Cheshire East Local Plan
Site Allocations and Development Policies Document


February 2019
Revised March 2019 to include Appendix 7 (addendum)
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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.

Issues paper consultation 2017

1.5 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.

1.6 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.

1.7 Following consultation on the issues paper, the council prepared a first draft of the SADPD.

First draft SADPD consultation 2018

1.8 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.

1.9 The decision to publish the first draft SADPD together with its supporting evidence for public consultation was made by the Portfolio Holder for Housing, Planning and Regeneration on 31 August 2018.

1.10 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.

1.11 This report of consultation sets out the details of the consultation exercise carried out on the first draft SADPD, the Interim Sustainability Appraisal, the Habitats Regulations Assessment and the Gypsy, Traveller and Travelling Showpeople ‘call for sites’.

1.12 The draft Statement of Community Involvement sets out how the council intends to involve all sectors of the community in the planning process in the future. As this document was only in draft form at the time of consultation on the First Draft SADPD, consultation was carried out in accordance with the requirements of the council’s approved Statement of Community Involvement (2010).

2. Consultation documents

2.1 Comments were invited on the following documents:

• First Draft Site Allocations and Development Policies Document;
• First Draft SADPD Interim Sustainability Appraisal;
• First Draft SADPD Habitats Regulations Assessment; and
• Gypsy, Traveller and Travelling Showpeople ‘call for sites’ form.

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 draft policy in the first draft SADPD.

First 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 first 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;
- Transport and infrastructure; and
- Recreation and community facilities

2.6 It also contains 22 proposed site allocations, three 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 appendices setting out housing and employment figures by settlement and related documents and links.

First Draft SADPD Interim 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 Interim Sustainability Appraisal has been produced to assess the first draft SADPD. It was published alongside the first 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 at this stage, including the consideration of any reasonable alternatives.

First 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 first 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.

**Gypsy, Traveller and Travelling Showpeople ‘call for sites’**

2.12 The council is proposing to allocate sites for Gypsies and Travellers and Travelling Showpeople in the SADPD. Following a detailed initial site selection process, three site allocations are proposed in the first draft SADPD, which address part of the accommodation needs identified in the Gypsy and Traveller Accommodation Assessment.

2.13 A further ‘call for sites’ exercise, focused on Gypsy and Traveller and Travelling Showperson sites was carried out alongside consultation on the first draft SADPD. Through this process parties were invited to put forward sites they considered to be suitable and available for Gypsy and Traveller and Travelling Showperson accommodation.

**Background evidence and supporting documents**

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

- First Draft Site Allocations and Development Policies Document [FD 01]
- Draft adopted policies map [FD 02]
- First Draft SADPD Interim Sustainability Appraisal [FD 03]
- First Draft SADPD Interim Sustainability Appraisal Non-technical Summary [FD 03a]
- Habitats Regulations Assessment: Site Allocations and Development Policies Document [FD 04]
- Local Service Centres Spatial Distribution Disaggregation Report [FD 05]
- Settlement and Infill Boundaries Review [FD 06]
- Site Selection Methodology Report [FD 07]
- Strategic Green Gaps Boundary Definition Review [FD 08]
- Ecological Network for Cheshire East [FD 09]
- Cheshire East Landscape Character Assessment [FD 10]
- Cheshire East Local Landscape Designation Review [FD 11]
- Employment Allocations Review [FD 12]
- Cheshire East, Cheshire West and Chester, Halton and Warrington Gypsy, Traveller and Travelling Showpeople Accommodation Assessment [FD 13]
- Gypsy, Traveller and Travelling Showpeople Site Selection Report [FD 14]
- Methodology for Development of Aircraft Noise Policy [FD 15]
- Threshold Policy for Main Town Centres Uses Impact Test: Evidence and Justification Report [FD 16]
- Cheshire East Retail Study Update [FD 17]
- Green Space Strategy Update [FD 18]
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.

3.3 Printed copies of all of the consultation documents and selected key background evidence and supporting documents were available for inspection at:
3.4 All of the consultation documentation was made available in the above locations from 05 September 2018, ready for the start of the consultation period on 11 September.

4. Publicity and engagement

Consultation notifications

4.1 Following adoption of the Local Plan Strategy in 2017, the council contacted everyone on the council’s local plan consultation database to ask them if they wished to continue receiving local plan updates and consultation notifications.

4.2 Notification of the consultation was sent to all active stakeholders on the council’s local plan consultation database. This consisted of 56 printed letters sent on 10 September and 1,564 emails sent on 11 September. 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 Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

4.3 Copies of the notification email and letter are included in Appendix 1.

4.4 Separate email letters were also sent to Natural England, Historic England, the Environment Agency and Natural Resources Wales as statutory consultees, as well as all town and parish councils in Cheshire East and all MPs whose constituencies lie partly or wholly within Cheshire East Borough.

4.5 Cheshire East councillors were notified through an ‘all member bulletin’ issued by the Portfolio Holder for Housing, Planning and Regeneration.

4.6 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 paragraph 4.2.

4.7 A further 141 email notifications were sent on 14 September to those people that has submitted sites during the 2017 ‘call for sites’ exercise but who were not included in the council’s local plan consultation database.

Other publicity

4.8 A number of pages on the Cheshire East Council website provided information and links to the consultation. These pages included:
4.9 Screen shots from each of these pages are included in Appendix 2.

4.10 Two press releases were issued, informing people of the consultations. The first was issued on 20 August with the title ‘Council prepares to launch next phase of borough’s development plan’ and the second was issued on 17 September with the title ‘Consultation begins on next phase of borough’s development plan’. Copies of these press releases are included in Appendix 3.

4.11 The press releases resulted in a number of articles on the consultation being published on the local and regional press and other news sources, both in printed and online form including:

- ‘Council prepares to launch next phase of borough’s development plan’, wilmslow.co.uk 21/08/18.
- ‘Council to launch next phase of borough development plan’, The Chester Chronicle 21/08/18.
- ‘Consultation begins on September 5’, Middlewich Guardian 22/08/18.
- ‘Consultation begins on next phase of borough’s development plan’, wilmslow.co.uk 17/09/18.
- ‘Consultation begins on proposed sites for new houses in Alderley Edge’, alderleyedge.com 17/09/18.
- ‘Consultation on next phase of Cheshire East development plan’, socheshire 17/09/18.
- ‘Your chance to have your say on future development of Cheshire East’, Macclesfield Express 19/09/18.

4.12 The consultation was also highlighted in the September edition of the council’s ‘Spatial Planning Update’ newsletter which is sent to all town and parish councils and displayed on the council’s website.
4.13 In addition, there was an article in the September / October edition of the Connected Communities newsletter, which was distributed at the end of September and is also available on the council’s website at www.cheshireeast.gov.uk/council_and_democracy/connected-communities/connected-community-newsletters/

Town and parish council engagement

4.14 A series of ‘drop-in’ sessions for town and parish councils to discuss the SADPD and other planning documents with officers from the Spatial Planning Team were held on 02 and 04 October.

4.15 Invitations were sent to all town and parish councils in the consultation notification email letters sent out (as in para 4.4). The invitation to the town and parish council sessions was repeated in the ‘Spatial Planning Update’ which was sent out to all town and parish councils on 21 September.

4.16 Seven town and parish councils took the opportunity to meet with officers to discuss the proposals in relation to their parishes. These were:

- Audlem Parish Council;
- Brereton Parish Council;
- Bunbury Parish Council;
- Doddington Parish Council;
- Haslington Parish Council;
- Newhall Parish Council; and
- Prestbury Parish Council.

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 4.

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 a separate printed consultation response form for the Gypsy, Traveller and Travelling Showpeople ‘call for sites’, which was also available in each of the locations listed above.

5.5 Both response forms are shown in Appendix 5.
5.6 Information on how to submit comments was included on the consultation portal; in the foreword of the printed and PDF versions of the first draft SADPD; and on the printed comments form.

6. Representations received

First Draft SADPD

6.1 In total, 3,042 comments were received from 756 different parties.

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

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<thead>
<tr>
<th>Method</th>
<th>Comments</th>
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<tr>
<td>Online consultation portal</td>
<td>710</td>
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<tr>
<td>By email</td>
<td>1,721</td>
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<tr>
<td>By post</td>
<td>611</td>
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<tr>
<td>Total</td>
<td>3,042</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.

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<td>• Policy PG 9 ‘Settlement boundaries’ (87)</td>
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<td>• Policy PG 10 ‘Infill villages in the open countryside’ (54)</td>
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<td>• Policy PG 11 ‘Green Belt boundaries’ (39)</td>
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<td>• Policy PG 12 ‘Safeguarded land boundaries’ (14)</td>
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<td>• Policy PG 13 ‘Strategic green gaps boundaries’ (19)</td>
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<td>• Policy PG 14 ‘Local green gaps’ (12)</td>
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<td>Chapter 3: General requirements (intro) (1)</td>
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<td>• Policy GEN 2 ‘Security at crowded places’ (0)</td>
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<td>• Policy GEN 3 ‘Advertisements’ (3)</td>
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<td>• Policy GEN 4 ‘The recovery of infrastructure costs and deferred planning obligations’ (24)</td>
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<td>• Policy GEN 5 ‘Adopted policies map’ (13)</td>
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<td>• Policy ENV 4 ‘River corridors’ (6)</td>
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<td><strong>Policy ENV 8</strong> ‘District heating network priority areas’ (3)</td>
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<td><strong>Policy ENV 16</strong> ‘Protecting water resources’ (12)</td>
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**Chapter 5: The historic environment (intro) (11)**
- **Policy HER 1** ‘Heritage assets’ (15)
- **Policy HER 2** ‘Designated heritage assets’ (5)
- **Policy HER 3** ‘Non-designated heritage assets’ (7)
- **Policy HER 4** ‘Conservation areas’ (6)
- **Policy HER 5** ‘Listed buildings’ (4)
- **Policy HER 6** ‘Historic parks and gardens’ (2)
- **Policy HER 7** ‘World heritage site’ (10)
- **Policy HER 8** ‘Archaeology’ (3)
- **Policy HER 9** ‘Enabling development’ (13)

**Chapter 6: Rural issues (intro) (5)**
- **Policy RUR 1** ‘New buildings for agriculture and forestry’ (6)
- **Policy RUR 2** ‘Farm diversification’ (2)
- **Policy RUR 3** ‘Agricultural and forestry workers dwellings’ (3)
- **Policy RUR 4** ‘Essential rural worker occupancy conditions’ (2)
- **Policy RUR 5** ‘Best and most versatile agricultural land’ (18)
- **Policy RUR 6** ‘Outdoor sport, leisure and recreation in the open countryside and Green Belt’ (6)
- **Policy RUR 7** ‘Equestrian development’ (5)
- **Policy RUR 8** ‘Visitor accommodation’ (3)
- **Policy RUR 9** ‘Caravan and camping sites’ (1)
- **Policy RUR 10** ‘Employment development in the open countryside’ (6)
- **Policy RUR 11** ‘Extensions and alterations to buildings in the open countryside and Green Belt’ (11)
- **Policy RUR 12** ‘Residential curtilages in the open countryside and Green Belt’ (7)
- **Policy RUR 13** ‘Replacement buildings in the open countryside and Green Belt’ (10)
- **Policy RUR 14** ‘Re-use of rural buildings for residential use’ (6)

**Chapter 7: Employment and economy (intro) (0)**
- **Policy EMP 1** ‘Strategic employment areas’ (7)
- **Policy EMP 2** ‘Employment allocations’ (17)
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**Chapter 8: Housing (intro) (38)**
- Policy HOU 1 ‘Housing mix’ (39)
- Policy HOU 2 ‘Specialist housing provision’ (8)
- Policy HOU 3 ‘Self and custom build dwellings’ (26)
- Policy HOU 4 ‘Houses in multiple occupation’ (1)
- Policy HOU 5 ‘Gypsy, Traveller and Travelling Showpersons provision’ (5)
- Policy HOU 6 ‘Optional technical standards’ (29)
- Policy HOU 7 ‘Subdivision of dwellings’ (1)
- Policy HOU 8 ‘Backland development’ (8)
- Policy HOU 9 ‘Extensions and alterations’ (3)
- Policy HOU 10 ‘Amenity’ (3)
- Policy HOU 11 ‘Residential standards’ (18)
- Policy HOU 12 ‘Housing density’ (28)
- Policy HOU 13 ‘Housing delivery’ (37)
- Policy HOU 14 ‘Small sites’ (19)

**Chapter 9: Town centres and retail (intro) (0)**
- Policy RET 1 ‘Retail hierarchy’ (18)
- Policy RET 2 ‘Planning for retail needs’ (7)
- Policy RET 3 ‘Sequential and impact tests’ (9)
- Policy RET 4 ‘Shop fronts and security’ (5)
- Policy RET 5 ‘Restaurants, cafés, pubs and hot food takeaways’ (6)
- Policy RET 6 ‘Neighbourhood parades of shops’ (7)
- Policy RET 7 ‘Ensuring the vitality of town and retail centres’ (19)
- Policy RET 8 ‘Residential accommodation in the town centre’ (9)
- Policy RET 9 ‘Environmental improvements, public realm and design in town centres’ (10)
- Policy RET 10 ‘Crewe town centre’ (4)
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**Chapter 10: Transport and infrastructure (intro) (8)**
- Policy INF 1 ‘Cycleways, bridleways and footpaths’ (13)
- Policy INF 2 ‘Public car parks’ (4)
- Policy INF 3 ‘Highway safety and access’ (13)
- Policy INF 4 ‘Manchester Airport’ (6)
- Policy INF 5 ‘Aerodrome safeguarding’ (3)
- Policy INF 6 ‘Airport public safety zone’ (3)
- Policy INF 7 ‘Airport car parking’ (5)
- Policy INF 8 ‘Protection of land and routes for proposed infrastructure’ (7)
- Policy INF 9 ‘Hazardous installations’ (0)
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- Policy REC 1 ‘Green/open space protection’ (26)
- Policy REC 2 ‘Indoor sport and recreation implementation’ (20)
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<td>• Policy REC 3 ‘Green space implementation’ (31)</td>
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<td>• Policy REC 5 ‘Community facilities’ (11)</td>
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Chapter 12: Site allocations (intro) (123)

- **Crewe** (general) (17)
  - Site CRE 1 ‘Land at Bentley Motors’ (5)
  - Site CRE 2 ‘Land off Gresty Road’ (1)

- **Congleton** (general) (15)
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- **Middlewich** (general) (4)
  - Site MID 1 ‘Land off St. Ann's Road’ (1)
  - Site MID 2 ‘East and west of Croxton Lane’ (5)

- **Poynton** (general) (11)
  - Site PYT 1 ‘Poynton Sports Club’ (16)
  - Site PYT 2 ‘Land north of Glastonbury Drive’ (16)
  - Site PYT 3 ‘Land at Poynton High School’ (11)
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  - Site ALD 1 ‘Land adjacent to Jenny Heyes’ (9)
  - Site ALD 2 ‘Ryleys Farm, north of Chelford Road’ (32)
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- **Audlem** (general) (1)
  - Site AUD 1 ‘Land south of Birds Nest’ (2)
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- **Bollington** (general) (101)
  - Site BOL 1 ‘Land at Henshall Road’ (208)
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  - Site BOL 4 ‘Land to the east of 41a Shrigley Road’ (168)

- **Chelford** (general) (4)
  - Site CFD 1 ‘Land off Knutsford Road’ (7)
  - Safeguarded land CFD 2 ‘Land east of Chelford Railway Station’ (11)

- **Disley** (general) (6)
  - Site DIS 1 ‘Greystones allotments’ (12)
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- **Holmes Chapel** (general) (7)
  - Site HCH 1 ‘Land east of London Road’ (3)

- **Prestbury** (general) (26)
  - Site PRE 1 ‘Land south of cricket ground’ (10)
  - Site PRE 2 ‘Land south of Prestbury Lane’ (25)
  - Safeguarded land PRE 3 ‘Land south of Prestbury Lane (safeguarded)’ (20)

- **Gypsy, Traveller and Travelling Showpersons sites** (general) (3)
  - Site G&T 1 ‘Land east of Railway Cottages, Nantwich’ (2)
  - Site G&T 2 ‘Land at Coppenhall Moss, Crewe’ (20)
  - Site TS 1 ‘Lorry park, off Mobberley Road, Knutsford’ (6)
6.4 All comments are available to view on the council’s consultation portal at http://cheshireeast-consult.limehouse.co.uk/portal/planning/cs/sadpd/firstdraft

6.5 A summary of the key issues raised is set out in Appendix 6.

Interim Sustainability Appraisal

6.6 In total, 8 comments were received from 6 respondents.

6.7 In summary, the key points raised were:

- Further recognition required of Impact Risk Zones.
- The ‘where possible’ caveat in paragraph 4.5 suggests that biodiversity/natural environment considerations are less important than economic or social ones.
- The Interim SA deeply under values the sterilisation of minerals.
- The proposed policies will have a negative impact on the historic environment.
- Further consideration required with regard to noise in the Health Impact Assessment.

Habitats Regulations Assessment

6.8 In total, 14 comments were received from 4 respondents.

6.9 In summary the key points raised were:

- GTSS 66 – HRA should take account of air quality impacts on the Tatton Mere SSSI.
- South Pennine Moors SPA – the site has the presence of birds including farm, coastal habitats and estuary birds. Need to consider the impact of extra vehicles and air pollution on that site.
- Midland Meres and Mosses – has open water and bog’s which support rare plants. Disagree with conclusions on HRA
- Mersey Narrows – contains rare birds and is a haven for wildlife. Disagree with position set out in HRA
- Object to the levels of development and sites proposed for Bollington
- Natural England – move table 4.1 into section 5
- Natural England – the HRA should make it clearer which sites are being proposed to be allocated in the SADPD.
• Natural England – further assessment needed for sites EMP2.3 (land east of University Way) and CFS 423a (Land East of London Road)
• Natural England – consider combining tables 4.1 and 5.3 in the revised report
• Natural England - Further information required on the in combination assessment of likely significant effects section to include consideration of Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351
• Natural England - Further work required on chapter 6 appropriate assessment focused on the features and conservation objectives of the European site.

Gypsy, Traveller and Travelling Showpeople ‘call for sites’

6.10 One additional site was submitted in response to the ‘call for sites’ exercise.

7. Next steps

7.1 All comments received on the first draft SADPD, Interim Sustainability Appraisal, Habitats Regulations Assessment and the Gypsy, Traveller and Travelling Showpeople ‘call for sites’ will be fully considered and any further background research and evidence will be carried out as required to produce a further draft of the SADPD, which will be called the ‘Publication Draft SADPD’.

7.2 It is expected that a further six week period of consultation will take place on the Publication Draft SADPD in 2019. Following this consultation, it would be the intention to submit the Plan to the Secretary of State for independent examination.
Appendix 1: Notification letter and email

Cheshire East planning documents consultations 11 September – 22 October

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.

Following the adoption of the Local Plan Strategy last year, the council is preparing a number of additional planning policy documents. These are being consulted on between 11 September and 22 October 2018. They are:

- First Draft Site Allocations and Development Policies Document (SADPD);
- SADPD Sustainability Appraisal and Habitats Regulations Assessment;
- The Garden Village at Handforth draft supplementary planning document;
- Revised and updated Statement of Community Involvement; and
- A ‘call for sites’ that may be suitable for Gypsy, Traveller and Travelling Showpeople accommodation.

A brief explanation of each of these is set out overleaf.

The consultation documents and comments forms are available on the council’s website at www.cheshireeast.gov.uk/localplan and in Cheshire East customer service centres and libraries. Responses should be returned to us using the consultation portal on our website, by email to localplan@cheshireeast.gov.uk or by post to Spatial Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by no later than Mon 22 October.

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

Further information can be obtained from the council’s website or by contacting the Spatial Planning Team using the details at the top of this letter.

Yours sincerely,

Adrian Fisher
Head of Planning Strategy
Cheshire East planning policy consultations 11 September – 22 October 2018:

The Site Allocations and Development Policies Document (SADPD) will contain detailed planning policies and site allocations. Once adopted, its policies will be used alongside the Local Plan Strategy and neighbourhood plans to help determine planning applications. This consultation is on the first draft of the SADPD and is an important opportunity to help shape its policies and proposals, and to help us make sure that the document will provide an up-to-date planning framework to support our ambition of making the borough an even better place to live, work and visit.

In addition to the First Draft SADPD, we are also consulting on its accompanying Sustainability Appraisal and Habitats Regulations Assessment which look at the SADPD’s contribution to sustainable development and its impact on internationally-designated nature conservation sites.

There is also a consultation on the draft supplementary planning document for The Garden Village at Handforth which includes a masterplan and design guide to inform development on this important site. We are holding a consultation drop in session at Handforth Library from 3pm – 7pm on Tuesday 25th September where more information will be available.

We are consulting on a revised and updated Statement of Community Involvement which sets out how the council will engage with stakeholders and the wider public when preparing planning policies and considering planning applications.

Finally, we are also carrying out a ‘call for sites’ that may be suitable for Gypsy, Traveller and Travelling Showpeople accommodation.

Further information is available on our website www.cheshireeast.gov.uk/localplan, at Cheshire East libraries and customer service centres, or by contacting the Spatial Planning Team:

Tel: 01270 685893
Email: localplan@cheshireeast.gov.uk
Post: Spatial Planning Team (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ

Printed letter sent to the local plan consultation database
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.

Following the adoption of the Local Plan Strategy last year, the council is preparing a number of additional planning policy documents. These are being consulted on between 11 September and 22 October 2018. They are:

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The consultation documents are available on the council’s website at [www.cheshireeast.gov.uk/localplan](http://www.cheshireeast.gov.uk/localplan) and in Cheshire East customer service centres and libraries. Responses should be returned to us using the consultation portal on our website; by email to [localplan@cheshireeast.gov.uk](mailto:localplan@cheshireeast.gov.uk); or by post to Spatial Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by no later than **Mon 22 October**. Your personal data will be processed in line with our [Privacy Notice](#) and your name and comments will be published and made available to view on the consultation portal.

The **Site Allocations and Development Policies Document** (SADPD) will contain detailed planning policies and site allocations. Once adopted, its policies will be used alongside the Local Plan Strategy and neighbourhood plans to help determine planning applications. This consultation is on the first draft of the SADPD and is an important opportunity to help shape its policies and proposals, and to help us make sure that the document will provide an up-to-date planning framework to support our ambition of making the borough an even better place to live, work and visit.

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Further information is available on our website [www.cheshireeast.gov.uk/localplan](http://www.cheshireeast.gov.uk/localplan), at Cheshire East libraries and customer service centres, or by contacting the Spatial Planning Team at [localplan@cheshireeast.gov.uk](mailto:localplan@cheshireeast.gov.uk) or on 01270 685983.

Yours faithfully,

Adrian Fisher  
Head of Planning Strategy  
Cheshire East Council

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**Email sent to the local plan consultation database**
Appendix 2: Screen shots from the council website

Screen shot of www.cheshireeast.gov.uk (taken 28 September 2018)
Cheshire East Council Consultations

Welcome to Cheshire East Council's consultation portal - please browse our current consultations below.

- Read about document accessibility

Cheshire East Digital Panel

The purpose of the digital influence panel is to involve anyone and everyone who lives in the borough in our consultations and surveys. Digital influence panel members will receive regular emails inviting them to complete consultations and surveys.

- Join the digital influence panel by filling out this form.

Current Consultations

Consultations are listed by closing date - those closing soonest are listed at the top.

Mental Health Strategy Consultation

Cheshire East Council has developed a Mental Health Strategy to ensure there is support in place for those with mental health conditions. We would now like your final feedback on this strategy.

- Give your views on our Mental Health Strategy

This consultation will close at 5pm on Friday 5 October 2018.

Learning Disabilities Strategy Consultation

Cheshire East Council has developed a Life. My Choice strategy, which sets out the vision, ambitions and commissioning intentions for people with learning disabilities of all ages living in Cheshire East. The main aim of the strategy is to ensure that all individuals can live a healthy, happy and independent life with choice and control over the care that they receive.

We would now like your final feedback on this strategy.

- Give your views on our Learning Disabilities Strategy

This consultation will close at 5pm on Friday 5 October 2018.

Local Plan Consultations

The second document of our local plan is the ‘Site Allocations and Development Policies Document (SADPD).’

This document contains more detailed planning policies and, following 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.

You can view more information about this consultation, and give your views, via our local plan consultations webpage.

This consultation will close on 22 October 2018.

Expansion of Sandbach Secondary Schools

An analysis of the latest pupil forecasts has identified the need to provide an additional 300 secondary school places in Sandbach in response to increasing pupil population from housing developments.

Screen shot of www.cheshireeast.gov.uk/council_and_democracy/council_information/consultations
(taken 28 September 2018)
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.

Submit your views

Following the adoption of the Local Plan Strategy last year, work is in progress on some further documents to set out planning policies in the borough and there are a number of different consultations taking place between 11 September and 22 October 2018.

- The Site Allocations and Development Policies document will contain detailed planning policies and site allocations. Once adopted, its policies will be used alongside the LP and neighbourhood plans to help determine planning applications. Further information on the First Draft SAPPD consultation is available on our consultation portal.
- In addition to the SAPPD, there is a Sustainability Appraisal consultation and a Habitats Regulations consultation, which looks at the SAPPD’s contribution to sustainable development and its impact on internationally-designated nature conservation sites.
- There is also a consultation on The Garden Village at Handforth draft SPD which includes a masterplan and design guide to inform development on this important site.
- We are consulting on a revised and updated statement of community involvement which sets out how the council will engage with stakeholders and the wider public on all of its principal planning functions.
- Finally, we are also carrying out a call for sites that may be suitable for gypsy, traveller and travelling showpeople accommodation.

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>
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<tr>
<td>Local Plan Strategy</td>
<td>Adopted 27 July 2017</td>
<td>The Local Plan Strategy 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>Consultation on the first draft runs until 22 October 2018</td>
<td>The SAPPD will allocate the remaining sites needed for future development and set out further detailed planning policies to be used when considering planning applications. The First Draft SAPPD consultation runs from 11 September - 22 October 2018.</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 24 April and 05 June 2017, alongside a 'call for sites' for minerals and waste sites.</td>
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Screen shot of www.cheshireeast.gov.uk/localplan (taken 28 September 2018)
Screen shot of www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx (taken 28 September 2018)
Local Plan consultations

This page gives details of all consultations that have taken place on the new Local Plan and all those that are currently scheduled. The consultations are listed in reverse chronological order. Community engagement is very important in developing the new Local Plan. Responses received during each consultation stage have been considered and have helped to influence the production of the Local Plan. Consultations on Neighbourhood Plans are shown separately on the Neighbourhood Planning page.

Current consultations

Following the adoption of the Local Plan Strategy last year, work is in progress on some further documents to set out planning policies in the borough and there are a number of different consultations taking place between 11 September and 22 October 2018.

- The site allocations and development policies document will contain detailed planning policies and site allocations. Once adopted, its policies will be used alongside the LPS and neighbourhood plans to help determine planning applications. Further information on the PPS are available on our consultation portal.
- In addition to the LPS, there is a Sustainability Appraisal consultation and a Habitats Regulation Assessment consultation, which looks at the SADD’s contribution to sustainable development and its impact on internationally-designated nature conservation sites.
- There is also a consultation on The Garden Village at Handsford draft SPD which includes a masterplan and design guide to inform development on this important site.
- We are consulting on a revised and updated statement of community involvement which sets out how the council will engage with stakeholders and the wider public on all of its principal planning functions.
- Finally, we are also carrying out a ‘Call for Sites’ that may be suitable for Gypsy Traveller and Travelling Showpeople accommodation.

Previous consultations

Community Infrastructure Levy Draft Charging Schedule (September - November 2017)

Cheshire East Council intends to introduce a Community Infrastructure Levy Charging Schedule for new development. Following consultation on a preliminary draft charging schedule in February - April 2017, we produced a Draft Charging Schedule for the proposed introduction of CL. This sets out the level of CL charge which is considered to be payable in different parts of the borough. Consultation ran from 28 September to 6 November 2017. To view the consultation documents and responses received, please see the council’s consultation portal (draft charging schedule page).

Minerals and Waste Issues Paper (April - June 2017)

The Minerals and Waste Development Plan document will set out policies for dealing with minerals and waste, and identify sites. Consultation on the Minerals and Waste Issues Paper took place between 24 April and 6 May 2017, alongside a call for sites for minerals and waste sites.

Site Allocations and Development Policies document - issues paper (February - April 2017)

The site allocations and development policies document will form the second part of the new Local Plan, allocating non-strategic sites for development and setting detailed planning policies to guide development. Consultation on an issues paper took place between 27 Feb and 10 April 2017. We have now published the SADD’s issues paper report of consultation (PDF, 2.6 MB). Further information and feedback invitation is available to view the consultation documents and responses received.
Appendix 3: Press releases

Council prepares to launch next phase of borough’s development plan

20 August 2018

Cheshire East Council is about to launch the next phase of the Development Plan, the approved framework for housing, employment, and other key infrastructure sites up to 2030.

With the local plan strategy adopted last year, the council is now in the position of identifying further non-strategic sites for development, including housing. There will be a consultation process (starting 5 September) but no final decisions will be made until the consultation process is concluded and all feedback considered.

The Site Allocations and Development Policy Document (SADPD) will follow a similar pathway to the Local Plan Strategy, with two rounds of six-week public consultations, supported by a range of evidence documents and followed up with a series of public hearings chaired by a government planning inspector.

When adopted, the SAPDP will replace the legacy policies of the three former borough local plans, covering Macclesfield, Congleton and Crewe and Nantwich.

To meet its target the council needs to ensure 36,000 homes are built between 2010 and 2030, therefore additional sites will be identified together with more detailed development management policies to guide planning decisions.

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

The sites in the SADPD will be non-strategic – sites of less than 150 homes or five hectares in size. Some will be focused in key employment areas in principal towns, such as Crewe, or in smaller key service centres such as Poynton or Middlewich or smaller local service centres such as Bollington and Audlem.
The council must also meet its obligation to provide affordable housing, Gypsy and Traveller sites and sites for Travelling Showpeople.

A further element of the document is the review of policy boundaries around towns and villages to guide location of development and direct investment to them. But there will also be measures to protect land regarded as important to biodiversity and recreation.

Councillor Ainsley Arnold, Cheshire East Council cabinet member for housing, planning and regeneration, said: “It is important that our residents and businesses are given a clear picture of what the council must provide in terms of housing sites, employment sites and other infrastructure requirements.

“Cheshire East is a great place to live, work, raise a family and have access to good schools and quality housing. It is important that this next phase in the local plan process is open and transparent and that we encourage as many people as possible, including stakeholders and partners, to engage in this consultation process.

“The Local Plan Strategy and the SADPD are central to the achievement of sustainable development in the borough.”

Press release dated 20 August 2018.
Consultation begins on next phase of borough’s development plan

17/09/2018

Public consultation has begun on the next phase of Cheshire East Council’s development plan.

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

With the Local Plan Strategy adopted last year, the council has now launched a number of consultations, which will help identify further non-strategic sites for sustainable development, including housing. However, no final decisions will be made until the consultation process is concluded and all feedback considered.

The site allocations and development policy document (SADPD) follows a similar pathway to the Local Plan Strategy, with two rounds of six-week public consultations, supported by a range of evidence documents and followed up with a series of public hearings chaired by a government planning inspector.

When adopted, the SADPD will replace the policies of the three former borough local plans, covering Macclesfield, Congleton and Crewe and Nantwich.

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 150 homes or five hectares (12.4 acres) in size. Some will be focused in key employment areas in principal towns, or in smaller key service centres.

The council must also meet its obligation to provide affordable housing, Gypsy and Traveller sites and sites for Travelling Showpeople and, as part of the consultation process, is now calling for potential sites to be identified.
A further element of public consultation is the review of planning boundaries, such as those for greenbelt and built-up areas. But there will also be measures to protect land regarded as important for biodiversity and recreation.

Consultations on sustainability appraisal and habitats regulations have now begun, which look at the SADPD’s contribution to sustainable development and its impact on internationally-designated nature conservation sites.

Councillor Ainsley Arnold, Cheshire East Council cabinet member for housing, planning and regeneration, said: “I would urge all interested members of the community to get involved in this important consultation process.

“We know that Cheshire East is a truly great place to live, work, do business, raise a family and have access to good schools and quality housing. It is crucial that this next phase in the local plan process is open and transparent and that we encourage as many people as possible, including stakeholders and partners, to engage in this consultation process.

“Our Local Plan Strategy and the SADPD are absolutely central to the achievement of sustainable development in the borough – so I would urge people to get involved and have their say.”

The council is also consulting on a revised and updated ‘statement of community involvement’, which sets out how the council will engage with stakeholders and the wider public when preparing planning policies and considering planning applications.

As previously announced, this week also saw the start of a consultation on the draft supplementary planning document for the Garden Village at Handforth, which includes a masterplan and design guide to inform development on this important site.

The council will hold a consultation drop-in session at Handforth Library on Tuesday 25 September from 3pm-7pm, where more information will be available on this draft.

Links to all the consultation documents can be found by visiting the web page: www.cheshireeast.gov.uk/localplan

The consultations run until 22 October 2018.

Press release dated 17 September 2018
Appendix 4: Screen shots from the consultation portal

First Draft Site Allocations and Development Policies Document

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.

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

This consultation is on the first draft of the SADPD, its draft policies and proposals have been informed by:

- The Local Plan Strategy and external planning policies and guidance;
- A variety of sources, reports, statistics and other evidence, many of which have been completed or commissioned by the council;
- The findings of last year’s consultation on the SADPD issues papers;
- Involvement of key stakeholders, particularly including town and parish councils, infrastructure providers and statutory consultees such as the Environment Agency, Highways England and Natural England; and
- Recommendations from appraisals and assessments including a Sustainability Appraisal and Habitats Regulations Assessment.

The first draft SADPD has been developed for public consultation between 11 September and 22 October 2018. This is an important opportunity to help shape the policies and proposals if the SADPD is adopted. We make sure that the document will provide an up-to-date planning framework to support our ambition of making the borough an even better place to live, work and visit.

Consultation documents

The first draft SADPD document is available to read online on this consultation portal. Click the read and comment on document button below the document is available to view from 11 September and comments will be submitted until the consultation ends on 11 September. The first draft SADPD is accompanied by an interim Sustainability Appraisal, a Habitats Regulations Assessment, a draft policies map and an extensive series of background evidence and reports. You can download all versions of all of these documents to keep from the background evidence and reports page.

Paper copies of all documents can be inspected at the council offices at Waterfront, Sandbach. In addition, copies of the first draft SADPD document, the Sustainability Appraisal, the Habitats Regulations Assessment and the draft policies map can be inspected at Cheshire East Customer Service Centre, Marketfield Customer Service Centre and all public libraries in Cheshire East.

Making comments

The consultation is part of the plan-making process, which will lead to the examination of the SADPD by an independent planning inspector appointed by the Secretary of State. The inspector will consider whether the SADPD is sound and has been prepared in accordance with the statutory national planning policy requirement. To help the inspector prepare the SADPD for its future examination, it would be very helpful to receive your comments to the test of soundness that the inspector will consider (as well as any legal or procedural requirements).

Comments can be submitted on the first draft SADPD, the Sustainability Appraisal and the Habitats Regulations Assessment. If you have comments to make on the draft policies map or the background evidence, please relate these to the corresponding policy in the first draft SADPD.

Submit your views

The council’s online consultation portal is our preferred method for submitting responses, but we will also accept responses by email or in writing. Full details of how to submit comments are available at the above and the council offices listed above.

- Consultation portal: click the read and comment on document button below the document is available to view from 11 September (you will need to log in to view the consultation before submitting comments);
- Email: ceph@cheshireeast.gov.uk;
- Phone: 0345 458 0808

Please make sure that you submit your comments reach us by 22 October 2018. 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 Privacy Policy.

