condition should be added to the policy wording covering the relocation and redevelopment of the sports facilities.

• The 8m wide buffer should be measured from bank top and be increased to 15m to protect the wildlife corridor.

• Any new riparian development adjoining Poynton Brook needs to ensure main ecological network and ecological receptor of site is actively protected and where feasible enhanced.

• There has been flooding off Glastonbury Drive where the Poynton Sports Club is proposing to move to.

• Impacts to the riparian zone and any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric in order to achieve biodiversity Net Gain.

• A number of policies and conditions would need to be met to allow sport and recreation on this site and this must be made clear.

• It should be explained why the site will remain in the Green Belt.

• It needs to be clarified whether PYT 2 will be made available for sport and recreation development anyway and independent of being linked to site PYT 1.

• The building cannot be treated in isolation in the open countryside and cannot fulfil LPS Policy PG 3, criteria 3 ii.

• Any structure should be limited to a single storey with turf roofs and any entrance is as close to London Road North as possible.

• The statement that the area is vulnerable to erosion of its open character is not justified and must be removed.
Site PYT 3 ‘Land at Poynton High School’

Summary of key points:

- The delivery of a housing site that involves a strip of land from the playing field carries risk; whilst a 3G pitch is identified it may not deliver the needs for a range of sports, solely football.

- Allocation of the site amounts to the loss of a strip of functional playing field land giving rise to a statutory objection to dispose of for non-sport uses, unless the playing field lost is replaced or otherwise justified against sport England policy and NPPF para 97.

- It impacts on several existing pitches and would cause a net loss of pitches on this site, possibly greater in number than the strip taken for development.

- No justification has been given that these pitches are surplus to requirements and no details have been provided of where this lost playing field could be replaced.

- It is assumed that any replacement would be likely to be divorced from the school site.

- Recreational and amenity space would be lost and there is insufficient justification that replacement playing fields or recreational facilities will be delivered.

- The water main easement and gravity sewer will affect the deliverability of the site, and it is unclear if development of this scale would be viable.

- Further evidence is required to demonstrate that a suitable access can be achieved.

- It has not been demonstrated 25 units can be achieved with on site open space/affordable housing policy requirements on the land.

- It has not been demonstrated that the sale would fund the 3G pitch or that it is viable.

- It has not been demonstrated that the loss of the playing fields can be adequately compensated for to meet national, local and Sport England's policy requirements in relation to the loss of playing fields.

- 25 dwellings would only be achievable in a high-density development which may be seen to be out of character with the local area.

- Vehicular access to and from the site and impact on Dickens Lane traffic flows has not been considered; a traffic impact assessment needs to be added.

- The site needs to be assessed for possible flooding as part of the wider Flood Risk Investigation.
• The allocation is not consistent with a strategy to address the shortfall of sports facilities.

• If the school expands, it might not be able to properly meet the future sports needs of its pupils.

• The field is heavily used, including a children’s football camp through the Leisure Centre, where direct access is crucial.

• The existing access point off Dickens Lane is far superior for emergency access for the playing fields, being directly off a main road.

• Concern with regards to the increased risk of road traffic collisions along Dickens Lane.

Site PYT 4 ‘Former Vernon Infants School’

Summary of key points:

• Developing the site of the former school buildings along with a strip of playing field could have a prejudicial impact on the playing field; replacing such a strip of playing field elsewhere may not be sufficient on its own

• There is no certainty of any likely lack of direct or prejudicial impact on the playing field and therefore developing this site is likely to carry a potential objection from Sport England.

• The proposal requires playing fields to be lost, with no proposal to deal with the planning policy and Sport England's requirement that must be met to allow such loss of playing facilities on land in the owner's control.

• The impact of the culvert on the development of the site requires investigation, particularly as to whether the target of 50 units on the site would be achievable.

• Concerns over the delivery of the site regarding replacement provision and no details are provided as to whether an alternative location has been found or if Sport England has agreed to the proposals.

• Redevelopment of this site would result in a very high-density scheme, which is not in keeping with the surrounding area.

• The policy should make reference to the delivery of retirement homes, if this is the intention.

• The loss of playing field from the site has not been justified; the impact of this loss has not been quantified.

• The site needs to be assessed for possible flooding as part of the wider Flood Risk Investigation that is taking place.
Sandbach (general issues)

Summary of key points:

- There does not appear to be any trail to suggest that these responses have been considered or amendments made in relation to the settlement boundary/open countryside around the Zan Industrial Park in Wheelock. (FDR2935)

- The housing supply, alongside proposed allocations, is not considered to meet Objectively Assessed Needs.

- The supply is too reliant on the delivery of large scale housing sites which poses deliverability risks particularly in the short term. LPS53 is unable to deliver the full 450 dwellings to meet Sandbach requirements. Therefore the overall scale of housing growth particularly on small sites should be increased so an adequate degree of flexibility can be applied. Land north of Wright Lane, Sandbach forms part of LPS53 and can deliver housing in two phases with phase 1 delivering circa 25 units with the remainder of the site delivering additional units as part of the second phase. Alternatively, the site could be included as an individual housing allocation given that it can be delivered independently of the wider Strategic Site LPS53.

- Additional sites are needed to meet the overall housing requirement; ensure the Council can demonstrate and maintain a five year supply of housing land; to ensure the SADPD is consistent with the LPS; and to provide flexibility in the event that HS2 is committed to come to Crewe by 2030.

- Several sites put forward for consideration in Sandbach:
  - Land to the rear of Twemlow Avenue and Marlborough Drive (FDR2097, CFS129) for residential development
  - Land south of Old Mill Road, Sandbach (FDR2262, CFS305) for mixed use development
  - Land at the Hill, Sandbach (FDR2183A, FDR2183A, FDR2183B, FDR2183C, FDR2183D, CFS304) for residential development
  - Land to the rear of Park Lane and Crewe Road, Sandbach (FDR 2835, CFS 537) for residential and/or C2 development
  - Land at Hind Road, Sandbach for self and custom build housing (new site)
  - Land off Belmont Avenue, Sandbach for self and custom build housing (new site)

- The Albion works should be included within the settlement boundary for Sandbach (CFS419)

Wilmslow (general issues)

Summary of key points:
• Three sites were submitted (references refer to the site’s reference in the Wilmslow Settlement Report [PUB 43]):
  o Land west of Rotherwood Road (CFS194);
  o Land east of Rotherwood Road (CFS87); and
  o Land at Mobberley Road and Sandy Lane (CFS49).

• The forecasted and completed allocations may not fulfil the required need in Wilmslow and further sites should be allocated.

**Alderley Edge (general issues)**

**Summary of key points:**

• Six sites were submitted (references refer to the site’s reference in the Alderley Edge Settlement Report [PUB 21]):
  o Land to the west of Heyes Lane (CFS366);
  o Land to the east of Heyes Lane (CFS370);
  o Whitehall Meadow (CFS405);
  o Land to the west of Congleton Road (CFS359/400);
  o Land at Mayfield (FDR2831); and
  o Land at Ryleys Farm, north of Chelford Road (CFS404 Plot 1)

• Further site allocations are required in Alderley Edge to make sure its development requirement will be delivered, to account for the shortfall in dwellings and for flexibility.

• It is considered doubtful that the delivery of the County Hotel site is viable over the plan period.

• There are no exceptional circumstances for the release of Green Belt land.

• No sites should be built on as Alderley Edge is unusual in having in-commuting for work.

• The site promoter of land at Whitehall Meadow considers the site to be more suitable than the proposed allocations for Alderley Edge and considers the site should be allocated for up to 50 dwellings and a local car park.

• The site promoter of land at Mayfield considers that it is no longer necessary to keep this land permanently open and the site should be removed from the Green Belt and included within the settlement boundary.

• The site promoter of land to the west of Congleton Road considers that the council’s Green Belt Assessment overstates the contribution that the land makes to the purposes of Green Belt; and considers that development of the site would only have a negligible impact on the adjacent conservation area. The site should be allocated for residential development.
The site promoter of land to the west of Heyes Lane considers that the council’s Green Belt Assessment overstates the contribution that the land makes to the purposes of Green Belt. It is suitable for development and should be allocated for housing.

The site promoter of land to the east of Heyes Lane considers that the council’s Green Belt Assessment overstates the contribution that the land makes to the purposes of Green Belt. The traffic light assessment should reflect that an access point could be created; landscape impacts could be mitigated. The site should be allocated for residential development.