Next steps

Following this consultation, we will consider all the responses received and carry out any further background research and evidence as required to produce a final draft SADPD. There will be further public consultation on the final draft SADPD in 2019, and following that we will submit the SADPD to the Secretary of State for its independent examination.

Other local plan consultations

In addition to the first draft SADPD, the interim Sustainability Appraisal and the Habitats Regulations Assessment, there are a number of other local plan consultations and under way until 22 October 2018:

- Option and Value and Value for Money Study for Sites;
- The Garden Village at Middlewich Draft Supplementary Planning Document and
- Draft Stewart of Community Involvement

Screen shot from First Draft SADPD consultation portal page (taken 28 September 2018)
The site is by a wooded watercourse forming its western boundary. There is built development to the north (Greg Avenue), south (Springbank) and east (Ashbrook Drive) of the site.

12.32 View Comments (0)  Add Comments
There is historic tipping associated with the Henshall Road site to the south west and this matter will need to be carefully assessed.

12.33 View Comments (0)  Add Comments
A gravity sewer crosses the site, which should be appropriately accommodated in any development proposals.

Site BOL 3

Land at Oak Lane/Greenfield Road
Land at Oak Lane/Greenfield Road is allocated for residential development for around 9 new homes. Development proposals for the site must:
1. retain the majority of the mature hedgerow/trees along the frontage (southern boundary of the site); and
2. take into account the gravity sewer that crosses the site.

[view site on the draft adopted policies map]
Supporting information

12.54 View Comments (1)  Add Comments
The site lies on the southern edge of Bollington with housing development on three sides, with open countryside to the south.

12.55 View Comments (1)  Add Comments
Kerridge Conservation Area lies to the south of the site and there are views into and out of the site. The majority of the trees/hedge on the boundary must be retained to avoid there being any unacceptable impact on the setting of the conservation area.

12.56 View Comments (0)  Add Comments
A gravity sewer runs through the site, which should be considered as part of any future proposal on the site.

12.57 View Comments (1)  Add Comments
The access will need to be widened/improved to allow two way traffic and ensure sufficient driveway visibility for the existing dwelling on the eastern corner.

12.58 View Comments (0)  Add Comments
There is a former mill premises adjacent, which means that a contaminated land assessment is required.

Site BOL 4

Land to the east of 41a Shrigley Road
Land to the east of 41a Shrigley Road is allocated for residential development for around 15 new homes. Development proposals for the site must:
1. be accompanied by an ecological survey and include proposals for a protective buffer adjacent the wooded Harrop Brook corridor;
2. minimise the loss of trees and stone walls in creating adequate vehicular access; and
3. provide a boundary treatment along the northern/north eastern boundary of the site to make sure that a readily recognisable Green belt boundary can endure in the long-term, and which incorporates a belt of trees and shrubs to mitigate the visual impact of the development from Shrigley Road.

[view site on the draft adopted policies map]
Supporting information
First Draft SADPD Interim Sustainability Appraisal

Sustainability Appraisal is an ongoing process that must be carried out during the preparation of a local plan. Its role is 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. An Interim Sustainability Appraisal has been produced to assess the First Draft SADPD.

The Interim Sustainability Appraisal of the First Draft SADPD has been published for public consultation between 11 September and 22 October 2018.

Consultation documents

The Interim SA of the First Draft SADPD is available to read online on this consultation portal. Click the ‘read and comment on document’ button below the document to view from 28 September, but comments cannot be submitted until consultation starts on 11 September. PDF versions of the Interim SA and a Non-technical summary can be downloaded here:

- First Draft SADPD Interim Sustainability Appraisal (PDF, 3.6MB);
- Non-technical Summary of the First Draft SADPD Interim Sustainability Appraisal (PDF, 746KB)

Paper copies of the Interim SA and the Non-technical summary can be requested at the council’s offices at Westfields, Sandbach, the Crewe Customer Service Centre, the Nantwich Customer Service Centre and all public libraries in Cheshire East.

Submit your views

The council’s online consultation portal is our preferred method for submitting responses, but we will also accept responses by email or in writing. Paper comments forms are available at libraries and the council’s offices listed above.

- Consultation portal: click the ‘read and comment on document’ button below (from 11 September) you will need to log-in or register with the consultation portal before submitting comments.
- Email: consultation@cheshirewest.gov.uk
- Post: Spatial Planning (Westfields), GO Municipal Buildings, Earle Street, Crewe CW1 2BU

Please make sure that your comments reach us by 22 October 2018. We are unable to accept anonymous comments and you may provide us with your name and contact details. Your personal details will be processed in line with our Spatial Planning Privacy Notice and your name and comments will be published and made available to view on the consultation portal.

Other local plan consultations

A number of other local plan consultations are also underway until 22 October:

- First Draft Site Allocations and Development Policies Document
- First Draft SADPD Housing Regulations Assessment
- Odyssey and Traveller and Travelling Showpeople Call for Sites
- The Option Village at Handforth Draft Supplementary Planning Document
- Draft Statement of Community Involvement

Screen shot from Interim Sustainability Appraisal consultation portal page (taken 28 September 2018)
First Draft SADPD Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) has been prepared to support the development of the First Draft SADPD. The HRA has assessed the impact of the SADPD on internationally designated nature conservation sites. The impact of the SADPD has been assessed both alone and in combination with other plans and projects. The HRA is an iterative process and plays an important role in refining the contents of the plan, both in terms of policies and site allocations.

The Habitats Regulations Assessment of the First Draft SADPD has been published for public consultation between 11 September and 22 October 2018.

Consultation documents

The HRA of the First Draft SADPD is available to download from this consultation portal. Click the View and comment button below to download the document and submit your comments (the document is available to view from 09 September but comments cannot be submitted until consultation starts on 11 September).

Paper copies of the HRA can be requested at the council’s offices at Westfields, Sandbach; the Cheshire Customer Service Centre; the Macclesfield Customer Service Centre and all public libraries in Cheshire East.

Submit your views

The council’s online consultation portal is our preferred method for submitting responses, but we will also accept responses by email or in writing. Paper comments forms are available at libraries and the council’s offices listed above.

• Consultation portal: click the View and comment button below (from 11 September) (you will need to login or register with the consultation portal before submitting comments)
• Email: laceyjl@cheshirewest.gov.uk
• Post: Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 1BJ

Please make sure that your comments reach us by 22 October 2018. 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 Spatial Planning Privacy Notice and your name and comments will be published and made available to view on the consultation portal.

Other local plan consultations

A number of other local plan consultations are also underway until 22 October:

• First Draft Site Allocations and Development Policies Document;
• First Draft SADPO Intertwine Sustainability Appraisal;
• Gyngs and Traveller and Travelling (Showpeople) Cell for Sites;
• The Garden Village at Handworth Farm Supplementary Planning Document and;
• Draft Statement of Community Involvement.

Screen shot from Habitats Regulations Assessment consultation portal page (taken 28 September 2018)
Gypsy and Traveller and Travelling Showpeople ‘Call for Sites’

The council is currently consulting on the First Draft Sites Allocations and Development Policies Document (SADPD), which will contain detailed planning policies and site allocations. Once adopted, its policies will be used alongside the Local Plan Strategy and neighbourhood plans to help determine planning applications in the borough. The council is proposing to allocate sites for Gypsies and Travellers and Travelling Showpeople in the SADPD. Following a detailed initial site selection process, three site allocations are proposed in the First Draft SADPD, which will address part of the accommodation needs identified in the Gypsy and Traveller Accommodation Assessment (PCA, 1.1MB).

A further ‘call for sites’ exercise, focused on Gypsy and Traveller and Travelling Showpeople’s sites, is now being carried out alongside consultation on the First Draft SADPD. The council invites parties to put forward sites they consider to be suitable and available for Gypsy and Traveller and Travelling Showpeople use. The council will use the information received to inform the preparation of the first draft SADPD. Please note that all sites will be assessed by the council and submission of a site does not automatically mean that it will be allocated for development.

Submit your site

The call for sites exercise runs until 22 October 2018. The council’s online consultation portal is our preferred method for submitting responses, but we will also accept responses by email or in writing. Paper comments forms are available at the council’s office at Westfield, Sandbach, the Cheshire Customer Service Centre, The Mossfield Customer Service Centre and all public libraries in Cheshire East.

- Consultation portal: click the ‘start survey’ button below (from 11 September) (you will need to log-in or register with the consultation portal before submitting comments).
- Email: gypsytraveller@cheshirewest.gov.uk
- Past Spatial Planning/Westfield, C/O Municipal Buildings, Crewe, CW1 2BU.

Please make sure your comments reach us by 22 October 2018. 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 Spatial Planning Privacy Notes.

Other local plan consultations:

A number of other local plan consultations are also under way until 22 October:

- First Draft Sites Allocations and Development Policies Document
- First Draft SPDs for Sustainability Appraisal
- First Draft SADPD Policies Regulations Assessment
- The Bank and Village at Handforth Draft Supplementary Planning Document
- Draft Statement of Community Involvement
Appendix 5: Consultation response forms

Cheshire East Local Plan
Consultation Response Form (Autumn 2018)

Following the adoption of the Local Plan Strategy last year, work is in progress on some further documents to set out planning policies in the borough and there are a number of different consultations taking place between 11 September and 22 October 2018. The consultation documents are listed below and can be viewed online at www.cheshireeast.gov.uk/localplan and at:

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

You can use this consultation response form to submit comments on any of these documents:

- The Site Allocations and Development Policies Document (SADPD) will contain detailed planning policies and site allocations. Once adopted, its policies will be used alongside the Local Plan Strategy and neighbourhood plans to help determine planning applications. This is an important opportunity to help shape the policies and proposals in the SADPD and to help us make sure that the document will provide an up-to-date planning framework to support our ambition of making the borough an even better place to live, work and visit.
- In addition to the First Draft SADPD, we are also consulting on its accompanying Sustainability Appraisal and Habitats Regulations Assessment which look at the SADPD’s contribution to sustainable development and its impact on internationally-designated nature conservation sites.
- There is also a consultation on the draft supplementary planning document for The Garden Village at Handforth which includes a masterplan and design guide to inform development on this important site.
- Finally, we are consulting on a revised and updated Statement of Community Involvement which sets out how the council will engage with stakeholders and the wider public on all of its principal planning functions.

We are also carrying out a 'call for sites' that may be suitable for Gypsy, Traveller and Travelling Showpeople accommodation, but there is a separate form available for this purpose.

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 comments form.

<table>
<thead>
<tr>
<th>Online:</th>
<th>Via the consultation portal at <a href="http://www.cheshireeast.gov.uk/localplan">www.cheshireeast.gov.uk/localplan</a></th>
</tr>
</thead>
<tbody>
<tr>
<td>Email:</td>
<td>To <a href="mailto:localplan@cheshireeast.gov.uk">localplan@cheshireeast.gov.uk</a></td>
</tr>
<tr>
<td>By post:</td>
<td>Spatial Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ</td>
</tr>
</tbody>
</table>

Please make sure that your comments reach us by 22 October 2018. 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 Spatial Planning Privacy Notice, which is available on the council’s website. Your name and comments will be published and made available to view on the consultation portal.

* The Handforth Garden Village documents are available online and in Handforth, Wmslow and Poynton libraries only.
### Cheshire East Local Plan
Consultation Response Form
(Autumn 2018)

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

Please return by: Monday 22 October 2018

This comment form has two parts:
- Part A – Personal details.
- Part B – Your representation(s).

### Comments Form Part A: Personal Details

<table>
<thead>
<tr>
<th>Personal Details*</th>
<th>Agent’s Details (if applicable)</th>
</tr>
</thead>
<tbody>
<tr>
<td>*If an agent is appointed, please complete only the Title, Name and Organisation in column 1 but complete the full contact details of the agent in column 2.</td>
<td></td>
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<tr>
<td>Title</td>
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<tr>
<td>Email Address</td>
<td>(where relevant)</td>
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<td>Your Reference No. (if known)</td>
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Please complete a separate Part B form for each comment that you would like to make. This response form provides enough space for four comments but please copy and attach further part B forms if required.

For further assistance in making comments please contact the Spatial Planning Team at localplan@cheshireeast.gov.uk or by telephone on 01270 685693.
Comment Form Part B: Comment

Q1. Which document are you commenting on? (please tick one box)
- [ ] First Draft Site Allocations and Development Policies Document (SADPD)
- [ ] Interim Sustainability Appraisal of the First Draft SADPD
- [ ] Habitats Regulations Assessment of the First Draft SADPD
- [ ] The Garden Village at Handforth Draft Supplementary Planning Document
- [ ] Draft Statement of Community Involvement

Q2. Which section of the document are you commenting on?
Paragraph / Policy / Site / Chapter / Figure
(please delete as appropriate and state which):

Q3. What is your overall view on this section? (please tick one box)
- [ ] Support
- [ ] Object
- [ ] Comment only

Q4. Please set out your comments or views on this section:

Printed consultation response form
Cheshire East Local Plan
Gypsy and Traveller and Travelling Showpeople ‘Call for Sites’ Form (Autumn 2018)

The council is consulting on the First Draft Site Allocations and Development Policies Document (“SADPD”). The SADPD will contain detailed planning policies and site allocations. Once adopted, it will be used alongside the Local Plan Strategy and neighbourhood plans to help determine planning applications in the borough.

The council is proposing to allocate sites for Gypsies and Travellers and Travelling Showpeople in the SADPD. Following a detailed initial site selection process, three site allocations are proposed in the First Draft SADPD which will address part of the accommodation needs identified in the Gypsy and Traveller Accommodation Assessment.

A further call for sites exercise, focused on Gypsy and Traveller and Travelling Showperson sites, is now being carried out alongside consultation on the First Draft SADPD. The council invites parties to put forward sites they consider to be suitable and available for Gypsy and Traveller and Travelling Showperson use.

The council will use the information received to inform the preparation of the final draft SADPD. Please note that all sites will be assessed by the council and submission of a site does not automatically mean that it will be allocated for development.

Submitting Sites
The call for sites runs until the 22 October 2018.

You can submit sites for consideration by using the online web form available at www.cheshireeast.gov.uk/localplan or by completing this call for sites form. So that sites can be properly assessed by the council, we do ask that you complete all the information requested on the form and include a plan showing the location and boundaries of the site.

Online: form available at www.cheshireeast.gov.uk/localplan
Email: To localplan@cheshireeast.gov.uk
By post: Cheshire East Council, Spatial Planning, Westfields C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ

Please make sure that completed forms reach us by 22 October 2018. We are not able to accept anonymous forms and you must provide us with your name and contact details. Your personal data will be processed in line with our Spatial Planning Privacy Notice, which is available on the council’s website.
Cheshire East Local Plan
Site Allocations and Development Policies
Gypsy and Traveller and Travelling Showpeople
Call for Sites form

Please return to: [Cheshire East Council, Spatial Planning, Westfields C/O Municipal Buildings, Earl Street, Crewe CW1 2BJ] or by email to [localplan@cheshireeast.gov.uk] or complete a copy of the form via the Cheshire East website.

Please return by: 22 October 2018

Section 1 – Personal Details

<table>
<thead>
<tr>
<th>Personal Details*</th>
<th>Agent’s Details (if applicable)</th>
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* If an agent is appointed please complete only the Title, Name and Organisation in column 1 but complete the full contact details of the agent in column 2.

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<td>Telephone Number</td>
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<td>Email Address (where relevant)</td>
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Section 2 – Site Plan

Please enclose a site plan identifying the location and boundaries of the site including detail of the local road network. The council will not accept submissions that are not accompanied by a plan clearly identifying the exact location of the site in question.
Section 3 – Site Details (relating to accompanying plan)

<table>
<thead>
<tr>
<th>Site Address</th>
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<tr>
<td>Post Code</td>
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<tr>
<td>Site size in hectares (if known)</td>
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Section 4 – Site Proposal – Is the site proposed as a Gypsy and Traveller site or a Travelling Showperson site. Please select one option from the list below.

- Gypsy and Traveller Site
- Travelling Showperson Site
- No preference

How many Gypsy and Traveller and/or Travelling Showperson pitches/plots could be accommodated on the site? (please provide justification for your answer)

Section 5 – Site Interest

<table>
<thead>
<tr>
<th>What is your interest in the site (Owner/Lessee/Prospective Purchaser)</th>
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<tr>
<td>Have you sought permission from the owner(s) to provide their contact details?</td>
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<tr>
<td>Please provide contact details for any other land owners on the site (including land registry reference, if known)</td>
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</tbody>
</table>
| In identifying a site you are giving permission for Council officers, to access the site in order to ascertain site suitability | Yes
| The information provided within this assessment is correct, to the best of your knowledge | Yes

Section 6 – Brownfield / Greenfield – Please select one option from the list that describes the site

- Greenfield
- Brownfield
- Mixture
- Unknown

Section 7 – Site Information

<table>
<thead>
<tr>
<th>Current Land Use(s):</th>
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<tr>
<td>Previous Land Use(s) (if known):</td>
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<tr>
<td>Is the site currently subject to a lease or other restriction that would limit when it would be available? Please provide details.</td>
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Section 8 Timescales for Availability

- Please provide details of when the site would be considered available (taking account of any known constraints affecting the site):

| Timescale               |   
|------------------------|--
| Immediately            | ✓  
| Within the next 5 years|   
| Within 6-10 years      |   
| Within 11-15 years     |   
| More than 15 years     |   

Section 9 Site Information

- Is the site affected by any known issues relating to contaminated land?
- Is the site located in an area of 'flood risk' defined by the Environment Agency?
- Is the site affected by matters relating to air quality or have an negative impact on the natural environment (e.g., proximity to a Site of Biological Importance)?
- Is the site subject to any other physical or planning constraints which could limit future development opportunities? i.e., conflict with surrounding uses, protected trees (Tree Preservation Orders), listed buildings, historic designations, overhead/underground infrastructure (pylons or pipes), site topography, other known planning constraints. Please give as much information as possible.
- Does access exist to the site or would it need to be created as part of any new development or redevelopment? Please give details as necessary.
- Are all utilities available, or can they be viably provided, to service any development on the site? If so, please give details.

Section 10 Planning Status

- Current Planning Status? If known, provide reference(s) and details of any other relevant planning history.
- To the best of your knowledge, has the site previously been considered by Cheshire East Council for Gypsy and Traveller or Travelling Showperson use? If so, please provide details, including relevant reference number(s).

Section 11 Additional Information

Please provide any additional information:

For any questions in completing this form – please contact localplan@cheshireeast.gov.uk or 01270 685893

A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems that would restrict development of the land.

Printed Gypsy and Traveller and Travelling Showpeople ‘call for sites’ form
Appendix 6: Summary of key issues

Chapter 1: Introduction / general issues

Summary of key points:

- The SADPD must reflect the LPS and meet the tests of soundness.

- Development Plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

- Future developers should be encouraged to contact United Utilities as early as possible to discuss water and wastewater infrastructure requirements for specific sites.

- The SADPD must make sure it can deliver the housing needs identified.

- The SADPD must reflect the most recent evidence base and make sure there is enough flexibility to demonstrate a five-year supply of deliverable housing land.

- In terms of key strategic matters between Cheshire East and Cheshire West and Chester Council’s, these issues have been fully addressed through the preparation and adoption of the Local Plan (Part One) Strategic Policies in Cheshire West and the Local Plan Strategy in Cheshire East.

- The SADPD should allocate further housing sites to accommodate the dwellings that were to be provided on the larger strategic sites but will now not be delivered in the plan period.

- The SADPD should allocate further housing sites to provide flexibility in the event that HS2 is committed to come to Crewe by 2027.

- The SADPD should allocate further housing sites to help meet the requirement to identify 10% of the housing requirement on sites of 1ha or less.

- The SADPD should allocate further housing sites to acknowledge the continuing need to boost the supply of housing generally and because the requirement should be regarded as a minimum.

- The allocation of non-strategic sites is of critical importance in ensuring that the future growth needs and spatial strategy outlined in LPS are deliverable. The identification of nonstrategic sites will help diversify the land supply.

- The SADPD should provide for the most appropriate approach when considered against the alternatives; it should respond positively to the requirements of the LPS; and it should reflect the policies of the NPPF.
- Policies of the draft SADPD are unsound, not legally compliant, unjustified, not positively prepared or consistent with national policy.

- There was no advanced notice of the publication date of the First Draft SADPD.

- The way the portal is presented is incomprehensible and inaccessible to a substantial portion of Bollington’s residents; the presentation of the ‘consultation’ has been one that could be construed as developer friendly yet resident unfriendly.

- The Local Plan is deficient in local explanation, consultation and resolute disregard for local community opinion regarding the actual housing needs in the area and lack of value placed on productive agricultural land and nature conservation.

- The Local Plan does not reflect the lower housing targets set by government.

- The SADPD is limited and disappointing with regards to the promotion of health.

- Cheshire East and Cheshire West and Chester Councils have had a unique opportunity to co-operate which does not appear to have been fully exploited to date.

- There is an over-provision of housing in Cheshire East, justified by the government’s latest (reduced) population growth figures and its proposed methodology for calculating housing needs.

- The boundaries associated with policy PG6 need to be more accurately drawn, for example on the eastern edge of Wheelock.

- Concerns and disappointment over the delays in producing a strategic minerals spatial strategy in advance of issuing the SADPD.

- The current consultation unjustified, ineffective and contrary to national policy.

- The SADPD does not comply with LPS Policy SE 10.

- Minerals can only be worked where they exist and without a clear strategy for minerals, over the coming plan period to 2030, other types of development may be allocated and thereby compromise future mineral development.

- Mineral safeguarding, mineral consultation zones (as applicable), Areas of Search, Preferred Areas and Specific Sites for minerals should all be established first to inform where other types of development (non-mineral development) can potentially be located.

- Non-mineral development should have no higher status in a Local Plan than mineral development, not least because non-minerals development will ultimately rely to a large extent on the availability of minerals for construction.
Cheshire East is still relying on saved policies from the 1999 Cheshire Replacement Minerals Local Plan. This does not allow mineral companies to plan properly for future areas, meaning proposals are having to come forward to seek to ensure continuity of supply that are necessarily not in compliance with the adopted plan.

The SADPD should include a commitment to review the need and extent of new build required at least every five years in order to fine tune the strategy to the development on the ground.

The removal of further Green Belt land for development or safeguarding should be withdrawn from the SADPD.

Request for the Council to set out in a table format (as for existing Saved Policies in the LPS) how the content of each existing Saved Policy is to be saved, deleted or incorporated into a new SADPD policy.

The proposal fails to take proper account of the Bollington Neighbourhood Plan; this is unjustified.

There are some inconsistencies between the First Draft SADPD and the second stage pre-submission 2018 version of the Poynton Neighbourhood Plan.

References to neighbourhood planning in the First Draft SADPD are unbalanced in focussing too much on development, without referring to the other useful potential of Neighbourhood Plans.

The assessment methodology did not allow councils to use local knowledge to help shape the content of the draft document.

Local residents, Bollington Town Council, Bollington Civic Society and other representative bodies have not been asked to suggest where land should be allocated for housing, only local developers and land owners; this is a biased sample.

The consideration of sites in High Legh should have full regard to the High Legh Neighbourhood Plan.

The impacts of the proposed increase in housing numbers and, hence, population, car numbers, car journeys per day, etc. have not been given any weight in the final calculation.

There are no plans for the enhancement of infrastructure.

This section is not effective because reference is not given to the actual neighbourhood plans; these should be listed.

There needs to be a commentary as to how the amendments to the NPPF have been considered.
• The Council may wish to consider the allocation of land in rural areas solely for 100% rural exception sites, developing affordable homes for rural needs on small sites large enough for a small number of dwellings.

• The Council have not published a whole plan viability assessment as part of this consultation.

• There does not appear to be any evidence to support the population increase and demographics that justify the delivery of increase in demand for housing in the area.

Chapter 2: Planning for growth (general issues)

Summary of key points:

• The council has experienced issues with under-delivery of housing and it is necessary to ensure that a range of sites are allocated in the plan to ensure that the housing requirement can be met.

• Small, available sites can make a significant contribution to housing land supply and choice.

• Sites in the OSRA should be allocated and the flexibility for this tier retained.

• Over reliance on windfall to meet the OSRA requirement. There is a finite number of infill sites in the OSRA and infill boundaries are drawn tightly around settlements. Neighbourhood Plans will not provide housing growth for those settlements washed over by Green Belt. Sites should be allocated and/or settlement boundaries defined for infill villages, particularly where they are ‘washed’ over by Green Belt.

• No evidence is provided of historic delivery rates for windfall sites.

• Over optimistic assessment of housing need, based on assumptions of growth that are unlikely to be achieved. The Site Allocations and Development Policies Document compounds provision for over-development of Cheshire East.

• The methodology used to assess sites is flawed.

• The focus of the plan is reaching a target number of homes rather than an assessment of housing need in each area. The model is dependent on landowners offering sites, not necessarily in the right place, in order to fit the numbers. Allocation of safeguarded land in Chelford demonstrates this approach.

• Social and economic objectives are not weighed against environmental considerations.

• Achieving the right balance is relevant to both urban and rural areas - paragraph 2.1 should be reworded.
• Paragraph 2.1 ‘development proportionate to the scale of settlements’ should also consider potential, existing and planned infrastructure.

• The Bollington Neighbourhood Plan supports:
  
  o future development on the western side of the town to avoid exacerbation of the traffic problems on the single access road,
  
  o building homes suitable for single young people, young families and one level units for older people downsizing.

  o Development limited by the services already present unless improved services are constructed alongside the development.

• The policies continue and supplement the planning for growth policies PG1-PG7 in the Local Plan Strategy.

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

Summary of key points:

General

• The LPS was previously found sound on the basis that a flexibility factor was to be applied to LSC’s. The flexibility factor should be retained, this would result in a need for an additional 245 dwellings in the LSC’s (with 7% flexibility factor).

• The purpose of the “Flexibility Factor” was to ensure that the agreed and adopted housing “targets” for each of the settlement hierarchies is delivered rather than the overall plan target. While targets may be exceeded elsewhere, there is a need to ensure that the housing target for the LSCs is met.

• There is no evidence that development within higher order settlements will support lower tier settlements.

• A total of 3,501 dwellings are proposed in the LSC tier, this is 1 dwelling more than the requirement for the tier. There is a risk that insufficient development will take place to provide for a sustainable pattern of development.

• The SADPD disaggregates the overall 3,500 figure based on a diminishing residual requirement; this figure has the potential to reduce further over time through windfall development. This approach fails to consider the housing needs of each settlement, for example, the need for affordable housing or the ageing population profile. There is no methodology for establishing what any local needs are.

• The hybrid option results in a disproportionate level of growth being allocated to southern LSC’s (63.4%). The proposals will not support northern communities or deliver sufficient homes to meet local needs. The plan fails to
identify sufficient housing sites in the right locations, will result in unsustainable patterns of development and will not ‘boost significantly’ housing land supply.

- A balanced geographical approach is required to ensure that there is sufficient growth to maintain and support the vitality of all LSC’s.

- No account has been made of existing housing density figures for settlements when disaggregating the housing requirement.

- All of the residual requirement for LSCs should be directed to the northern LSC’s. There is already a significant imbalance in the distribution of development at this tier.

- Providing flexibility at the LSC tier would provide choice of sites and increased certainty that sufficient homes will be delivered to meet the LPS requirement, particularly if LPS sites slip.

- Sites counted as commitments include allocated sites and sites with outline planning permission – these may not be ‘deliverable’ without sufficient evidence.

- The policy should be reworded to clarify that any target is not a maximum figure and additional housing may be permitted where it is consistent with development plan policies.

- The 150 dwelling threshold for SADPD sites is an arbitrary threshold which serves no useful planning purpose and inhibits opportunities for comprehensive proposals.

- There is an over-reliance on ‘off plan’ planning permissions, all of which are in the south of the borough, setting these against the housing figures.

- There is an over-allocation of housing numbers within the Green Belt, including Alderley Edge, Chelford, Disley, Prestbury, Bollington and Holmes Chapel.

- The six approaches to disaggregating the housing requirement are flawed. The spatial distribution disaggregate report contains errors and no evidence is provided to show how the level of commitments and completions has been derived.

- All sites submitted in LSCs should be fully assessed to ensure that the proposed strategy is the most appropriate and that all reasonable alternatives have been considered.

- Timetable for the SADPD is rushed. The need for additional housing should be considered post Brexit.
• Standard methodology for calculating housing need is likely to result in a lower housing need figure for the borough. The Part 2 should take account of the updated projections.

• Brownfield land availability should be assessed. Any new build should use renewable energies and sustainable build designs.

• The plan should adopt a ‘constraints led’ approach to spatial distribution.

• Methodology is flawed, the variables used to assess the options and site assessments are not weighted - they are not of equal importance.

Crewe

• There has been a shortfall in housing completions in Crewe since 2010.

• LPS allocations will not deliver fully within the plan period. To ensure that the housing requirement is met, further sites should be allocated.

• Additional employment sites are proposed and there is a need to allocate further housing sites in Crewe.

Shavington

• The dwelling figure for Shavington is too low, additional land for housing should be allocated.

• Shavington performs more strongly as an LSC than other southern settlements, for example Bunbury.

• Shavington could accommodate the housing requirement of other southern settlements as it is a sustainable location for further development.

• Shavington has met its housing and employment requirement and no further allocations are needed.

Haslington

• The evidence base does not justify why further development would be limited in locations such as Haslington.

• The allocation for Haslington should be increased from 490 dwellings to 700 dwellings.

Bunbury

• The SADPD enables Bunbury to grow sustainably.

• Bunbury is a less sustainable location for development, the housing requirement should be reduced and any residual requirement allocated to Shavington.
Sandbach

- Support for no further allocations.

Holmes Chapel

- The accommodation of a higher proportion of development in Holmes Chapel than other LSC’s is supported. Holmes Chapel could be a candidate KSC in the future.

- Further allocations should be made around Holmes Chapel. There is scope for additional housing allocations, including specialist housing, such as over 55’s and first time buyers.

- Allocation of additional employment land is supported.

- Proposed settlement boundary is supported.

- ‘Sanofi’ should be referred to as ‘Recipharm’

- Support for no additional housing allocations – reflecting the high level of housing completed and committed. The plan should be clarify that Holmes Chapel is not expected to accommodate any unmet housing needs of Goostrey. The plan should be amended to make it clear that no further housing will be expected within Holmes Chapel without long term plans for infrastructure being agreed.

- Consideration should be given to safeguarding land for a future relief road.

Knutsford

- Knutsford should meet its housing requirement through the LPS strategic sites.

Prestbury

- The proposed housing requirement for Prestbury is too low and it should be increased to align with other Green Belt settlements such as Chelford and Disley.

- There has been very little housing development in Prestbury, there is a limited stock of affordable housing, family housing, accommodation for an ageing population and smaller dwellings in the village.

- The SADPD should consider further green belt release around Prestbury to ensure that the housing needs of the village are met.

- It is unclear how the figure of 130 dwellings has been derived.
• No employment sites are proposed and this undermines the future sustainability of the village.

• Prestbury benefits from a good range of services and facilities. The Kings School will be relocating to Prestbury shortly and this will enhance the sustainability of the village.

• Majority of children attending the school in Prestbury live out of catchment.

• The amount of housing proposed will not sustain the local community.

Bollington

• The level of housing proposed is too low and should be increased to at least 500 dwellings, based on existing population and number of households. Further land should be released from the Green Belt.

• Unclear how 400 figure derived.

• Lack of family housing in Bollington, a high proportion of housing stock is terraced.

• Level of housing proposed in Bollington is disproportionately high in relation to the population of the village and in comparison with other LSCs. Insufficient account is taken of the constraints and the impact of additional housing development upon infrastructure and congestion is not considered.

• There is no assessment of housing need within the village.

• The SADPD evidence is flawed and contains errors.

• The residual requirement for Bollington should be redirected to Alderley Edge.

• There is no residual requirement for Bollington, any future housing needs can be met from brownfield sites as indicated in the Neighbourhood Plan.

• No account is taken of density of housing. Bollington is already over-developed compared to other settlements.

• Other sites have been submitted through the call for sites, in other settlements which are less constrained than Bollington. Any housing requirement could be met elsewhere.

• Only sites submitted by owners/developers have only been considered. There are brownfield sites in the village.

• Allocation is based on ONS figure which has now been revised down to 350, reducing any residual requirement to 32 dwellings rather than 82.

• The flexibility factor has been removed and there is now no need for the number of houses proposed.
• Conflict with the Bollington Neighbourhood Plan.

• Test of exceptional circumstances has not been met for Green Belt release.

Mobberley

• Mobberley is one of the largest LSCs, the housing figures are too low in comparison to other LSCs and having regard to the size of the settlement and its range of services.

• The housing needs of Mobberley will not be met by the policy. There is little opportunity for open market or affordable housing within the village. Sites should be allocated to meet local housing need, including C2 and retirement living accommodation.

• There are existing commitments for housing within the village, suggesting that aircraft noise is not the constraint suggested by the council. Aircraft noise does not affect all areas of the settlement.

• Other LSCs are also affected by aircraft noise but attract a higher level of allocations.

• The influence of constraints upon housing development in Mobberley is questioned. Constraints are similar to other LSCs.

• Aircraft noise does not preclude the allocation of sites for employment uses.

• If land is not allocated within Mobberley, it should be allocated within the same market area such as Ashley or Knutsford.

Alderley Edge

• The housing requirement figure is too low.

• Housing requirement should be increased to at least 300 dwellings.

• Additional safeguarded land should be identified.

• Affordability is a significant issue in Alderley Edge and this is compounded by the low level of completions. There is a need to allocate further land for housing to ensure that the housing needs of the local population can be met.

• Alderley Edge performs better than other LSCs such as Bollington, which is allocated a higher housing figure.

• Alderley Edge is identified by the council as a ‘borderline’ KSC. It is a sustainable settlement with a range of shops, services and facilities.

• The town is not so constrained that it could not deliver further development.
Sufficient new housing is required to support economic growth - Alderley Park is capable of meeting the employment needs of Alderley Edge. Support for identifying the level of housing for the village and the sites to meet the requirement.

Housing requirement could result in overdevelopment of green spaces and gardens within the village to the detriment of the character and appearance of the local area.

Unclear where the employment land will be provided.

**Wybunbury**

- Wybunbury should be identified as an LSC as it displays many of the characteristics of other LSCs.

**Goostrey**

- Lack of evidence to justify the low housing figure for Goostrey. There is no supporting information in the evidence base that relate to Jodrell Bank Observatory (JBO) that justifies the low numbers proposed in Goostrey or the impact of JBO on housing delivery.

- Support for the allocation of 16 dwellings (which have now been constructed) and the factors influencing the allocation including the sensitive nature of radio telescope.

**Disley**

- Insufficient land is allocated for new homes in Disley and it does not reflect the existing population and number of households. It should be increased to at least 300.

- It is unclear how the figure of 225 dwellings and 0.35 hectares of employment land has been derived.

- The principle of releasing land from the Green Belt was established through the LPS. Further development in Disley should not be discounted on the basis that the settlement is constrained by the Green Belt.

**Chelford**

- Support for identification of safeguarded land

- Is a sustainable location for additional housing development

- Illogical that Chelford has a similar level of housing allocation to Alderley Edge, and considerably more safeguarded land given the respective sizes of the settlements.
• Lack of suitable sites in Mobberley should not result in the allocation of additional sites in Chelford.

• Chelford does not have a high rate of housing need, there are a significantly lower number of people on the housing register than the median figure for LSC’s. Need is skewed by the inclusion of Chelford in a sub group with Mobberley and Alderley Edge.

• The amount of safeguarded land at Chelford is not proportionate to the future needs of the settlement.

Other settlements and rural areas (OSRA)

• Sites should be allocated within the OSRA. The case that it would be ‘time consuming’ to allocate sites in the OSRA is not a sufficient justification for not doing so.

• Development in OSRA would contribute to the vitality of rural communities.