**Site ALD 1 ‘Land adjacent to Jenny Heyes’**

**Summary of key points:**

- It is considered that the site is remote from existing transport and social infrastructure.
- The site has potential flood risk constraints which means there may be viability issues; reduced quantum of development. Insufficient evidence on flooding issues is presented.
- There is little or no opportunity to deliver affordable housing.
- There is no certainty that a suitable access with appropriate visibility could be provided.
- It is doubtful that suitable pedestrian access or safe crossing point could be provided.
- Mature tree planting would need to be removed and the opportunity to provide replacement planting is limited.
- The size if the site limits the opportunity to provide complementary open space.
- The site is considered to be an illogical extension to the settlement boundary as it only adjoins the existing settlement on one side.
- The site is outside of Alderley Edge parish and the Alderley Edge Neighbourhood Plan area.
- The site makes a ‘major contribution’ to Green Belt purposes in the Green Belt Assessment Update but the council has now re-classified it as only making a ‘contribution’.
- The site should provide minimum 8m undeveloped semi-natural buffer to Whitehall Brook, but preferably larger where feasible. Development should positively integrate with the watercourse.
The site promoter has confirmed that initial highways and flood risk work demonstrates that there are no technical constraints to development and the site could accommodate around 10 dwellings as envisaged.

**Site ALD 2 ‘Ryleys Farm, north of Chelford Road’**

**Summary of key points:**

- It is considered that the site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.
- The boundaries are not well-contained leading to further potential encroachment into the open countryside.
- There are no proposals to provide any public car parking within the site.
- The site promoter considers that additional land should be released from the Green Belt because the current proposed boundaries are not robust and a larger site would allow delivery of 75 dwellings alongside other benefits. Alternatively, even more land could be allocated to enable delivery of up to 100 dwellings to help meet any identified shortfall within Alderley Edge.
- The site policy should require proposals to include additional compensatory measures to offset the impacts of removing land from the Green Belt.
- Given the current Green Belt designation, development should be required to achieve a reduction in energy use compared to standard new build construction.
- Development should provide for a minimum of 30% affordable dwellings.
- The site should be required to accommodate a sports pitch and a car park to support the village’s needs and community benefits.
- The site should provide a cycle access to the bypass and screening / landscaping from existing dwellings and infrastructure.
- An additional policy requirement should be added to require development to be in accordance with the Cheshire East heritage impact assessment document including the specific mitigation/enhancement measures for the site.

**Safeguarded land ALD 3 ‘Ryleys Farm (safeguarded)’**

**Summary of key points:**

- It is considered that the site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.
- The boundaries are not well-contained leading to further potential encroachment into the open countryside.
• There are no proposals to provide any public car parking within the site.

• The site promoter considers that the boundaries of the safeguarded land should be amended to allow the provision of a larger allocation on the adjacent site ALD 2 and to ensure that a strong permanent defensible boundary defines the northern boundary of the safeguarded land.

• The site should be required to deliver cycle access to the bypass and protective green screening and landscaping between it and existing housing and infrastructure when it is developed.

**Safeguarded land ALD 4 ‘Land north of Beech Road’**

**Summary of key points:**

• It is considered that the site is remote from existing transport and social infrastructure.

• The site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.

• The boundaries are not well-contained leading to further potential encroachment into the open countryside. The policy requirement to create a physical feature is not adequate given the important role of Green Belt in this location.

• The site is located in much closer proximity to Wilmslow, with a separation distance of only 380m. The Green Belt gap has already been reduced following removal of the Royal London site to the south of Wilmslow and removal of this site would narrow the gap further.

• There are no proposals to provide any public car parking within the site.

• The Green Belt Assessment Update considers the area to make a ‘major contribution’ to the purposes of Green Belt but this has now been downgraded to ‘significant contribution’. It is considered that the site makes a ‘major contribution’ to the purposes of Green Belt.

• No evidence is provided to demonstrate how the appropriate flood risk mitigation and compensation could be provided and no Environment Agency response is provided to indicate that the use of the site for residential development would be acceptable.

• The site is 2.9 ha and could accommodate 35 dwellings; therefore development density is 12 dwellings per hectare. Development should make efficient use of land and release of the land from the Green Belt cannot be justified when its development potential is so poor.

• It is not clear how appropriate design and landscaping could mitigate the impact on settlement character and urban form when the site only adjoins the settlement on one side.
• The site policy should require proposals to include additional compensatory measures to offset the impacts of removing land from the Green Belt.

• Given the current Green Belt designation, development should be required to achieve a reduction in energy use compared to standard new build construction.

• Development should provide for a minimum of 30% affordable dwellings.

• Pedestrian route improvements would be required along Davey Lane to support the additional residents in the area.

• The access roads are small, narrow and already unfit for purpose; this proposal will put too many cars on the roads and extra traffic will be a danger to children.

**Audlem (general issues)**

**Summary of key points:**

• Audlem Parish Council broadly supports the proposals and welcomes the withdrawal of the proposed footpath along Little Heath Green towards Audlem.

**Site AUD 1 ‘Land South of Birds Nest’**

**Summary of key points:**

• Support the proposed housing allocation. The site is suitable, deliverable, achievable and available for development. Criterion 2 requires a ‘suitable pedestrian and vehicular access in to the site from Audlem Road’. A new pedestrian route has already been provided on the other side of the road, running alongside the Anwyl development. It is therefore suggested that the policy wording be amended to ‘a new pedestrian crossing to be provided to the site’.

• Site south of AUD 1 (East View CFS 570) should also be considered for residential allocation.

**Bollington (general issues)**

**Summary of key points:**

• Exceptional circumstances to release green belt have not been demonstrated (and do not exist); Cheshire East’s approach unsound and in legal error (view supported by legal opinion obtained by Bollington Town Council)

• Contrary to NPPF and paras 136/137 – failure to demonstrate that all reasonable alternatives have been examined; not considered alternative options
• LSC housing target can be met without releasing green belt land; 92% of the target requirement of 3,500 houses has been met.

• The green belt release should be expressed as a strategic policy.

• There are other suitable sites with lower green belt status.

• Failure to observe Bollington Neighbourhood Plan: The proposals to release green belt land goes against the Bollington Neighbourhood Plan (policies HO.P1 - 4, V1, GE.01, EGB.P1).

• The proposed target of 390 houses for Bollington is inappropriate – flawed methodology (seventh “hybrid” method – illogical); takes no account of the previous large increase in housing (2001 -2011); target higher than other LSCs; Bollington already has highest housing density of all 13 LSCs; target not compatible with sustainable development; Bollington and Prestbury figures compared (several of the standard letters contain a short critique of the various options considered in the disaggregation report).

• There are brownfield sites, windfall and infill sites available in alternative places (other LSCs); the residual target can be achieved by small developments removing need for green belt release (Some reps refer to a figure of 5,500 potential non-green belt sites).

• Just because Bollington may not reach target of 390 houses in 10 years time does not justify releasing green belt land now.

• East Tytherington housing should count.

• Traffic concerns with the extra housing proposed; pressure on transport infrastructure; increase in out commuting; pollution.

• Concern regarding destruction of local wildlife habitats.

• No account taken of large response to Draft SADPD consultation; no effective engagement with the Bollington Community.

• Taking green belt land for housing does not fit in with vision for local service centres; not modest growth.

• New housing and housing extensions leading to feeling of continual pressure of increased population in a very confined space.

• Releasing green belt for housing will not meet local needs.

• Concerns regarding pressure on infrastructure – use of medical and dentist services, parking, overloaded drains and sewage systems etc.

• Reduction in green belt – reduction in open space.
• No complimentary increase in employment, infrastructure, compensatory green belt and open space improvements

• Concern regarding effect on Bollington’s historic assets

• The SADPD proposals fail to maintain the integrity of the Bollington Community including the distinctiveness of Bollington, Bollington Cross, Lowerhouse and Kerridge.

• Concern that structured response form provided by Cheshire East restricts the development of a discussion (Bollington Civic Society expand on points above including giving detail on history of Bollington)

• Clear summaries of the relevant arguments would have made it easier for residents to comment

• Local bus service not viable for residents to work in Stockport

• Local service centres in the west should have more development to reflect west v east traffic movements

• Bollington a commuter town – poor infrastructure links

• Bollington NP Made May 2018; updated Bollington Housing Needs Assessment Oct 2018 concluded figure should be 330-350

• Suggest land to east of 41a Shrigley Road should be allocated for development and removed from green belt (was previously allocated in Draft SADPD); access to site can be gained by the demolition of the existing dwelling which is in the same ownership – detailed response regarding why the site should be allocated – covers boundary treatments, green belt issues and impact on heritage assets etc.) Object to site remaining in green belt – should be included in built –up area and thus become available as a site allocation within the local plan. (Site CFS79/80)

• Land off Shrigley Road Bollington should be allocated for development to provide affordable housing, community uses and employment floorspace – logical and small-scale urban extension (detailed representation giving information regarding proposals for site and reasons why it is suitable for removal from the green belt) (Site CFS 277/FDR1768)

• Land to south of Grimshaw Lane Bollington should be removed from the green belt and included in built-up area of Bollington – could therefore become a windfall site or be allocated (detailed reasons why green belt boundary should be changed)(Site FDR855a)

• Land at Albert Road, Bollington (Hillcrest Homes) – legal agreement being finalised for application for 34 houses LPA ref 18/3938M; support that site is counted as a “commitment” in terms of meeting the housing needs of Bollington; support removal of employment land designation and the fact that
site shown as “white land” within the urban settlement though could comprise an allocated site for circa 34 dwellings.

- Land at Hall Hill (site CFS 352 and 352a); information on why site/sites could be allocated for housing or as safeguarded land; access rights from Ashbrook Drive and Greg Avenue confirmed (logged under PG11 and PG12)

- Dyers Mill Pond, Bollington – seeking housing on part of site (logged under REC 1)

- Settlement boundary should be revised to include the group of houses at Dumbah Lane, Tytherington Lane, Springwood Way and Larkwood Way. (Logged under PG9)

Site BOL 1 ‘Land at Henshall Road’

Summary of key points:

- For general issues see Bollington section above

- Traffic impact, safety, increased risk of accidents and congestion; access off bend

- Concern regarding impact on local wildlife and local wildlife habitats; Cheshire Wildlife Trust survey – area medium to high habitat distinctiveness; tree loss; contrary to policies in the Neighbourhood Plan (e.g. ENE.P1)

- To comply with policies ENV1 and ENV2 substantial areas of habitat creation are likely to be required.

- Increase in run-off; removal of sump effect of site; increased risk of flooding (recent flooding events in Bollington this summer cited); stress on combined sewer systems; concern re run-off towards Albert Road in particular and the two schools there an residential properties; United Utilities expressed a preference to use other sites

- Contamination concerns (toxic waste, asbestos etc.); tipping of waste by Bollington Printworks up to 1980

- Area of land part of the larger open space of Hall Hill overlooking Lowerhouse

- Concerns regarding effect on nearby historic assets - Lowerhouse area and its association with Samuel Greg (see Bollington Civic Society representation for historical detail)

- Not compatible with sustainable development

- Essential to retain mature trees

- Add reference to Historic Impact Assessment within the policy – additional bullet point to be added: “Be in accordance with the Cheshire East Heritage
Impact Assessment document including the specific mitigation/enhancement measures for the site” (Historic England)

- 2013 SHLAA – site assessed as not suitable, not achievable and not currently developable

- The proposed allocation of BOL1 for around 40 dwellings is supported and considered to be justified, effective and consistent with national policy, and based upon robust and up to date evidence. The site is suitable, available and achievable. Representation provides detailed information on why the site is suitable as an allocation looking at how the development policy requirements would be met and providing detail around drainage and flooding concerns, the creation of a new green belt boundary and the visually contained nature of the site (in a bowl with rising land to the east and west and woodland barrier to the north). Updated masterplan for site also attached to representation. D

Site BOL 2 ‘Land at Oak Lane/Greenfield Road’

Summary of key points:

- See Bollington section above for general comments

- Tree loss, effect on local wildlife; great crested newts on site and bats

- Historic site of the Beehive Mill; potential contamination

- Impact on Kerridge Conservation Area

- Houses on site will introduce a significant urban element to quiet country lane; land acts as strong border to Green Belt; valuable amenity for nearby homes

- Insufficient weight given to location of site within Peak Park Fringe

- Concerns regarding access to site; effect on nearby properties and walker’s access to Tinker’s Clough

- Not within walking distance of local services

- Flooding concerns; flooding in nearby garden July 2019

- Insufficient attention given to gravity sewer crossing site

- Traffic impact; concerns re provision for off-road parking; doubt about suitable access

- History of planning permissions refused for site – nothing has changed

- Need reference to historic impact assessments in policy
• Support for site’s release from green belt and the delivery of much needed homes in Bollington; Council supported green belt release of site in the 1990s; logical in-fill; target for Bollington should be much higher than 390 dwellings (detailed information concerning site in representation – covering Green Belt, access rights etc.).

Site BOL 3 ‘Land at Jackson Lane’

Summary of key points:

• See Bollington section above for general comments
• Steep sloping site between track and busy road – neither upgrade of track or impacting upon stone wall acceptable; limited access
• Impact on Kerridge Conservation Area and surrounding historic assets; sensitive area; houses in local stone
• Traffic problems – parking and congestion
• Concern regarding radon on site – unsuitable to disturb the natural surroundings
• Urban sprawl – would connect Bollington to Kerridge
• Infrastructure would not support the development of housing on the site
• Site privately owned – CEC no right to allocate it for development
• Not compatible with sustainable development
• Insufficient weight given to site within the Peak Park Fringe; landscape impact
• Impact on wildlife in area; presence of international important plants in area e.g. wax-cap fungi
• Need reference to historic impact assessments in policy
• Suggestion of covenant on site preventing building
• Effects of tree preservation orders; lime tree will be compromised
• Further information required on topographical impact and effect on views through site
• Owner of site confirms site is available for development and supports proposed allocation
• Low water pressure; inadequate drainage system – concern regarding flooding
Bunbury (general issues)

Summary of key points:

- Land at Whitchurch Road, Bunbury Heath has been put forward for consideration.
- The proposed settlement boundary should be amended to include Bunbury Heath.

Chelford (general issues)

Summary of key points:

- Chelford Neighbourhood Plan questions the ability of the area to accept further development (para 28). There are a number of sites under construction in the village. The Neighbourhood Plan says it does not want to see further development on Green Belt land (policy HP1).
- Spatial distribution - no explanation on means of decision making in respect of the options identified. Complex analysis offers a catalogue of statistics and explanation, but there is no means of actually understanding some methods of calculation.
- Site selection – object to no weighting in decision making. Unclear on role of RAG analysis in final decisions. RAG prone to optimism bias.
- Distinction between major and significant contributions to Green Belt purposes is unclear.
- Low level of housing need in Chelford – lower future of applications on the housing register than the median figure for LSCs.
- There is also a question mark against the accuracy of the data used to determine the settlement profiles in PUB05—to describe some of the data as ‘up to date’, when it is clearly not, does little to instil confidence in the analyses
- The vision for ‘modest growth’ in the LSCs over the planning period would appear to have been met already in Chelford.
- Disagree with moving Bollington’s share of safeguarded land to Chelford. Disagree with the level of safeguarded land distributed to Chelford.

Site CFD 1 ‘Land off Knutsford Road’

Summary of key points:

- Exceptional circumstances have not been proven to remove this site from the Green Belt. The site makes a significant contribution to Green Belt purposes.
• East Cheshire Clinical Commissioning Group – the policy refers to the need for "a financial contribution towards the provision of health facilities". This is no longer required as the Medical Centre has undergone modification in the last 5 years to future proof the premises.

• Not related to housing need in Chelford.

• Note the statement protecting car parking, but there is no clear information on whether this will still lead to a loss of parking space overall. Car parking is extremely limited for residents and visitors.

• Reinforce the points made elsewhere, relating to increased car usage, emissions, and out commuting.

• Representation from site promotor noting legal control of the site. The site could represent an extension to the adjacent site (Cricketers Green development). The allocation is supported. Supporting statement submitted detailing site specific matters.

Safeguarded land CFD 2 ‘Land east of Chelford Railway Station’

Summary of key points:

• Representation from site promotor. Information included in the representation setting out the support for the safeguarded land proposal - east of Chelford Railway Station.

• Representation from site promoter - supporting text to policy CFD2 is premature and unjustified – the development of the safeguarded land should be considered, if necessary, against the relevant circumstances at that time, rather than trying to meet the anticipated requirements from an earlier Development Plan.

• The decision to choose a location for safeguarded land, which is grade 2 agricultural land flies in the face of Cheshire East policies which recognise the importance of retaining good quality agricultural land to maintain local food production.

• The area of safeguarded land identified, represents a significant reduction in green belt land in the Parish and any further development on this land will impact negatively on its settlement character and urban form, the visual amenity, its openness and character and on the character of the village itself.