• There is a shortfall of 390 dwellings in the OSRA. There is no up to date evidence to suggest that any residual requirement will be met.

• Windfall should not be relied upon to meet the housing needs of the OSRA. Sites should be identified.

• Housing development within OSRA settlement boundaries should be allowed and the settlement boundaries should include site allocations.

• The approach to defining tight infill boundaries would significantly limit sites coming forward for residential development within the OSRA.

• No details are provided on the distribution of commitments and completions in the OSRA, some settlements may have received higher levels of growth than others. The SADPD should consider which settlements could be subject to additional growth, some are more constrained than others and the settlements should be assessed to ascertain where the OSRA requirement could be accommodated.

• The most sustainable settlements within the OSRA are Marton and Weston.

• There is a demand for affordable housing within the OSRA. The Macclesfield Rural Area has unmet demand and no supply.

Policy PG 9 ‘Settlement boundaries’

Summary of key points:

• Several potential development sites put forward for inclusion in settlements boundaries.
• The settlement boundaries are too restrictive; the policy should be flexible to be able to accommodate new development outside of settlement boundaries.

• The settlement boundary of Prestbury should be extended.

• Albion Works should be included in the defined settlement boundary for Sandbach, similar to the current Congleton Local Plan 2005.

• The boundary with regards to Zan Industrial Park (Sandbach) should be amended.

• Wilmslow’s settlement boundary at the southern end of Sunny Bank Drive should be reassessed.

• The policy should state that the settlement boundaries of other settlements such as Wybunbury should be amended.

• The Wybunbury/Shavington Triangle area should not be included in Shavington’s settlement boundary.

• Knutsford’s boundary should be reassessed.

• The Shavington Settlement Report [FD42] makes no reference to the fact that the A500 is a strong and logical northern boundary to Shavington and fails to assess the strategic implications of planning permission/built out development in the Green Gap.

• The review of Crewe’s settlement boundary has not appropriately taken into account the relationship of settlement boundaries to physical features.

• Bunbury Heath should be included in the settlement boundary of Bunbury.

• The review of the Sandbach settlement boundary has no regard or consideration to the wider context and physical relationship between built form, open countryside and proposed settlement boundary.

• The proposed Sandbach settlement boundary at Twemlow Avenue and Marlborough Drive has created an area of open countryside which is in the settlement.

• Safeguarded land should be included in Prestbury’s settlement boundary.

• Congleton’s settlement boundary should take into account the approved route of the Congleton Link Road.

• The Holmes Chapel boundary should not include the area to the west of London Road; the site would not act functionally as part of Holmes Chapel and the boundary is soft.

• Hankelow, Bucklow Hill, Pickmere, Brereton Green should have settlement boundaries.
The Holmes Chapel sites selection map shows The Cottons on Middlewich Road to only have outline permission; it’s under construction.

No justification for an increase in policy restriction in relation to infill boundary lines.

Without the designation of development boundaries in ‘infill village’ settlements, the SADPD is neither justified nor consistent with national policy, and is therefore unsound, as it fails to accord with the aims and objectives of the adopted LPS and the NPPF.

Several permissions and applications do not appear to have been fully taken into account when redrawing the settlement boundary and designating Open Countryside to the west of Alsager.

The Alderley Edge settlement boundary does not reflect the true settlement boundary of Emerson’s premises.

The Paddock should be removed from the Bunbury settlement boundary.

The settlement boundary for Bollington should include all parts of the administrative town of Bollington, including the parts at East Tytherington that lie in Bollington, and adjacent parts that can only be accessed from Bollington, including parts of Ingersley Vale.

Policy PG 10 ‘Infill villages in the open countryside’

Summary of key points:

- It adds a new definition of infill villages in the open countryside, creating ambiguity with the settlement hierarchy.

- The policy should refer to OSRA to be consistent with the LPS and para 16 (d) of the NPPF.

- The approach in bullet 2 to identify OSRAs as ‘Open Countryside’ or Green Belt is contrary to LPS Policy PG 2.

- The use of ‘infill boundaries’ in bullet 3 creates ambiguity, as essentially the infill boundaries are read as settlement boundaries.

- Achieving the housing requirement for OSRA is restricted by PG 10.

- Bullet 3 is contrary to Paras 78 and 84 of the NPPF as it does not promote sustainable development in rural areas or allow appropriate development to come forward on sites that are physically well related to existing settlements.

- Bullet 3. i. is too restrictive as not all local areas will contain buildings of similar appearance. The policy should be flexible and allow schemes to be considered on their individual merits and on a site by site basis.
• Bullet 3. ii. is unnecessary as whether a development creates an impact will be determined as part of any planning application.

• Bullet 3. iii. is too restrictive and unlikely to allow 2,950 homes to come forward.

• Part 4 of the Policy should be removed as it reiterates LPS Policies PG 3 and PG 6.

• Objection to the non-allocation of sites in OSRA; this is contrary to para 78 of the NPPF.

• Meeting the OSRA requirements should not be deferred to Neighbourhood Plans; made Neighbourhood Plans can fail to facilitate housing delivery.

• The identified infill boundary does not accurately reflect the true settlement boundary or development curtilage of Ashley.

• Amends should be made to the assessment of Rostherne.

• Little Bollington should be a village and assessed as an infill village.

• Hotels should be taken into account in, and further amends made to, the assessment of Bucklow Hill, resulting in it being a village. It should also be assessed as an infill village.

• The policy is contrary to paragraph 50-001 of the PPG.

• The policy seeks to “downgrade” established settlement boundaries around settlements such as Winterley, Brereton Green, Pickmere and Wybunbury to allow infill only.

• The infill boundaries have been drawn so tightly around the settlements that they would only allow very few (if any) opportunities for any infill development to take place at all.

• The policy is conflicting as it states that infill villages do not have a settlement boundary however the supporting ‘Settlement and infill boundaries review’ sets out the proposed new boundary for Winterley.

• Amends should be made to the Winterley, Sutton Lane Ends, Higher Poynton, Wybunbury and Mow Cop boundaries.

• The IBL for Lawton Gate Estate, Church Lawton, does not take account of recent planning permissions and doesn’t reflect what is on the ground.

• Burleydam, Brereton Green, Church Minshull, Broomedge, Wybunbury/Shavington Triangle (Clannor Heath), Hankelow and Marton should be infill villages.

• The definition of infill needs strengthening.
- Wychwood Park and Wychwood Village should not be infill villages.
- The policy is contrary to LPS Policy PG 6 and is more restrictive than national Green Belt policy.
- The assessment of Church Minshull should be amended; it has been assessed inconsistently and has a coherent spatial form.
- The identification of infill villages should not be arbitrarily prescribed through the local plan and such an approach is contrary to established case law.
- An assessment as to whether a development constitutes ‘infill development’ should not be prescribed through the local plan process; it can only be made ‘on the ground’ with due regard for the site-specific circumstances.
- The flexibility for OSRA has been lost through the SADPD.
- A number of additional settlements are referenced in Policy PG 10 over and above those previously listed in Table 8.3 of the LPS; if a settlement was deemed sustainable for growth in OSRA, it should have been referenced in Table 8.3 of the LPS.
- The 2,950 housing requirement for OSRA should be disaggregated.
- The policy will worsen the currently adopted policy situation (Saved Policy GC 4) with regards to infilling and the redevelopment of entire sites. Saved policy GC 4 should be carried forward or PG 10 amended to reflect it.
- Langley village infill boundary does not reflect the full extent of the existing major developed site in the Green Belt designation (saved Policy GC 4).
- There is no explanation or justification for the statement in footnote 4.
- The size and service differences between Brereton Heath or Brereton Green reflected in the CBLP should be kept by applying the same principles to the Cheshire East hierarchy of settlements.
- Brereton Heath should be included with no settlement boundary, ‘washed over’ by open countryside and be subject to Open Countryside policies.
- The southern boundary of Weston identified in the Neighbourhood Plan does not match the Weston Village Infill Boundary.
- Objection to the Henbury, Gawsworth and Eaton infill boundaries.
- Sound should be identified as OSRA.
- The Stock Lane/Dig Lane/Newcastle Rd Triangle should not be incorporated into the new proposed Shavington village boundary.
- With regards to village amenities, Wybunbury does have a playing field.
• Greater clarity is needed regarding the definition of a ‘relatively small gap’.

• Hankelow should be reassessed and redefined as an infill village.

• The boundary of Higher Poynton is different to that shown on the current version of the Poynton Neighbourhood Plan.

• The Wychwood Park Village North map should be relabelled Wychwood Village.

• Wychwood Park Village central and south is an inappropriate split of a single community.

• Wychwood Village Park Central map must be re-labelled as "Wychwood Park: North" and 'Wychwood Village Park South' must be re-labelled as Wychwood Park: South".

• To deliberately encapsulate Wychwood Village from its associated land uses seems counter-intuitive.

• Wychwood Park was designed specifically to be a series of small hamlets.

• The word 'settlements' in para 1 is unnecessary and can be omitted, as it is confusing to use it again in para 2.

• Reword the policy to provide the flexibility to enable 'made' neighbourhood plans to provide clearly defined infill boundaries for villages additional to those in the list set out in the policy PG10.

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

**Summary of key points:**

- Recognised that Knutsford housing requirement through LPS strategic sites, seems to have led to over allocation of housing numbers within the Green Belt to Alderley Edge, Chelford, Disley, Prestbury and the extraordinarily high number in Bollington, and Holmes Chapel outside it.

- The ‘exceptional circumstances’ seem to be based more on employment projections and the land that came forward in the call for sites than on identified ‘exceptional need’

- Land east of Waterloo Road, Poynton should be removed from the Green Belt and allocated for housing.

- Further amendments and housing allocations are required in Prestbury – Heybridge Lane, Prestbury Road.

- Whilst the settlement character of the infill villages has been assessed in the Settlement and Infill Boundaries Review document, an assessment has not been carried out as to whether or not these settlements should be washed
over by the Green Belt or inset in the Green Belt as required by NPPF paragraph 140. To do this, a character assessment of each village located within the Green Belt should be prepared to determine the contribution each village makes towards the key characteristic of Green Belt.

- The current Green Belt boundary was last considered through the Macclesfield Local Plan, adopted in 2004 and the SADPD appears to solely rely upon this in determining the Green Belt boundary that is appropriate around the villages of Ashley, Rostherne, Little Bollington and Bucklow Hill, as well as other villages in the Green Belt. It is important to note that this boundary will have been considered against the guidance set out within PPG2 (1988) which was subsequently replaced in 2006 by an updated PPG2. There are stark changes to PPG and the NPPF (2012 and 2018).

- Additional sites need to be allocated in Knutsford. Given the lack of brownfield sites further land will need to be released from the Green Belt. Attention is drawn to Parkgate land parcel (Ref 168).

- The boundary should be extended for Site ALD 2 to use existing recognised landscape features such as Chelford Road.

- Exceptional circumstances have not been demonstrated and has not explored properly options to allocated alternative sites in other LSCs.

- In order to meet housing needs in Wilmslow, it will be necessary to consider non-strategic housing allocation such as Rotherwood Road.

- Land south of Glastonbury Drive, Poynton should be removed from the Green Belt and listed in Policy PG 11.

- The Kings School new and existing sites at Derby Fields (including Fallibroome Farm Site) should be removed from the Green Belt and included on the list in Policy PG 11. This would reflect what was envisaged in the LPS. It would also provide the school with the necessary means to progress operational matters relative to its operation as a school. Should it not be removed from the Green Belt, the site should be given special status to allow additional development to meet education needs.

- Policy PG 11’s approach towards assisting in the delivery of the LPS strategy of seeking to address some development needs in the north of the borough is the best and most fully justified approach in all cases. By this the representor means, can all of the proposed Green Belt releases be justified by reference to NPPF policy on the same? The council has not given due weight to other potential development opportunities offered by non-Green Belt sites/land. A key consideration in this regard, and as set out under representations relating to Policy PG8, has to be the brownfield development resources that are available at the Land off Ilford Way site.

- The Knowle House is brownfield land that could accommodate residential development. The Green Belt around Handforth should be amended to exclude the site. Should the Green Belt not be amended the policy should
acknowledge that brownfield sites within the Green Belt are suitable for development.

- The policy should account for Paragraph 145 in the NPPF (2018) which contains an additional line which allows for the development of brownfield land in the Green Bet which does not have a ‘significant’ impact on the openness when there is provision of affordable housing to meet local housing need.

- Whitehall Meadow should be allocated and taken out of the Green Belt.

- Land to the west of Heyes Lane should be removed from the Green Belt and allocated for housing.

- Land to the west of Congleton Road should be removed from the Green Belt and allocated for housing.

- Further amendments and housing allocations are required in Prestbury.

- It is unclear whether the safeguarded sites should be included within this list as the next policy; Policy PG 12 refers specifically to these locations. For clarity and to avoid any confusion, the safeguarded land should be removed from Policy PG 11 and dealt with separately through Policy PG 12.

- Land at Bolshaw Farm Lane should be removed from the Green Belt and allocated for housing

- The release of land from Green Belt has only taken place in settlements within the ‘Local Service Centre’ category of the settlement hierarchy. Without the release of additional non-strategic sites from the Green Belt to enable development in infill villages, it is considered that the SADPD is neither justified nor consistent with national policy, and is therefore unsound.

- The "exceptional circumstances" required by both the NPPF and the LPS has not been demonstrated to remove Green Belt in Bollington. No evidence of all reasonable alternatives has been identified. The town does not have the infrastructure in place to add the number of new houses planned as facilities are already overstretched.

- There are likely to be other brownfield sites becoming available in to next 13 years and therefore there is no need to allocate Green Belt to meet future housing needs

- The scale of proposed development in the SADPD is not justified, nor needed. The SADPD is not positively prepared, and not consistent with national policy requiring development to be sustainable. According to the MHCLG’s own housing needs methodology, the housing requirement for Cheshire East is 1,142 p.a. which would provide 22,840 homes over the 20 year period of the Local Plan.
The revised NPPF sets out a range of new and additional requirements that need to be satisfied before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. The burden of evidence placed upon LPAs has therefore increased, albeit there remains no statutory approach or standardised methodology for assessing exceptional circumstances, and so ultimately it is for LPAs to determine an appropriate approach and reach a view as to whether they consider that exceptional circumstances exist to justify removing land from the Green Belt.

Policy PG 12 ‘Safeguarded land boundaries’

Summary of key points:

- Several potential development sites put forward to be included as safeguarded land.
- Safeguarded land and more is needed for development now.
- A re-review of the Green Belt boundaries around Knutsford must be undertaken to explore suitable sites for Green Belt release to meet emerging development requirements.
- Safeguarded land should be identified in Poynton.
- The safeguarded land allocated to Chelford should be redistributed to Alderley Edge.
- For any site allocations in this policy it will need to be demonstrated that an appropriate heritage assessment has been undertaken of the impact they may have on the historic environment.
- The revised population/housing figures render the safeguarded land provision unnecessary.
- The policy would result in the over development of Cheshire East.

Policy PG 13 ‘Strategic green gaps boundaries’

Summary of key points:

- Reps received for the release of land off Land off Gresty Lane as it does not function as Green Gap
- This policy to be an unnecessary duplication of LPS Policy PG 5, as it does not provide any new criteria.
- This is contrary to the Revised NPPF: Local Planning Authorities should ensure plans ‘serve a clear purpose, avoiding unnecessary duplication
The proposed policy should be amended to allow for the alteration of the green gap when needed, for example when the supply of houses falls below 5 years.

Support LPS Policy PG 5 and the retention of the Strategic Green Gaps.

This policy should be expanded to allow a review of the existing strategic green gaps in light of the strategic site allocations in the LPS and particularly where those strategic green gaps have been eroded by planning consents granted at appeal.

Land West of Crewe Road, Shavington should not be in the Strategic Green Gap.

The Settlement and Infill Boundaries Review [FD06] and Strategic Green Gap Boundary definition Review [FD08] which have been prepared as part of the Council evidence base to justify alteration to boundaries appear to 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.

Land to the north of Shavington should be excluded from the Strategic Green Gap. The detailed settlement and Strategic Green Gap boundary should be re-drawn with the A500 forming the long term defensible boundary to the north of Shavington.

Land south of Newcastle Road, Willaston should be entirely excluded from the SGG and the boundary should be altered to follow the A500 rather than Cheer Brook.

The site known as Land at Rope Lane, Shavington represents a suitable and sustainable location for development now and should be allocated for housing in the SADPD. The site should also be removed from the Green Gap and Open Countryside as defined on the draft allocations policies map.

Hough and Chorlton Parish Council strongly support these Policies. The Parish would like to see the Strategic Green Gap extended further to the South of Crewe to protect the villages within the Parish. In addition, as part of Wybunbury Combined Parishes Neighbourhood Plan we would wish to see this supplemented by Local Green Gaps. This will ensure effective planning control to prevent the coalescence of development between settlements within the Parishes and Crewe.

The SGG should include no more land than is necessary to prevent the coalescence of Crewe and Haslington having regard to maintaining their physical and visual separation.

Land north of Sydney Road and land east of Nantwich Road should be excluded from the proposed SGG as it does not maintain the sense of separation.
• Recommended change to the SGG detailed boundary: To be realigned to follow the north side of A500, to the immediate west of the Basford West Site, as far as Crewe Road, and then follow Crewe Road northwards to join up with the proposed detailed boundary west of Crewe Road the exclusion of the Crewe Road site from the Green Gap would not conflict with the purposes relating to boundary definition of the Strategic Green Gap, and would not set a precedent for making changes to the west of the Crewe Road and elsewhere.

• The Nantwich/Willaston/Crewe Green Gap boundary should follow the A51 Nantwich bypass rather than the proposed boundary as the road is a stronger boundary.

• Development of Land at Park Road would have very minimal impact on the function of the Willaston/Wistaston/Nantwich/Crewe Strategic Green Gap.

• In the Weston and Basford area a key strategic green gap is field D1 between Basford East and the South Cheshire Growth Village. This strategic green gap must be maintained in its entirety between these two strategic allocations, the Crewe to Stoke railway line to the north and the A500 Shavington Bypass to the south. Any erosion of this key green gap will be totally unacceptable to the Parish Council and will undermine the strategic principle of the green gap boundaries and Strategic Policy PG 5 and SADPD Policy PG 13. The same principle applies to the Strategic Green Gap separating Weston Village from the A500 Shavington bypass which is extremely narrow and must be retained in its entirety.

• Object to Policy PG 13 which is considered not to be effective, positively prepared, justified or consistent with national policy.

• The boundary of the SGG south of the SCGV (LPS 8) should be revised and informed either by master planning of the village or alternatively should be aligned to the A500 consistent with land at Basford East.

• The map of the Strategic Green Gap south of Crewe, should be extended to the east to provide additional protection to Weston Village, Wychwood Village and Wychwood Park - all of which will be significantly impacted upon by HS2a construction work over the next 10 years and by the HS2a operations in perpetuity.

• The current document does not completely protect the individual villages within the Haslington Parish boundary. We are keen to ensure that no development takes place at the Winterley to Wheelock boundary, the Winterley to Haslington gap and Haslington to Crewe Green Gap. It is imperative that these villages retain their individuality and the protection of the countryside is maintained. Any development be it small or large house dwellings will have detrimental impact on environment, highways and transport network along with health and wellbeing of the communities.
Policy PG 14 ‘Local green gaps’

Summary of key points:

- Support the policy

- PG 14 iii should also refer to allocated sites and permitted development. This would require 'and/or allocated sites or permitted development' to be added to the text.

- Local Green Gaps proposed between Haslington and Winterley and Winterley and Wheelock to preserve their individual identity and character. In an appeal decision on a site at the north-eastern end of Haslington village, the Inspector acknowledged the desire of local residents, the Parish Council and the Council to retain openness between Haslington and Winterley and to protect the intrinsic character and beauty of the countryside.

- The Local Green Gaps referred to within this policy would appear to be Local Green Space (LGS) by another name. Reference should be made within Policy PG14 to paragraph 100 of NPPF18 which sets out the tests which must be applied when seeking to designate LGS.

- Any Local Green Gap or Green Wedge policy being brought forward through a neighbourhood plan must have robust and transparent rationale and evidence for its inclusion and must meet the tests outlined in NPPF18 paragraph 100.

- Suggest a Local Green Gap to the south and east of the village of Weston separating Weston Village from Wychwood Park and Wychwood Village.

- PG 14 on green gaps/ green wedges would seem helpful as a measure complementing Green Belt policy

- Moston Parish Council supports this policy recognising its importance in helping to maintain the distinctive character of individual settlements and to prevent the coalescence of towns. 3 Gaps have been designated by the Neighbourhood Plan:

  - Gap 1 Land on North side of Booth Lane between Tetton Bridge Cottage and the junction with Bradwall Road, the strip of land from Booth Lane back to the Railway Line but excludes land set aside for the preferred route of The Middlewich Eastern Bypass

  - Gap 2 Land on the South West of Booth Lane between Mill Lane and the property known as The Cedars.

  - Gap 3 Land on the North East side of Booth Lane between land immediately after the driveway to Holly Bank Farm and the Track adjacent to The Albion Lock development
• Wybunbury Parish Council is supporting the WCP NHP Group with the request for a green gap to be formed at land within the following roads Stock lane, Main Rd, Wrinehill Rd Wybunbury, Cobs lane, Pit lane, Hough & the Newcastle Rd

• The Policy is not adequate for rural cases as it is currently written; the gap between Hankelow and Audlem is being eroded. It is intend to include a separation policy in our Neighbourhood Plan, but that will not change the status of the land between Hankelow and Audlem.

• It would perhaps be better to include an item in PG 14 which is specific to distinct settlements of compact form, with or without an infill or settlement boundary, which are surrounded by open countryside. This could then apply a variation of the three points in Paragraph 1 of PG 14 to land surrounding the settlement, i.e. no permission will be granted which would:

  o i) result in the erosion of any clearly identified gap between the settlement and any nearby settlement:

  o ii) adversely affect the visual character of the landscape immediately surrounding the settlement; or

  o iii) significantly affect the undeveloped character of the countryside immediately surrounding the settlement, or lead to coalescence between settlements.

Also, should "green wedge" be defined - I haven’t yet found a definition.

• The Wybunbury Combined Parishes Neighbourhood Area is situated in the Meres & Mosses Nationally Designated Meres and Mosses Nature Improvement Area. The Steering Group is actively considering Local Green Gaps in those parts of the NP Area that are especially vulnerable to surface water contamination and development coalescence following liaison with Natural England. Local Green Gaps will have a very particular relevance to the protection of those parts of the NP Area that are part of core ecological areas but affected by HS2a. Whilst it is not appropriate for the NP to oppose major national infrastructure projects, Local Green Gaps may help reduce the cumulative impact of other development in close proximity to HS2a.

• There is no requirement for additional development that requires reducing local green gaps.

• Haslington Parish Council is concerned that the current document does not completely protect the individual villages within the Parish boundary. We are keen to ensure that NO development takes place at the Winterley to Wheelock boundary, the Winterley to Haslington gap and Haslington to Crewe Green Gap. It is imperative that these villages retain their individuality and the protection of the countryside is maintained. Any development will have a detrimental impact on environment, highways and transport network along with health and wellbeing of the communities we serve.
Chapter 3: General requirements (general issues)

Summary of key points:

- The policies in this Chapter seek to provide guidance on a number of issues that are universal to nearly all developments.

Policy GEN 1 ‘Design principles’

Summary of key points:

- The wording of the policy is weak in relation to ‘should’.

- Bullet 1 is vague and does not make it clear how the policy can be complied with, or otherwise.

- The policy does not adequately consider the step change in the NPPF 2018 to how appropriate densities for new development should be determined.

- The policy should reference water efficiency measures and sustainable drainage.

- More should be made of the need for new developments to reinforce or reflect the local built character, especially of historic places and towns.

- It is unclear how the policy relates to the Cheshire East Design Guide SPD.

- More could be made of the Cheshire East Design Guide and more emphasis placed on ‘sense of place’ and the uniqueness and special qualities of the local area in which any development is proposed.

- Regarding bullet 10, access should be defined further as to local facilities; there must be safe pavements and pathways to local facilities.

- The general design requirements should also include those incorporated into Neighbourhood Plans.

- There is overdependence on the CE Design Guide with little/no reference to the “Sense of Place” or Design and Character statements produced by Neighbourhood Plans.

- Where additional documents exist, they too must be recognised as having material planning weight in the determination of development in NP Areas.

- The policy could be used to justify pastiche design leaving little scope for modern innovative architecture.

- Developers should engage with the council and relevant statutory consultees, at the earliest opportunity.
Policy GEN 2 ‘Security at crowded places’

Summary of key points:

- No comments made.

Policy GEN 3 ‘Advertisements’

Summary of key points:

- The strong wording of this policy: ‘Proposals…. will be supported by the following ‘criteria’ could be adopted with benefit in a number of other policies where the present text read ‘should’ and thereby lacks teeth.

- The statement “internally illuminated signs will not be approved on listed buildings or in conservation area” is inconsistent with government policy and guidance, and therefore unsound. Para 132 of NPPF is clear that advertisements should be subject to control only in the interest of amenity and public safety, taking account of cumulative impacts.

- The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 does not explicitly preclude the display of internally illuminated signs on listed buildings or in conservation areas.

- Applications for advertisement on listed buildings are subject to listed building consent and separate requirements in terms of safeguarding the significance of the heritage asset and minimising any harm. Therefore to ensure certainty for those submitting applications, the policy would benefit from removal of Point 7.

- Point 9 would benefit from being deleted and being replaced with a criterion which states that any applications affecting a designated heritage asset will be dealt with using the policies contained in Chapter 5 of the Plan.

- Should Point 8 be retained, reference should be made to setting as the criterion specifically mentions areas adjacent to the conservation area (which may contribute to its setting).

Policy GEN 4 ‘The recovery of infrastructure costs and deferred planning obligations’

Summary of key points:

- Clarity needs to be provided as to how the proposals suggested would meet the three CIL tests set out in the Framework and CIL Regulations. In the absence of this information, it cannot be demonstrated that the policy is legally compliant and sound.
- The policy could be applied to future developments enabling their earlier delivery where upfront costs are substantial. This could be a real benefit to securing housing delivery on stalled or uncertain sites.

- The Council should not seek the full cost of infrastructure where it has received grant funding securing its delivery. Only costs required form developers as set out in the Infrastructure Delivery Plan should be sought.

- The policy is problematic: the infrastructure needed to support a development should be part of the viability tests before the application is approved. If a development runs into financial difficulty and needs CEC to step in, the grounds for doing so and recompense need to be decided before every development is approved. If not it will be Council Tax payers who will be funding developers with ineffective business plans for the site and lax financial control.

- Criteria 3 in relation to deferred planning obligations should be reworded to make it clear that it isn't based simply on profit being demonstrated, but that the scheme must be profitable at a level that makes the scheme viably acceptable.

- Further clarity as to how infrastructure which benefits from grant funding will be treated. It is considered that only the cost directly funded by the authority should be sought from developers.

- How will the Council approach developments which have already been consented and would rely on infrastructure? It should not be up to the sites which have yet to come forward to pick up the entirety of the accumulated costs. Costs should be proportionate to the scale and kind of that development rather than the cost of infrastructure.

- To ensure transparency and allow infrastructure costs to be taken into account prior to the submission of an application, the Council should publish what it has paid for infrastructure to be provided. It should be made clear to applicants at the pre-application stage what response would be required for any planning application to avoid any delay later down the line.

- The policy indicates that the Council will identify through further policy or guidance, the particular infrastructure projects to which the policy applies and the development sites that are expected to contribute to the cost of that infrastructure. This should be provided alongside the consultation of the First Draft SADPD, in order that full implications of the policy, including upon site viability, could be properly considered.

- With regard to deferring planning obligations the SADPD should be supported by an evidence base which demonstrates that the policies and allocations within it can be viably delivered, in order to accord with the Framework. The inclusion of a policy which establishes an option for deferral suggests that this may not be the case.
• Details of the particular infrastructure project to which the policy applies and the development sites that are expected to contribute to the cost of that infrastructure needs to be identified now, rather than through an SPD or other document at a later date. Detail of the interrelationship between the Policy and the Councils CIL Charging Schedule also need to be provided.

• Recovering costs associated with forward funded infrastructure, can this be done in a fair and equitable way?

• What happens if development is relatively minor and its related impacts are very small but is where it fully benefits from a new road. How will the calculation relating to an appropriate and justified obligation be arrived at?

• It is inevitable that there will be differences of opinion between applicants and the council on what represents a fair and reasonable retrospective contribution. The policy and supporting text needs to provide more detail on the how the process the policy introduces will be rolled out and administered including how disputes can be arbitrated.

• The system relating to obligations should only be allowed to work in relation to the point at which the planning application is determined. It is inappropriate for the system to be allowed to re-determine the same at some arbitrary point in the future, when, for example, economic conditions might be different.

• How to define what is a piece of “forward funded infrastructure” that requires some proportional recovery of cost in connection with development.

• It is unclear: who this payment will benefit, the Council, a statutory undertaker, or another private developer that may have provided ‘capacity’ in a prior development now claimed; over what timescale such an assessment might be brought; how this will relate to CIL as there can be no “double-dipping” of developer contributions; and how the policy will be managed to prevent duplication of payments by multiple developers to the same infrastructure?

• With regard to the deferred obligations it is unclear if the Council intend to use the policy to refuse planning applications where a developer refuses to agree to a request made by the Council for such an overage arrangement – clarification is required.

• Point 5 specifically states a refusal will arise where the applicant has requested the deferral but then does not agree to the legal agreement, but this seems a rather unlikely scenario. It is suggested that Point 5 is reworded.

• Clarity is required as to how infrastructure which benefits from grant funding will be treated. Only the cost directly funded by the authority should be sought from developers.

• How would the Council approach development which have already been consented and would rely on infrastructure. It should not be up to the sites which have yet to come forward to pick the entirety of the accumulated costs. Costs, in line with the tests set out within the NPPF, should be proportionate.
to the scale and kind of that development rather than the cost of infrastructure.

- To ensure transparency and allow infrastructure costs to be taken into account prior to the submission of a planning application, the Council should publish what it has paid for infrastructure to be provided. It should be made clear at the pre-application stage what response will be required for that planning application to avoid later delay.

- Unsure how the drafting of the policy would be consistent with an adopted CIL Charging Schedule of the Council. A development may be reliant upon infrastructure which was/is to be provided through funds collected from CIL charging but not liable for CIL in its own right. There is no mechanism by which monies would be collected through s106/278, if an infrastructure project appears on a Regulation 123 list and is already funded/will be funded through the collection of CIL.

- Objection to wording of policy – the recovery of infrastructure costs is key to any new development and if a development is not viable because of infrastructure costs then that development should not be permitted. It is surely counter intuitive to permit development that cannot fund its own infrastructure as this will overload the existing infrastructure to the detriment of the whole local community. Consequently, no planning obligations, particularly those relating to the provision of infrastructure, should be deferred. If the required infrastructure to serve the development cannot be provided by the applicant then the application should be refused.

- The Council should produce a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of site to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period.

- Planning obligations should not be deferred on the ground of viability.

- Some elements of the policy seem paradoxical – If the infrastructure required to support an application is not financially viable, the application should not proceed. If an application is initially considered viable but later fails (for whatever reason) or requires planning obligations to be deferred, any Council intervention must be based on a legal agreement that requires Full (not part) recompense. Council funding (i.e. the public purse) must not be used to support failing developers or unviable applications.

- Point 3 “with the aim of recovering all or part of the deferred planning obligations” should be limited to “with the aim of recovering all of the deferred planning obligations”. Developers must not be allowed to avoid their obligations on the ground of viability.

Policy GEN 5 ‘Adopted policies map’

Summary of key points:
A detailed policy approach for proposals located in the Jodrell Bank Consultation Zone is not included.

The Policies Map should be amended to include the land known as Albion Works in the defined settlement boundary for Sandbach, similar to the current Congleton Local Plan 2005.

Some of the policy designations listed in the policy are not clearly shown on the policies map, e.g. the ecological networks and the route of the proposed Poynton Relief Road are not shown.

The ‘Land Reserved for Future Railway Station’ should be removed or relocated to the norther section of the site in line with the draft Masterplan.

Local Landscape Designations are subject to amendment and it may be useful to discuss these further once the outcome of the Part Two examination is known in relation to Cheshire West’s Areas of Special County Value.

Manchester Airport’s Operational Area should also be included on the downloadable pdf version.

Land for a full parallel taxiway for Runway 2 at Manchester Airport should be safeguarded or at least recognised.

The London Road site should be excluded from the Homes Chapel settlement boundary.

There is a lack of mapping of heritage assets.

The policy is not necessary as it just lists what is contained on the policies map.

It fails to identify settlement development boundaries and associated land allocations for ‘infill villages’.

Disagreement with primary and secondary shopping frontages.

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

Summary of key points:

- Duplication of policies, therefore, contrary to the clear guidance at paragraph 16 of the NPPF which states that Plans should “serve a clear purpose, avoiding unnecessary duplication of policies…”.

  In particular, the following policies replicate those in the LPS and should be removed:

  - Draft Policy GEN 1 ‘Design Principles’ would overlap with adopted LPS Policy SD 1 ‘Sustainable Development in Cheshire East’;
Draft Policy ENV 1 ‘Ecological Network’ would overlap with adopted LPS Policy SE 3 ‘Biodiversity and Geodiversity’;

Draft Policy ENV 3 ‘Landscape Character’ and draft Policy ENV 5 ‘Landscaping’ would overlap with adopted LPS Policy SE 4 ‘The Landscape’.


Draft Policy ENV 12 ‘Air Quality’ would overlap with adopted LPS Policy SE 12 ‘Pollution, Land Contamination and Land Instability’; and

Draft Policy ENV 15 ‘Surface Water Management and Flood Risk’ would overlap with adopted LPS Policy SE 13 ‘Flood Risk and Water Management’

- Support for ecological and built environment submissions in connection with neighbourhood plans
- Traffic concerns (Bollington)
- Full account must be taken of Neighbourhood Plan policies
- Cheshire East should actively support and find ways to develop sustainable energy.
- Support for Environment Policies from Poynton Town Council

**Policy ENV 1 ‘Ecological network’**

**Summary of key points:**

- Strong support for policy - although the wording of the policy should include all the categories that merit protection
- Object to policy on the grounds that it is onerous; consider that reference to new development protecting or conserving the ecological network and the particular role that the site has to the network is given greater importance within this emerging policy than that required by the NPPF (Chapter 15, Paragraph 175); delivery of enhancements not always practical; should be determined on a case by case basis. The policy as currently drafted is inconsistent with national policy and is not justified. The policy is therefore unsound. The draft policy should be reviewed in full.
- Concerns that that the policy is simply not defined enough. The map contained in Figure 4.1 is not produced at a scale which enables the reader to determine within which ‘area’ a site may be located in the ecological network. Similarly, the sub-criteria to part i. of criterion 4 is not clearly defined. The policy should be reworded to ensure that it is clear that any changes to the
ecological network are appropriate and proportionate to individual development proposed.

- Boundaries need to be more accurately drawn; concerns regarding boundaries in the Wheelock area; new boundaries suggested in relation to settlement boundary and wildlife corridor

- Land west of Eaton Bank, Congleton should not be included within the scope of policy ENV 1 and associated ecological network/corridor

- The policy is considered to be unsound as it is not justified or effective. It is not clear in the Policy or explanatory text how the parts of the borough covered by each of the ecological areas identified within the Policy have been defined. It is not therefore possible to assess whether the areas defined are justified. The SADPD should be amended to include this information.

- More clarity and explanation needs to be provided in the Policy and explanatory text in order to make it possible to assess the impact these Policy requirements will have on the development of sites, and to assess the level of provision that is required on sites to meet the requirements of the policy. Clarification is also needed in the Policy that the intention of the Policy is not to stifle or preclude development on these sites. In order to assist in this process, it would be beneficial if an ‘example site’ diagram could be provided in the SADPD, showing how the Council anticipates that these measures could be incorporated into a typical development site.