• Furthermore weight should also be given to the impact a future large housing development would have on the adjacent natural habitats surrounding the quarries east of the Alderley Road. Many of the important planning considerations appear to be reduced in importance by the panacea of mitigation, which seems to be a convenient way of removing their relative importance.
• The impact on infrastructure would be significant and would not deliver the proposals set out in policy.

• A further large scale development in Chelford will increase out commuting, increase the use of the car and will turn Chelford into a dormitory village, such as to retail destinations.

• A study of the cumulative effects of developments on the road network is desperately required not in the future, but now before the SADPD proposals become effective. This is a point made by Highways England. We are also concerned that this area of land has accessibility issues.

• Residents of Chelford have indicated in feedback during the preparation of its Neighbourhood Plan, strong views that any future development in Chelford should be small scale, that visual amenity and openness are retained, the open countryside and green belt is protected and that the character of the village is not significantly altered.

**Disley (general issues)**

**Summary of key points:**

- Two sites were submitted (references refer to the site’s reference in the Disley Settlement Report [PUB 29]):
  - Cloughside Farm (CFS29); and
  - Land off Jacksons Edge Road, Disley (FDR1941).

- Further development will lead to additional traffic on the already congested A6. Traffic has increased significantly following the opening of the A555 (A6-Manchester Airport) road.

- Disley needs a bypass.

- Further development will increase air pollution, which already breaches legal limits.

- There is no capacity in local education, health care and public transport services for additional residents.

- Green Belt should only be altered in exceptional circumstances.

- The housing requirement for local service centres has nearly been achieved already and the remainder will be met through windfall developments; therefore there is no requirement for further housing development in Disley.

- The total supply in Disley is just one dwelling over its 245 dwelling requirement which gives no flexibility. A flexibility factor of at least 10% should be applied, meaning that more sites are required.

- There have been flood events in the area recently.
• The promoter of land at Cloughside Farm considers the council’s flood risk assessment of the site is incorrect as there has not been any flooding on the eastern section of the land in 20 years and the flooding that occurred in the western section was as a result of a mains water leak. The site has never been sprayed by insecticides or pesticides and contamination is not considered to be an issue.

Site DIS 1 ‘Greystones Allotments’

Summary of key points:

• Policy CF2 in the made Disley Neighbourhood Plan states that the allotments are ‘greatly valued’. The policy requires that any proposal to develop allotment land should result in clear and significant environmental community benefits.

• Green Belt land should only be used in exceptional circumstances. Use of Green Belt sets a precedent for future developments.

• Further development will lead to additional traffic on the already congested A6. Traffic has increased significantly following the opening of the A555 (A6-Manchester Airport) road. All traffic from this site would access to the A6.

• It is considered that safe vehicular access could not be provided to the site, either through Peveril Gardens or from the A6.

• Further development will increase air pollution, which already breaches legal limits. The SADPD fails to account for the air pollution impacts of additional traffic generated by this development.

• The allotment holders have worked on the site to get good crop yields; good yields would not be assured on a different site. Plot holders have improved drainage and if moving the allotments to the area adjacent to Newtown Playing Field, drainage of the playing fields is problematic.

• Loss of the Newtown Playing Fields would be contrary to SADPD Policy REC 1.

• A development of 20 houses would be overbearing and unsympathetic to the surrounding properties which would not be in accordance with SADPD Policy HOU 10.

• The habitats provided by the allotments and their proximity to the railway embankment wildlife corridor could not be replicated by a high density housing scheme.

• The site promoter has confirmed that there are various sites within its ownership that could be used to provide replacement allotments.

• The site for the replacement allotments has not been identified but would be in the Green Belt; therefore allocation of this site would still require development in the Green Belt.
• The site promoter has stated that there is no guarantee that the site will actually be developed.

• The site is considered to be further from the village centre than alternative sites and is therefore less sustainable.

• There are approximately 40 empty dwellings in Disley which indicates there is no need for more houses considering the falling birth rate and the fact that the council’s plans for the number of houses were drawn up in the 1980s.

• The village infrastructure (schools, GP surgery, drains) could not cope with additional residents.

Safeguarded land DIS 2 ‘Land off Jacksons Edge Road’

Summary of key points:

• The site promoter considers that the site should be allocated for residential development rather than safeguarding, in order to provide a realistic prospect of meeting the overall housing need; the ensure the council can demonstrate and then maintain a deliverable five year supply of land for housing; to ensure the SADPD is consistent with the LPS; and to provide flexibility in the event that HS2 is committed to come to Crewe by 2027. The site promoter also considers the assessment of the site in the Green Belt Assessment Update 2015 to be inaccurate and further Green Belt assessment of the site should be carried out as required by the LPS examining inspector.

• The site has a history of flooding; surface water run-off from the site means Lymewood Drive is susceptible to flooding; there is a history of flooding on Jacksons Edge Road. Development on this field would increase the risk of flooding.

• Further development will lead to additional traffic on the already congested A6. Traffic has increased significantly following the opening of the A555 (A6-Manchester Airport) road. Jacksons Edge Road is already congested and very dangerous.

• Further development will increase air pollution, which already breaches legal limits. The SADPD fails to account for the air pollution impacts of additional traffic generated by this development.

• The proposals do not include any affordable housing.

• Green Belt land should only be used in exceptional circumstances. Use of Green Belt sets a precedent for future developments.

• The Disley Neighbourhood Plan seeks to protect Green Belt land.

• The housing should be built on brownfield sites instead.
- The village infrastructure (schools, GP surgery, dentists, wastewater, public transport, car parking, policing) could not cope with additional residents.

- Lyme Park and Disley are tourist attractions and any more homes would detract from the natural beauty.

- Several trees will need to be felled.

- 73 houses is far too many for this site; 90+ houses is too many for the site.

- The site provides habitats for a number of different species.

- To walk to the village, the pavements are narrow and the road is steep.

- The village boundary will become blurred and Disley will be regarded as part of High Lane. Further, gradual incursions into the Green Belt would eventually result in Disley effectively merging with High Lane.

- There is no information on the compensatory improvements that are required to offset the impact of removing the land from the Green Belt.

- The housing requirement for local service centres has nearly been achieved already and the remainder will be met through windfall developments; therefore there is no requirement for further housing development in Disley.

- The one-year review on traffic and air pollution arising from the opening of the A555 due in November 2019 should be undertaken before any further development in Disley village is considered, as it is clear that an important way to mitigate the impact of the A555 is not to develop further sites of this size.

- The First Draft Disley Settlement Report [FD 29] agrees that this site should not be developed.

- The plan is not compliant with the Duty to Co-operate because it has not taken into account cross-boundary matters. As Disley is on the edge of Cheshire East, neighbouring areas will have to cope with increased demand for services and increased traffic. No consultation has been made with neighbouring authorities, health care providers, transport bodies or other key stakeholders.

- There are approximately 40 empty dwellings in Disley which indicates there is no need for more houses.

- The 2013 Green Belt Assessment considered that the site made a ‘major contribution’ to Green Belt purposes but the 2015 Green Belt Assessment Update downgrades the contribution to ‘significant contribution’ even though it concludes that it ‘...is considered to make a major contribution of the Green belt purposes and removal of this parcel from the Green belt will detrimentally undermine the overall Green Belt function of preventing urban sprawl.’
• Disley should be considered to be a rural village rather than a local service centre

• The site promoter seeks to develop the land as soon as possible; therefore there is a high risk that building would start soon rather than after 2030.

• The site was not included in the First Draft SADPD; therefore denying the opportunity to comment at that stage.

• The site is currently an ecological stepping stone, therefore development would not be compliant with LPS Policy SE 3 ‘Biodiversity and geodiversity’.

• The site makes a ‘significant contribution’ to the purposes of Green Belt yet there are other sites elsewhere that make a lower contribution but are not proposed for allocation.

Goostrey (general issues)

Summary of key points:

• One site put forward for consideration: land adjacent to 51 Main Road, Goostrey (CFS 296, FDR2251, PBD2704), greenfield, 6 dwellings

• The correct ONS Census figures for Goostrey are pop 2,179 and 956 dwellings. At minimum the footnote wording in [PUB 30] should be changed to say that as well as including an extensive area outside the LSC boundary it also includes Cranage Parish, which is part of another LSC boundary.