- The policy wording should have more clarity as to how ecology on the identified network component areas should be retained/improved and how development proposals will be considered on such areas

- Aligns with the proposed approach in Cheshire West although it will be useful to revisit this when the Part Two examination is concluded.

- Neighbourhood Planning Steering Groups have invested in detailed ecological research and reports that must each be incorporated into the ecological policies of the SADPD.

- No account taken of impact of HS2 (line of route, mitigation, wildlife trust reports etc.)

- Needs reference to major development projects such as HS2 and fracking

- Welcome the addition of Figure 4.1 illustrating the ecological network within Cheshire East; but certain meres and meres appear to be omitted - recommend that the figure is updated to include all meres and mosses within the ecological network

- This policy is welcome. The inclusion of an ecological network map and clear policy guidance in the SADPD is crucial to help inform future development and aid the Nature Recovery Network (NPPF footnote 57 and the 25 Year Environment Plan, Michael Gove 2018). Consideration should also be given
to local wildlife corridors that have been identified through an evidence based methodology via the Neighbourhood Planning process. These wildlife corridors compliment the wider ecological networks and provide a greater level of refinement at the parish/neighbourhood level.

- Natural England welcomes the policy wording that clearly maps the ecological network and identifies stepping stones for habitat creation and restoration. Policy ENV1 sets out clear policy objectives for future development to contribute towards strengthening the ecological network. There is also a strong link to increasing ecological connectivity by enhancing the stepping stones between sites and the creation of appropriate green infrastructure and habitats. The focus on avoiding contamination and hydrological impacts on the Meres and Mosses catchments (buffer zones) as a result of development impacts is a policy Natural England welcomes. The policy ENV1 does not include reference to the following protected sites: Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI). The above sites are listed in the explanatory policy text as being contained in the core areas however, these sites are not included in the policy wording ENV1. A possible suggestion would be to include additional wording, reference or a footnote to ENV1 policy wording to ensure the above sites are captured in the Ecological Network for clarity.

- Full account must be taken of environment policies in Bollington Neighbourhood Plan

- Support for policy and notes extensive areas of meres and mosses catchments in Knutsford area

- Add potential local wildlife sites to paragraph 4.5

**Policy ENV 2 ‘Ecological implementation’**

**Summary of key points:**

- Criterion 1 - Concerns that the metric calculation will be used instead of a reasonable, objective approach to assessing the landscaping, planting plans and variety of habitats to be created, as found in ecological and landscaping reports. Expect that the metric calculation will be used side by side with the desk assessment by Planning Officers and if the metric calculation is found to be too subjective, then a ‘common sense’ approach is taken to assessing the mitigation proposed.

- Criterion 2 - Often compensation is required on development sites and the wording ‘as a last resort’ is too strong.

- Criterion 3 iv - re-word – add “and/or assessment of the ecological mitigation/landscaping plans by the Nature Conservation Officer, using their knowledge of the site and the locality”.
• Criterion 4 – concerns regarding long-term maintenance and management (onward sale of sites) – add as planning condition e.g. production of a 10 year management plan.

• The requirement in Policy ENV2 for all development proposals to deliver an overall measurable net gain for biodiversity and for net losses and gains for biodiversity/geodiversity to be identified using a biodiversity metric calculation is not justified and is not consistent with national planning policy. Part 1 and Part 3(iv) of Policy ENV2 should be deleted.

• Whilst pursuing opportunities for securing net gains in biodiversity is encouraged, the Framework does not set a blanket requirement for all developments to achieve this aim. In addition, it does not establish a requirement for net losses and gains for biodiversity/geodiversity to be assessed using a biodiversity metric calculation. This position is supported by information produced by the Government (www.gov.uk/government/collections/biodiversity-offsetting) on this matter which makes clear that biodiversity offsetting is an option available to developers to fulfil their obligations under the planning system’s mitigation hierarchy, rather than a requirement.

• A biodiversity metric calculation is a subjective tool which can often fail to recognise the quality of mitigation proposed. This tool should be used side by side along with the desk assessment by planning officers, and in cases where the metric calculation is too subjective then the officer should take a ‘common sense’ approach to assessing the scheme and the proposed mitigation.

• Unsound for a policy to seek the application of such a biodiversity requirement to all development proposals, given that many development proposals will simply have (an appropriate) neutral effect. The policy should be drafted so that it relates only to development that has the potential to result in an impact on biodiversity and that the biodiversity impact of development is a material consideration in the determination of such planning applications.

• Support for policy - and could be strengthened by reference to major development projects such as HS2a and fracking, and the impact these proposals could have on the very important ecological networks in Cheshire.

• Support for policy - Improving biodiversity is clearly stated under the environmental objective (paragraph 8c) with further explicit guidance on how to achieve measurable net gain in paragraphs 174b, 175d. Pleased this guidance has been used to inform policy ENV 2.

• As net gains may not be achievable within the constraints of each individual development suggest that a caveat is added to point 1, i.e.: “1. Net gain: all development proposals must deliver an overall measurable net gain for biodiversity using a biodiversity metric calculation. Where this cannot be delivered on site, off site compensation should be secured through a process agreed with the Local Authority”.

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• Requirements of policy are onerous for small-scale developments – clarification required.

• Suggest that the policy be better balanced/re-worded so that an overall net gain is sought unless it can be demonstrated that this is not economically or technically feasible and that the wider benefits of the scheme outweigh any overall net loss in biodiversity.

• Welcomes the inclusion of a measurable net gain policy and the use of a biodiversity metric calculation. May wish to consider specifying the Defra metric as an approved approach to ensure consistency between developers and to simplify the process of assessing planning applications. Reference to the NPPF (para 174) could be made to strengthen this policy further.

• Policy ENV 2 includes strong wording that clearly demonstrates how all development proposals must take account of the mitigation hierarchy. The detailed policy wording and the application of Ecological Assessments as part of planning application, as well as the management and maintenance of habitat creation/enhancement works are also welcomed and in particular the inclusion of site of geodiversity.

• Would like to see some wording in this policy about avoiding development on peat, peat is a precious resource that can take thousands of years to form and should be protected.

• Query whether the Council have a means to quantify impact in order to effectively implement criteria 2ii) and 2iii) of the policy.

• Policy should allow for the ability to balance the effects of net gain against other sustainable objectives. Criteria 1 could be amended to say; “wherever possible” or “unless it can be clearly demonstrated that the provision of net biodiversity gain would be outweighed by other benefits....”

• This policy would benefit from the Planning Authority commissioning the assessments at the applicant's expense to ensure independence of the process.

• Support the Policy - the requirements of Neighbourhood Plans on this topic must also be implemented.

• Detailed ecological reports produces for Neighbourhood Plans should be incorporated into the ecological policies.

• Policy does not take into account of Meres and Mosses Area, impact of HS2 and mitigation proposed.

Policy ENV 3 ‘Landscape character’

Summary of key points:
Support for policy – should include all categories that merit protection; developers do not always take into account supporting paragraphs

Supportive of the decision to remove the parkland element from the Bollin Valley LLD, by way of creating the new Alderley Edge and West Macclesfield Wooded Estates LLD. Also supportive of the decision to remove key developments sites from the LLD, such as the Manchester airport runway. It is therefore disappointing that the report has failed to pick up on the area around Yarwood Heath Farm, which due to the A556 and M56 works, is now distinctly separate from the river valley and provides no landscape contributions to the LLD. The SADPD should review this as a matter of urgency and remove the land parcel from the Bollin Valley LLD. Also supportive of the decision to remove the fields west of Parkgate Industrial Estate from the Rostherne/Tatton LLD, given that they provide limited landscape contribution to the LLD. Urge that more detailed analysis is undertaken to take account of the future HS2 route, which is planned to the north of the Rostherne/Tatton Park LLD. This will undoubtedly have a significant impact on the landscape character of the area, and although timescales have slipped, is likely to occur during the Local Plan period (by 2030).

Areas to the north of the River Bollin lie within Trafford Councils Policy ENV17 Protection of Landscape Character, this is a general policy that does not specifically provide context to the River Bollin Corridor. Therefore, the Bollin Valley LLD is an incomplete designation with limited meaning as it only covers the southern side of the valley. For this reason, the Bollin Valley LLD should be removed in its entirety, as it is an incomplete designation given that it does not traverse the two local planning authority boundaries.

Consider that the landscape-led approach to the LLD designations is inconsistent with the provisions of the NPPF (paragraph 170 of the NPPF does not take just a landscape led approach to conserving the natural environment)

Support the decision to assess and designate the Bollin Valley LLD in its own right but question evidence to support detailed boundaries – should be more detail (evidence base must go in to more detail at the localised level, to ensure that the detailed boundaries of the Bollin Valley LLD can be fully justified as part of the emerging SADPD process)

Feel that the language used is aspirational rather than conclusive. Neighbourhood Plans should have more prominence paragraph 4.19 would read better as "Where Neighbourhood Plans provide further detail at the local level regarding landscape character, these must be respected in any development proposals."

Consider that policy ENV3 is weak and fails to present criteria as to when permission will not be granted. ENV3 should be amended to state “must” in place of “should.

Refer to major development projects such as HS2a and fracking
Policy should not restrict quest to build unique designs on self-build plots

Support for policy - the requirements of Neighbourhood Plans on this topic must also be implemented

Object to the fact that the draft SADPD includes no policy on the protection of long-distance and/ or strategic views of significance. That omission should be rectified, especially with the quality of much of Cheshire East’s built and natural environment and with the scale of development proposed to 2030.

Genuinely pleased to see the inclusion of a landscape character policy (ENV 3), backed by a new landscape character assessment, but unhappy to note its weak phrasing and are concerned that it may not carry any weight in the planning process. The requirement ought to be compulsory as in “must respect the qualities” and it ought to refer to “demonstrably respect” instead of simply “respect”, and state “Planning permission will not be granted for development proposals which fail to do so”.

Welcomes the existence of the Landscape Character Assessment and the promise in paras. 4.14 and 4.15 to assess development proposals in relation to landscape character types and landscape character area profiles, it does not appear that the assessments will carry any real weight. If this is in fact the case, then this is no more than window dressing. There needs to be a statement to the effect that if development proposals fail to recognise landscape character, they will be refused.

Policy ENV 4 ‘River corridors’

Summary of key points:

- Support for policy but needs addition of incorporation of ecological reports from neighbourhood plan; impact of HS2 on River Corridors etc; mitigation measures in relation to HS2 etc.

- Policy ENV 4 should be amended to include reference to the Water Framework Directive (WFD), as this outlines the important link between protecting river corridors/hydromorphology and watercourses achieving good ecological status/potential.

- Support for policy (refers to the importance of the Congleton River Corridors).

- Strongly support Policy ENV4 which recognises river corridors as important natural landscape features and valuable green infrastructure assets. Suggest the wording could be strengthened (In bold) as follows: Development proposals must make sure that river corridors are protected and opportunities should be taken to enhance them as important natural landscape features and usable areas of open land including, where appropriate, by:

  i. conserving and enhancing existing areas of value;
• ii. restoring and enhancing the natural elements of the river environment including related habitats and ecosystems; and

• iii. promoting public access.

**Policy ENV 5 ‘Landscaping’**

**Summary of key points:**

- Support policy and building upon Point 5 suggest the following additional criterion: “Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge.”

- Support, but consider the objectives should include the contribution that appropriate landscaping (hard and soft) can make to the achievement of air quality objectives and benefits to public health and well being.

- Support for policy - suggest that point 5 should perhaps include ‘native’ planting as opposed to species that are ‘in sympathy’,

- Support for point 6, in terms of maintenance and aftercare of landscaping. Suggest that this needs to be for the lifetime of the development. Suggested wording: “makes satisfactory provision for the maintenance and aftercare of the scheme to make sure it reaches maturity and thereafter for the lifetime of the development.”

- Need to clarify what “blue infrastructure” refers to.

**Policy ENV 6 ‘Trees, hedgerows and woodland implementation’**

**Summary of key points:**

- Further justification is required in relation to the Council’s 3 to 1 tree loss policy. The approach would appear to be out of scale with the potential loss and is in excess of the need for a net benefit towards the environment as required by the NPPF.

- The policy as drafted fails to take into account the condition of any trees to be removed, or any site specific characteristics and constraints whereby such a replacement ratio may be unsuitable or not feasible.

- Support but point 1 requires strengthening. The policy fails to deal with the wholesale removal in towns of garden hedges and their replacement by feather boarded fences that do nothing for either the environment or for the aesthetics of the townscape.
• The policy should promote tree replacement planting that is site and project appropriate, taking into account the site characteristics and the quality and condition of the trees removed.

• Policy considered to be too onerous in relation to replacement trees In regard to hedgerows – policy too onerous – policy should be reworded to say: “Hedgerows deemed to be important under the Hedgerow Regulations 1997 should be retained and their loss, by exception, would require a justification”.

• Requirement for an arboricultural impact assessment should not be required in all cases but on a site by site basis – add the words “where relevant” to the policy

• Concerned a three for one replacement requirement would place unnecessary burdens upon developers; suggest alternative wording: “Where tree loss is unavoidable it must be compensated for on the basis of one new tree for every tree removed”.

• The explanatory text (First Draft SADPD August 2018) notes that a two for one replacement would not result in net gain should one of the replacement trees fail to reach maturity. However, the management of any tree planting can be secured by planning condition to ensure that any new trees within a development which die or fail to reach maturity are replaced accordingly

• Support and welcome this Policy and in particular welcome the tree loss compensation proposal of three replacement trees for every one lost. This reflects the need for ecological and environmental mitigation to provide not just ‘like for like’ replacements but an overall ‘ecological net gain’ as recommended by Natural England and the Revised NPPF (2018) Para 170 (a-f).

• Do not feel that Ancient Woodland, woodland and Hedgerows are adequately addressed / mitigated for in this policy in relation to the impacts of HS2a

• It is considered that if the Council are seeking a ‘net environmental’ gain that this could be achieved in many other ways than seeking a 3:1 tree ratio, and achieved by using empirical evidence. For example, through wildlife habitats to support protected and other species either on or off site on basis of surveyed need. In absence of a clear evidential basis for the 3 for 1 approach, this part of the policy should be deleted as it is unjustified and may prove ineffective at providing other, suitable habitat mitigation by deflecting attention to tree planting, and in absence of an evidential base the draft policy is not positively prepared and contrary to NPPF (35).

• The section on hedgerows should be redrafted to state that any loss of protected hedgerows should be offset by mitigation

• In general, this policy should be amended to simply state that net environmental gains should be sought in accordance with the NPPF.
• Requests that tree replacement (where a net gain) is taken into account in the overall assessment of biodiversity enhancement as set out in Policy ENV2.

• Replicates national guidance – remove policy

• The Policy should require equal or better tree replacement provision, on a site by site basis, without a defined formula.

• Support this policy as these are all very important features in our countryside and towns and more often than not are a crucial part of what is described as local character and setting. Perhaps more emphasis could be made for the retention and protection of trees on development sites and the protection and replacement of hedge rows when access points are created to facilitate development.

• Support for policy but makes the following recommendations:

  o The wording of this policy needs to be better aligned with that of the NPPF i.e. the protection for irreplaceable ancient woodland and ancient/veteran trees needs to be more explicit. The NPPF paragraph 175c states: 175c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;

  o Semi-natural broadleaved woodland and high value hedgerows are priority habitats which should be considered in line with the mitigation hierarchy i.e. ‘avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for’ (NPPF paragraph 175a). As a last resort replacement habitat should be sought, the area of which should be determined through the use of the Defra net gain metric which takes into account time and risk factors. The replacement ratio of 3 trees for each one lost is inappropriate for parcels of woodland. The Defra metric must be used to calculate the level of compensation required to deliver net gain for this habitat. Replacement trees should not be planted on areas of existing valuable habitat such as species rich grassland or wetlands as this will reduce its wildlife value.

  o This policy should specify that compensation will also be required if areas of woodland are negatively impacted as a result of nearby developments (indirect impacts), as paragraph 174b of the NPPF states that plans should ‘promote the conservation, restoration and enhancement of priority habitats’. All priority woodland habitats (which may also be selected as Local Wildlife Sites or potential Local Wildlife Sites pLWS) should be protected by a suitable buffer zone to reduce the level of indirect impacts. The policy guidance currently only refers to a buffer for ancient woodlands. This should be amended.

• The new NPPF recognises the importance of non-ancient woods and trees and their contribution in terms of character and their natural and ecosystem
benefits, this should be echoed in this policy. Also, at point 4 it is important in conservation terms that replacement trees and hedgerows must be native species

- Comments re Ancient or veteran trees - Policy ENV6 Ancient Woodland and Ancient or veteran trees should be strengthened so that it reflects the NPPF (para 175) that states: "When determining planning applications, local planning authorities should apply the following principles: …c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons(1) and a suitable compensation strategy exists”. In its current form Policy ENV6 does not reflect the NPPF’s (para 175) requirements. However, reference is made to NPPF (para 175) in the explanatory text that is welcomed. ((1) For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat)

- Support - The 3 to 1 ratio is to be valued and its impact two-fold in deterring the original loss and if unavoidable promoting a substantial compensation. The net gain additional younger trees offer is an established compensation used throughout the forestry industries and is deemed acceptable to the loss of the original and promotes the development of forest land within policy as opposed to the widespread denuding of this important natural resource for wildlife.

- This policy would benefit from the planning Authority commissioning the assessments at the applicant's expense to ensure independence of the process

Policy ENV 7 ‘Climate change mitigation and adaptation’

Summary of key points:

- Climate change policies should be on a par with the status of heritage related policies.

- Wording in the policy should be strengthened – the policy should state ‘development must…’

- Listed Building impacts often have competing heritage and climate change impact mitigation.

- Should include reference to ‘where possible’ in the policy wording.

- United Utilities - recommend that the policy is expanded to include 10th criteria – “Incorporate water efficiency measures”.

- Canal and Rivers Trust - Reference should be added to the importance of waterways and the role they play in transition to a low carbon economy.
- Words “where appropriate’ should be added to the end of the sentence as not all development is of a nature that can support measures pursuant to climate change resilience.

- Policy should help to promote and deliver future technologies and solutions

- Policy should include provision for energy storage.

- The SADPD should consider Warmingham Brine Field as a location for renewable energy creation (solar & wind) and energy storage. A renewable energy hub could be created in this location.

- Natural England welcomes policy wording including mitigation and adaptation measures (NPPF Para 20d)

- This should be a primary policy in the environmental section of the Plan with all other policies linked to it.

Policy ENV 8 ‘District heating network priority areas’

Summary of key points:

- Policy requirements are too onerous.

- Policy is not supported by specific references to development proposals and / or any viability evidence or testing. There is a lack of clarity in the policy and its implementation.

- District Heating Network proposals should be sought through the Council’s Community Infrastructure Levy Regulation 123 list.

- No justification for the policy ‘ask’ has been provided.

- Reference to Crewe and Macclesfield should make clear that these are principal towns – rather than main towns as currently worded.

- Concerned by reference to ‘large scale development elsewhere’ as this is not clearly defined. There may be suitable semi-rural locations that have potential for such heating networks.

Policy ENV 9 ‘Wind energy’

Summary of key points:

- Object to the view that fully addressing impacts automatically assume that proposal has community backing.

- Policy ENV 7 point 1 (iv) propose the words ‘unbuilt / natural or’ be inserted before historic environment.
• Point ENV 7 point 1 (iv) replace with “Proposals should not have an unacceptable impact on aircraft safety …” with “Proposals should not have an impact on aircraft safety”. The word ‘unacceptable’ allows for subjectivity and by removing it provides a more definitive statement.

• Para 4.53 should be amended using the following wording – “4.53 The presence and operation of wind turbines can present operational issues for aviation and also for the operational requirements of Jodrell Bank. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can negatively affect signals radiated from and received by aeronautical systems. The rotating blades create electromagnetic disturbance, which can degrade the performance of these systems and cause false information to be received. The amount of interference depends on the size and number of wind turbines, their location and on the material and shape of their blades. Developers are encouraged to undertake thorough pre-planning application discussions with airport operators at the earliest stage of project planning. Where consultations with the relevant operators identify that there may be impacts on aircraft safety and the operations of Jodrell Bank then proposals will not be supported”.

• The policy should make specific reference to visitor accommodation and visitor amenity to take account of the impact turbines can have on the tourism and economic benefits of these uses.

• All proposals should be required to provide a visual impact assessment as part of the planning application submission to ensure that the impact of the proposals can be properly assessed particularly when considered against sensitive developments and landscapes including listed buildings.

• United Utilities wishes to highlight that there are significant areas of Cheshire East which are public water supply catchment land. Policy ENV 7 should identify the need to engage with the statutory undertaker for water supply purposes to determine whether any proposal is on land used for public water supply catchment purposes. We recommend the inclusion of the following additional criterion under point 3 (vi). details of consultation with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply purposes, careful consideration should be given to the location of the proposed wind turbines and a risk assessment of the impact on public water supply should be included with the identification and implementation of any required mitigation measures.”

• The SADPD should provide guidance to help with the interpretation of what should be; "affected local communities have been fully addressed...and have their backing". This must ensure that renewable wind schemes can be delivered sustainably. The policy should be clear so that renewable technology can come forward. At one extreme it could imply that any and every last objection on any matter relevant to wind energy must be fully overcome and no objections can be allowed in order for development to be
supported. At the other extreme it could simply require development to have support from the majority of the local community (or that the number of objections does not equate to more than 50% of the local community) to not object to a proposal in order for it to benefit from policy support.

- Natural England – strong references to cumulative impacts and avoiding impacts on designated sites, which is welcomed.

- The issue of sensitive landscapes is understood when it comes to impact on nearby residents, but object to the notion that wind turbines are an eyesore and should not be allowed. Not only are they graceful structures, but they have an underlying beauty in their purpose; a far cleaner and kinder solution to our ever growing need for power than a fossil fuel power station.

- In areas where there are no designated sensitive sites, ecological, historic sites, heritage assets and their settings, the value of unbuilt green spaces may have an equal value in terms of amenity and resource to the communities adjacent to them.

**Policy ENV 10 ‘Solar energy’**

**Summary of key points:**

- No mention in the policy currently to developed land that provides potential for roof arrays on industrial agricultural buildings – potential to provide above ground level capacity and access to the grid

- Due to reduction in government subsidies, those applications that have been approved but not constructed within three years should be subject to a full reappraisal in the light of the LPS and emerging SADPD policies

- Require reference to aircraft safety in policy ENV 10. Proposals should not have an impact on aircraft safety. Additional paragraph needs to be inserted under supporting information, as follows: - “4.58 The presence and operation of solar panels can present operational issues for aviation. In addition to their potential for presenting a physical obstacle to air navigation, solar panels can present a hazard to aircraft by: being attractive to birds to roost or nest on; creating a glint or glare hazard to pilots and air traffic control personnel and potential interference with aeronautical communication navigations systems (CNS) equipment”.

- Agricultural land requires good management techniques and should not be lost to alternative uses.

- To require opportunities for solar development to effectively ‘rule out’ all PDL before looking towards non-PDL imposes a significant risk that opportunities to help meet our climate change objectives would be unnecessarily lost. Low-margin development such as solar arrays will not be able to compete with higher value uses, such as residential or commercial. The policy should be flexible enough so that opportunities for development of solar arrays can come forward on areas that are not PDL where it can be demonstrated that
they provide a clear and demonstrable need and the benefits outweigh the harm, as opposed to a sequential expectation that all PDL must be utilised first.

- Object to the policy omitting reference to landscape character assessment. The policy should reference ‘unbuilt / natural or’ before historic environment.

Policy ENV 11 ‘Proposals for battery energy storage systems’

Summary of key points:

- Support for policy subject to the safeguards set out

- Criterion 1 should be deleted. Disagreement with sequential approach set out – PDL or existing industrial areas to be considered first - as opportunities are often lost due to competing land uses.

- Due to intermittent nature of renewable energy sources – increased call for energy storage facilities. Planning system needs to be flexible to allow for development in the right locations.

- Council should consider allocating sites for the development of renewable energy and energy storage facility. One opportunity is referenced at Warmingham brine extraction and gas storage site.

Policy ENV 12 ‘Air quality’

Summary of key points:

- Lack comprehensive distribution of monitoring equipment to collect sufficient data and therefore to evaluate impacts effectively. The policy should include a commitment to introduce a comprehensive system and a target date.

- Protection of residential amenity should be expanded to include the protection of visitor amenity. It should be reworded to include “Development that is likely to produce an odour should demonstrate that there will be no negative effect on residential and visitor amenity.”

- United Utilities operates a range of wastewater treatment works within Cheshire East and notes that he Policy should take into account Para 182 of the NPPF. A third criterion should be included regarding new proposals being able to integrate with existing businesses, and existing businesses not having unreasonable restriction placed on them as a result of development permitted after they were established.

- ENV12 and ENV13 are too general. The airport operations need more attention both for aircraft emissions and noise.
Elaboration of the type of mitigation measures that would be sought would give better guidance to prospective developers.

In the case of odour pollution should there not be a requirement for mitigation measures if there are demonstrable impacts on local amenities.

Support of policy when there is a notable increase in car ownership, particularly in rural areas. In addition to this is the likely impact on air quality of infrastructure proposals such as HS2a and the construction traffic associated with these works and other strategic land releases.

Paragraph 1 refers to mitigation through the design of sensitive receptors but recent examples of non-opening windows and mechanical ventilation is not considered to provide acceptable living conditions for residents. The policy should be amended with the insertion of “without comprising the amenity of future occupants” at the end of the sentence.

It is not clear if the above policy addresses the impacts of air quality on the natural environment. Para 181 of the NPPF should be taken into account. The policy should be strengthened to include impacts on Designated Sites, as well as include potential traffic impacts of new development and new agricultural developments (e.g. intensive pig and poultry) if this is a known air quality risk.

CEC needs to survey existing air quality in places like Bollington, not just in conjunction with and adjacent to new developments.

There is no recognition in this policy regarding the impact of low-level air borne contamination (particularly by motor vehicles) on sensitive ecological areas. Air-borne contaminants require a more stringent and robust implementation.

The policy does not include a solid commitment to introduce an air quality strategy that will improve its air quality performance, including better coverage of the Borough with (more) diffusion tubes, better data collection (properly monitored) and robust action taken without delay wherever necessary. Measures in the Air Quality Strategy such as banning HGVs from certain roads and introducing 20mph zones are welcomed. However, in the event of a serious breach of trust that has occurred in respect of air quality management there should be a stronger policy covering this important environmental issue.

Policy ENV 13 ‘Aircraft noise’

Summary of key points:

- As drafted this policy is not nearly strong enough.

- It must set out to do more than ‘evaluate aircraft noise in relation to amenity and well-being’. Nor is an appropriate level of noise defined. Manchester Airport has failed to introduce effective Noise Action Plans for the past decade.
and CEC needs to limit development in noise zones as specified nationally. The policy appears to deal with the symptoms rather than the cause.

- Whilst it is acknowledged that it is important to appropriately assess locations potentially affected by significant aircraft noise, there are concerns about how policy ENV 13 does not provide clarity but alternatively invites comments on the methodology to be used.

- The report produced by Jacobs in August 2018 (Background SADPD Evidence Base Ref - FD15) doesn't provide robust conclusions, but invites consultation on the proposed methodology.

- The decision not to propose allocated sites for housing sites in Mobberley, based on the potential impact of aircraft noise, without presenting robust conclusions from an aircraft noise assessment questions the soundness of the plan.

- It is unclear how the strong demand for open market housing in Mobberley and Knutsford, with the apparent Aircraft noise issue, is reflected in the proposed policy.

- The final paragraph of the Policy should be revised to remove invitation to provide views on the methodology and replaced with wording outlining that the sites specific reports will be considered to assess the suitability of development proposals.

- Given that road and rail noise are far more prevalent and affect much greater proportion of the council’s district it would seem appropriate that these sources should also be considered as a wider review of all the noise policy aspects of the local plan.

- It would be useful if Policy ENV 13 were to expand on the second element of the ICAO balanced approach to reference the advice on land use planning in ICAO guidance DOC 9184, Part 2 Edition NO. 3 Dated 27/3/09. This advice can be summarised as not solely to “discourage or prevent” noise sensitive development in areas affected by aircraft noise, but is more nuanced in suggesting that whilst there are locations that are just too noisy where noise sensitive development etc. should be prevented undue to unacceptable effects or on health and quality of life, there are other locations affected by less aircraft noise that can be developed for noise sensitive uses etc. provided adequate mitigation. This approach is reflected in the land use section of the Aviation Policy Framework (APF), The proposed policy should not solely look to “discourage or prevent” noise sensitive development in areas affected by aircraft noise as this would be excessive if no consideration is given to the degree of aircraft noise and/or the potential mitigation that could be included in a scheme to prevent unacceptable and avoid significant effects.

- The Agent of Change Principle is highlighted. But is not a new concept as from at least 1994, PPG 24 paragraph 12 the inclusion of specific reference to the ‘Agent of Change’ principle in the revised NPPF amounts to a change of emphasis rather than the introduction of an alien and entirely novel concept.
Given the safeguarding or airports via the Aviation Policy Statement (APF) and the exclusion of aircraft from civil and statutory nuisance law under the Civil Aviation Act 1982 s.76(1) or s.77(2) there already is a substantial degree of protection for airports and aircraft against imposition of legal controls against noise, and it would seem excessive and contrary to the principles in paragraph 183 of the revised NPPF to replicate this protection in the local plan.

- The policy ENV 13 ought to take account that the Noise Policy Statement for England. The NPSE seeks to balance the negative effects of noise with the positive benefits of development, and assimilate the following elements of the Policy

- There is a need to integrate consideration of the economic and social benefit of the activity or policy under examination with proper consideration of the adverse environmental effects, including the impact of noise on health and quality of life. This should avoid noise being treated in isolation in any particular situation, i.e. not focussing solely on the noise impact without taking into account other related factors.

- The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development (paragraph 1.8). This does not mean that such adverse effects cannot occur.

- The Policy ENV 13 should recognise that the PPG supplements the NPSE and NPPF policy by defining what are No Observed Adverse Effect (NOEL), Significant Observed Adverse Effects (SOAEL) and Unacceptable Adverse Effects (UAELs) i.e. these terms have specific meaning in the context noise policy and not their normal colloquial connotation.

- The policy should acknowledge that whilst the PPG advises that Local Planning authorities can develop and include in their Local Plans specific noise standards to apply to various forms of proposed development and locations in their area. Care should be taken, to avoid these being implemented as fixed thresholds as specific circumstances may justify some variation being allowed i.e. Policy ENV 13 should leave room for the exercise of informed discretion.

- The World Health Organisation (WHO) is publishing new guidelines on noise (due in October 2018). Policy and guidance are not prescriptive as to the method by which the likely response to noise associated with a development is to be determined

- The PPG identifies factors that might need to be considered when making a judgment. Although the NPSE, NPPF and PPG has adopted two categories of effect from the WHO Guidelines, and then added to them a category or level not derived from the Guidelines, namely the "significant observed adverse effect level". They did not adopt or incorporate more from these Guidelines, or
any other standard. Accordingly, the NPSE, NPPF and PPG do not adopt or incorporate the specific advice in the WHO's Guidelines or any other standard about what noise levels might be appropriate in the circumstances. Further, the NPSE, NPPF and PPG do not treat the WHO Guidelines or any standard as setting any specific noise threshold that must apply. Instead the decision maker can form their own judgment in the context of the proposed scheme and the site in question and in the light of the technical evidence provided.

- Ensure that the policy ENV 13 does not elevate the existing or recently published WHO guidelines as immutable limits that must be complied with in every case, not least because they represent the onset of effects i.e. are broadly equivalent to NOELs or LOAELs which policy permits rather than representing SOAELs that policy states should be avoided or prevented.

- The new policy is to apply to proposed noise sensitive development consequently the Airports’ commissions noise score card approach is of limited value as it was formulated to allow comparison of different airport development options rather than evaluation of impacts of aircraft noise on a specific proposed noise sensitive development.

- Regarding noise sensitive residential development, the most effective descriptors for effects of aircraft noise are day time $L_{Aeq,16\text{ hr}}$ and night $L_{Aeq,8\text{ hr}}$ for overall annoyance and sleep disturbance respectively, which can be derived from the airport noise contours. In order to assess the impacts on sleep of peak noise levels from individual aircraft movements, these metrics should be supplemented by site surveys of $L_{Amax}$ values and number of events at night (covering both westerly and easterly modes of operation of the airport as departure and approach $L_{Amax}$ values are likely to be different).

- The following additional references are suggested.
  - Secretary of State decisions made regarding planning inquiries where the principle issue has been the question of aviation noise; and what levels can be regarded as representing
  - The ProPG jointly published by the Chartered Institute of Environmental Health, The Institute of Acoustics and the Association of Noise Consultants in May 2017. This supports the implementation of policy and guidance regarding noise and planning and noise
  - WHO Environmental Noise Guidelines for the European Region: A Systematic Review of Transport Noise Interventions and Their Impacts on Health

- ENV12 and ENV13 are too general and airport operations need more attention in these policies, both for aircraft emissions over Knutsford and the horrific effects of noise in the town, particularly from aircraft landing on
Runway 2 in an easterly direction at night. Further development of new homes under the easterly final approach to Runway 2 should be refused for environmental reasons alone. These issues could also be dealt with in Health Policies.

- The effect of aircraft noise upon the amenity of local residents requires careful consideration in the planning process and development should be limited in certain affected areas. Policy should therefore be included within the SADPD that controls development (residential and other noise sensitive development) in areas adversely affected by aircraft noise and should provide details of the levels of noise at which planning permission would be refused or granted subject to appropriate protection against noise. This would limit development to that which is compatible with noise levels in the area and ensure that development is capable of occupation without undue nuisance from aircraft noise. The policy should reflect guidance contained within the National Planning Policy Framework (NPPF) and Noise Policy Statement for England (NPSE).

- The aircraft noise policy should be informed by Manchester Airport’s Noise Action Plan and regularly updated noise contours. Consultation on the draft Noise Action Plan 2019-2023 took place earlier this year and it is now awaiting formal adoption. The Noise Action Plan will commit to offer predicted noise contours, which will allow the policy to take forecast noise into consideration.

- Another forecast impact that can be considered when writing the aircraft noise policy is Airspace Change. This is a nationally promoted review of airspace by NATS (National Air Traffic Services) that will re-position some of the airways over the UK and will determine the future routing of aircraft in the vicinity of Manchester Airport. Consultation on Airspace Change is imminent, and we therefore advise that you are mindful of this to ensure that the aircraft noise policy is not compromised by the outcome of this.

- This draft Policy is weak and ineffective. It is hoped it will be informed and strengthened by the further information to be evaluated.

- CPRE objects to the fact that the stated purpose of the intended policy is very limited, only to “evaluate” for amenity and wellbeing; and even then it is not stated (as it should be) that if the vague “appropriate” level is not achievable, planning permission will not be granted for development proposals. Some people might wonder whether the intended policy is cosmetic and will have any teeth. The effect is to be considered, but not the cause. What about limiting aircraft noise?

- Reference is made to “the airport”. It should be to “Manchester Airport”.

Policy ENV 14 ‘Light pollution’

Summary of key points:
No mention of Full Cut Off Lighting which should be specified for all exterior lighting and CEC’s commitment to the Dark Skies objective.

Objection to the wording of “external lighting must include details of the lighting scheme as part of the application”. This wording requires all applications, including outline applications where the detailed design of scheme maybe unknown, to be accompanied by such details. A suitably worded condition on any planning permission would successfully deal with this.

The wording “acceptably minimised” under Criteria 2 is ambiguous - an alternative wording should be used.

Criteria 4 could be usefully expanded to include greater reference to preventing light pollution on habitat/wildlife corridors due to the impact lighting can have on protected species such as bats. This could also correlate with paragraph 4.67.

The policy should be strengthened to require the use of ‘the most energy efficient lighting available at the time’ which also links back into policy ENV7 Climate Change.

Policy makes no differentiation between urban lighting where comparatively higher light levels during the hours of darkness may be reasonable tolerated, and rural lighting systems that can have a far greater and wide reaching impact across open countryside.

In rural areas where there is limited or no street lighting, the impact of light pollution rises exponentially the more remote the area is from urban conurbations and their hinterland. The impact on wildlife also has a higher impact the further the site is from urban centres. The policy therefore requires a statement that reflects the need for more robust conditioning in areas where the lack of night-time illumination is significant and valued characteristic of that area.

**Policy ENV 15 ‘Surface water management and flood risk’**

**Summary of key points:**

- Support for the policy especially in light of climate change and the increase in surface water run off and consequent flood risk likely to arise with all the new developments proposed.

- The policy confuses the assessment of the hierarchy of surface water drainage with the inclusion of SUDs and should be reworded.

- Discharges are not granted as of right to Canal and River Trust waterways; where they are granted, they will usually be subject to completion of a commercial agreement.
• Request for a further point to be added to the policy that identified the specific surface water drainage requirements in areas that are in or adjacent to the water catchment areas of ecologically sensitive and designated sites.

• Request for amends to supporting text to provide further detail with regards to the sequential approach and to reference that it is not always appropriate to discharge surface water runoff from certain catchments to the environment prior to appropriate levels of treatment.

• A recommendation that, to improve clarity, paragraphs 4.76 and 4.77 should be amalgamated and amended.

• Mature trees can have an effect on surface water flooding.

Policy ENV 16 ‘Protecting water resources’

Summary key points:

• Recommended Additional Policy- Groundwater Source Protection Zones

  The Environment Agency have defined Groundwater Source Protection Zones (GWSPZs) for groundwater sources, which are often used for public drinking water supply purposes. These SPZs signify where there may be a particular risk from polluting activities on or below the land surface. The prevention of pollution to drinking water supplies is critical. Our mapping system shows that none of the preferred or optional allocations are within SPZs 1 or 2. This is welcomed by United Utilities. However, with respect to any windfall sites or potential alternative sites, the planning department should be aware that early engagement with the Environment Agency and United Utilities is strongly recommended when development is proposed in GWSPZs so effective masterplanning can be undertaken. Where sites lie within a GWSPZ, it may be necessary that the applicant submits evidence of mitigation as part of their application.

• The details of GWSPZs can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful. United Utilities’ strong preference is for development to take place outside of any Environment Agency designated SPZ1. Accordingly, we recommend the following specific policy is included within the emerging Local Plan Review in regards to groundwater protection.


• New development within Groundwater Source Protection Zones will be expected to conform to the following:
  
  i. MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment.
For example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.

- ii. RISK ASSESSMENT - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

- iii. CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters.

For residential proposals within Source Protection Zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided.

Chapter 5: The historic environment (general issues)

Summary of key points:

- Although supported, these policies are examples of the synthesis of legacy policies leading to a more general and generic policy which loses the grain of specific references within the various townships.

- There does not appear to be the same level of focus given to our Heritage Assets as there does to other areas. We would have expected them to have been mapped in the same way as, for example, the Ecology of the area. Without a clear repository of this information it could make the impact assessments on the heritage assets and surrounding area more difficult and worryingly subjective.

- Cheshire East is an exceptional place to live and work. Given the number of wonderful conservation areas, listed parks and gardens and heritage features assets that Cheshire East has I expected to see this reflected and protected in the plan.

- HER 1-9 offer some general protection for heritage assets, however the characteristics of Knutsford’s Conservation Areas and specific reference to Listed Buildings in Knutsford has been lost in the policy detail. The
Neighbourhood Plan will compensate, but the suite of heritage policies could be strengthened specifically for the Knutsford heritage assets.

- The Council might usefully consider how this plan can encourage the commemoration of worthy local individuals. History is about people as well as places. If an otherwise undistinguished building is to be demolished, but has a connection with an important local person, the developer should be encouraged to mark that link in some way – such as a display of some kind, the design, or naming of the new development.

- Crewe Town Council has recently adopted a policy on street naming very similar to the one which was adopted by Crewe & Nantwich Borough Council. I’m not aware of an equivalent policy by Cheshire East Council and would suggest that it might usefully adapt and adopt the same.


- The Local Plan for Cheshire East will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.

- A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. Whilst the Council has an existing evidence base for their adopted Local Plan, they need to ensure that this provides the most up-to-date evidence for the historic environment.

- Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.

- Historic England is concerned that the Plan policies do not contain policies that will deliver the conservation and enhancement of the historic environment in Cheshire East and to guide how the presumption in favour of sustainable development should be applied locally. In particular the policies in particular as drafted do very little to detail what elements of the area will be conserved and enhanced including specific references to its historic environment and the Plan needs to be amended to detail this.
• Could this be covered under a general heritage asset policy?

• Parks and gardens are registered not designated.

• Registered parks and gardens are subject to the same tests as other heritage assets in terms of harm to the significance, yet the policy weakens the protection given to these assets.

• Whilst Historic England welcomes the Council’s inclusion of a chapter on the historic environment within the Plan, as drafted it does not provide clarity for those who are submitting an application affecting a heritage asset. We have the following comments to make:

• The chapter appears to have a series of policies covering the same types of assets. For example, a listed building by definition would sit under Policy HER 1, HER 2 (as it is designated) and HER 5 (title).

• It may be better to have one policy which applies to all heritage assets (as the same principle in terms of harm to the significance of the asset and its setting applies to all designated heritage assets) as required by the NPPF or alternatively, amend the proposed policies to ensure that it is clear which policy applies to which asset type. There could be separate points within the policy (or separate policies) to deal with elements of the historic environment that are not covered by this, for example, the council’s position on non-designated assets, archaeology and if preferred, conservation areas. In addition to the above the Local Authority has a Registered Battlefield – Battle of Nantwich 1644 (List Entry number 1000022), yet the Plan does not appear to provide any guidance for applications affecting this asset.

• CPRE objects to the fact that the draft SADPD includes no policy on the protection and enhancement of the Borough’s cultural heritage, whether such is focussed on the built or unbuilt/ natural environment. (An example is historic Knutsford, the ‘Cranford’ of author Elizabeth Gaskell). That omission should be rectified, especially with the importance of cultural heritage to the Borough’s ‘offer’ for residents, businesses and visitors.

Policy HER 1 ‘Heritage assets’

Summary of key points:

• The comments of Historic England are fully supported and, where they identify weaknesses, CEC needs to strengthen the wording accordingly and ensure that proposed development meets the strengthened criteria. Historic England correctly identifies the economic contribution of designated and non-designated heritage assets and their settings and landscape views to the economic well-being of CEC historic towns.

• Hope to see a continuation if not the strengthening of the protection afforded to heritage sites afforded by the old Congleton plan
Mapping of heritage assets should be included on the policies map as is the case with ecological networks and other important features. Lack of reference to the assets leaves them exposed as there appear to be no reference points for planning applications.

Do not object to the need for heritage statements if a proposal has an effect on a heritage asset.

Crewe Town Council welcomes the policy, but believes that a review of Crewe’s heritage and a strategy for its future interpretation and conservation is required. The town has a rich industrial and architectural heritage which is rapidly vanishing, and has received little protection through the planning system to date. A commitment to such a review and strategy in the supporting information would be a step forward.

This policy should begin with the Council’s position on applications affecting the historic environment.

- Bullet 1 doesn’t provide any guidance for those submitting an application affecting a heritage asset; rather it is a supporting sentence.
- Bullet 2 should be the opening sentence of any policy, but it could be shortened as there is no need to list the types of assets within a policy. Reference should be made to the Borough’s historic environment, heritage assets and their setting rather just the latter.
- Bullet 3 would benefit from making it clear that there is a requirement that all applications affecting a heritage asset will be expected to submit a statement etc. rather than must be supported by a statement. It might be helpful to include reference to the requirements contained in the Council’s validation checklist for listed building consent.
- Bullet 4: This would sit better within another section of the policy on harm.

In addition to the requirements of this Policy, the requirements of Neighbourhood Plans on this topic must also be implemented. This requires consideration of the setting of “non-designated heritage asset” and the wording should include “and/ or its setting”.

CPRE objects to the fact that point no. 3 does not address the importance of the setting of heritage assets. The words “non-designated heritage asset” should be followed by “and/ or its setting”.

Policy HER 2 ‘Designated heritage assets’

Summary of key points:

- There does not appear to be any reference to the historic assets we have within Brereton parish and therefore there is concern that they will not be
afforded the current level of protection they have within the existing plans in place, such as the Congleton Local Plan.

- There does not appear to be the same level of focus given to our Heritage assets as there does to other areas. I would have expected them to have been mapped in the same way as, for example, the Ecology of the area. The lack of reference to the assets leaves them exposed as there are no reference points for planning applications for those interested in the assets themselves.

- Bullet 1: Does the policy need to define what a designated heritage asset is? Could this sit within the supporting text? This also appears to repeat content in Policy HER 1.

- Bullet 2: and Bullet 3: Unacceptable harm to a heritage asset should be avoided and the policy could be simplified to have one paragraph covering this and the public benefits required rather than repeating the NPPF.

- Could be part of a single policy on heritage assets?

**Policy HER 3 ‘Non-designated heritage assets’**

**Summary of key points:**

- HER 3 lacks the caveat that harm should be weighed against specified public benefit. It could be added with advantage future drafts of the SADPD should also include an appendix with detailed addresses of all Locally Listed Buildings, so that these can be readily identified

- Policy HER 3 (1) outlines what constitutes a non-designated heritage asset and part (2) sets out the test to be applied to proposals affecting non-designated assets. This states that “Where such affects are unavoidable, proposals will not be permitted unless the scale of any harm to the significance of the heritage asset has been minimised and is outweighed by the public benefits of the proposal.” With reference to paragraph 197 of NPPF18, Policy HER 3 needs revisiting to ensure that it applies the correct policy test for proposals affecting non-designated heritage assets. The test that should be applied in relation to non-designated heritage assets is a ‘balanced judgment’. Paragraph 197 clearly states: “In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

- Crewe Town Council considers that there should be an addition to the second paragraph of this policy to make clear that where a heritage asset cannot be saved, it should be replaced with a building of equal or greater architectural quality.

- Bullet 1: This is repetitive and could sit in the supporting text or within the glossary.

- Bullet 2: This could sit in a standalone policy to avoid repetition.
In terms of the detail:

- How does the policy apply “avoid direct and indirect harm”?
- It is not the scale of harm to an asset that is minimised but that any harm should be avoided and where this is not possible mitigation measures should be used.

**Policy HER 4 ‘Conservation areas’**

**Summary of key points:**

- CEC’s Conservation Areas are not listed in the document even as an Appendix. Only 34 have had Appraisals and many of those are more than 10 years old. No commitment is made to remedying these shortfalls or perhaps an indication that these should be done by Neighbourhood Plans with appropriate supervision. It is difficult to find the Conservation Areas and Appraisals on the website and some are not the most recent editions. The widespread ignorance of the purposes, advantages and responsibilities of Conservation Areas is not confined to householders but also to developers – especially individuals and small builders. This policy is a crucial priority for strengthening preferably within the policy itself and/or within the Explanatory supporting sections.

- Object to limb 3 of Policy HER 4 on the basis that there is no statutory or legal requirement that states outline applications cannot be accepted within Conservation Areas. Properly supported, outline applications can be appropriate within Conservation Areas and are routinely accepted and approved across England. The requirement within HER 4 is therefore unsound as it has no legal basis and is not evidenced.

- There is no need for development plan policy to repeat national planning policy guidance as set out through paragraphs 189 to 202 of the NPPF.

- With regard to the second part of this policy, any harm should be assessed within the context of paragraphs 193 to 196 of the NPPF. There is no justification for arbitrarily requiring the retention of all buildings that make a positive contribution as there may be circumstances whereby it is desirable for such buildings to be demolished or substantially altered. Furthermore, 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.

- Support the objectives of this policy. In note 3 perhaps the aspirational “should” ought to be replaced by the definitive “will”?

- The policy would benefit from reference to applications being supported which enhances those elements identified as being positive in a conservation area and within the appraisal.

- Bullet 3: This is not a requirement – “should” be replaced with “will”.
Para 5.6 contains text that should be in the policy.

Related documents: conservation area appraisals should be mentioned in the policy.

**Policy HER 5 ‘Listed buildings’**

**Summary of key points:**

- The policy is supported but it remains weak. Historic England’s comments are apposite and merit inclusion in a re-draft. The policy does not mention Locally Listed buildings or buildings of Townscape Merit which are a prominent feature of Knutsford’s heritage landscape. These are presumably non-designated assets and, even if they are non-designated, they and their settings are key components of Conservation Areas. Harm to these buildings constitutes a failure to preserve and enhance the designated heritage asset of the Conservation Area. These points need to be spelled out clearly in one or other of these policies.

- Support the objectives of the policy – should there be a reference to unauthorised works will be subject to action for discontinuance and reinstatement?

- Bullet 1: Is it necessary to list the type of proposals that may be included within an application? Could this be too prescriptive? Is architectural and historic integrity different to significance? How is integrity defined in terms of historic buildings and the requirements of national policy and guidance?

- Under the NPPF harm to the significance is harm and not defined as indirect or direct harm. Is this meaning setting?

- Sub-bullets: this would not apply to all listed buildings.

- Bullet 2: This appears to be repetition of bullet 1 and previous policies.

**Policy HER 6 Historic Parks and Gardens**

**Summary of key points:**

- A registered park or garden or one of local historic interest needs more positive protection than ‘should respect and preserve its character, setting and appearance’. The criteria for the development to be able to go ahead needs to be specified.

**Policy HER 7 ‘World heritage sites’**

**Summary of key points:**
Policy PG8 proposes in the order of 16 new homes in Goostrey and the supporting information states that “the housing figure for Goostrey is low due to its location in one of the most sensitive areas for radio interference for the Jodrell Bank Observatory” (JBO) (para. 2.5). Whilst it may be generally accepted that Goostrey is in one of the most sensitive areas because it is in close proximity to JBO, there does not appear to be any supporting evidence to justify the low housing figure.

FD Policy EMP2 allocates 2.3ha of land for employment use in Holmes Chapel. The site and settlement lies within the JBO consultation zone. The Council does not have any evidence base documents to justify the proposed development within the JBO consultation zone. Given the repeated refusal of applications for residential development in the JBO consultation zone, it is considered necessary that the Council fully justifies employment development which must have the potential to impact upon the efficiency of JBO too.

As demonstrated in this CS, there is a need for affordable housing in the MRA within the JBO consultation zone. It must be demonstrated whether the EMP2 allocation in Holmes Chapel would have a cumulative impact on JBO to the extent that it would prevent much needed affordable housing from coming forward.

The evidence base for the FD does not include any documents relating to JBO or its impacts on housing delivery.

The SADPD must be informed by a report on the impact JBO has on housing delivery. Not only is it important for Goostrey, but it has also has significant impacts on potential housing sites elsewhere within the JBO consultation zone, including the Macclesfield Rural Area where there is a need for affordable housing.

Until very recently, the Council has refused applications for housing development within the consultation zone, including applications for prior approval under Class Q of the GDPO (agricultural buildings to dwellings). The council has cited the impact on JBO as a valid reason for refusal. Numerous examples of this can be provided, if necessary, and several parties have subsequently commented that there has effectively been a moratorium on housing within the JBO consultation zone. There have been very few appeals against the JBO-related decisions.

CEC has not formally imposed a housing moratorium on development within the JBO consultation zone each scheme must be judged on its merits via the application of the planning balance. However, there is presently no guidance available from CEC or JBO as to what forms of development may be acceptable in what areas of the consultation zone.

It is evident that the Local Plan should include some form of criteria-based policy that is supported by a strong evidence base on JBO. That would provide much needed clarity on what development may be considered appropriate within the consultation zone and would undoubtedly be helpful for prospective developers and the Council’s Planning Officers within the
Development Management Department. The SADPD affords the Council the opportunity to do this.

- The operation of the Jodrell Bank Observatory is self-considered to hold “universal” importance to Science. The position of the Observatory is to object to all new development which takes place within the Consultation Zone (as defined within the Jodrell Bank Direction 1973) due to the adverse cumulative impact of new development on the operations of the Radio Telescope, and the clarity of observations. To date, the Observatory has assessed the impact on the Radio Telescope on a hierarchical basis ranging from very minor to severe.

- The absence of additional guidance has effectively resulted in a “moratorium” on new development within the Consultation Zone, unless land is allocated by the Council (despite the fact that these sites would still have an impact on the Radio Telescope and have been objected to by Jodrell Bank). The Council’s lack of understanding of the technical evidence regarding adverse effects is evident through the inconsistent approach it has adopted when determining residential schemes within the Consultation Zone – in some cases, an arbitrary line on a proposals map (i.e. settlement boundary) has been found to make a scheme acceptable despite it still impacting on the Radio Telescope. As such, together with the “universal” weight applied by the Observatory to its operations, it means that the Council does not know how to deal with this matter consistently in the overall planning balance.

- The poor wording of LPS Policy SE14 contributes significantly to this problem. Policy SE14 sets out that any adverse effect(s) which cannot be mitigated will mean that a development should be refused. However, this Policy does not account for the fact that the University of Manchester (the statutory consultee) now object, as a matter of principle, to all new development within the Consultation Zone, regardless of its direct effects and the potential for mitigation. This means under Policy SE14 that all new developments are refused where Jodrell Bank objects (even replacement dwellings), and as such effectively precludes any new development across a large area of the Borough – an approach inconsistent with the wider LPS.

- Object to the SADPD owing to the absence of any specific policy on Jodrell Bank.

- Policy HER 7 outlines the policy approach in relation to proposals affecting world heritage sites but this is not considered necessary within the SADPD.

- The site is already afforded protection through Policy SE 14 of the LPS and the associated consultation zone. Policy SE 14 of the LPS is a restrictive policy and we object to the inclusion of a further restrictive policy in relation to proposals in this location. This additional level of protection is not necessary and is not appropriate as there are currently no UNESCO world heritage sites within the borough.

- It is important that the World Heritage Status should only apply to the physical Jodrell Bank Campus as opposed to the Consultation Zone defined by the
On the matter of Jodrell Bank, it is noted that there is no detailed policy advice and guidance contained within the SADPD, contrary to paragraph 13.163 of the LPS. This needs to be included within the next version of the SADPD as it has implications for growth across a number of LSCs and Other Settlements and Rural Areas.

As drafted the policy does not provide robust guidance for Jodrell Bank and it is suggested that it be rewritten to ensure that it specifically relates to this important site. Whilst it is recognised that the site is not yet been designated as a world heritage site. The supporting text recognises this and the related documents include reference to the evidence that could be used to provide some specific detail within the policy. In addition to this, the policy as drafted uses incorrect terminology e.g. refers to setting. It is suggested that this be amended also.

Goostrey PC strongly supports this as it is in line with Goostrey NP Policies SC2 and HOU1.

JBO is an active scientific institution with a world renowned reputation for continuing to carry out cutting edge science. It is the third largest fully steerable radio telescope in the world. When it is also inscribed by UNESCO as having Outstanding Universal Value, it will be one of the most important assets in the Borough.

**Policy HER 8 ‘Archaeology’**

**Summary of key points:**

- It is unclear whether this policy is for scheduled monuments, sites of national importance or local heritage assets. It is suggested that the policy be rewritten to set out the Council’s position on these assets in terms of whether harm is acceptable, what is required for each type of assets and also the different methods of mitigation and recording. It is important to note that scheduled monuments are of the highest significance and this policy does not protect these assets from unacceptable harm.

**Policy HER 9 ‘Enabling development’**

**Summary of key points:**

- The Policy as currently stated under Items 1 to 4, together with the Supporting information as detailed under Paras 5.13 to 5.16 inclusive; in its present form is inadequate and selective and as such it fails to make any reference whatsoever to Historic England’s(HE) current Advice, as contained in their

- Historic England is the Government's statutory adviser on the historic environment. Local Authorities are obliged to consult Historic England on certain planning and listed building consent applications, as set out in legislation e.g. in "Arrangements for Handling Heritage Applications - notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015".

- The policy itself now sits within the framework provided by English Heritage’s Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008), which promotes a values-based approach to assessing heritage significance. The detailed practical guidance provided here should be applied within the context provided by the Principles.'

- Supporting information, are inadequate as they fail to fully and properly address the requirements of Section 35 of the HE Guidance, which sets out that full information is necessary not just to demonstrate physical impact, but particularly to establish and quantify need, since the financial considerations involved are fundamental to the decision.

- Enabling development is a type of public subsidy, and so should be subject to the same degree of financial scrutiny, transparency and accountability as cash grants from public sources.

- References to PPS5 Policy HE11 can now be replaced with NPPF paragraph 140.'

- In accordance with the NPPF, the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.’

- We support the strict application of this policy and consider the bar should be set as high as possible, particularly in the Green Belt and Conservation Areas

- Suggest minor re-wording for ease of reference and having regard to Historic England guidance on enabling development. We consider that Policy HER9 should be reworded to read as follows:
  "Enabling development will only be permitted where:
  1. it would secure the future conservation of a heritage asset;
  2. the amount of enabling development is the minimum necessary to secure the future conservation of the heritage asset and is designed in a way to minimise harm to other public interests;
  3. it will not materially harm the integrity and sustainability of the heritage asset;
  4. it represents the most sustainable solution following a full evaluation of all
5. The benefits of securing the future conservation of the heritage asset outweighs the disbenefits arising from conflict with other local and national policies.

- The policy needs strengthening by the inclusion of the 8 criteria in the guidance published by English Heritage.

- Support should be given to proposals that conserve or enhance heritage assets and their settings, including listed buildings and historic parks and gardens in draft Policy HER 1 (“Heritage assets”); and for allowing enabling development where this would secure the future conservation of a heritage asset as per draft Policy HER 9 (“Enabling development”).

- This policy gives the opportunity to say that houses trump heritage harm. Effectively negates the purpose of the previous policies. It must be strengthened to say that only owners of heritage assets can put forward ‘enabling development' proposals to ensure the survival and access to such assets.

- It is unclear what the purpose of the policy is within the Plan. As drafted it does not provide an appropriate framework for the management of Cheshire East’s Heritage assets and therefore should be deleted from the Plan. Enabling development is defined as development that would be unacceptable in planning terms but for the fact that it would bring public benefits to a heritage asset or group of assets, sufficient to justify it being carried out and which could not otherwise be achieved. The inclusion of a policy within the Local Plan provides a policy basis for the approval of applications therefore, making such developments acceptable in accordance with the local plan. The content of the policy also weakens the protection of heritage assets and does not comply with the requirements set out in the NPPF, Historic England’s Guidance on Enabling Development and Historic England’s Conservation Principles, Policies and Guidance. For example the policy suggests enabling development is acceptable where it is used to secure the future conservation of a heritage asset, yet there is no mention of condition or identified harm or costs.

- This policy as it fails to include any reference to the Historic England (Heritage England) Guidance "Enabling Development and the Conservation of Significant Places" (Revised 2012).

- The 2018 Revised NPPF affords no more than the following statement in relation to enabling development; “Para 202. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. In the light of this paucity of national guidance we strongly advocate the continued acknowledgment of the Historic England (Heritage England) Guidance and in particular the underlying principles that inform the Guidance.
• Failure to be able to present a well-reasoned and well-structured case in this regard has the potential to undermine the planning process, undermine public confidence in the concept of enabling development and damage the reputation of the planning department.

Chapter 6: Rural issues (general issues)

Summary of key points:

• Film and Creative Industries, Part 2 Local Plan should consider the need for some bespoke policies relating to the film industry and the ability to provide certain exception policies for proposals relating to this. Policies that actively supported the filming industry in the local plan, would therefore be a welcomed

• Within the 'Rural Economy' section of the plan (pages 60-65) there is no reference or policies in relation to the Shropshire Union Canal and the significant opportunity this asset can provide in terms of leisure and recreation facilities which will boost the rural economy. This is a missed opportunity and we advocate a proactive approach through the inclusion of policies that actively support and encourage this form of development.

• There is general support for the various provisions within Section 6 (“Rural issues”) that enable new buildings for agriculture and forestry; farm diversification; homes for essential rural workers; outdoor sport, leisure and recreation in the open countryside; visitor accommodation; and employment development in the rural areas. It is noted that NPPF2 also supports the development of rural exception and entry level exception sites.

Policy RUR 1 ‘New buildings for agriculture and forestry’

Summary of key points:

• Clarification required as to whether the policy should state ‘will be permitted’ or ‘will only be permitted’

• The growth of rural businesses will be hampered and constrained; the approach does not accord with NPPF para 83.

• The emphasis should be on enhancement and reasonable expansion, not stringent restrictions.

• By being overly restrictive, the policy could push people towards utilising permitted development rights to implement a series of smaller, uncontrolled developments.

• Positive wording to support the rural economy could enable new buildings to come forward that are adequately controlled and screened.
Policy RUR 2 ‘Farm diversification’

Summary of key points:

- The policy is too restrictive and need to be as flexible as possible.
- It is difficult to quantify whether something is ‘necessary’ or not.
- The approach seeks to achieve only the minimum level of intervention needed, failing to secure the long-term future of agricultural businesses.
- This policy fails to recognise instances where an existing agricultural business has ceased operations and therefore a new use for a farmstead or farm buildings needs to be identified.
- The wording in relation to proposals for new or extensions to existing farm shops is particularly restrictive; restricting goods to be mainly produced on site in a particular locality does not account for the wider supply chains often at work for farmhouse shops.
- Farm shops may play a crucial component of a wider leisure or tourism development.
- The policy in bullet 2. ii. introduces an impact test that is not consistent with national policy.
- A further point should be added with regards to animal husbandry and the impact on air and water pollution in areas of ecological importance/national designations.

Policy RUR 3 ‘Agricultural and forestry workers dwellings’

Summary of key points:

- A statement should be inserted that such dwellings cannot be sold on the open market.
- A strict approach should be taken to increase in the number of buildings and other features such as roadways, parking and illumination to avoid creeping urbanisation of the rural environment.
- Table 6.1 is unfairly prescriptive over the size of accommodation that could be acceptable and does not account for the range of people who may comply with the need for on-site accommodation.
- The policy does not take into account the revisions to paragraph 79 of the NPPF.
Policy RUR 4 ‘Essential rural worker occupancy conditions’

Summary of key points:

- If no long-term need is demonstrated, the dwelling should be subject to the change of use allowances set out in Policy RUR 14 – Re-use of rural buildings for residential use.

- There is no justification for change of use to be restricted to affordable housing provision, especially as the location may not be suitable to meet affordable housing needs.

Policy RUR 5 ‘Best and most versatile agricultural land’

Summary of key points:

- Concerns about how any loss of BMV would be assessed by the Council.

- It is unclear as to the meaning of "other benefits of the land".

- How will the loss of land to development be measured against the economic benefits of residential development given that each has different importance for different sectors?

- The requirement to consider alternative poorer quality locations could amount to a sequential approach, which isn’t promoting sustainable development or reflective of national planning policy.

- Concerns about how applicants are to collate the information required under part 2 of the Policy.

- The further use of BMV land is unsustainable as Cheshire is synonymous with farming and food production and fertile soil is a limited and finite resource, which has been used as such for many years and cannot be easily replicated.

- Bullet 2. ii. Is too onerous.

- There will be some instances when significant benefits could be delivered through the development of sites on BMV, which would outweigh the loss of a relatively small portion of high-quality agricultural land.

- The policy should be strengthened to say ‘that any development on such land will be resisted’.

- The extent of work required to respond to this Policy would be significant and costly and is not justified.

- The policy requires strengthening to protect BMV land and to offer greater clarity to potential developers on how BMV must be evaluated.
BMV definitions should be based on the quality of the land where ‘reasonable land husbandry’ is utilised (usually over a minimum four year period).

Where land is claimed to be of ‘poor quality’, it must be subject to an agricultural land improvement scheme over an appropriate time-frame.

It is important for the policy to recognise that development impacts (soil sealing) have an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land.

Avoiding loss of BMV land should be a priority as mitigation is rarely possible.

**Policy RUR 6 ‘Outdoor sport, leisure and recreation in the open countryside and Green Belt’**

**Summary of key points:**

- The policy is too negative and does not fully reflect that by putting such facilities outside of defined settlement boundaries provides the potential for best use to be made of development resources located in settlement boundaries.

- It would be helpful if the policy or its justification could provide examples or list circumstances when such facilities might be supported in the Green Belt.

- The policy is over-restrictive and should be broadened enable the benefits that the scheme would generate for the rural economy to be considered and weighed against any impacts.

- Further clarification should be given to the use of the term ‘isolation’ and whether this is intended to refer to building locations in the proposed development as a whole, or is referring to the location of the site. If the latter, the nature of some tourism and recreation facilities require a rural isolated location and therefore including this term would be overly restrictive.

- The restriction placed on development by bullet 1. iii. is unclear and may be unduly prohibitive.

- Concern that the wording could prevent the growth of sports and clubs due to lack of adequate ancillary facilities being in place to support the growth.

- The policy should state that it is subject to Policy ENV 14.

**Policy RUR 7 ‘Equestrian development’**

**Summary of key points:**

- Point 3 should be clarified to state that ménages and other hardstanding in the Green Belt or open countryside should not be considered as ‘brownfield’ and as a result, cannot subsequently be developed.
• The policy should state that it is subject to Policy ENV 14.

Policy RUR 8 ‘Visitor accommodation’

Summary of key points:

• The policy makes no reference to supporting existing visitor accommodation and it only supports small scale visitor accommodation and not venues.

• The policy is not consistent with the strategic approach taken in LPS Policy EG 4.

• The policy does not recognise the importance of the tourism sector to the local economy and the Council is unnecessarily restricting development of visitor accommodation – inconsistent with the LPS and NPPF para 83 (c).

• The policy should clarify, and some flexibility should be built into bullet 2, to enable hotel or retail development ancillary to a rural development, based on the merits of the individual scheme and the benefits it would generate.

• Hotel or retail development ancillary to a rural development may need to be located outside existing settlements and a sequential approach is likely to restrict this.

• The policy should be drafted to enable decisions to be made on a case by case basis.

• There is no reference to the rural economy in the policy or an allowance in the policy for the consideration of the benefits to the rural economy to be considered against any impacts.

• A restriction to 8 months is onerous and unnecessary and could have significant impact on the viability of rural businesses and leisure and tourism developments which the NPPF (para 83) details planning policies should be enabling.

• The siting of static caravans is a change of use of land, which is appropriate development in the Green Belt.

Policy RUR 9 ‘Caravan and camping sites’

Summary of key points:

• The policy is inconsistent with the NPPF as the change of use of land for caravan and camping can comprise appropriate development in the Green Belt.
Policy RUR 10 ‘Employment development in the open countryside’

Summary of key points:

- The wording of the policy means that any proposal in the open countryside (including for example a small office building) would be subject to an arbitrary and unnecessary judgement over whether it might at some point potentially be converted to residential use.

- The policy should provide additional detail for employment development which, whilst not ‘essentially required’ to be located within rural uses, may be appropriate due to what has historically been developed over time.

- The plan must make sure that, in appropriate rural locations, emerging technologies that help to meet our climate change objectives are not prevented from being developed by restrictive policy formation.

Policy RUR 11 ‘Extensions and alterations to buildings in the open countryside and Green Belt’

Summary of key points:

- Concerns with the blanket approach to an increase in overall building height in bullet 2. as an increase in height may not necessarily result in a disproportionate addition.

- Bullet 3. should not reference a percentage; flexibility should be added to allow planning judgement on a case-by-case basis.

- The Courts have ruled that the fall-back position can be a material planning consideration provided it is a clear possibility, therefore bullet 5. should be deleted.

Policy RUR 12 ‘Residential curtilages in the open countryside and Green Belt’

Summary of key points:

- The policy should be strengthened to state that such extensions into open countryside, green gaps and green belt will be resisted.

- The reference to curtilage should be removed as by definition the curtilage of a property can only relate to an area in residential land use.

- The curtilage of a property is a factual determination that can change in an instant, for example, by the removal of a fence line.
• The only consideration for this policy should be garden extensions, which represent a change of use of land.

• Point 1. i. will be difficult to control without a definition of what constitutes a ‘reasonable sitting out area’.

• The policy needs strengthening to protect the Open Countryside from opportunistic development by those seeing to re-classify paddocks, equestrian menage facilities and agricultural small-holdings (fields) as domestic garden and/or brownfield sites for the express purpose of residential development.

• There should be an emphasis on residential gardens in the open countryside meeting the requirements of PG6/sustainability as necessary tests when being considered for development and policy should reflect this approach.

Policy RUR 13 ‘Replacement buildings in the open countryside and Green Belt’

Summary of key points:

• The text in the Policy should be split to make it explicit how buildings in the open countryside and the Green Belt should be dealt with.

• Bullet 3. should not reference a percentage; flexibility should be added to allow planning judgement on a case-by-case basis.

• The Courts have ruled that the fall-back position can be a material planning consideration provided it is a clear possibility, therefore bullet 5. should be deleted.

• The policy needs to be updated to bring it in line with NPPF paragraph 145 to allow for development where there is not a significant impact on openness where there is affordable housing provision to meet local needs included on site.

• Bullet 3 which refers to the material increase in site for replacement properties in the Green Belt should be amended to reflect NPPF paragraph 145 and allow for a higher percentage increase where affordable housing is provided.

• A strict approach should be taken to the objectives of the policy, which should not be eroded by acceptance of “permitted development” additions or planning applications for ancillary buildings following completion.

• In the past the general consensus of materially larger is where the additional floor area exceeds a 30% increase. This general consensus applies beyond Cheshire East to many Local Authorities and has historically been established through case law as opposed to being written into policy.
• The definition of what is materially larger does not change over time and there has been no sea change in precedent to justify this drastic shift in policy approach.

• It is not reasonable to state categorically that a proposed height increase or development extending ‘notably’ beyond the existing footprint would usually result in a proposal that is materially larger.

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

Summary of key points:

• Sites containing buildings have been and are continuing to be promoted for employment uses, although do additionally have the potential for residential conversion.

• The policy is inconsistent with the NPPF as it only allows for re-use of rural buildings for residential use, whereas the NPPF does not restrict the use to which a rural building can change to.

• It is not clear what purpose would be served by restricting the conversions of outbuildings; such development may comprise sustainable development through the efficient use of redundant buildings with a contribution towards the Council’s housing windfall allowance.

• A structural survey should be required to make sure that conversion, as opposed to replacement, of the building represents the proposal to be considered.

• Bullet 2. is significantly more restrictive than paragraph 146 of the NPPF. Further justification for this approach is required together with greater flexibility in the policy.

• The policy is unclear; if it relates to rural buildings in the Green Belt, the expression of the policy should follow the wording set down in the NPPF.

• The policy seeks to introduce a test of "so as not to require extensive building works", which is not a test set down in Government policy or in the LPS.

• The policy relates only to rural buildings in the open countryside, and is not in addition to policy PG3.

• To make it clear the policy should be stated as relating to rural buildings in the open countryside beyond the Green Belt.

• If the policy if is to be relevant to rural buildings in the Green Belt, remove the wording of "so as to not require extensive building works".
Chapter 7: Employment and economy (general issues)

Summary of key points:

- No comments

Policy EMP 1 ‘Strategic employment areas’

Summary of key points:

- Requests for the following sites to be listed in the policy:
  - Radway Green Business Centre, Alsager (10.4 ha, B1, B2, B8).
  - Capricorn, Sandbach.
  - British Salt Factory, Middlewich.
  - Manchester Metropolitan University Campus, Crewe

- Hurdsfield Industrial Estate, Macclesfield and Ma6nitude, Middlewich are crossed or in close proximity to National Grid electrical transmission infrastructure.