Haslington (general issues)

Summary of key points:

• Site submissions received for land at:
  o Land East of Slaughter Hill, Haslington (CFS 195)
  o Land at Shukers Farm

Holmes Chapel (general issues)

Summary of key points:

• Several sites put forward for consideration:
  o Land off Manor Lane, Holmes Chapel (PBD2249) (includes part of CFS 272 and FDR2311), greenfield, 60 dwellings and residential care home
  o Land south of Middlewich Road, Holmes Chapel (PBD1355) (includes parts of CFS 425, CFS 280, FDR1318 and PBD1334, and FDR2654B), greenfield, 14.7ha mixed use (employment 3.7ha (FDR 2654B), housing 6.4ha, extra care 0.55ha)
  o Land north and south of Middlewich Road (PBD1334) (includes CFS 425, FDR2654A, FDR2654B and PBD1344 and parts of CFS 280, CFS
Additional sites should be allocated to provide flexibility and contingency regarding delivery for both housing and employment.

The Neighbourhood Plan has identified development needs that will not be delivered by the committed and more limited forms of development in Holmes Chapel as provided for through the LPS and SADPD.

Holmes Chapel has accommodated the housing and employment land need in the SADPD proposal, which includes a provision to accommodate Goostrey requirements. This assumption should be confirmed and that no more growth due to Goostrey needs is expected.

Site HCH 1 ‘Land east of London Road’

Summary of key points:

The allocation is intended solely for the purposes of a particular operator, and does not serve as new employment land (available on the open market) to secure new inward investment into the Borough.

Workers living in Holmes Chapel, and who are not employed in the pharmaceutical industry, will have to continue to travel greater distances out of Holmes Chapel to access jobs.

The SADPD fails to provide for new employment growth/inward investment across the LSCs.

Any new riparian development adjoining River Croco, make sure main ecological network and ecological receptor of site is actively protected and where feasible enhanced.

The 8m wide buffer should be measured from bank top and should be increased to 15m to protect the wildlife corridor.

Impacts to the riparian zone and any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric in order to achieve biodiversity Net Gain.

Mobberley (general issues)

Summary of key points:

Environment Agency advocates SuDS approach to protect adjoining watercourse and ecological receptor.

Warford Park should be allocated for C2 older person’s accommodation.

Allocate the land at Pavement Lane for new residential development.
- Allocate land at Ryecroft Lane. Option 1 either the whole site should be allocated for a Care Home (C2), specialist care unit and retirement living accommodation (apartments and bungalows) including a club house and other communal facilities, or. Option 2 a smaller 0.9 hectares (2.3 acres) parcel immediately adjacent to the settlement boundary for a Care Home (C2) and a specialist care unit.

- Allocate the land between Ryecroft Land and Pavement Lane for housing.

- The proposed housing on the land off Ilford Way should be removed from the SADPD and the Ilford site should be zoned as a mixed use employment site only. Access arrangements to the safeguarded land north of Carlisle Close should be specified in the SADPD

Site MOB 1 ‘Land off Ilford Way’

Summary of key points:

- Any scheme design should adopt multifunctional SuDS.

- ENV 13 only allows for non-family homes, on the premise that it would not be possible to provide acceptable external amenity space. In the Cranford case, it is considered that this restriction is also not justified and should be deleted.

- Request that brownfield land is assessed in line with empirical evidence, rather than stated opinion and the brownfield benchmark land value should be adjusted to reflect an industrial value. The VA is not regarded as providing proportionate evidence, as required by NPPF paragraph 35.

- United Utilities request an Acoustic Design Statement is needed to demonstrate how the internal noise levels for any new homes can be achieved and that a guarantee be given that development would not adversely impact the existing access to the United Utilities Waste Water Treatment works.

Safeguarded land MOB 2 ‘Land north of Carlisle Close’

Summary of key points:

- The site is so small as to be effectively undevelopable making a wholly nominal contribution to potential future development needs. Such a small safeguarding site has been influenced by the aircraft noise policy. This is a flawed approach and the low housing apportionment to Mobberley has in turn determined the distribution of the residual requirement for safeguarded land across the LSC’s.

- It is considered that land adjacent to MOB 1 should safeguarded to provide for the element of the safeguarded land requirement that cannot be met in Bollington (instead of Chelford, which is a less sustainable option).
• The land makes a ‘significant contribution’ to Green Belt purposes in the Arup Green Belt Assessment and it still has that designation. Land with that designation should not be identified for development.

• The Viability Assessment is not regarded as providing proportionate evidence, as required by NPPF paragraph 35.

**Prestbury (general issues)**

**Summary of key points:**

• Six sites were submitted (references refer to the site’s reference in the Prestbury Settlement Report [PUB 40]):
  
  o Land off Heybridge Lane (southern site) (FDR2871);
  o Land to the north of Withinlee Road, Mottram St. Andrew (CFS576);
  o Land at Shirleys Drive (CFS58);
  o The Bowery (CFS391 plot 4);
  o Butley Heights (CFS391 plot 5);
  o Chrystallis Care Centre and Butley Heights Commercial Zone (CFS391 plot 5b); and
  o Land off Heybridge Lane (northern site) (FDR2001).

• Allocations are made for around 45 dwellings in Prestbury, meaning that with completions and commitments there remains an 11 dwelling shortfall against the 155 dwelling requirement.

• A flexibility factor should be applied to the housing requirements for Prestbury.

• Further Green Belt site allocations are needed in Prestbury.

• The site promoter of land of Heybridge Lane (southern site) considers the site to make a ‘contribution’ to Green Belt purposes.

• The site promoter of The Bowery and Butley Heights considers these sites to make a ‘contribution’ to Green Belt purposes.

• The housing requirement for Prestbury should be expressed as a minimum figure, rather than ‘in the order of’.

• The council over-estimated housing delivery figures for the strategic sites included in the LPS and it is important that the same error of judgement is not repeated in Prestbury.

• At March 2019, 72 houses had been completed or committed in Prestbury. If you add in the 10 houses proposed for PRE 1, that gives 82 houses (71% of the total) in less than half of the plan period. Based on the current ‘run rate’ of 8 new houses per year and include the 10 houses on PRE 1, Prestbury will achieve its target in 2023 with no need for Green Belt release.
Sites are identified for only 45 homes, leaving a shortfall of around 70 over the plan period. At 31 March 2018, there were only 18 completions (just over 2 per year) but this figure is not thought to account for demolitions which are prevalent in Prestbury and net completions may well be less than 18.

The housing requirement for local service centres has nearly been achieved already and the remainder will be met through windfall developments; therefore there is no requirement for further housing development in Prestbury.

The sites selected should be closer to the village centre to support local services and facilities.

Sites should provide accommodation for young families and people over the age of 55.

The site promoter of land at Shirleys Drive considers the council’s assessment of heritage issues overstates the harm that would be caused to the conservation area and St. Peters Church; and that development has the potential to enhance the heritage assets.

The site promoter of land at Shirleys Drive considers that the council’s assessment of landscape impact overstates the harm to landscape character; and that development has the potential to enhance the landscape.

The site selection process should prioritise the most accessible locations as required by the NPPF.

Specific sites should be allocated for retirement living in Prestbury.

Each of the sites is within or surrounded by designated low-density housing areas and the amounts of housing proposed would be significantly out of keeping with the area.

Prestbury is unusual in having in-commuting for work.

Prestbury is not listed as an area of high housing need in the Local Service Centres Spatial Distribution Disaggregation Report [PUB 05] and exceptional circumstances have not been identified to justify alteration of Green Belt boundaries.

Prestbury has lost over 20 ha of Green Belt for a large school development which will generate significant amounts of traffic. Therefore, there should be no further development in Prestbury.

The council has ignored the community response to the First Draft SADPD consultation.

The site selection methodology ignores the Strategic Priorities set out in the LPS.
• The site selection ignores the community benefits from alternative site options.

• The small plot of previously derelict land at the rear of the former Ye Olde Chocolate Box has been counted as Prestbury’s allocation for employment land when in fact this plot is a car garage for the adjoining residence. Consequently, Prestbury has not been given any employment land although it is been given a quota.

• Specific sites should be allocated for self-build housing.

• The site promoter of land to the north of Withinlee Road considers the site makes only a limited contribution to the purposes of Green Belt.

Site PRE 1 ‘Land south of cricket ground’

Summary of key points:

• There is concern that a ball strike risk assessment has not been carried out and is instead deferred to the planning application stage. There is a lack of supporting evidence and likely prejudicial impact on the cricket pitch.

• The number of units should be reduced allowing for higher quality, lower density housing that is less susceptible to ball strikes.

• Some of the land is used by Prestbury Cricket Club for parking; some of which should be retained.

• Tree cover should not be lost.

• The pedestrian crossing on Castle Hill should not be lost or rendered unsafe.