- Sanofi Aventis are now owned by Recipharm.

Policy EMP 2 ‘Employment allocations’

Summary of key points:

- Requests for the following sites to be listed in the policy:
  - Radway Green Business Centre, Alsager (10.4 ha, B1, B2, B8).
  - Capricorn, Sandbach.
  - Old Bengers/Fisons site, London Road, Holmes Chapel
  - British Salt Factory, Middlewich

- EMP 2.4 has potential and is suitable for residential development e.g. a facility for assisted living or a care home.

- Several comments on EMP 2.5:
  - It is not suitable or viable for employment use.
  - Issues with ground conditions including remediation costs associated with the storage of radioactive aeroplane dials during the use of the site as RAF Handforth.
There is no evidence to support the Council’s overly optimistic assertion of market interest.

- It makes a valuable contribution to the employment supply.
- The market attractiveness of the site for a broad range of employment uses has been underestimated.
- The assessment underestimates the suitability of the site for employment uses.

- A specific site/or sites should be allocated to meet the residual requirement of 1.29ha of employment land in Knutsford.

- The allocations should be covered by a site specific policy including reference to surface level sustainable drainage.

- Reservations as to whether EMP 2.1, EMP 2.2 and EMP 2.3 are genuinely available, viable, attractive to the market and ultimately capable of delivering the required quantum of employment land.

- Several comments on EMP 2.8:
  - There are no evidence documents to justify the proposed development in the JBO consultation zone.
  - It must be demonstrated whether EMP 2.8 would have a cumulative impact on JBO to the extent that it would prevent much needed affordable housing from coming forward.
  - Only a small section at the northern end of the site is still in employment use; the remainder of the site has been cleared and former employment premises demolished.
  - There would appear to be very limited prospects of this site coming forward for B1 and B8 uses.
  - The restriction to B1 and B8 is unreasonable, ignoring the lawful use of the site and does not allow for flexibility.
  - Mixed uses should be permitted in line with LPS Policy E3 and Holmes Chapel Neighbourhood Plan.

- EMP 2.7 is crossed or in close proximity to National Grid electrical transmission infrastructure.

Chapter 8: Housing (general issues)

Summary of key points:

- Additional allocations are required in the SADPD to:
meet the overall housing requirement

to assist with maintaining a five year supply of housing

accommodate dwellings which are to be provided by larger strategic sites but will not be delivered in the plan period (associated impact on affordable housing delivery)

provide flexibility in the event HS2 is committed to come to Crewe by 2027

to assist the Council in meeting the requirement to identify 10% of the housing requirement on sites of 1 ha or less (para 68a of the revised NPPF)

Boost the supply of housing generally and because the requirement should be regarded as a minimum

The Council’s trajectory compared to actual completions indicates that it has under delivered by 1,361 dwellings

- Reference made to a number of sites including:
  - Land rear of Park Lane and Crewe Road
  - Land at Pexhill Road, Macclesfield
  - Moorside Car Park, Knutsford
  - Land west of Crewe Road, Shavington
  - Land at Pavement Lane, Mobberley
  - Land west of Toft Road, Knutsford
  - Rotherwood Road, Wilmslow
  - Land off Newcastle Road and Holmes Chapel Road, Brereton
  - Land off Linley Lane, Alsager
  - Lymewood Drive, Disley
  - Land at Priory Park, Macclesfield
  - Land at Wybunbury Road, Walgherton
  - Land at Somerford Park Farm
  - Land off Oakleigh, Knutsford
- Revised NPPF (July 2018) emphasises the need for local planning authorities to provide housing for first time buyers (para 71). Entry level exception site policy required

- Revised NPPF / PPG definition of a ‘deliverable site’ and impact on 5 year supply position needs to be considered and accommodated for.

- 5 Year supply – 10% buffer will be required to be demonstrated by the SADPD at the regulation 19 stage.

- Delivery rates and expectations regarding LPS strategic sites need to be re-considered and the implications factored into the SADPD where sites are no longer considered to be able to deliver within the Plan period.

- The Council should expect slippage on sites, particularly those affected by the Congleton Link Road whose timescales for construction are optimistic.

- Disagree with the precision proposed by the Council to particular locations in the SADPD. Numbers should be considered as a minimum

- There is a clear need for additional C2 bedspaces to meet the overall housing requirement

- Definition of affordable housing in the glossary of the SADPD needs to be updated, to reflect the NPPF

- The SADPD significantly lower allocation for future housing sites places a heavy reliance on existing commitments being delivered early in the plan period, and it is questioned as to if enough sites are being allocated within the Site Allocations DPD to positively plan for the predicted housing need.

- The standardised methodology for determining local housing need came into place through the publication of the revised NPPF in July 2018. The Government has since indicated an intention to potentially adjust the methodology in order to ensure that sufficient homes are being planned for. With the Government now undertaking a review of the methodology, any subsequent changes to the guidance should be considered in full to inform the level of allocations now required by the Site Allocations DPD, and to establish if further allocations are in turn now needed.

- Bollington has been allocated too much housing

- Oppose site LPS 53 (land adj to J17 of the M6, south east of Congleton Road Sandbach) in the Local Plan Strategy

**Policy HOU 1 ‘Housing mix’**

**Summary of key points:**

- Broad support for intention of policy but concerns over practical implementation and precise wording.
• A large proportion of the Council’s housing supply is already fixed

• Council should consider allocating specific sites in the SADPD for specialist housing

• Council should be flexible and proportionate in the application of this policy. It should reflect stage in planning process (outline / reserved matters etc.)

• Policy should be workable and not be overly prescriptive in requirements

• Collection of evidence may be time consuming and require the input of different specialists

• Criterion v of Part 1 should also be reworded to make it clear that self and custom build will be encouraged, rather than a pre-requisite to any housing development. Numbers registered on the custom and self-build register may not be an accurate reflection of demand.

• Factors including viability or site specific criteria will influence overall provision.

• The policy should be more specific in what the correct mix for each area would be and / or direct the reader to the correct documents to identify the mix required for the settlement

• Because the SADPD is mainly directing allocations to Local Service Centres and rural locations the opportunities for sustainable development are inherently diminished in such locations which, with an accepted degree of variation, have fewer services, facilities and capacity to support additional needs and often have poorer transport connectivity and choices.

• Policy makes it incumbent on the developer to provide a comprehensive report on why it may be unable to provide all the elements, supported by a viability assessment to demonstrate what may be a range of permutations on housing mix, type, tenure, etc.

• Policy will not promote sustainable development as sought by policy 35 of the revised NPPF.

• More bungalows are required to satisfy the needs of an ageing population

• Onerous demands that do not recognise the need and demand of an area.

• The policy should be amended to make clear that the needs of all the groups identified will not necessarily need to be met on individual sites.

• There is a lack of detail in the policy currently on how it would be implemented, what constitutes a housing mix statement and the level of information required. Greater clarity and flexibility is requested in response to changes in demand and / or site market conditions
Unclear on the weight to be attributed to the housing mix statement from the decision maker

The onus should not be on the developer but the local authority as it is their responsibility to assess and define housing requirements

Glossary in the SADPD needs to be updated to reflect the NPPF (July 2018)

Part 3 also states that developments that do not demonstrate an appropriate mix on the site will not be permitted. It is not clear if this is only intended to apply to the requirements of part 3 or the whole policy.

Policy ignores the reality of the various business models used by developers

Need for excessive evidence can increase unnecessary costs and hinder housing delivery

Design and Access statements must already accompany planning applications and these consider the character and design of the site in the local area.

Scope for overlap between this request and other documentation

It can take 2-3 years from consent to build and occupation of sites, therefore data may become out of date quickly.

Policy HOU 2 ‘Specialist housing provision’

Summary of key points:

Policy, as worded, is too restrictive in limiting the provision of specialist housing within settlement boundaries only. Policy should refer to sustainable locations not just settlement boundaries.

Policy should state that when a demonstrable need exists (alongside an absence of sites within the relevant settlement boundary) then sites adj to settlement boundaries which are well related and accessible to existing facilities and services should be allowed at a scale proportionate to the settlement

FDSADPD does not make allocations for specialist housing. There is a need to relax the policy requirements and allocate sites to meet appropriate needs in the borough.

Paragraph 3 vi) should be removed from policy HOU 2, which refers to affordable housing being required for the creation of any Use Class C3 self-contained dwellings. Adopted LPS policy SC 5 (affordable housing) already clearly outlines the Council’s affordable housing policy and the trigger points

Reference to the requirement of suitable open space / grounds could undermine delivery on brownfield locations. The requirement for open space /
grounds should be assessed in the round. The context of existing or proposed open space should be taken into account.

- Query where the need (for specialist housing) is to be identified and whether it will be the applicant who will have to demonstrate this need or whether the Council intend to identify a need for each settlement.

- Concern raised in relation to criteria vi, which states “affordable housing provision will be required in line with the thresholds set out in LPS Policy SC5 ‘affordable homes’ for elements of a proposal that would create use class C3 self-contained dwellings.” Concerned by the wording within this criteria as it would appear to suggest that anything that is self-contained is counted as a dwelling, this is wrong. Recommend that for clarity this criterion should be amended to state that any use class C3 proposal for specialist elderly accommodation should provide affordable housing, and C2 proposal should not

- FDSADPD has limited scope to meeting requirements for specialist accommodation. These point to the requirement for a specific policy to manage and equalise such demands, as per paragraph 55 and 61 of NPPF. For the above reasons, we believe the proposed Policy HOU1 and HOU2 of the FDSADPD cannot be considered sound, as per paragraph 35 of the revised NPPF as they are:
  
  o Not positively prepared, as they fail to meet the area’s objectively assessed need for older persons and specialist care accommodation;
  
  o Not justified, as the policies will fail to take into account the effect of a shortfall for older persons and specialist care accommodation;
  
  o Not effective, as they will not provide the amount of older persons and specialist care accommodation required over the plan period; and are
  
  o Not Consistent with national policy, by failing to accord with paragraphs 59 and 61 of the Framework

- The policy should be reworded to specifically encourage specialist housing. Given the need for such accommodation and the issues associated with its delivery, we consider that the best approach towards meeting the diverse housing needs of older people is by having clear and specific policies that encourage the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation. 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.”
Policy HOU 3 ‘Self and custom build dwellings’

Summary of key points:

General points

- The policy is unsound because it is not justified, effective or consistent with national policy.

- The policy approach is restrictive rather than permissive. The policy should be reworded to ‘encourage’ self and custom build housing rather than impose a prescriptive requirement.

- The policy should cross refer to other policies in the plan, in particular GEN1, SC4 and HOU1.

- Policy HOU 1 also requires developers to consider the demand for SB – what if no demand is identified?

Viability

- The requirement to provide SB should be assessed on a site by site basis dependent on local demand and viability considerations. The inclusion of a viability clause in the policy is supported.

- No viability evidence has been provided for the policy. The impact of the policy upon developability and deliverability should be considered as part of a whole plan viability study to ensure that the cumulative impacts of policy requirements do not render the majority of schemes unviable.

- The policy will result in uncertainty for developers in terms of the viability of a development when factoring in other requirements such as affordable housing, housing mix, tenure and type to meet other housing needs, developer contributions and CIL.

- The requirement to include SB will impact upon the costing for services on site. There will be difficulties obtaining quotes for services to inform building and delivery costs as there will be uncertainty over the number of units. This could affect site viability.

- The policy will have an adverse impact upon small to medium size housebuilders as they do not have the capacity to subsidise or offer SB plots.

Delivery of housing

- The policy will slow down the delivery of housing and lower the density of sites resulting in less homes being delivered.

- Evidence should be collated to ensure that housing delivery from this source provides an additional contribution to boosting housing supply.
- West Lancashire are not implementing the requirement for allocated sites to include SB based on feedback from consultation.

- The effect of the policy will be to stymie development of sites of more than 29 units.

- There is no duty placed upon an authority as part of the Act to demand a private housebuilder to give up part of its own development to a third party or parties.

- Requiring SB will have the effect of changing the house building delivery mechanism from one form of house building to another. It will not boost housing supply.

**Evidence of need / demand**

- No evidence of demand - the council has not published a SB Register, it is premature to require larger housing sites to provide SB plots.

- There is no evidence to support the inclusion of a threshold of 30 dwellings. The requirement to require SB plots should only apply if there is evidence of local demand.

- If there is evidence of demand, the policy should require a minimum percentage of homes to be provided as SB.

- Policy could delay development of suitable affordable housing where need is already proven.

- There will be a limited demand for SB plots within larger developments because they will not deliver the types or location for the homes that that self builders are seeking. Evidence should be provided to demonstrate that those wanting to self build would consider building within a larger housing development.

**Meeting the obligation for SB**

- There are no guarantees that the policy would be effective in delivering the homes that are needed to meet the council’s obligation.

- The latest published evidence of demand for SBH in Cheshire East indicates that at the 1.3.2017 there were 58 applicants for SB plots and it is likely that this will have increased in the last 18 months. There is no evidence to suggest that a single SB plot has been delivered to date.

- The most effective way to meet the obligation would be through the specific allocation of sites for SB in the SADPD.

**Site allocations**
Self Build would be a suitable form of development at the Withinlee Road (Prestbury) site. The site is suitable, available and achievable for residential development and there is a clear demand for this type of development with the area. The site could make an important contribution to meeting the council’s requirement and Prestbury’s wider housing requirement. A design code could be used for all SB plots as well as a specific site allocation.

Practical issues

- Heath and safety issues from SB plots being developed alongside a housing scheme in terms of construction and traffic management.
- Long term management, insurance and maintenance of sites – who will own the land for SB – this could cause management and security issues.
- Lack of control over the design of SB plots which could impact upon sales on the wider site resulting in housing need and supply issues.
- The policy should set out the circumstances that would apply if the SB plots are not taken up. If a plot is not sold within 12 months, the plot should be returned to the developer for construction, rather than offered to the council or a registered provider. SB is not equivalent to affordable housing and the plots should revert back to market housing as part of the wider scheme. It is impractical to require a developer to reserve a plot for SB on a site indefinitely for the council or an RP to take it up. It is essential that a developer is able to complete construction without the need to re-establish the site later.

Other

- The Knutsford Design Guide supports this category of development.
- The Wybunbury Combined Parishes Neighbourhood Planning Group supports Policy HOU3. The provision of SB on larger development sites presents challenges but this is not a reason to prevent what is increasingly recognised as an important addition to housing mix. SBH provides opportunity for individuals to gain property in more rural areas that larger housebuilders prefer not to accommodate at the current time. SB plots would have to accord with the CELPS design guide and complement existing housing stock or that which is being built on adjacent sites.

Policy HOU 4 ‘Houses in multiple occupation’

Summary of key points:

- The policy should be clearer in terms of how far ‘the vicinity’ stretches from the site (in metres) and what an unacceptable concentration (% of dwellings) would be.
- Reference should be made within the policy/ supporting text to the permitted development rights that exist for smaller HMO’s as the local community could assume that the policy gives a greater degree of protection than is the case.
• There should be a clear commitment to the use of Article 4 Directions where necessary and appropriate, in areas with high concentrations of HMO’s.

**Policy HOU 5 ‘Gypsy, Traveller and Travelling Showpersons provision’**

**Summary of key points:**

• 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

• Request for a further ‘principle’ is added to section 4 of Policy HOU 5: Site Principles: 4 vi) Proposals for Gypsy, Traveller and Travelling Show People sites should be restricted to those sites named in Policy HOU5

• Sites identified in HOU5 must be compliant with those principles outlined in 4 i) - vi) - Any Proposed site must be assessed in terms of numbers (of pitches) and occupancy numbers (Reason: to ensure the safety and amenity of site occupants and the amenity of adjacent communities (where appropriate).

• The policy should make reference to a site submission at Land at Fir Farm, Newcastle Road Brereton. The site has been submitted to the Gypsy and Traveller and Travelling Showperson Call for Sites process and is proposed as a Travelling Showperson site.

**Policy HOU 6 ‘Optional technical standards’**

**Summary of key points:**

• Introduction of space standards requires evidence on need, viability and timing in line with requirements of Planning Practice Guidance.

• If the Government had expected all properties to be built to National Space Standards then these standards would have been made mandatory and not optional

• Blanket space standards could negatively impact on housing delivery and reduce capacity of allocations

• Portion of new developments should be single storey

• HMO properties often have inadequate room sizes.

• Space standards can negatively impact on viability, increase affordability issues and reduce customer choice.
Compared with England in general and the North West in particular, Cheshire East has a high proportion of larger dwellings and there is no dominance of small property sizes which would be characteristic of more densely developed urban environments.

A full range of accommodation choices will enable people to move within the hierarchy of the housing market as their priorities and resources evolve.

Optional technical standards on accessible, adaptable and wheelchair entry homes need to consider evidence required by PPG, particularly viability evidence. Also consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that

Policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

There is a lack of clarity regarding the requirements of the policy.

Planning policies should not seek to duplicate other regulations, such as building regulations.

Some respondents felt that the standards should be mandatory.

Support for the Council’s position on not proposing to introduce water efficiency standards.

The evidence provided within the Housing Option Technical Standards Paper appears to show that in the case of the CORE information, the Disabled Facilities Grant, Census long-term illness and ill health benefit claimants Cheshire East has lower than the national average requirements. The data collected so far therefore does little to support the need for the additional optional standards. The Paper also does not cover all the requirements set out within the PPG e.g. the accessibility and adaptability of the existing stock, the size, location, type and quality of dwellings and the viability of the requirements.

Housing Optional Technical Standards report presents a mixed picture, for example, although the number of over 65s is forecast to increase in Cheshire East, this is at a lower rate than the population as a whole. Appendix 1 indicates that Disabled Facilities Grants per 1,000 population are amongst the lowest of the ‘Nearest Neighbour’ comparisons and the text suggest this might be due to a higher level of income or a lower level of need, or a combination of both.

The majority of older people wish to stay in their communities and would welcome single-storey properties / smaller properties into which to down-size / some form of supported or extra-care living (preferably ‘extra-care at home’).
• It is important to note that the Disabled Facilities Grant indicator is of NO value in assessing Policy HOU6 as this grant has been designed to be consistently reduced over the past 5 years and ends in CEC in 2020

• CEC must not fall onto the 'trap' of considering only the needs of older people in the context of this policy. CEC Adult Social Care and Children's Social Care are experiencing a significant shortfall in suitable accessible accommodation for younger adults with disabilities and children with disabilities who wish to remain with their families in a ‘family’ environment

• There is a marked 'under-occupation' of larger homes in rural areas where older people have to balance their ability to afford / cope with a larger home and the prospect of moving away from their wider community and social support networks. To stay in a larger home is often not a choice but a necessity and has an impact on the incidence of rural poverty where older people may be 'asset-rich' but 'cash-poor'

• Wheelchair accessible housing imposes a substantially higher cost again, with the cost of buildings to Part M4 (3) adding on average about £16,000 to the cost of construction.(Housing Standards Review: Cost Impacts September 2014 (EC Harris))

Policy HOU 7 ‘Subdivision of dwellings’

Summary of key points:

• Should include reference to the need for sufficient parking and waste disposal facilities for the increased number of affordable households in the subdivided dwelling.

Policy HOU 8 ‘Backland development’

Summary of key points:

• Restrict such development to bungalows which would have the added benefit of giving much needed provision for the elderly and disabled.

• Request a general presumption against subdivision of existing housing plots unless there are special circumstances.

• Tandem development should be discouraged where it would prejudice appropriate redevelopment schemes occupying several plots or the area as a whole

• Objection to policy which will allow back land development and urban cramming

• No definition of backland development (or cross reference to one) leads to ambiguity which will not assist development management decisions. A definition or guidance should be referred to.
Policy HOU 9 ‘Extensions and alterations’

Summary of key points:

- Reference should be made also to “husband, wife, partner” in explaining ‘immediate family connection’.

Policy HOU 10 ‘Amenity’

Summary of key points:

- The policy does not go far enough to protect existing businesses from new residential development; suggestion of a new policy that reflects the ‘Agent of Change’ principle.

Policy HOU 11 ‘Residential standards’

Summary of key points:

- The policy should be deleted as it is too prescriptive and unnecessary, and is therefore not compliant with national policy.

- Rigid space standards between dwellings do not allow for creative design solutions.

- The policy should simply refer to good design practice, rather than arbitrary separation distances and standards.

- One set of residential standards should be set for the whole Borough and this should be in line with those set out in the Cheshire East Design Guide.

- Queries regarding how the standards are to be implanted alongside the CE Design Guide.

- 12m of separation between habitable and non-habitable rooms between dwellings is a generally accepted industry standard, not 14m.

- The proposed standard requiring 18m separation distance between front elevations does not allow for variation in streets widths as set out in Manual for Streets.

- ‘Generally’ should be underlined to outline the importance of this word to the policy and its implementation.

- Flexibility to the spacing standards should be applied to the type of housing proposed.

- Different types of housing can also have an influence on the impact of relationships to adjoining properties.
Policy HOU 12 ‘Housing density’

Summary of key points:

- Council should apply the policy flexibly and pragmatically based on the site, type and nature of the proposed development.

- Opposes blanket approach and density applied on all sites

- Text should be added ‘determined on a site by site basis’ after ‘achieve a net density’.

- Additional evidence should be supplied to justify the proposed net density

- Broad application of 30dph consistent with requirements of paras 122/123 of the NPPF.

- Concerned how this policy will be implemented alongside the approach and requirements set out in the Design Guide SPD.

- Object to policy being too prescriptive for sites in the settlement boundary

- The blanket requirement to achieve a minimum density standard across all new housing developments is at odds with the NPPF particularly as there are clearly some areas of Cheshire East where lower density developments would be more appropriate.

- Policy should be amended to take account of local circumstances including additional factors such as market aspirations and viability considerations.

- Policy should be re-structured so that points i-v are applicable to both Parts 1 and 2.

- The nature of the housing proposed will have an impact on density. For instance, Specialist housing for older people generally achieves a higher density than conventional housing. It is recommended that an additional criteria be added at H12 1 (i) ‘the nature of the residential development proposed’

- Reservation about part 2 i) as it will not necessarily be appropriate to have a higher density within the whole of the settlement boundary of larger settlements including on the periphery

- The maximum average density anywhere in Goostrey village is only 12.8dph, therefore it doesn't make sense for the SADPD to impose a general (and un-evidenced) 30dph and require an even higher density in LSC's, many of which are small country villages.

- Questions of housing density should be left to neighbourhood plans to determine.
Policy HOU 13 ‘Housing delivery’

Summary of key points:

- Support to references in the policy to the preparation of masterplan’s and the sub-division of sites where they can assist decision making and overall delivery.

- Preparation of masterplan’s should be to help delivery and not introduce additional tiers of assessment and scrutiny that could delay proposals. This should be acknowledged in the policy wording.

- Design assessments should be consistent and should not lead to additional work on top of the stipulations of the Cheshire East Residential Design Guide.

- Policy should enable site promotor to produce the relevant masterplans

- Once established, decision making in line with the masterplan should be fast tracked

- Concern over part 4 (i) over planning conditions requiring development to start in a shorter timeframe than the default period. This provision is referenced in para 76 of the NPPF (July 2018) and so should be deleted from the SADPD. If the policy is kept, then it needs to be expanded or clarified to take account of local circumstances.

- Part 4 (i) is not compliant with para 55 of the revised framework

- Development may not always be able to start quickly as a consequence of site conditions and other obligations. Part 4 (i) of the policy could lead to an increase in the number of planning applications which lapse.

- Part 4 (ii) of the policy and the requirement to sign planning obligations in an expedient fashion. The Council requires evidence to justify the obligations they request in line with the requirements of regulation 122 of the CIL regulations

- Flexible decision making and greater resourcing of Council’s planning and legal departments would have a positive impact in securing housing delivery.

- Larger sites, give rise to a much more complex range of issues.

- Part 4 – require commitment from the Council to deal with reserved matters and discharge of conditions in a timely fashion.

- Part 4 (ii) many factors outside the applicant / local planning authority control impact on the signing of planning obligation and so not practical in practice.

- Not clear how this policy would be monitored and enforced.

- Part 4 of the policy should be deleted.
Council resources often lead to a delay in the signing of planning obligations / agreements.

Signing and agreement of pre-commencement decisions in advance of granting planning consent will aid overall delivery.

The Council should refocus the policy to consider what mechanisms could be put in place to bring about a development in a positive manner. This could be secured by:

- Avoiding over cumbersome planning conditions and agreeing this in advance of granting planning consent with the agent (as now required by Planning Regulations);

- Flexibility in the application of its policy requirements including the Cheshire East Design Guide, enabling renegotiation where evidenced that policy requirements are not deliverable or suitable;

- Offsetting infrastructure/policy requirements until later in the development where appropriate; and

- Permitting revisions to plans where necessary within statutory timescales

Support for modern methods of construction which could lead to positive impact on delivery, alongside the sub-division of sites.

The finalisation of planning obligations and S.106 agreements can be delayed by the involvement of third parties. Important that communication is maintained, allowing for open and practical dialogue.

A viability assessment should be published alongside the SADPD, in line with para 34 of the NPPF.

Following the publication on NPPF (2018), it would now be appropriate for the policy to refer to the new Housing Delivery Test and the circumstances in which the Council will instigate an action plan in the event of under-delivery.

**Policy HOU 14 ‘Small sites’**

**Summary of key points:**

- Rather than the ‘up to 30 homes’ specified in the policy, the size of the site should be considered in the context of the surrounding area. Each site should be considered on its own merits on a site by site basis to ensure they remain viable and deliverable.

- This is a positively-worded policy and it recognises that small and medium-sized sites have the capability of making a contribution to the delivery of housing land in the borough.
A number of objection sites, which would fall within the definition of small sites, have been promoted for allocation.

The policy seems to be at odds with the NPPF which talks about the benefits of large scale, planned developments.

NPPF paragraph 68 outlines that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. It therefore follows that small sites should be allocated in each settlement across the borough to ensure a consistent delivery of housing for local people.

Use of 30 units as a definition of a ‘small site’ for policy purposes is supported, recognising that there is no industry standard for what a ‘small site’ may be.

The policy does little to actively encourage small sites to come forward.

The policy does not set out a policy requirement but merely indicates that the Council recognise the benefits of small sites and will give them positive weight.

The Council has not addressed NPPF paragraph 68 which indicates that, through development plan and brownfield registers, land to accommodate at least 10% of their housing requirement should be identified on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. Further sites should be identified through the SADPD to assist in securing at least 10% of the supply on such sites.

SADPD Para 8.47 highlights: “In a joint report by the Local Government Information Unit and the Federation of Master Builders in December 2016,(15) a small site was considered to be one that was unlikely to be developed by large volume house builders. In the absence of a better measure this was defined as a site with the capacity for 30 units or fewer, or 1.5 hectares or less in size.” Given this and to make allowances for different approaches to density the Policy should also refer to an area of 1.5 hectares.

**Chapter 9: Town centres and retail (general issues)**

**Summary of key points:**

- No comments received

**Policy RET 1 ‘Retail hierarchy’**

**Summary of key points:**

- Support for ‘Town Centre First’ approach

- Generic policies lose the fine detail of the ‘legacy’ local plans, particularly the Macclesfield Local Plan
• Object to identification of neighbourhood parades in the retail hierarchy – facilities do not accord with the NPPF and its definition of ‘town centres’ and should be deleted from retail hierarchy

• Support for Welsh Row (Nantwich) Local Urban Centre

• Support for Crewe and Alsager definition in the retail hierarchy

• Mention needs to be given to Barn Road, Congleton and connections into the town centre particularly when the Congleton Link Road is constructed.

• Congleton Town Centre retail role, needs to be protected and enhanced by promotion of retail activity in the town centre

• Retail hierarchy should recognise the Local Centre included in the North Cheshire Garden Village.

• Edleston Road (Crewe) is mentioned as a neighbourhood parade of shops, this should be expanded to include Coronation Crescent, Bramhall Road, Readsdale Avenue and Coleridge Way

• Support for recognition of Macclesfield at top tier of the retail hierarchy. Opportunity to add a paragraph to policy RET1 which specifically recognises Macclesfield as being at the top of the retail hierarchy.

• Support the Macclesfield Town Centre boundary.

• Welcome approach of not designated retail parks in the retail hierarchy as to not undermine the function of Macclesfield Town Centre.

• Wilmslow – Davenport Green (Knutsford Road Wilmslow) should be considered for inclusion as a neighbourhood parade of shops.

• The Poynton Neighbourhood Plan seeks to amend the boundary of the town centre to include the School Lane parade of shops, whereas the SADPD omits the School Lane parade from the town centre and also reduces the size of the town centre.

• Disagreement with Alsager recommendations in terms of establishing a local urban centre at Crewe Road (Alsager).

• Development management should consistently apply the retail hierarchy.

Policy RET 2 ‘Planning for retail needs’

Summary of key points:

• FDSADPD fails to ensure that retailing needs in Cheshire East will be met, with particular reference to Knutsford. Evidence base should be updated to explore and allocate sites for retail uses.
• Object to inclusion of LPS 47 (Snowhill)

• Request that adjustments are made to the allocation LPS 47 (Snowhill) of the Local Plan Strategy to remove ‘Mill Island’ and include Swinemarket

• Rigorous application required of policies RET 3 and RET 7 to ensure no impact on existing centres.

• Policy RET 2 should make reference to Mill Street in Crewe to be consistent with LPS 1 (Central Crewe)

• Support for the approach taken in Policy RET 2 which recognises that additional retail floorspace should and can be delivered in Macclesfield and Crewe. Policy could be strengthened through an additional paragraph to the policy which states that retail development in out or edge of centre sites will not be required to meet the projected capacity

**Policy RET 3 ‘Sequential and impact tests’**

**Summary of key points:**

- Impact Assessment should be required for any mixed use development including A1-A5 uses on developments on the edge of the town centre.

- Reference to Local Urban Centres within the sequential test is confusing as they are not being treated as ‘town centres’ for the purposes of the policy.

- Part 2 of RET 3 should be redrafted to accord with paragraph 89 of the revised NPPF which only requires the assessment of impact for retail and leisure uses not all main town centre uses. Also should make clear to all four categories in the table that it relates to ‘where the closest centre to the development proposals’

- Question as to why the same Primary Shopping Area distinction are not afforded to the town centres. For all town centres, there should be a distinction between convenience and comparison goods outside the PSA and the rest of the town centre boundary.

- Broadly supportive of the proposed inclusion of locally set thresholds provided that they are justified by robust evidence in line with the requirements of the assessment criteria in the PPG

- Point 1 of the policy should be amended to consider greater flexibility in relation to ancillary developments in rural locations which would be exempt from the sequential test.

- The text should reflect the revised framework, for example para 86 of the NPPF (July 2018).

- RET 3 should also make reference to the applicants demonstrating flexibility in terms of scale and format of their proposals
• Support for locally set thresholds in relation to impact assessments but a request for the table used in the policy to be clearer. Suggest that the reference to the requirement for Retail Impact Assessments for Class A1 proposals outside of town centre boundaries is removed the implication being any proposals for Class A1 development larger than 500sqm outside of the PSA must be the subject of a RIA.

• Point 3 - wording of this paragraph is unclear and should be split into two separate sentences. The first sentence should relate to extensions of existing stores re-worded so a RIA is required if the extension would result in the size of the unit (as a whole) exceeding the thresholds set in Paragraph 2. The proposed re-wording of the second sentence relating to applications to vary the range of goods will need to be altered to reflect the splitting of the paragraph.

• Sensible to split Paragraph 3 into two paragraphs. The first paragraph (Paragraph 3) should deal with proposals that seek to either extend existing Class A1 stores or vary the range of uses permitted. A new paragraph (Paragraph 4), which is by its very nature applicable to the first, second and third paragraphs, should be added which contains just the second sentence of Paragraph 3 which states that proposals that fail to satisfy a sequential test and/or impact assessment will be refused.

Policy RET 4 ‘Shops fronts and security’

Summary of key points:

• There is support for this policy provided there is some sensitivity in the design of shop fronts and security shutters particularly in Conservation Areas.

Policy RET 5 ‘Restaurants, cafés, pubs and hot food takeaways’

Summary of key points:

• With Policy RET 7, in part, setting a series of tests for the change of use away from Class A1, Policy RET 5 adds an additional layer in managing the impact of Class A3, A4 and A5 uses on amenity. Whilst the use of conditions to control the implications of such uses on amenity is sensible, conditions must comply with tests in NPPF.

• Suggests the need for a fall-back position established through previous grants of planning permission to be considered in the imposition of planning conditions.

• RET 5 is too strong in stating “conditions will be imposed” and should be rephrased to “conditions may be imposed”.

• Should include all schools otherwise contrary to item 91c in the NPPF.
Policy RET 6 ‘Neighbourhood parades of shops’

Summary of key points:

- An addition to the policy should state that in the event of non-viability of a convenience store in a new development, a community use should be the priority for re-allocation of the premises.

- Support the inclusion of the east end of Welsh Row (Nantwich) for the allocation RET 6.

- Object to the inclusion of a sliver of land on Waterlode (Nantwich) for the allocation RET6.

- Support the policy provided that the neighbourhood parade of shops does not detract from the town centre offer.

- Consider adding to the policy that if a convenience shop is proved no-longer viable, then another community facility use must be sought before any housing or restaurant or business application is brought forward.

- Support reference to REC 5 community facilities.

- Crewe – need to increase scope for parades of shops to include Coronation Crescent, Bramhall Road, Readsdale Avenue, and Coleridge Way (not an exclusive list).

Policy RET 7 ‘Ensuring the vitality of town and retail centres’

Summary of key points:

- Policy should make a clearer distinction between day / night time uses.

- Objection to proposed changes to Knutsford Town Centre boundary - should include the OKA building, car park and bowling green.

- No longer a requirement to identify primary / secondary frontages. Need to review approach in line with revised NPPF (July 2018).

- Over concentration of A1 uses can lead to higher vacancy rates.

- Part 4 of the policy should be revised and made more flexible to respond to market conditions.

- Part 4 of policy – need to define ‘over concentration’ and ‘significant break’.

- Objection to proposed changes to Nantwich Town Centre boundary – the northern end of the open space at Mill Island, south of the River Weaver should not be included in the town centre area.
• Objection to Crewe / Alsager Town Centre boundaries – Asda car parks should be included in the PSA

• Objection to Congleton Primary Shopping Area boundary – should exclude 19 – 1 Mill Street.

• Colours on the Policies Map should be amended to improve the clarity as to the extent of policy boundaries

• Alderley Edge Local Centre boundary – should retain the railway station site.

• Objection to draft Policy RET 7 on the basis that the approach proposed in the draft policy is unnecessarily restrictive, and that the proposed wording is too vague. In accordance with para 85 of the NPPF, planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, and allow a suitable mix of uses (including housing) in order that their distinctive characters are reflected. 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.

• Minor objections to Holmes Chapel Local Centre – The Retail Boundary, 25a are identified as St Luke’s but this is a private house. What is shown as EL Sub Station is in fact St Luke’s Hall. The Youth Centre is shown outside the retail boundary. Both should be included in the Local Centre boundary.

• Macclesfield – Christ Church area should be included within the town centre

• Macclesfield – object to proposed deletion of Macclesfield Local Plan policies MTC 19 – 21.

• Should avoid a retail led focus on town centres – reference made to the LGA report Revitalising Town Centres (May 2018)

• Object to Congleton Town Centre boundaries and exclusion of Danebridge Mill

• Focus should be on retailing in the centre of the town.

• Crewe – Heath Street frontage should be a primary rather than secondary frontage

• Macclesfield – further detail needed on the primary shopping area for Macclesfield. There is a need to ensure that the primary shopping area, in Macclesfield, is drawn tightly and relate to where there is a concentration of Class A1 uses, consistent with the revised NPPF (July 2018) definition. Support the inclusion of the indoor market within the shopping area and Tesco supermarket and B&M store. Also it should be extended to include both Churchill Way and Exchange Street Car Parks that signal an intention to bring
these sites forward. Question the inclusion of parts of Chestergate, the southern part of Jordangate and Mill Street. These do not have a concentration of retail uses.

- Objection to Poynton Town Centre boundary – it should include the school lane parade of shops in the town centre boundary. Town centre should include all public buildings. For this reason, the School Lane shopping street and Park Lane between School Lane and Waitrose store should be included. All property on both sides of London Rd South to the junction with Queensway should be included. St George’s church at the cross roads, the Poynton Centre at Poynton Green, Park Lane, and the Fire Station at School Lane should be included.

- Flexibility is also required in order to allow for potential expansion of town centre functions as new developments and an expanding population increase the pressure on existing facilities. The town centre has a tightly drawn boundary and further flexibility is needed for the future.

- Objection to Goostrey Local Centre boundary – it should not include a residential bungalow between the Post Office and Pharmacy

- Objection to Alsager retail boundaries – primary frontages should include the post office, Asda and the area including Chatwins.

- Alsager retail boundaries - prefer to keep the boundaries as within the Congleton Local Plan. Objection to approach of the Crewe Road Local Centre. Policy RET7 should be deleted (particularly iii, iv and v).

- The removal of PSFs or SSFs will allow landlords to market units with greater levels of flexibility and with a greater degree of certainty on the acceptability of various uses. In this respect, it should encourage occupancy, reduce vacancy periods and allowing for the introduction of new occupiers that will generate higher levels of footfall and increase dwell time far more than if a unit remained unoccupied.

**Policy RET 8 ‘Residential accommodation in the town centre’**

**Summary of key points:**

- Support for policy, particularly the redevelopment of car parks if it can be shown to at least maintain number of car parking spaces in the town

- Careful balance needed in decision making between night time economy related uses and residential uses

- The introduction of upper floors in the town centre for residential accommodation is welcomed
• Item 3 should include additional wording after “remains” which comprises “or suitable alternative provision can be made available within reasonable walking distance

• Balance needed that residential amenity issues do not prejudice the primary role of the town centre and its retail function

• Object to point 3 as not consistent with the wording of policy INF2. It is also important that “adequate alternative” is properly defined by the inclusion of a requirement that it is equally convenient for the facilities served, and is available for the same time periods at the same cost.

• Policy, as currently worded, does not contain the necessary tests to ensure residential uses are compatible with existing uses. The NPPF is clear in introducing the requirement for the ‘agent of change’ (i.e. a new use amongst established use(s)) to provide appropriate noise mitigation measures so as not to restrict the continued operations of existing uses. A second part of the policy be added to read: “The provision of residential accommodation in town centres will only be permitted where:
1. It does not result in the loss of A-Class uses at ground floor level within the Primary Shopping Area or prejudice the viability and vitality of the Primary Shopping Area; and
2. It does not prejudice the continued operations of existing occupiers/uses. Where appropriate and compliant with national planning policy, planning conditions will be used to manage the introduction of new residential uses.”

• Alsager Town Council would like two non adopted car parks in Alsager formally adopted as car parks to ensure they are not lost to other uses.

Policy RET 9 ‘Environmental improvements, public realm and design in town centres’

Summary of key points:

• Support, should specify that criteria should be met for development to proceed unless exceptional reasons indicate otherwise

• Support, unsure of precise meaning of paragraphs 3v & 6i

• Object to the overall approach – should be revised in line with section 12 of the NPPF and para 127. Object to reference to public art and reference to vertical mix of uses in the town centre, could have an impact on viability

• Reference should be made to public realm and a heritage strategy for Crewe Town Centre.

• Point 5 (ii) should include suitable and safe access together with adequate bin and cycle storage.
• Duplication of SE1 (Design) in the Local Plan Strategy and should be deleted

• Support for intentions to support public realm and high design standards

• Design should be mindful of beauty and historic assets and not accept ‘newness’ that quickly looks dated

**Policy RET 10 ‘Crewe town centre’**

**Summary of key points:**

• The boundary of the Northern Edge Development Area should be amended so that it does not extend beyond the boundary of the town centre onto the opposite of West Street. The purpose of Policy RET 10 is to strengthen the town centre, therefore depicting an NEDA boundary which extends beyond it only serves to pave the way for large out-of-centre retail units. The draft plan either needs to make clear that any new out-of-centre retail in the NEDA would be subject to other policies in the plan (RET 3 and RET 7, referred to above) or redraw the boundary of the NEDA along West Street, to ensure that there is no impact on existing businesses within Crewe town centre.

• The four “character areas” of Crewe town centre shown at figure 9.1 are broadly valid. The boundaries between these areas should not be regarded as inflexible.

• Point 3 on page 105 refers to “Proposals anywhere in the town that are likely to prejudice the comprehensive redevelopment of the RADA”. It would be more robust if the phrase “in the town” was omitted. Where does “the town” begin and end?

• Point 9 refers to the connectivity between the Town Centre and the Retail Park. This is the key factor in planning the future of the town centre. For the “old” town centre to be revitalised it will not be sufficient to simply redevelop the Royal Arcade site. The Retail Park is well established and well supported. There needs to be a plan to recognise that and to devise ways of providing easy access between the two.

• It is disappointing that there is no comparable statement for Crewe to that at 9.54 which refers to the “significant heritage assets” of Macclesfield. Crewe has a number of assets which should be protected.

• Larger buildings should incorporate green walls to help to deal with air pollution.

• Consideration should be given to what effect that building a cinema in the Royal Arcades Development Area will have on the area on Dunwoody Way where the existing cinema will, no doubt, close down.

• There should be a far greater emphasis on the creation of green spaces in the town centre including where they could enhance the key link between the town centre and railway station.
• The policy should include specific reference and commitment to both a public realm strategy and a heritage strategy for Crewe Town Centre.

• It is understood that the Police will soon be vacating the building which occupies an important and prominent site. It should therefore be included in clause 7(i) (Civic and Cultural Quarter Development Area)

• The policy repeats policy RET 8 (Residential accommodation in the town centre) which allows for the residential redevelopment of car parks subject to certain requirements, including the provision of “adequate alternative” parking provision. This term should be properly defined - so that this provision is equally convenient, available during the same hours and with the same parking charges.

Policy RET 11 ‘Macclesfield town centre’

Summary of key points:

• The SADPD is missing any site specific guidance for individual sites within the identified character areas. Any planning application determination will have to be made in accordance with the Development Plan, unless material considerations indicate otherwise. The Macclesfield Borough Local Plan provides a good example of how to provide specific guidance for individual sites/areas. Reference made to policies MTC 4, 5, 7 and MTC21. Park Green Area part of Silk Quarter; there should be separate policies for the Silk Quarter and Historic Quarter. Need for adequate car parking within the town centre - the issue of car parking in the SADPD is not addressed in relation to the West of Churchill Way site and the town centre as a whole. The reference to large format development being permitted subject to meeting other policy requirements does not provide the specific planning guidance that the Central Exchange Centre and the town centre require. Christchurch area also not properly addressed within the policy / SADPD. Need for thorough rewriting of Policy RET11 of the SADPD, in order to address detailed and site / area specific requirements in order to provide appropriate statutory, detailed guidance for applicants when submitting planning applications.

• The objectives of the policy are supported, together with the area designations and preferred forms of development, redevelopment and changes of use. The land use elements of the policy require support through the implementation of economic strategies for the town centre through appropriate governance mechanisms. Consider that there is a case for the Council to take a more active role in site acquisition and development promotion, including designation of Local Development Orders and exercise of compulsory purchase powers to bring forward “problem sites”.

• 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 which confirms that the Council will, in principle, support opportunities for improving and regenerating Macclesfield town centre as defined in Figure 9.2 ‘Macclesfield town centre character areas’. Christ Church is excluded from the
list and discussion and therefore from the list of priority areas for regeneration. Lack of Conservation Area Appraisal for Christ Church area and specific guidance for the Christchurch area are part of the above concerns. Christ Church was a featured building of the Borough Council’s HARP project in 2017-18 and much work was done to look at options to support its regeneration with the Churches Conservation Trust as building owners. The viability and marketing of any future use is likely to be negatively impacted by the removal of the church and the majority of its Conservation Area from the town centre. (will convey a “nothing to see beyond here” message). In addition, there is a failure to reference, respect or reflect Christ Church and its Conservation Area in the SADPD documents.

- Request some form of planning guidance for the Christ Church area to provide an updated framework to guide development, facilitate positive change and ensure that high quality place making is embedded into future development projects affecting the area. Support the rejuvenation of the town centre as a high priority of the Borough Council but the future of the Christ Church area also needs some positive planning due to its location, its heritage, its quality and its potential to support and enhance the whole town centre and the town itself.

- Concerned about the position and status of this policy. It is presently vague and high level, consisting of a series of aspirations and aims but little teeth and it may be more suitable for this policy to be removed and instead worked into a (or a series of) more detailed and comprehensive Supplementary Planning Document(s) (“SPD”). If policy remains – needs reworking: Reference to new retail developments underpinning the retail function of Macclesfield should be made whilst encouraging further developments for town centre uses. Concern about Historic Market Quarter and how the policy is used in managing the balance of uses along Chestergate. Suggest that the Churchill Way Car Park should be included as a site in the ‘Sites’ section of the FDSADPD and that the Policies Map should be amended to reflect this. Policy wording similar to that of Policy MTC7 of the MBLP, but with flexibility for a wider range of uses (including food retailing) would be appropriate. Addendum to the above suggests a revised Primary Shopping Area boundary.

- Given the challenges facing the retail sector, Eskmuir suggest that there is a need to draw Macclesfield’s PSA boundary tightly around parts of the town centre where there is a real concentration and predominance of Class A1 uses as well as those locations where CEC have aspirations to deliver retailed developments. Accordingly, while Eskmuir supports the appropriate rounding off of PSA boundary (such as the indoor market, Tesco supermarket and B&M store) it does not see the justification for the extension of the PSA to include the three areas (Chestergate west of Churchill Way, the southern part of Jordansgate and Mill Street south of Roe Street) and instead suggest that it would be sensible to include the Churchill Way and Exchange Street car parks.
Chapter 10: Transport and infrastructure (general issues)

Summary of key points:

- The transport and infrastructure policies contained in Chapter 10 of the SADPD fail to consider the importance of delivering motorway service areas and are therefore not in accordance with the NPPF. Paragraph 104 e) of the revised NPPF, notes how planning policies should provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. Footnote 42 of the revised for the NPPF confirms that: “Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user. The NPPF footnote confirms that roadside services are unlikely to be nationally significant infrastructure projects, therefore it is concerning that SADPD as currently drafted fails to consider this matter within the Cheshire East context.

- There is a need for an allocation to provide roadside facilities in relation to the A500. The A500 is identified as a Strategic Link from Nantwich as both a link to the M6 and a link to employment opportunities in Crewe. It links Crewe and Nantwich with Stoke and the M6 to the east, and then connects with the A51 which links to Chester to the north-west. Our client has specifically proposed the land at Newcastle Road, Willaston as an allocation for roadside facilities.

- Recommended Additional Policy - Investment in Future Infrastructure

- It is requested that local policy is worded to recognise United Utility sites, located within the green belt or open countryside, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy.

United Utilities requests the Council’s support for future investment in infrastructure in order to be able to expediently respond to the needs of Cheshire East. We recommend a policy based on the following wording: “Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.” These amendments would enable us to ensure we can continue to meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of these future developments can be achieved.

- The increased levels of car ownership in the rural areas and the resultant problems of a demand for car parking over and above the standards set out by the Council. This problem is further emphasised by the construction of
integral garages in new build housing which are not large enough to accommodate the average family car.

- The plan fails to address the impact of HS2 in the Cheshire East area, in particular in the southern parishes, which is already being widely discussed and is the subject of a number of published strategies.

- The plan fails to address the impacts of fracking on local communities, particularly on traffic, local communities and the local environment.

- There is no policy on the provision of electric car charging points in the plan notwithstanding the Governments stated objective to support a shift to electric vehicles over the next 20 years.

Policy INF 1 ‘Cycleways and footpaths’

Summary of key points:

- 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.

- Suggest that wording should be added to Policy INF 1 which confirms support for diversions where they will secure improvements to the usability of cycleways, bridleways and footpaths where feasible and viable.

- Should be expanded to also include ‘canal towpaths’. Towpaths are not designated as public bridleways or footpaths and are not all cycleways, but play a key role in providing linkages and in terms of sustainable travel routes. Upgrading and better utilising the canal towpaths is included as part of the PROW Improvement Plans and the objectives of the Cheshire East Local Transport Plan. Including canal towpaths would also relate better to adopted Local Plan Strategy policy CO1 in terms of sustainable travel which at criteria 2v, specifically supports works to canal towpaths and recognises their value as sustainable transport routes.

- Specific mention should be made to the opportunity provided by canal towpaths to increase sustainable active travel... We suggest the following amendments:

  Cycleways, bridleways, towpaths and footpaths
  1. Development proposals that would lead to the loss or degradation of a cycleway, bridleway, canal towpath or footpath will not be permitted.
  2. Development proposals that involve the diversion of cycleways, footpaths or bridleways will be permitted where the diversions provide clear and demonstrable benefits for the wider community.
  3. Development proposals should seek to contribute positively to: i. the Cheshire East Cycling Strategy;
ii. the Cheshire East Rights of Way Improvement Plan Strategy and Implementation Plans; and
iii. the walking, cycling and public transport objectives of the Cheshire East Local Transport Plan.

4. Development proposals should seek, where feasible, to provide links to national cycle routes, long-distance footpaths, canal towpaths and rights of way networks

- Support this policy but would suggest that it should go further to include proposed standards of construction, materials to be used etc.

- The Council’s commitment to improving connectivity by walking, cycling and public transport in draft Policy INF 1 (“Cycleways, bridleways and footpaths”) is supported. However, as per NPPF2, it should be recognised that “opportunities to maximise sustainable transport solutions will vary between urban and rural areas”.

- The impact of HS2a in the Wybunbury Combined Parishes Neighbourhood Area (and other parts of CEV) will be significant over the life of the CELPS and must be addressed separately.

- We must put the responsibility on the applicant to identify where adding to or upgrading the nearby cycleways footpaths and bridleways would help especially where new routes or diversions are proposed inside new development and an opportunity exists to link to existing routeways.

- Perhaps put here - 3) Design and Access statements must be accompanied by map showing links to community facilities and existing PROW as per the Active Design guide principle

- All applications for diversions must consider wider infill and multi modal upgrades to the route.

- Where a neighbourhood plan is in place this must be checked for path and cycleway improvements.

**Policy INF 2 ‘Public car parks’**

**Summary of key points:**

- Support both the objectives and rigorous future application of the policy

- Car parks need protecting and must not been seen as easy game for brownfield development.

- Strengthen the wording to say that any development on car parks must deliver a substantial increase in parking spaces in excess of any new demand that may be generated by new development - e.g. office.
Car parks are often the only public space in a town as all the small green space is being acquired. All car park development should have to provide some green space / landscaping.

Policy INF 3 ‘Highway safety and access’

Summary of key points:

- The policy needs strengthening as loose wording will allow developers to “creep in”
- The lack of electric car charging points on all new development should be rectified as this mode of transport is becoming increasingly popular
- Policy needs strengthening and should read “Development Proposals must’ etc. This would strengthen Highway Authorities position at appeal
- Should be applied in the context of the cumulative impact of a proposed development with other activities and demand on the road network in the same area.
- The impact of additional B2, B8 uses and HGV traffic on a fragile rural network has been substantial and must be evaluated properly prior to granting permission
- Point ii has got to happen. Travel plans and highway design must happen before site commences. Design must be in the Nation planning way – i.e. pedestrians, cyclist then cars.
- Bus provision must be considered in road widths for bus stops and parking bays.
- Point iv is too weak – build the road for vehicles then consider how pedestrians cross is unacceptable.
- As part of the support for the Bollington Neighbourhood Plan, studies were carried out by professional consultants to recommend improvements to address traffic and parking problems and improve parts of the public realm. Further consultation of the community needs to be carried out and ways must be found to implement the final recommendations.
- No evidence of applications coming in has been seen where highways have done any serious non vehicle highways assessments- It is particularly poor on employment development sites forgetting cycle storage, showering and routes and bus service contributions.
- The planning application form needs to be changed to steer applicants to do good design on highways with pedestrians cyclists and public transport designed in from the beginning - not an afterthought after the outline with road access application has been agreed.
• No mention of Sport & Public Health England - Active Design guide

**Policy INF 4 ‘Manchester Airport’**

**Summary of key points:**

• Not strong enough policy and will allow Manchester Airport to do whatever it wants with the Green Belt for operational reasons. This policy should say that operational necessities need to be clearly evidenced.

• Wording of policy needs to be strengthened to reflect that this is a defined area within which development and uses that are necessary for the operational efficiency and amenity of the airport are expected. The designated Operational Area should be viewed as tantamount to exceptional circumstances in relation to green belt.

• Request that the wording is amended as follows: “The Manchester Airport Operational Area is shown on the adopted policies map. Within the Operational Area, development and uses that are necessary for the operational efficiency and amenity of the airport will usually be permitted. These types of development and uses are likely to include operational facilities and infrastructure; passenger facilities; cargo facilities; airport ancillary infrastructure; landscaping works; and internal highways and transport infrastructure including surface car parking.”

• The policy is inadequate in protecting Cheshire East residents from adverse impacts. What about the impact of such growth on noise, air quality and vehicular traffic?

• The Manchester Airport Masterplan to 2030 forecasts throughput of “around 50 million passengers per annum by 2030”. For Cheshire East Council not to critically consider, but “usually permit”, development at Manchester Airport would represent a failing in its duty of care to the Borough’s residents.

• The airport is not trying hard enough on sustainable transport or building design. Travel plans and building standards should be worked on before allowing any more expansion.

• Objection where operational use is for car parking. Manchester Airport has to contribute to sustainable transport from nearby residential areas. The airport is relying too much on revenue and ability to land grab for car parking. Employment opportunities for people who cannot reach the airport and businesses by public transport are being missed.

• The policy does not give weight to environmental consequences. More effort should be made to achieve more journeys to and from the airport by sustainable modes.

• Manchester airport has many responsibilities, including limiting noise. Cross reference should be made to Policy ENV13 (Aircraft Noise).
Policy INF 5 ‘Aerodrome safeguarding’

Summary of key points:

- Not a strong enough policy and will allow Manchester Airport to do whatever it wants with the Green Belt for operational reasons. This policy should say that operational necessities need to be clearly evidenced.

- Welcome inclusion of this policy. However this should be within Chapter 3 General Requirements because the aerodrome safeguarding policy relates to general development issues and non-airport development off-site and not purely the development of the airport itself.

- The text at Paragraph 10.10 should be deleted and the following new text inserted: “The Safeguarding Authority for Manchester Airport will assess planning applications and 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 and whether its construction will present any hazard to flight safety”.

Policy INF 6 ‘Airport public safety zone’

Summary of key points:

- Not strong enough policy and will allow Manchester Airport to do whatever it wants with the Green Belt for operational reasons. This policy should say that operational necessities need to be clearly evidenced.

- Welcome inclusion of this policy. However this should be within Chapter 3 General Requirements because it is a general development requirement rather than Airport related development.

- Has this been checked against LPS37?

Policy INF 7 ‘Airport car parking’

Summary of key points:

- General support for policy. Eating away at the remaining Green Belt in this area is unsustainable and no local or national initiatives are in hand to improve access by public transport. How will this access issue be solved?

- The heading should be amended to “Off-Airport Car Parking” to make it clear that policy relates to car parking provision outside of Manchester’s Operational Area.

- Point 2 should replace existing text with “where proposals accord with criterion (1) above, preference will be given to locations identified for off-
airport car parking in the ‘Manchester Airport Sustainable Development Plan: Economy and Surface Access’, or replacement guidance”.

- Point 4 should include a requirement for on-site attenuation in addition to making maximum use of permeable materials

- Paragraph 10.14 should be made clear that only authorised off-airport car parks are being referred to

- The wording is excessively restrictive and therefore not effective. The Council will need to clarify the car parks that it proposes to use as the measure against which capacity will be assessed. In the absence of such, it will not be possible for potential future operators to be able to determine whether demand is met. A table of the airport car parks and the lawful off-site car parks should be included in the plan with their approved capacity.

- The suggestion in clause 1(i) is that an application would need to demonstrate that these car parks, regularly, do not provide sufficient parking but no evidence is given to justify this. This implies that there would be need for monitoring and it is unclear whether either the Council or the Airport undertake or publish such monitoring

- The policy should be amended to identify those locations/areas of search that the Council would consider appropriate for additional long stay / park and ride off-site car parks.

- Clause 3 of the policy states that proposals will be considered inappropriate without, effectively, a sequential approach having been taken to location and that proposals will preserve the openness of the Green Belt. As parking provision will need to be secure and therefore likely to require boundary fencing and lighting, the basis of how the Council would consider proposals is not clear. The policy as worded is not therefore considered effective.

- The documents listed as supporting the SADPD do not appear to include a Green Belt Review which has considered potential locations for parking along the routes proposed by Manchester Airport. The 2013 Green Belt Assessment prepared to support the preparation of the Local Plan Part 1 only appears to have assessed the impacts of potential housing development. Given this, it is felt that it would be almost impossible for effective park and ride schemes to be approved on the basis of Clause 3 of proposed Policy INF7.

- Airport must have a travel and transport plan that reduces the need for private vehicle travel. All efforts should be concentrated on public transport and cycling and a sustainable recruitment policy. Bus routes to Knutsford would be good.

- Car park surfacing must be permeable - not tarmac as the flood risk is immense.
Policy INF 8 ‘Protection of land and routes for proposed infrastructure’

Summary of key points:

- No strategy for HS2 and its impact on local transport and traffic arteries is indicated.

- Policy seeks to protect key infrastructure proposals and the text refers to Middlewich Eastern Bypass as one such scheme. CWaC have no specific comments on this other than to note the joint working that has taken place on this and that the scheme is being progressed by way of planning applications to both authorities.

- Policy should be phrased in a more positive way such as development should be located and implemented in such a manner as to promote modal choice and use of alternatives to the private car.

- Improved connectivity to Manchester Airport should be supported under the policy to facilitate economic growth and development.

- Infrastructure should consider new routes for pedestrians, cyclists, buses and trains.

Policy INF 9 ‘Hazardous installations’

Summary of key points:

- No comments.

Policy INF 10 ‘Telecommunications infrastructure’

Summary of key points:

- We welcome the reference to aviation within policy INF 10 but suggest that the wording of the policy is consistent with ENV 9 and that which we suggest for ENV 10. At point 1 under criteria iv. replace current text “there will be no unacceptable interference with electrical equipment, air traffic services or the Jodrell Bank Radio Telescope” with “there will be no impact on electrical equipment, air traffic services or the Jodrell Bank Radio Telescope”. As per our earlier advice in relation to policy ENV 9, the word ‘unacceptable’ could be viewed subjectively and should be deleted.

- An additional paragraph will also need to be inserted under Supporting Information, as follows: “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.”

- Part 1iv of the policy states that there will be “unacceptable interference with electrical equipment, air traffic services or the Jodrell Bank Radio Telescope”. Our objection is based on the lack of any evidence in the plan or evidence base in order to test the appropriateness of this part of the policy and it is also not quantified at to what is deemed to be an unacceptable impact. Therefore evidence must be produced, then tested and if it is found to be justified clearly set out in the policy.

- Policy INF 10 ("Telecommunications infrastructure") requires that “all new properties … should be developed with fibre to the premises enabling them to have a superfast broadband network connection.” The requirement to improve digital connectivity is supported by the Estate, but it should also be recognised that improvements can be achieved by other means (e.g. by satellite connections in rural areas). Furthermore, schemes that actively deliver improved internet connectivity (particularly where it can support rural communities and sustainable patterns of living such as home-working and entrepreneurialism) should be actively supported.

**Policy INF 11 ‘Utilities’**

**Summary of key points:**

- United Utilities are supportive of Policy INF 11 and specifically paragraph 10.28 of the supporting Policy. United Utilities seeks to emphasise the challenge is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.

- United Utilities highlights concerns regarding those large sites which are in multiple ownership. These can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries. In practice where sites are in multiple ownership, the achievement of sustainable development can potentially be compromised by developers/ applicants working independently. We therefore encourage the council to make early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a legally binding framework. It should be demonstrated that there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability. We believe that raising this point at this early stage is in the best interest of achieving challenging housing delivery targets from the allocated sites in the most sustainable and co-ordinated manner.

- With respect to larger development sites, we recommend the following additional text at the end of criterion 1 of Policy INF11.
“...It will be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.”

With respect to investment in future infrastructure to respond to growth and meet changing environmental needs, we recommend the following additional criterion to Policy INF11.

“The Council will support the principle of investment in infrastructure to respond to the needs of the borough. Infrastructure is key to the delivery of sustainable development and economic growth and meeting development needs. Cheshire East Council will be supportive of infrastructure investment which facilitates the delivery of wider sustainable development and meeting environmental objectives by water and sewerage providers.”

- Draft Policy INF 11 seeks to establish that all development proposals will be required to demonstrate that the utilities infrastructure capacity would be sufficient to meet forecast demands arising from the proposed development and that appropriate connections to utilities infrastructure can be made. We consider that Policy INF 11 is unsound and object on this basis. The policy fails to differentiate between types of development. Logically, only major development proposals should be required to demonstrate that infrastructure capacity will be sufficient to meet forecast demands and the policy text should reflect this.

Policy INF 12 ‘Canals and mooring facilities’

Summary of key points:

- The Canal and River Trust supports the principle of having a standalone canal and mooring policy but believe it could be usefully expanded in Part 1

- The Canal and River Trust has no objection in principle to new moorings/marinas. The Trust does have a general presumption against the development of new online moorings, subject to certain criteria. In terms of marinas, such development would require the Trusts consent to connect to waterways owned by them, and prospective developers must enter and successfully complete the Trusts application process. The Canal and River Trust suggests additional wording in Part 2 of the policy.

- FCC Environment considers that the canal is a significant asset to the rural economy but INF12 refers to, at best “where possible enhance”. The proactive approach in the Cheshire East Visitor Economy Strategy 2016-2020 should be reflected in the Local Plan.

- Text policy states that it will allow “for future development of liner or lay-by mooring facilities, new marina developments, or extensions to existing facilities”. However the Policy does not adequately allow for this given that a sequential approach is proposed as opposed to consideration of the merits of each application against the impacts.
• Too restrictive for permanent moorings which allows them only in open countryside if adjacent to a settlement boundary and where there is a demand. Policies should be drafted to enable decisions to be made on a case by case basis rather than a sequential restrictive policy.

• Site specific constraints may not allow development proposals to maintain an active frontage and positive connection with the waterway. The Policy should be reworded to include the words “where appropriate”.

• The Canal and River Trust recommend additional wording of the supporting text (¶10.28 and ¶10.29); the insertion of links which provides further detail to help support developers with planning applications; and to remove the reference to the ‘Trusts Developers Guide’ which was withdrawn in early 2012.

Chapter 11: Recreation and community facilities (general)

Summary of key points:

• REC1-5 – The objectives of these policies are supported and strict application is essential to ensure no unacceptable loss of existing facilities or preclusion of opportunities for new forms of recreational provision.

• Better definition needed as to what is meant by recreation and community facilities; confusion between indoor and outdoor greenspace and open space. Sports playing facilities should be recognised separately.

• The policies should take a more positive tone - seeking to support enhanced and new facilities not just trying to protect existing. This wealthy borough should have greater ambition for the health and wellbeing of its residents.

Policy REC 1 ‘Green/open space protection’

Summary of key points:

• The play pitch strategy forms part of the research and evidence to inform the Local Plan. Representations were made to the draft play pitch strategy by the club but they have not all been taken into account. Information attached provides a more accurate picture of the Poynton Sports Club facilities and deficiencies to inform the local plan and decision making on planning applications. The Playing pitch strategy should be updated to reflect them.

• Suggest that the first part of Policy should be deleted as it appears to exclude the possibility of any form of development within identified areas of open space; such an approach would be inconsistent with paragraph 97 of the NPPF; suggest that the second part of the policy is retained and a further exception added: ‘where the community benefits of the proposed development would clearly outweigh any harm arising from the loss of part, or all, of any area of open space’. This would reflect instances whereby a development would secure the long-term viability and condition of an area of
open space. (Comments made in respect of a Mill Pond in Bollington where some development of the pond is sought)

- Representations received regarding land to the west of Eaton Bank; object to the allocation of the land as open space; detailed comments submitted covering nature of site, site assessment, relationship to NPPF, ecological aspects etc. Have no objection to policy wording but request removal of an area of land from the open space designation (wider area suggested plus smaller area shown hatched red on accompanying plan).

- Representations received regarding land at Pownall Park, North of Gorsey Road, Wilmslow; 2 areas discussed – one site extant permission for two dwellings 16/4518M (kitchen garden/ancillary garden area; other site formerly part of school grounds with permission for 1 dwelling (replacement recreation/pitch provision secured via a new playing pitch on the former tennis court area of the school). Request that both sites should no longer be protected open space but be within the settlement boundary only.

- Representations regarding land to the south of Lilybank Drive, Knutsford; details of the site are provided (for example within Legh Road Conservation Area, open space, no public access, Sanctuary Moor to the south, part of Local Wildlife Site); evidence base justifying the continued designation of the site as open space out of date and not sufficient; has not taken into account all typologies of open space and tested them against the requirements of para 100 of the NPPF. Argue that the open space allocations are based upon out-of-date evidence which renders the proposed SADPD plan unjustified, not positively prepared and inconsistent with national planning policy. Request removal of open space designation and/or allocate site for small scale housing development.

- FD18 – Green Space Strategy Update - It is not possible to see the detail in Appendix 1: Baseline Map, due to the enlargement of the image required. In Appendix 2: Thematic Map, there is no indication of the Dane Meadow country park in Holmes Chapel. It is of concern that the authors are not aware of this very important area of green space in Holmes Chapel.

- Support for policy but felt that it should be extended to include a definition of all green spaces, including green gaps, not just school playing fields. Nearly every settlement in the Borough has substandard green space provision and this policy presents an opportunity to ask for more green space rather than just the protection of that which already exists.

- Support for policy but suggested updates and amendments to Green Space Strategy Update
  - Type 6 facilities
    - 279 25KOW NORTH DOWNS Longridge size is full size football pitch so 1ha. requires improved drainage & moving drain access covers to bring back in use as per PPS strategy
- 273 1KOW BARNCROFT Mobberley Road part of wider amenity area with Friends group in place.

- 277 13KOW LONGRIDGE COMMUNITY SPACE requires community plan for future development- paths & safety surfacing not a priority over new features

- 276 13KOW SOUTHFIELDS Shaw Heath would benefit from extra equipment

- 275 13 KOW LONGRIDGE COMMUNITY SPACE the football facility should be a full adult pitch , requires drainage and rebuilding and marking out. Size should be around 1ha.

- 309 14KOW St Johns Wood ACADEMY MUGA is not private it is municipal leased to Adelaide Academy Trust

  o Type 4 facilities

- The playing field at Booths Park, used by Rugby, is opposite Toft Cricket club has been missed off the assessment. Mentioned elsewhere in responses.

- 258 260 3KBW Knutsford Academy lower AVERAGE condition REQUIRES RESURFACING & SAFETY IMPROVEMENTS RE POSTS

- 263 & 262 4KBW Knutsford Academy upper Tennis courts & NETBALL COURTS POOR quality REQUIRES RESURFACING & SAFETY IMPROVEMENTS RE POSTS

- 636 4KBW Knutsford Academy Leisure Centre football pitches PPS ID66 used by community - Knutsford FC.

- 310 5KNW Knutsford FC quality GOOD PPS ID77 tenure is not secure - 1 yr rolling lease. Would benefit from increased drainage and using adjacent land for extra pitch.

- 621 14KOW St Johns Wood ACADEMY school. There is no football pitch it was built over for sports hall. This entry should refer to the football pitch on 25KOW PPS suggestion bring back into use.

- Sport England are supportive of this policy as it makes reference to the use of the Council’s evidence base (PPS, BFS) and is consistent with the NPPF para 97.

- Re point 1 - there needs to be some flexibility if there have been errors or omission on the Policies map so amend as: including but not limited to those shown on the policies map.
• Playing field at Booths Park Knutsford opposite Toft Cricket has been missed off the policies map, and from the Green Spaces technical assessment. It appears on App 8 of the Knutsford Neighbourhood plan as location 14. Please can the FD02 draft policies map, and FD18 green spaces technical evidence be revised and reissued. The land is currently in use for Rugby. Also query the inclusion on the FD02 Policies Map of 2 areas of protected open space in Knutsford. Land at Leaks Terrace in the Town Centre of Knutsford ref GKNW and at the Brooks Street Hollow Lane Mobberley Road ref 18KOW

• Support objectives of policy but may be circumstances where the sustainability benefits of redevelopment and delivering a beneficial use could clearly and demonstrably outweigh any limited open space benefit that may exist. In order for the policy to be justified and effective it 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.

• Garden land at Oak House, Victoria Road, Macclesfield incorrectly shown at Local Plan Strategy stage as Open Space; now shown correctly as within dwelling curtilage on Draft SADPD policies map; Once adopted, and to avoid any confusion, request that this draft new Policies Map supersedes the currently adopted version (First Part).

• Policy must be adhered to, in conjunction with the requirements of the Bollington Neighbourhood Plan

• Policy welcomed but green spaces lost through Part 1 of plan; That said, if these policies (RUR1 and REC1) hold firm in terms of stopping further encroachment, then they will serve a purpose

• Regarding paragraph 11.3 – support - The strategic local plan and this underlying SADPD must effectively keep the open spaces previously defined in 2012,13 evidence docs otherwise by implication you have lost everything and Neighbourhoods have to fight to get back something they thought was protected.

• Paragraph 11.4 – consistent with National Policy

• The playing pitch and Indoor facilities 'strategies' were not updated after the comments received on them during their consultation - thus the consultation summary report should form part of the related documents

**Policy REC 2 ‘Indoor sport and recreation implementation’**

**Summary of key points:**

• Requests flexibility in the application of the requirements of Policies REC2 and REC3 for developments comprising specialist housing. Such developments would not have the same effects on demand for open space as typical open market and affordable housing schemes, and as such should not be subject to the same open space requirements. Policy needs to be
amended to clearly distinguish between the types of development to which the Policy requirements would apply.

- Support for policy and for contributions to be directed to the nearest accessible facility to the development

- Policy should also make reference to the consideration of pooling contributions

- Further evidence needs to be provided to justify the policy and to explain its relationship with CIL payments in operation to allow detailed consideration of the policy to whether it conforms with NPPF (35).

- Do not think that this contribution is clearly necessary to make all development acceptable in planning terms.

- Each development should be considered on its own merits and only those obligations necessary to mitigate the impact of the development should be sought.

- The requirement for additional indoor sport and recreation facilities must be based on up to date evidence prepared by the Council and must show that new demand generated results in an unacceptable under provision of facilities. Only where this evidence justifies such a requirement should a contribution be warranted.

- Policy should be modified to only require a contribution where (a) there is an identified deficiency in the quantum or quality of an indoor sport or recreation facility within the catchment of the proposed development, or (b) where a development will lead to a deficiency in the quantum or quality of an indoor sport or recreation facility. Crucially, any contribution should only be sought where it is necessary to make the development acceptable in planning terms, and where it would meet all of the tests set out under Regulation 122 of the Community Infrastructure Levy Regulations 2010.

- Contributions should not be required simply for upkeep/maintenance as this will be captured from the Council Tax revenue generated from a new development.

- Absolutely correct that this should apply to all forms of development. Sports provision is for all abilities and interests so for example older residents may well require gym facilities and outdoor sports such as archery and bowls for their health and wellbeing. The gyms at leisure centres are increasingly in demand for stroke rehabilitation and getting the inactive - more active to tackle obesity.