• The land is unable to sustain vehicular and other access for 10 properties. The visibility splay at the entrance is hampered by a protected tree. The access point is considered unsafe.

• The site is adjacent to the Bollin Valley Flood Zone

• The site is adjacent to an area categorised as making a ‘significant contribution’ to Green Belt and also adjacent to the cricket ground which is within a local landscape designation area.

• The proposed access point is adjacent to a pedestrian crossing point on Castle Hill.

• An additional policy requirement should be added to require development to be in accordance with the Cheshire East heritage impact assessment document including the specific mitigation/enhancement measures for the site.
The site policy should note that Policy ENV 1 requires development at this site to increase the size of core areas and the quality and quantity of existing new or priority habitat; and that in order to achieve biodiversity net gain (required by ENV 2), impacts to semi-natural habitat on site will require mitigation/offsetting in accordance with the DeFRA metric version 2.0.

The volume of traffic generated will make local roads more dangerous.

Site PRE 2 ‘Land south of Prestbury Lane’

Summary of key points:

Prestbury Lane is narrow and an accident blackspot. The junctions at either end of Prestbury Lane are accident blackspots. It is considered that the site should score ‘red’ for highway safety due to the accident statistics.

Prestbury Lane is heavily congested.

Pedestrian access via Prestbury Lane is not suitable and the proposal for pedestrian access via the footpath to Heybridge Lane is also unsuitable and cannot be delivered as part of the access is owned by a third party. The path would need widening and the pedestrian crossing at Heybridge Lane improved.

The site has poor drainage and building would increase surface run-off, creating additional flood risk to surrounding properties. The site is subject to flooding. The site is permanently waterlogged and boggy. The field absorbs surface water run-off from London Road, which will increase with the development of the Poynton Relief Road.

The proposals are for high density housing in a low density area and are not appropriate.

The site promoter considers the site to be capable of delivering around 50 new dwellings; the flood risk supporting information should be updated in light of the information provided; the reference to the likely need for mitigation measures at either end of Prestbury Lane should be removed; the reference to the requirement for a botanical survey should be removed.

The site is considered to be peripheral and encroaches into open countryside.

The site is not as sustainably-located as some of the other potential sites and is distant from the services and amenities in the village centre. Only 4 out of 20 of the services and facilities required by LPS Policy SD 2 (in Table 9.1) are within the recommended distance. The site significantly fails to meet the recommended distances and should score ‘red’ in the traffic light assessment for accessibility.

It is not considered to be possible to provide mitigation measures to address the issues at the junctions at either end of Prestbury Lane. No information is provided as to what these measures may be.
• There is no need for further site allocations and there are no exceptional circumstances to justify altering the Green Belt boundary.

• The 2013 Green Belt Assessment categorised the site as making a ‘major contribution’ to Green Belt purposes but this has now been downgraded to ‘contribution’. The Green Belt status has been downgraded on a subjective basis, presumably to justify the site’s allocation.

• The site forms part of the setting of Prestbury on its north-west approaches and development would have an adverse impact on the character, appearance and setting of the village.

• There is a high likelihood that protected species are present on site, including great crested newts. The site provides a variety of habitats.

• The land either side of Prestbury Lane should be designated as part of the adjacent Local Landscape Designation Area. The site should score ‘red’ for landscape impact.

• The site will not come forwards for development in the plan period as the landowner has expressed a clear unwillingness to sell the land for development.

• The foul and surface water systems in the area are already over-stretched.

• Local services are overstretched, including the GP surgery and dental surgery.

• There is no safe pedestrian route to access public transport; therefore this should score ‘red’ in the traffic light assessment.

• Other brownfield sites in Macclesfield should be used instead.

• Reports prepared by the site promoter are said to lack credibility and their information has not been challenged by the council. The reports were only released following a Freedom of Information request. A number of respondents challenge statements made in the site promoter’s literature.

• The site selection is based on a subjective an inaccurate traffic light assessment; it appears to be based on a pre-conceived outcome. The rationale for decisions made is opaque.

• None of the responses made at the first draft stage have been taken into account or reflected in the revised traffic light assessments. The council has not even commented on any of the previous responses.

Safeguarded land PRE 3 ‘Land off Heybridge Lane’

Summary of key points:
• The site does not meet the accessibility criteria for four of the key facilities identified.

• There are unproven and untested access constraints that need to be addressed before the site could be developed. The access requires demolition of one detached home to gain access to the site.

• The settlement report notes that it may be necessary to reduce the development area to mitigate landscape impacts. The presence of the pond and problematic access arrangements may reduce the area further. These need to be factored in and the SADPD should be clear about how many houses can be delivered.

• The site was found to make a ‘significant contribution’ to Green Belt purposes in the 2015 Green Belt Assessment Update but has now been downgraded to make only a ‘contribution’. The re-classification was done without a re-evaluation of the Green Belt Assessment Update and is simply an acceptance of the developer’s opinion.

• There are concerns about the density of housing proposed. 70 dwellings on this site would be out of character with the surroundings.

• The land is understood to house a variety of flora and fauna and a full environmental impact assessment must be carried out. The site provides habitats for a number of species.

• The site promoter considers that the site should be allocated for development rather than safeguarded; and that a further area of adjacent be safeguarded for future development.

• This section of Heybridge Lane is not connected to mains drainage/sewage systems.

• The site policy should note that Policy ENV 1 requires development at this site to increase the size of core areas and the quality and quantity of existing new or priority habitat; and that in order to achieve biodiversity net gain (required by ENV 2), impacts to semi-natural habitat on site will require mitigation/offsetting in accordance with the DeFRA metric version 2.0.

Shavington (general issues)

Summary of key points:

• The housing requirement for Shavington should be increased.

• The following sites should be (re)considered for housing:
  o Grove Farm
  o Oakleaf Close
  o 199 Crewe Road
  o Land rear of 199 Crewe Road
- Land south of the A500,
- Depot and land west of Crewe Road
- 414 Newcastle Road
- 272 Newcastle Road
- Main Road

**Wrenbury (general issues)**

**Summary of key points:**

- The site north of Cholmondeley Road is considered to be suitable for residential development and is available and achievable. The site should be allocated for housing and the settlement boundary amended to reflect this.

- New Road, Wrenbury is considered to be suitable for housing development. The site although refused and dismissed at appeal was not subject to any technical reasons for refusal.

**Other settlements and rural areas (OSRA) (general issues)**

**Summary of key points:**

- A number of sites were submitted (references refer to the site’s reference in the Other Settlements and Rural Areas Report [PUB 46]):
  - Land off Crewe Road Winterley (part of CFS548);
  - Land at Agden Park Lane, Broomedge (CFS432);
  - Land off Dodds Green Lane, Burleydam (CFS262)
  - Warmingham Brinefield, Hole House and Spring Moss Farm (CFS330);
  - Land opposite Weaver View, Over Road, Church Minshull (CFS303);
  - Land off Newcastle Road and Holmes Chapel Road, Brereton (CFS297/300);
  - Land off Newcastle Road, Hough (CFS495);
  - Land at Newcastle Road, Brereton (FDR599);
  - Land at Boar’s Head Public House, Walgherton (FDR1926);
  - Land at the former George and Dragon Public House, Higher Hurdsfield (CFS251);
  - Brookside Hall, Arclid (CFS209/211);
  - Land at Cemetery Road, Weston (FDR1593);
  - Crewe Road / Newtons Lane, Winterley (CFS285/286);
  - Stone Cottage, 14 Summerhill Road, Prestbury (FDR1918);
  - Land adjacent to 150 Buxton Road, Disley (CFS85);
  - Land west of Fowle Brook, Crewe Road, Winterley (new site);
  - Warford Park, Great Warford (larger version of site CFS399);
  - Land at Corner Farm, Newcastle Road, Hough (new site); and
  - Land off Audlem Road, Hankelow (new site).

- The site promoter of Stone Cottage, 14 Summerhill Road, Prestbury considers the site to make no meaningful contribution to the purposes of Green Belt
Gypsy, Traveller and Travelling Showpersons sites (general issues)

Summary of key points:

- Site submission received – land at Mill Lane, Smallwood – should be considered as a site for Gypsy and Traveller pitches (permanent and transit pitches).

- Irish Community Care is keen to ensure that the consultation process on the SADPD is not the sole opportunity for community consultation.

- Irish Community Care objects to the Gypsy and Traveller Accommodation Assessment assumptions regarding household formation rates and the assessment of ‘unknown need’. The highest figure for permanent residential pitches therefore is 102 pitches to meet all need and the lowest is 57 pitches required using ORS small household base data according to Irish Community Care.