- Sport England - It is positive that the policy seeks to use the Councils evidence base and the sports facility calculator to secure and calculate contributions for development. The Active People Survey is now Active Lives Survey –would advise against the use of this data to inform contributions as it only provides sample data relating to current activity and does not take into
account current or future supply and demand data. This information should be taken from the BFS which provides demand/supply information and recommendations on what additional/improved facilities are required to meet this demand. Although supportive of contributions being spent locally, concerns around justification so would recommend that the policy is amended to reflect that requested contributions are to be informed by the requirements and recommendations and action plans set out by the evidence base.

- Sport England would also recommend the inclusion of a policy to ensure that existing indoor sports facilities are not lost unless a robust and up to date evidence base is in place and identifies the facility as surplus to requirements.

- Suggest that the second facility description be a bit broader. Instead of studio space say physical activity space so not limited to traditional sport e.g. chirobics; this would link to use of community halls also.

- Feel that this policy should be strengthened in its wording to prevent the loss of existing sport and recreation facilities.

- Support contributions to sports facilities - needs to include volunteer led ones not just the Council ones. Plus make it mandatory that developers have an active design mapping how new residents will access existing and new sports facilities

- Each Leisure centre should have a facilities plan for investment

- Strategic developments should contribute to a sports planning officer at CEC for major facilities and an activity coordinator at Town and Parish level in line with the active design guide mentioned in CEC LPS

**Policy REC 3 ‘Green space implementation’**

**Summary of key points:**

- Requests flexibility in the application of the requirements of Policies REC2 and REC3 for developments comprising specialist housing. Such developments would not have the same effects on demand for open space as typical open market and affordable housing schemes, and as such should not be subject to the same open space requirements. Policy needs to be amended to clearly distinguish between the types of development to which the Policy requirements would apply.

- Queries the requirement for 20 years maintenance to be paid for by the developer for strategic open space. Suggest that the figure would appear arbitrary and lacks any justification by the Council within the supporting Policy text.

- Regarding maintenance consider that a more justified approach would be to require maintenance fees from the developer during the construction phase and until the open space matures (i.e. up to 5 years), with future costs
covered by the revenue generated from the development (i.e. Council Tax). Request that the Policy is amended accordingly to reflect this approach.

- Regarding maintenance - If there is to be a maintenance plan, then there should be no requirement for a commuted sum as well.

- United Utilities recommends consideration is given in policy to how new green space can be used to help manage the impact of surface water run-off and integrate with the blue water environment to provide multi-functional benefits. Recommend a fifth criterion to Policy REC 3 as follows. “Development proposals should consider how new green space can be used to manage the impact of surface water run-off and integrate with the blue water environment to provide multi-functional benefits.”

- The management of green space provision should be in perpetuity in all situations

- No justification or evidence is provided for the provision of sports facilities at 40 sq.m per family home; and it is unclear as to what a family home is. It is requested that sports facilities should be based on evidence of need, specific to a local area, rather than have a broad brush policy. Any financial or space requirements should be derived on a per bedroom basis (starting with 2 bedrooms).

- Object - The provision of green space might be consistent with good design and it might support health and well-being, but there should be no explicit requirement that this be a requirement of all major non-residential development. In many instances this will simply not be justified or required and accordingly the policy is overly restrictive and would potentially impact upon development viability, investment decisions and investment coming forward.

- Policy REC 3 (4) quantifies the requirement for outdoor sports facilities and consequently provides clarity for developers. Part (2) outlines the preference for green space provision on site, whilst including a caveat that offsite provision may be acceptable in limited circumstances where this meets the needs of the development and achieves a better outcome - support this flexibility.

- Support for policy and suggest that it could be expanded to include the provision of more local green space together with the improvement of links between existing and proposed green spaces

- There is no justification provided for the requirement for 20 years of maintenance payments to be made to the authority in relation to strategic open space. This approach appears disproportionate. Payments should only be required during construction and up to maturity after 5 years

- In agreement that green space should, as a preference, be provided onsite as part of residential schemes; however, it is considered that the Policy is too inflexible with regards to those circumstances where off-site provision may
need to be provided/or more appropriate. For example, the Policy should allow for off-site green space provision where on-site delivery is proven to be impractical (due to site constraints – for example to meet density/efficient use of land) and/or where the green space provided would hold no recreational value to residents.

- 20 years would seem an arbitrary figure with little regard given to the type of strategic open space which is provided.

- Maintenance of open space usually transferred to a management company for the lifetime of the development

- Clarity regarding the provision of outdoor sports provision – can take up a significant amount of space and location on-site may not always be suitable – guidance currently within policy incomplete.

- Green space in the form of outdoor landscaped areas for specialist accommodation and employment must be encouraged. People spend a lot of time at work so the opportunity to get outdoors must be designed in - as per design guidance

- Although Sport England has no issues with a standards approach being used in the relation of green space provision - do not support this approach for the sports covered by the PPS. Neither our playing pitch strategy guidance or our assessing needs and opportunities guidance advocates the use of standards. Local standards do not identify specific needs therefore a strategy based on achieving a local or national standard will not address the needs of that area. Therefore, would recommend that REC 3 point 4 is updated to require the provision of, or contributions for, outdoor sports facilities are informed by the PPS and Sport England’s Sport Pitch Calculator. This is because the PPS takes into account current and future demand and has a specific action plan to ensure the correct facilities are provided in the right locations. Sport England are willing to offer our support to the Council in using these tools.

- Why is there no mention of green space being included in the developments of the four town centre areas discussed in section 9?

- Additional point needs adding regarding open space proposals from “saved” policies/Local Plans e.g. Land adjacent to Booths Mere/Longridge for playing fields (2.4 ha ) and Land at Manchester Road for playing fields (3 ha). This needs putting back in before the new SADPD can accurately replace the saved MBC policies.

- Add in the evidence consultation summary report that was generated following KKP pitch and indoor assessments also add reference to the ACTIVE design principles and see if you can get contributions to a Council Sports facility planning officer.

- Clarify what is meant by green space as compared to open space and sports space. What is a walking circuit or trim trail?
• Excellent that it includes non-residential development. Should also include multi site dwellings such as blocks of flats

• Policy must be adhered to, in conjunction with the requirements of the Bollington Neighbourhood Plan.

• Support for paragraph 11.8

• Support for paragraph 11.9 – so important for workplaces to have outdoor space

• Paragraph 11.10 - Excellent requirement - 40sqm per dwelling for outdoor sport. As space is at such a shortage in Cheshire East it is important that the land itself to provide playing pitches is provided to increase the amount of sports space. Brownfield big sites - also important to keep land back for green open sports recreation space.

• Paragraph 11.11 - Green spaces 2018 update technical data contains some inaccuracies

• Maintenance necessary to prevent next generation loss; support for strategic open space transfer to Council and 20yr commuted sum

**Policy REC 4 ‘Day nurseries’**

*Summary of key points:*

• No comments received

**Policy REC 5 ‘Community facilities’**

*Summary of key points:*

• All community facilities should be retained whether the contribution is positive or not.

• Fails to address the need for new community facilities, which are required in order to meet existing needs and to support ongoing growth

• Policy should seek to retain and propose community facilities.

• The policy should include a further element “development proposals should seek to retain, enhance and maintain (in proportion to their impact) community facilities’ that make a positive contribution to the social or cultural life of a community…”

• People should be encourages to justify their development proposals with community benefit upfront
Chapter 12: Site allocations (general issues)

Summary of key points:

- Sufficient deliverable land should be identified in the SADPD to incorporate flexibility over the plan period.

- Any assumptions on delivery and capacity should be appropriately evidenced, based on input from developers and other parties responsible for housing delivery.

- The spatial distribution of sites should follow the settlement hierarchy set out in CELPS Policy PG2, provide an appropriate development pattern and support sustainable development within all market areas.

- To maximise housing supply the widest possible range of sites by size and market location are required so that housebuilders of all types and sizes have access to suitable land in order to offer the widest possible range of products.

- The Council should over allocate to provide flexibility and contingency for instances when sites do not come forward as envisaged, for example a 20% buffer.

- The lack of progress on the strategic sites affects the Council’s ability to demonstrate a deliverable five year supply.

- The council does not have a 5 year supply of housing land.

- Where a development site is situated adjacent to a watercourse, the Environment Agency request an undeveloped buffer zone of at least 8 metres is provided, measured from the bank top of the river.

- The Environment Agency have no short terms plans for any physical flood defence schemes in Cheshire East at this time, however, they welcome early dialog where development and growth aspirations are unavoidably proposed in areas at risk of flooding that consequently require physical/natural flood defence schemes.

- The Environment Agency require unobstructed access to any ‘main river’ at all times and a minimum of 8m undeveloped buffer zone from top of bank and/or toe of any flood defence for maintenance and emergency purposes. They welcome discussion on any development proposing the deculverting of watercourses.

- Large sites that are located in proximity to the strategic road network (SRN), should be developed in a way that the phasing of development is appropriate to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to make sure there is minimal disruption to existing road users.
• While some sites in the north of the borough may not immediately appear close to the SRN, Cheshire East is characterised by significant levels of cross-borough boundary commuting, particularly into Greater Manchester and the Liverpool City Region, and the impacts of additional growth in northern Cheshire East could be felt on the M60 and other parts of the SRN in Greater Manchester.

• Highways England request that Cheshire East provide details of the likely planning use class that is intended for the employment site allocations in future iterations of the SADPD. This is to gain a better understanding of the potential traffic generation associated with the employment site allocations.

• Clarification is needed as to whether any assessment of the cumulative traffic impact of the site allocations, across the entirety of the borough and taking into account cross-boundary issues with adjacent local authority areas has been undertaken.

• Request for development trajectory of significantly sized sites is provided to indicate the potential traffic impact associated with phased build outs.

• Before allocating any site there would need to be some evaluation of the impact that the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment.

• Where adverse impacts are unavoidable to heritage assets, the Plan should consider how any harm might be mitigated.

• The allocation of sites for development may also present better opportunities for the historic environment.

• Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered.

• Conservation, archaeology and urban design colleagues at the Council should be engaged to ensure awareness of all features of the historic environment and that it is effectively and efficiently considered in policy.

• Suggestion of additional policy wording for sites in relation to sustainable drainage.

**Crewe (general issues)**

**Summary of key points:**

- Several sites submitted for consideration:
  - Land west of Broughton Road, Crewe (housing)
  - Land at Cattle Arch Farm, Crewe (housing)
- Land at Sydney Road, Crewe (housing)
- Land south of Park Road, Willaston (housing, extra care).
- Land off Gresty Lane, Crewe (housing) (part of CFS111)
- Land off Crewe Road and South of Gresty Lane (housing) (part of CFS111)
- Land off Crewe Road near to Rope Lane (housing) (Part of CFS111)
- Land off Crewe Road and Gresty Lane (housing) (CFS111)
- West Crewe Sustainable Urban Extension (housing) (CFS 593 & 304)
- Land to the rear of Hunters Lodge Hotel, Crewe (housing)(CFS 360)
- Land south of Bradley Hall Farm, Crewe (housing) includes CFS 320, 360, 367,369 plus an additional area of land to the south.
- Land at Newcastle Road, Willaston (roadside uses/ housing) (CFS200 &599)
- Land east of Nantwich Road, Crewe (“Crewe West”) (housing) (CFS 310)
- Land north of Sydney Road, Crewe (housing) (CFS 314)
- Land at Herbert Street (housing) (part of CFS89)
- Land north of Cheerbrook Road, Willaston (housing) (CFS 210)

**General comments**

- Insufficient land allocated in Crewe to reflect the settlement’s position at the top of the settlement hierarchy.

- Enough land should be made available for residential development to ensure flexibility/ sufficient choice and competition in the market.

- CELPS allocations are unlikely to deliver in full over the plan period.

- The adopted housing requirement is a minimum; more sites should be allocated to ensure housing needs are met.

- Provision should be made for small sites of 1 hectare or less to meet the NPPF requirement.

- The council has not demonstrated a 5 year housing land supply. Five year housing land supply will be considered at the examination of the SADPD. The buffer to be applied to the calculation of 5 year housing land supply will be at least 10% when the SADPD is examined.
Additional sites should be allocated in the SADPD to accommodate the growth which will be delivered as a result of HS2.

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 identification of further land for new homes will help to support the Councils economic growth and regeneration aspirations for the settlement.

The general size threshold of 5ha or 150 dwellings, identified in the SADPD consultation is an arbitrary size threshold which serves no useful planning purpose and will inhibit the opportunity for wider comprehensive proposals.

An assessment should be carried out of the need for roadside facilities.

The Green Gap should be reviewed to enable land which does not contribute to the Gap to be excluded.

Site 599 has been incorrectly attached to Site 207 and should be reassessed.

Concern over infrastructure needed to support new housing.

If HS2 does not materialise, the housing and employment requirement should be reviewed.

Site allocations should make use of brownfield land.

Query whether any cumulative traffic impact assessment has been carried out of all the site allocations, across the entirety of the borough and taking into account cross-boundary issues with adjacent local authority areas.

The development trajectory of significantly sized sites should be provided to indicate the potential traffic impact associated with phased build outs.

The level of development being proposed within Crewe alongside key development sites in Macclesfield, Handforth, Nantwich and Wardle have the potential to result in a significant traffic impact.

Large sites that are located in proximity to the Strategic Road Network should be phased to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to ensure there is minimal disruption to existing road users.

The majority of proposed site allocations for employment purposes do not set out the final use class that is envisioned will develop the site and this should be clarified.
Site CRE 1 ‘Land at Bentley Motors’

Summary of key points:

- The site contains major water and wastewater infrastructure which should be considered as part of any proposal to redevelop the site.

- The retention of the existing sports facility is supported.

- Cricket may take place at the site. The policy should make provision for a buffer zone of 80m from the crease. If this cannot be accommodated, a ball strike assessment should be carried out as part of a planning application. Any housing layout should also ensure that there is no indirect impact on the functionality and capacity of the playing fields.

- Bentley Motors support the allocation but raise a number of concerns in relation to the detailed wording of the policy, including:
  
  o The requirement to maintain the existing sports facility at the site. This is contrary to the approved masterplan and current outline application.

  o Any walking and cycling routes can be facilitated only on land in their ownership.

  o The reference in the policy to the need to take account of heritage assets, retention of the wide verge and the historical relationship between Pyms Lane and the buildings along it. Bentley comment that there are no listed buildings on site, nor are any buildings on the local list. No additional protection is supported.

Site CRE 2 ‘Land off Gresty Road’

Summary of key points:

- Morning Foods Ltd support the allocation and inclusion of site within settlement boundary however a number of detailed comments are provided in terms of the wording of the policy, including:

  o The requirement to maintain the all of the woodland, this is the only route for foul drainage to discharge of the site to connect to the sewer on Crewe Road.

  o Evidence of tree quality should be provided to justify the requirement to maintain the woodland

  o There is no justification for the requirement to retain/ respect historic field boundaries/ hedgerows.

  o The buffer to be provided along Gresty Brook should be agreed at the planning application stage. It is unnecessary for the policy to specify a particular requirement.
There is no sewer in the eastern part of the site.

Alternative wording is suggested.

Macclesfield (general issues)

Summary of key points:

- Need for flexibility and the consideration of allocating smaller/medium sites

- Council confirmed that it would however consider sites of less than 150 dwellings at the SADPD stage. Client’s site therefore put through the call for sites process in April 2017. It is referred to in the Macclesfield Settlement Report (ref: FD 35) as CFS 106. The SADPD does not propose any allocations in Macclesfield. The Council’s justification for this is that there is no requirement to allocate further sites in Macclesfield because in its view the housing requirement for Macclesfield has already been met by completions, commitments and the strategic sites which were allocated in the CELPS. This is disappointing because it essentially means that our client has had no opportunity to put their site forward for allocation before 2030 and for the Council to properly consider it through the plan-making process. This approach is not justified because the Council has not 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. Further sites should be allocated to assist meeting the housing requirement.

- Request that the new King School site (the Fallibroome Farm site and the existing Derby Fields facilities) is removed from the Green Belt and included in the list at Policy PG11. Alternatively, the site should be given special status within the SADPD to allow additional development to meet educational needs. Request that a site specific policy is developed that will allow the School to undertake work relating to its specific operation as a school, without having to demonstrate very special circumstances for each proposal. No policy in plan allowing additional development to support educational needs.

- If the Council accepts that it has not applied sufficient caution to the housing position at Macclesfield and reasserts the 107 unit supply from the LPS, then it will be incumbent to allocate land on the edge of the settlement boundary and revisit the review of the settlement boundary

- The allocation of the Macclesfield Rugby Union Football Club site is sought for a mixed-use development. State that this would address housing need and identified shortfalls in sporting provision both in Macclesfield and the wider Borough. Policy requirement (CEC Playing Pitch Strategy Assessment Report) for the provision of an artificial grass surface in Macclesfield and this constitutes the only such proposal that will be delivered without direct cost to the Council/taxpayer either in terms of capital or running costs. Delivery of the proposals in this location is entirely logical consistent with the existing cluster of educational, sporting and residential developments which logically should not be located within the Green Belt.
• Information received from Homes England regarding Fence Avenue Housing site - is anticipated the school will relocate out of Fence Avenue and into their new campus during the 2020 summer holiday, with full vacant possession of the site expected by December 2020. It is intended that Homes England will commence formal marketing of the site in late 2018.

• Churchill Way Car Park should be included as a site in the ‘Sites’ section of the FDSADPD and the Policies Map should be amended to reflect this. Policy wording similar to that of Policy MTC7 of the MBLP, but with flexibility for a wider range of uses (including food retailing) would be appropriate (also reported under Policy RET 11).

• Should the planning authority’s detailed examination of committed and allocated sites reveal that they are constrained in some manner, and cannot be relied upon to deliver the assumed level of housing, then detailed consideration should be given to allocating some or all of the representation land at The Tytherington Club

• Whilst our client does not object to any of the site allocations proposed, we consider that additional allocations should be included within the SADPD. Our client therefore wishes to put their site forward as an omission site - Proposed allocation – Land at the former George & Dragon Public House, Higher Hurdsfield

Sites put forward:

- Land at Lark Hall Estate

- Land to the East of Pexhill Road, Macclesfield. (CFS 106) The site could accommodate around 70 dwellings. It forms part of a much larger piece of land which is safeguarded for development beyond 2030 under LPS 19 of the CELPS.

- Land at Gawsworth Road

- Land at Prestbury Road – 5 hectare site (3 hectare net) for up to 90 homes at 30 dph assumed density

- Macclesfield Rugby Union Football Club - The whole site should be allocated (i.e. residential development at the front of the site and rugby club at the rear of the site) or alternatively just the area proposed for residential development

- Land at the Tytherington Club (Manchester Road)

- Former George and Dragon, Higher Hurdsfield (OSRA?)

Alsager (general issues)

Summary of key points:
Several sites put forward for consideration:

- Land off Fanny's Croft (Green Belt, mixed use development of 125 homes and 1,208 m² employment or solely 1,208 m² employment on the north west part of the site) – CFS 406
- Land north of Heath End Farm (housing) – CFS 380
- Land at Close Lane (2ha housing) – CFS 306
- Land off Linley Lane (Green Belt, 230 dwellings) – CFS 295
- Land at Linley Lane and Crewe Road (Green Belt, 20 dwellings) – CFS 218
- Land off Crewe Road (50 dwellings) – CFS 408
- Land at Manor Farm, off Dunnocksfold Road (40ha, dwellings)
- Land off Close Lane (extra care)

Additional sites could meet the needs of Newcastle-under-Lyme, a neighbouring authority with a shortfall in the number of dwellings for the plan area and a history of under-delivering.

There is no flexibility in supply in Alsager if difficulties in delivery are experienced on one or more of the allocated sites.

The allocations for Alsager are all large strategic brownfield sites, with the added complications of timely remediation requirements.

Further housing allocations should be identified in Alsager, incorporating a 10% flexibility allowance for housing provision in Alsager.

The First Draft SADPD fails to follow the Spatial Distribution of Development set out in the Local Plan Strategy in relation to OSRA.

The employment land shortfall has been ignored, which does not meet with Strategic Priority 1.

All reasonable alternative sites have not been considered.

There is an over reliance on the delivery of windfall sites across the ‘Other Settlements and Rural Areas’.

Smaller, non-strategic sites that may be suitable for release from the Green Belt around Alsager should be considered.

The housing target is a minimum, not a maximum target.

The Plan does not allocate any small or medium sized sites in Alsager. It is therefore considered to be unsound and inconsistent with the NPPF.
There is a lack of extra care development in Alsager.

**Congleton (general issues)**

**Summary of key points:**

- Support for the employment allocation in LPS 27 (Congleton Business Park Site). The area allocated as employment should not be considered for a mix of uses.

- Support for LPS 26 (Radnor Park) object to clause K of policy with reference to Jodrell Bank. Council should be very clear and robust that the allocations in the Plan stand and will be delivered.

- Further information provided for the following sites:
  - CFS 447 (Land adj to the River Dane)
  - CFS 448 (Land adj to Viking Way)
  - CFS 449 (HMRC site, off Viking Way)
  - CFS 220 (Land off Giantswood Lane)
  - CFS 374 (Belbro Farm)
  - CFS 434 (Sandbach Road)
  - CFS 607 (Land off Chelford Road)
  - CFS 56 (112 Broadhurst Lane)
  - CFS 439 (Land East of Moss Lane)
  - CFS 430 (Land at Waggs Road / Fol Hollow)

- New site submissions have been received, as follows:
  - Land to the north of Sandbach Road
  - Danebank Mill, Congleton

- Further site allocations needed in Congleton as current approach is dependent on strategic sites delivery.

- Further site allocations are required to support affordable housing delivery in the town.

- Figure in the adopted Plan presented as a minimum and support the need for further site allocations in the town.
Site CNG 1 ‘Land off Alexandria Way’

Summary of key points:

- No comments have been received regarding this site.

Handforth (general issues)

Summary of key points:

- Several sites put forward for consideration:
  - Knowle House
  - Clay Lane (Green Belt, 50 homes)
  - Dean Dale Farm (Green Belt, 150 homes)

- The remaining requirement for Handforth should be met through further allocations.

- Not meeting the local need deprives the town of affordable housing units and leads to less sustainable patterns of development and increased travel.

- The commitments in Handforth are largely provided in the Growth Village which is a large-scale development that will be delivered over the longer plan period.

- The policy does not accord with the NPPF.

- The level of development being proposed in Handforth will have the potential to result in a significant traffic impact.

Knutsford (general issues)

Summary of key points:

- Several sites put forward for consideration:
  - Land to the south of Lilybrook Drive Knutsford
  - Land East of Oakleigh
  - Land at Booths Park
  - Moorside Car Park
  - Land to the west of Toft Road

- The failure to allocate any additional sites within and around Knutsford to meet employment, housing, retail and other land use requirements leads to
the possibility of the SADPD being rendered unsound, as the development requirements of Knutsford will not be sufficiently met. We urge the Council to re-look at this as a matter of urgency as part of the next stage of the SADPD, where there will also be a need to re-assess the green belt boundaries around Knutsford given insufficient brownfield land being available.

- We propose that Moorside Car Park is allocated for residential use (C3), specialist care apartments (C2) or alternatively as employment land to assist Knutsford in meeting its needs. Without prejudice to this, the site should also be considered as safeguarded land to meet development needs beyond 2030. We consider that Moorside Car Park should be removed from the Green Belt in any event. The site comprises previously developed land which is contained by permanent transport infrastructure (the road and the railway line) on all sides. The site does not serve any Green Belt purpose and should be released from the Green Belt.

- Proposed allocation – land west of Toft Road, Knutsford. Our client’s site should have been considered as a separate parcel to KN01. It is surprising that the Green Belt Assessment Update did not seek to do so. In our view, had it been considered separately, it would not have been identified as having a ‘major contribution’. We request that this is addressed as part of the further Green Belt Assessment through the SADPD process.

- Bruntwood is seeking that land at Booths Park be allocated in the SADPD for residential development to deliver high quality homes to help meet local need and pent up demand in the early part of the Plan period. Furthermore, it is seeking that a policy is introduced through the monitoring and implementation framework indicators which ensures that Safeguarded sites are considered to be brought forward for earlier housing delivery on a settlement by settlement basis, if the strategic residential allocations are for any reason delayed. At the very least, there should be a policy-led approach that requires safeguarded land to be released before Green Belt sites are released. These two amendments would help ensure that a Positive and Effective Plan is prepared, with greater flexibility to ensure that the key objective of delivering the objectively assessed need is achieved.

**Middlewich (general issues)**

**Summary of key points:**

- Several sites submitted for consideration:
  - Land adjacent to Watersmeet, Nantwich Road, Middlewich
  - Land at Centurion Way, Middlewich (CFS 635)
  - Tetton Lane, Middlewich (CFS 387)
  - Land east and west of Croxton Lane, Middlewich (CFS 600)
  - Cledford Lagoon, Middlewich (CFS 164)
General comments

- Insufficient land allocated in Middlewich to meet the housing requirement.
- Reliance on large-scale sites to deliver the majority of housing in Middlewich poses deliverability risks particularly 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.
- Middlewich is an important settlement for growth. It is the closest Local Service Centre to Crewe which is due to see significant economic growth over the next 20 years with the building of HS2. It is likely that both Middlewich and Crewe will need to accommodate additional housing growth above that set out in the Local Plan Strategy and the draft Site Allocations document within the next few years.
- MID2 is an inferior site to that submitted at Centurion Way. The only ‘red lights’ in the site assessment for Centurion Way apply equally to many of the site allocations within Cheshire East. Housing needs cannot be met without utilising such sites.
- Query whether any cumulative traffic impact assessment has been carried out of all the site allocations, across the entirety of the borough and taking into account cross-boundary issues with adjacent local authority areas.
- The development trajectory of significantly sized sites should be provided to indicate the potential traffic impact associated with phased build outs.
- The largest employment site over the plan period is LPS 44 ‘Midpoint 18’ in Middlewich. Access to the SRN from Middlewich is generally obtained via accessing M6 J18, and therefore the development of the ‘Midpoint 18’ site has the potential for a significant traffic impact on this SRN junction.
- Large sites that are located in proximity to the Strategic Road Network should be phased to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to ensure there is minimal disruption to existing road users.
- The majority of proposed site allocations for employment purposes do not set out the final use class that is envisioned will develop the site and this should be clarified.

Site MID 1 ‘Land off St. Ann’s Road’

Summary of key points:

- The proposed capacity and viability of the site will have to be substantiated in view of the numerous site-specific constraints.
Site MID 2 ‘East and west of Croxton Lane’

Summary of key points:

- A gravity sewer runs through the allocation. Any applicant will need to establish a detailed constraints plan.

- The site is adjacent to the Trent & Mersey Canal towpath and the Canal is within a Conservation Area. Development of the site should embody the requirements of Policy INF12.

- The towpath should be considered as part of the public realm and pedestrian access provided.

- Opportunities for surface water drainage to the canal should be considered.

- The allocation of the site is supported and it is suitable and sustainable location for residential development. The removal of the site from the open countryside is supported.

- The Middlewich Settlement Report (FD36) provides a traffic light assessment of the site. This identifies two ‘red light’ issues which would equally apply to alternative sites. There are also a number of amber issues with no evidence that these can be resolved.

- The site would have a severe impact upon settlement character and urban form. The site would result in an intrusive incursion adjacent to the settlement.

- The site would compromise the rural character of the Trent and Mersey Conservation Area, resulting in harm to a heritage asset.

- The site would be next to a household refuse depot and conflicts arising from noise and odour.

- The site is inappropriate being next to a household refuse depot and conflicts arising from noise and odour.

- The allocation is unsound because it is not justified, effective or consistent with national policy.

Nantwich (general issues)

Summary of key points:

- A site at Broad Lane Nantwich is being promoted

- A site on land at Audlem Road, Nantwich is being promoted (it already has permission and is at Reserved Matters stage).

- The emerging site allocations documents needs to provide more flexibility to ensure that housing needs are met in the short term in Nantwich. Broad Lane represents a suitable and sustainable site which can be delivered in the short terms and should therefore be allocated for housing. The figures set out within the adopted and emerging policies is a minimum, therefore Cheshire East
Council is encouraged to allocate more sites to ensure housing needs are met.

- Muller Property Group object to the non-inclusion of the sites listed below. Land to the south of Nantwich, between Peter Destapleigh Way and Broad Lane Stapeley.

- The level of development being proposed within Crewe alongside key development sites in Macclesfield, Handforth, Nantwich and Wardle have the potential to result in a significant traffic impact. Large sites that are located in proximity to the Strategic Road Network, should be developed in a way that the phasing of development is appropriate to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to ensure there is minimal disruption to existing road users.

**Poynton (general issues)**

**Summary of key points:**

- Several sites put forward for consideration:
  - Land east of Waterloo Road, Poynton (150 dwellings, Green Belt) – CFS 418
  - Land at Woodleigh, 77 Chester Road, Poynton (20-40 dwellings, Green Belt) – CFS 560
  - Land Adjacent to Lostock Hall Road, Poynton (80-100 units, Green Belt) - CFS 562 and 565
  - Lostock Hall Farm, Poynton (10-15 dwellings, hotel, business and leisure uses, Green Belt) – Most of CFS 563
  - Land south of Glastonbury Drive, Poynton (30-35 dwellings, Green Belt) – CFS 329
  - Towers Yard Farm, Towers Road, Poynton (30 dwellings, Green Belt) – CFS 51

- Concerns that the current draft site allocations in the SADPD will not deliver the number of dwellings anticipated in the Local Plan Strategy and therefore the Council should identify alternative ‘contingency’ sites.

- The Poynton Settlement Report does not make reference to omission sites.

- The Poynton sites in the First Draft SADPD are subject to issues that could cause significant delay.

- Request for amends to the traffic light assessment for CFS 205 Hope Green Cottage, Poynton.
• Request for Poynton Town Council’s submission to be rejected as it is not supported by a revised Poynton Neighbourhood Plan.

• The population growth figures for Cheshire East are now evidenced to be less than those used for the LPS, equating to 22,840 homes over the plan period; the housing requirement and flexibility factor for Poynton needs to be adjusted.

• 2017 data for housing and employment completions, take-up and commitments has been used in the Poynton Settlement Report.

• Rejecting CFS 412 on the grounds of lower probability of flooding compared to other sites is not a valid reason for rejecting the site.

• The absence of any further loss of Green Belt at Poynton for housing development in the SADPD is welcomed.

Site PYT 1 ‘Poynton Sports Club’

Summary of key points:

• No evidence in the SADPD to say that Poynton Sports Club is surplus to requirements or that its redevelopment has the support of Sport England.

• The site is a green lung in the heart of the community that is highly valued.

• No evidence to say that the site can deliver 80 dwellings.

• No evidence to indicate that an operator of the sports club has been identified or any interest expressed.

• A buffer of no less than 10 metres to the woodland on the north and east of the site does not take into account the existing site specifics.

• Suggestion of additional policy criteria with regards to the establishment of an appropriate relationship with the trees as part of a planning application, informed by a detailed Arboricultural Assessment.

• The allocation 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.

• To have Poynton Sports Club fully operational from PYT 2 prior to the commencement of development on PYT1 has the potential to significantly delay the delivery of housing on site PYT2.

• The Policy is premature, unjustified, unsound, flawed and fails to accord with the provisions of national planning policy and guidance, and is not compliant.

• The Plan should acknowledge and recognise Safeguarded Land as identified in the Local Plan Policy PG4.
- The remaining 200 dwellings should include windfall sites.
- The Environment Agency has no specific infrastructure requirements for the site.
- Poynton recently experienced flooding in 2016 with ordinary watercourse run-off identified as a causative factor; further advice should be sought from the Lead Local Flood Authority.
- The policy does not take into account the actions and recommendations made in the evidence base; suggestion that the policy is reworded to state that an enhanced facility should be provided in line with the BFS recommendations and PPS action plan.
- Using this site for residential development does not have the support of Poynton residents that were consulted on the pre submission 2016 Poynton Neighbourhood Plan.
- There is no need to relocate the Poynton Sports Club and that improvement to the sports facilities and the grounds can be made on the existing site.
- If Poynton Sports Club relocated, the existing site could be retained as open space.
- Traffic impact accessing the site has not been given enough weight.
- Poynton Sports Club has a restrictive covenant in perpetuity, dating back from when it was bequeathed from the Vernon Estate, protecting this from other uses and most especially from development.
- The site would align with the latest proposals in the Poynton Neighbourhood Plan.
- The site does not meet all of the necessary criteria.
- The junction at Glastonbury Road is difficult to negotiate as it has no roundabout island or light system in place. Further traffic at this point would need to include a traffic control or signalling point.

**Site PYT 2 ‘Land north of Glastonbury Drive’**

**Summary of key points:**

- No evidence to indicate that an operator of the sports club has been identified or any interest expressed.
- The NPPF (2012 and 2018) identifies that outdoor sport and recreation, including associated buildings is not inappropriate development in the Green Belt, and that Local Authorities should plan positively to enhance the beneficial use of the Green Belt such as promoting access opportunities for outdoor sport and recreation.
The extent of the allocation should reflect at minimum the land that is under option and required for the relocation proposal, and also follow the topography and boundaries on the ground.

A Grampian condition that covers the relocation and redevelopment should be added into the policy wording.

Criterion 5 should be deleted as all developments have a right to be connected to a sewer.

Criterion 7 does not fully reflect the NPPF; it should be amended to reflect the wording in paragraph 45 of the NPPF.

The policy needs to be clarified so that it reads clearly i.e. consistency with names used in PYT 1.

The policy does not reference the leisure facilities that will be lost by the allocation of PYT 1.

The policy makes no reference to the additional requirements for sport and leisure facilities set out by the Council’s evidence base.

Using this site for provision of sports facilities does not have the support of Poynton residents that were consulted on the pre submission 2016 Poynton Neighbourhood Plan.

The site functions as an important barrier between Poynton and the Stockport, Hazel Grove area.

Concerns with the impact on biodiversity, flora and fauna in relation to Poynton Brook (wildlife corridor), Poynton Pool (significant wildlife value) and deciduous woodland (priority habitat), from noise levels, lighting and hard surfaces.

Traffic impact has not been assessed.

The site is significantly larger than the current Poynton Sports Club.

The proposed buffer of 8m is not sufficient to safeguard the ecology network.

The development of the existing sports field was reject by the inspector at the enquiry as it was proposed and submitted by the Poynton Neighbourhood Plan.

Moving the sports club and facilities to the school site where a leisure club exists already would be a better alternative of assisting school funding and encouraging sports in schools.

Surface water runoff from the proposed artificial surfaces and ground works cannot be accommodated by Poynton Brook, which is already susceptible to flooding.
• Cub house and changing facilities for such a commercial sports centre would be unacceptable in any form in the Green Belt.

• Noise levels will be worse than those from the SEMMS route.

• Flood lights will create an unacceptable spread of light.

• The site would align with the latest proposals in the Poynton Neighbourhood Plan.

• The proposal does not meet in full the conditions set out in policy RUR 6 of the SADPD and policies PG3 and PG6 of the Cheshire East LPS.

• A countryside location is not necessary (other non-countryside sites are available in Poynton).

• The proposal will unacceptably affect the landscape character of the area and does not preserve the openness of the Green Belt.

• The proposal conflicts with PG 3, which conditions the need for retention of gaps between settlements.

• There is inadequate infrastructure now and proposed to accommodate further development.

• The view from the A532 is irrelevant when you are proposing developing the Green Belt as the road does not need protection and nor do the people driving along this route.

Site PYT 3 ‘Land at Poynton High School’

Summary of key points:

• The main water easement and large gravity sewer in the site boundary will affect the deliverability of any development proposals.

• There is no evidence that alternative land has been identified to replace the lost playing field.

• There is no indication that the proposals that would result in the loss of in-use playing fields have the support of Sport England.

• The requirements of the policy are strict as there is no facility