- Irish Community Care advises the Council to use negotiated stopping places in consultation with relevant groups.

- Irish Community Care has had sight of the document “Cledford Lane Assessment” by Cheshire East Councillors Carol Bulman and Jonathan Parry. Irish Community Care would, whilst recognising that there are different thresholds relating to site standards for transit and permanent provision, like to offer support to the report’s statements relating to the suitability of the Cledford Site to meet the needs of nomadic Gypsies and Travellers as a transit site.

- Irish Community Care - There are 8 potential permanent sites discussed, and full viability assessments still need to be undertaken of which, there is also a requirement for habitat survey or botanical survey due to protected species being resident potentially, on several sites and one will need a contamination examination and the majority near areas of SSSI, and water flashes.

- Whilst all of these issues relating to the land development for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.

Site G&T 1 ‘Land east of Railway Cottages, Nantwich’

Summary of key points:

- Contrary to the advice in the Peter Brett Associates Report (“PBA”) (2014) which considered the site to be unsuitable.

- The Council owns numerous sites (see the East Cheshire Gypsy and Traveller Study Report) which are suitable for development, and a Council is
required to use its own public sites before considering private sites for
development.

- The site is in an unsustainable location. The proposed site can only be
reasonably accessed by vehicles, not pedestrians. This means that the
approval of this site would fail to meet the Council policy of reducing the
impact of vehicle journey pollution.

- Road safety concerns due to a humpback bridge adjacent to the site entrance
with failure to meet DRMB Sightlines. There is no footway or street lighting in
the vicinity. The additional volume of traffic which would be generated by the
proposed application would constitute a risk to highway users.

- Impact on landscape character. The proposed site would be highly visible
from local roads and public footpaths. Visual intrusion on the open
countryside. The report errs in completely failing to address the interim effect
of any development of the site as a gypsy or traveller site. In the period
between the planting and maturity of the landscaping.

- The site selection is "not consistent with national policy" because PPTS
(2015) states that the site must relate the number of pitches or plots to the
circumstances of the specific size and location of the site and the surrounding
population size and density. The proposed development, added to the existing
plots, will be of such a scale that it will dominate the local settled community
of Baddington both in terms of the number of residents and size. The site
selection report completely fails to identify the location of the nearest settled
community to the site and apply an appropriate analysis to its scale with that
of the site. The consideration of scale is not applied consistently compared
with the approach to other sites in the site selection report.

- There is concern about potential surface water rainwater run-off onto adjacent
prime farming land, and sewage pollution which could have an adverse
impact on wildlife in the area.

- There are protected species present within 300m of the site and a potential for
protected species to be present on the site.

- The site is in the open countryside.

- Irish Community Care – site specific policy requirements for a Traveller site do
not preclude such use, they do increase the costs and more importantly, for
the community who need them, they will slow up the implementation of said
sites into community usage.

- Information submitted by the land owner, in support of the allocation of the
site. In the land owners view, the site is:-

  o Sustainably located and the site would contribute to meeting unmet
  need in the area.
The site is within Flood Zone 1 (low risk of flooding); it is not subject to any other relevant designations. The site is in the open countryside for planning purposes.

Site allocation consistent with policy SC7 of the Local Plan Strategy. It would meet the needs set in the Gypsy and Traveller Accommodation Assessment.

The site benefits from an existing safe access on to Baddington Lane. The Draft SADPD states that development proposals for this site must “provide for an appropriate visibility splay and access arrangements from Baddington Lane”. This will ensure that this criterion is met.

There is adequate space on the site to provide appropriate pitch sizes to ensure adequate amenity for future occupiers.

The site is of adequate size to provide sufficient parking and circulation space.

The Draft SADPD states that development proposal for the site must “retain hedgerows and incorporate a comprehensive landscaping scheme that provides for appropriate boundary treatments” this will ensure that the impact on the character and appearance of the surrounding area is considered.

Site G&T 1 is not located within a conservation area and there are no listed buildings or ancient monuments on which the proposal will impact.

Site G&T 2 ‘Land at Coppenhall Moss, Crewe’

Summary of key points:

- Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.

Site G&T 3 ‘New Start Park, Wettenhall Road, Nantwich’

Summary of key points:

- New Start Park has consistently been refused permanent planning permission since 2009, as recently as August 2018. Its extension to temporary permission has been granted with the sole purpose of allowing Cheshire East time to allocate appropriate alternative sites within the SADPD at which point the New Start Park site would be returned to its original rural state.

- In its GTTS Site Accessibility Assessment 2018, New Start significantly failed to meet 70% of the listed criteria, including those for accessibility and transport accessibility. By way of contrast, an existing site at Wybunbury Lane, Stapeley, failing 50% of the listed criteria, has been disregarded. This is of particular concern as the latter was given permission at Appeal in 2009, APP/R06660/A/10/2131930, but is not fully occupied, nor is it clear whether these pitches have been included in the Council’s overall provision.
• Detrimental impact upon the rural character and appearance of the open countryside - conflict with the PPTS and NPPF. The PPTS places strong emphasis against new development in Open Countryside and the onus is on LPAs to “very strictly limit” Traveller Site development in this context.

• The site cannot be sufficiently landscaped to mitigate its effect upon Open Countryside. It introduces urbanising features, such as floodlighting, to an otherwise rural landscape.

• The number of pitches proposed to be allocated, in what the Appeal Inspector considered to be a “reasonably large” site for this area, do not relate well to the size and density of the nearest settled community.

• Impractical to use permeable materials as hardstanding as the structure of the site is already in place and occupied by substantial chalet homes. There have been drainage and run off issues from the site in the past which the Council is aware of (Paragraph 12.150).

• This point refers to the biodiversity of Wimboldsley Wood SSI which has a postcode of CW73NX and is 10.4 miles from this site (Paragraph12.149).

• Proposed allocation is not in line with conclusions of Peter Brett Report.

• Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.

• The site was “fully discounted” the site in the first draft SADPD due to its “rural location (Open Countryside), distance from facilities and an absence of public transport”.

• There is no public transport to the site, there are no roadside pavements along Wettenhall Road and the entrance to the site is directly off/onto a road with a 60mph limit. The site is only reasonably accessed by vehicles, not pedestrians, which is contrary to the Council’s policy of reducing the impact of vehicle journey pollution in any new developments.

• Residents are similarly aware of other applications in the immediate area for permanent residential development which have also been dismissed at Appeal on the basis of unsustainability in terms of lack of transport, lighting or footways, a 60-mph speed restriction and distance from accessible services. APP/R0660/W/16/3146021 in 2016 rejected the development of two new dwellings less than half a mile from New Start but in closer proximity to Nantwich.

Site G&T 4 ‘Three Oakes Site, Booth Lane, Middlewich’

Summary of key points:
There is no live planning permission on this site and given the site has been subject to two previous planning consents over the last 14 years neither of which have been implemented, concerns are raised over the deliverability of the site. Given there are also 6 plots within the existing site which are vacant, it is questioned whether there is an identified need for additional plots in this location.

The site is not considered to contribute to supply. Given the deliverability concerns of this site for market housing restricted to occupation for gypsy and traveller, the site should be reallocated for open market housing. Housing on this site should be developed at a higher density to promote delivery in Middlewich.

Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage

If an additional 24 are given planning permission at 3 Oaks it would take provision in Cheshire East to 151 pitches 75 of which would be in Moston. It is unreasonable that half of the Cheshire East Gypsy site provision could be located in one parish, there are other areas within Cheshire East where sites could be located and assimilated into the area

Historic England - An additional bullet should be included which states: Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

Site G&T 5 ‘Cledford Hall, Cledford Lane, Middlewich’

Summary of key points:

- Site is in industrial area (existing uses and allocated site in the Local Plan Strategy – Midpoint 18) and not fit for purpose. Site is too close to Wincanton Warehouse, TATA Chemicals and Lorry Park which runs 24/7.

- There are no pavements up to the proposed site. The road is narrow. Safety concerns.

- There was no proper consultation with the settled community, the settled traveller community about the Cledford Hall Farm.

- The planning permission for Cledford Hall has now lapsed and since the Planning permission was granted in May 2015 there have been changes to the area.

- Irish Community Care (ICC) has had sight of the document “Cledford Lane Assessment” by Cheshire East Councillors Carol Bullman and Jonathan Parry. ICC would, whilst recognising that there are different thresholds relating to site standards for transit and permanent provision, like to offer support to the report’s statements relating to the suitability of this site to meet the needs
of nomadic Gypsies and Travellers as a transit site. ICC echoes the key concerns from the report that, the 24 hour operation of the Wincanton site including the reversing of heavy lorries throughout the night time, with the addition of the ANSA waste Hub added to that and the difficulty for mothers with pushchairs to access the site, and a route to school, doctor and all other local services, as it has no pavements and is on a busy road, highlight that this is not a place for families to live, even temporarily, when temporarily is defined as up to three months. The drivers to developing a site need to include the local community insight of those who will be utilising the site, to ensure its suitability and fit with cultural and community needs. There have been some communications with Travellers encamping on the Barony Park, and they have expressed a desire to reside or resort to the Crewe area, and in encamping on the Barony repeatedly, that is itself an insight into the needs of the community who are in the area.

- No solid testing for contamination.
- The site is a significant distance away from where the bulk of unauthorised encampments occur.
- Site has no sewage connection.
- The eastern Bypass has been given planning permission and Cledford Lane will be an access road for the bypass. This will increase the traffic on the narrow lane even more making it extremely dangerous for pedestrians and also the noise levels will be drastically increased.
- Proximity to local amenities. This highlights the unsafe nature of the road again, but the doctors are about a 20 minute walk from the site. There is only one shop nearby which is still a ten minute walk.
- Air Quality - how safe is the air in that area at present?
- Historic England - The Council is advised that the National Heritage List for England still contains listing entries for buildings on the site that no longer exist. It is recommended that an application is made for their removal.
- There is a private transit site for 8 pitches on Warmingham Lane in Middlewich which satisfies the Council's stated need for 5-10 transit pitches in the borough but which does not satisfy the requirement for a public transit site
- The site is constrained due to its proximity to the Cledford Lime Beds Local Wildlife Site and because the local area is predominantly in industrial use.
- Part of the site is located within flood zone 2 and sequential assessment needs to demonstrate that there are no more available or deliverable sites within flood zone 1 prior to looking to allocating the site or developing in areas at greater risk of flooding.
- The Council's Gypsy, Traveller and Travelling Show people Site Section Report was informed by the findings within the cross-authority 'Gypsy,
Traveller and Travelling Show people Accommodation Assessment’. The assessment noted as one of the merits of the site at Cledford Hall in allocating it for transit Travellers, was that it benefited from an extant planning permission. This permission has since expired with no interest having been shown in developing the site. This is despite a Listed Building Consent being agreed on the site in 2017 to demolish the remaining listed outbuildings. The site has therefore already demonstrated its inability to attract a willing developer for Traveller use development in the past.

Site G&T 6 ‘Land at Thimswarra Farm, Moston’

Summary of key points:

- Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.

- Site previously considered to be not suitable for permanent development by Cheshire East Council, Peter Brett Associates Report and The Planning Inspectorate. The site has been viewed, historically, in both Council decisions and appeal decisions as unsustainable.

- Overall, there is clear inconsistency and contradiction in the current methodology and assessment processes to reach a view contrary to all of the Council’s in-house evidence and previous judgements in fully discounting this site as being wholly unsuitable for permanent residential development.

Site G&T 7 ‘Land at Meadowview, Moston’

Summary of key points:

- Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.

- Site previously considered to be not suitable for permanent development by Cheshire East Council, Peter Brett Associates Report and The Planning Inspectorate. The site has been viewed, historically, in both Council decisions and appeal decisions as unsustainable.

- Overall, there is clear inconsistency and contradiction in the current methodology and assessment processes to reach a view contrary to all of the Council’s in-house evidence and previous judgements in fully discounting this site as being wholly unsuitable for permanent residential development.

Site TS1 ‘Lorry Park, off Mobberley Road, Knutsford’

Summary of key points:
• Representation received from a Travelling Showman. There have been no developments for Travelling Showman for over 30 years. There are no issues with the site at Knutsford. It is central to many of the fairs and about 25% of the representors fairs are located in that direction. Questions included relating to the suitability of the site in terms of the need for further assessments and mitigation given proximity to household waste site and petrol station.

• Objection to the site. The site being in an urban area is not a sufficient reason to allow this site for a proposed use. It is not in the best location. Alternative uses for the site proposed including an expansion to the household waste recycling centre or a clubhouse.

• The site TS2 should be expanded from 10 to 13 plots.

• In the Councils own site selection methodology they state that stage 1 site sifting must look at the availability of the site. They have stated that Council ownership confirms this. This is an error; the site is in economic use being leased to a lorry transport business. Hence availability should be a red indicator in the traffic light assessment.

• The impact on the settlement character should also be a red light as adjacent to the site is a playing field, the future development of which is in the feasibility scoping stage to include an all weather pitch and floodlights as part of an integrated appraisal of facilities required by the proposed development of a nearby strategic site - land south of Longridge.

• As a residential site for travelling show people the suitability of the site for a home should be subject to the housing policies. The environmental impact of aircraft noise, recycling facility and petrol station should render this site as unsuitable for housing.

• As Knutsford is surrounded by Greenbelt, it would be unacceptable to force a lorry business off such a brownfield site to a greenfield site or indeed another new employment area expanding into greenbelt.

• This is publicly owned land and in Knutsford we lack such land to provide the base for community facilities we consider to be in shortfall. In the area there are 3 such deficiencies. Space for a changing facility for the all weather sports pitch, space for a community meeting building, additional overflow parking for the staff and customers of businesses on the Longridge Trading estate.

• It is adjacent to the recycling depot and is potentially on contaminated, infill land. The proximity of the site to the recycling and waste disposal holding facility has not been assessed for health impacts on the show person's families who will occupy the site and a previous option to locate a health centre there was withdrawn on the grounds of potential health hazards.

• If the site is approved, it should receive extensive landscaping, provision of suitable servicing, amenity areas which prevent young occupants straying into the shared access by which a constant procession of cars and light vans leave the recycling centre.
• Traffic impacts

• Paragraph 12.169 should be expanded to refer to Petrol Station and Shaw Heath Social Club

• Para 12.171 - The proposal of this site is unclear. Is it for the residence only of people employed as travelling showpersons?

• Para 12.172 - For residential amenity, outdoor greenspace should be designed into the development.

Site TS 2 ‘Land at Firs Farm, Brereton’

Summary of key points:

• Representation received from site owner. Providing background to the operations on the Fir Farm Site. The site promotor has sought a more comprehensive allocation to cover other uses on the land and is disappointed that the Council has only proposed to allocate a specific area of land on the site. Notwithstanding this, they support the allocation of land for accommodation needs at Firs Farm

• Representation received from site owner to paragraph 12.173 in the Plan. Objects as the cottages are 180 metres of the proposed allocation.

• Representation received from site owner to paragraph 12.177 in the Plan. Objects to the potential for the current wording to prevent circus and theatrical related activities being carried out at Fir Farm.

• Historic England - An additional bullet should be included which states: Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.

Chapter 13: Monitoring and implementation

Summary of key points:

• Triggers that prompt a full review of the Local Plan should be included.

• The LPMF should not be flexible – any changes made should be consulted on for 4 weeks.

• SC11 new assembly and leisure floorspace should have a target, as per the infrastructure plan and Community infrastructure levy collected.

• SC12 any loss of assembly or leisure floorspace should be recorded. It is for the notes to justify in line with or NOT policies SC1 & 2

• SC13 provision of outdoor sports facilities - amount gained should be stated and the targets in the sports strategy action plan highlighted. Any loss should be stated. This is to encourage a sports net gain ambition.
• SC14 provision of indoor sports facilities should be stated alongside the sports strategy action plan and any loss should be highlighted. This is to encourage a sports net gain ambition.

Chapter 14: Glossary

Summary of key points:

• There is a need to provide housing for first time buyers and the SADPD should include an entry-level exception site policy, as required by NPPF ¶71.

Appendix A: Related documents and links

Summary of key points:

• A number of issues were raised in respect of the Local Service Centres Spatial Distribution Disaggregation Report [PUB 05].

• A number of issues were raised in respect of the Green Belt Boundary Alterations Explanatory Note [PUB 56].

• A number of issues were raised in respect of Bollington and the Bollington Settlement Report [PUB 24].

• The planning department does not regard the Green Belt as permanent, but as a device to ensure Manchester uses its greenfield sites before releasing Green Belt for development.

• The search for housing sites was biased and the council put out a request for sites, which meant only sites were submitted that would not normally obtain planning permission.

• The duty to co-operate has not been fulfilled as there are very few comments on this section.

• The reference to Groundwater Source Protection Zone maps is old and should point to https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs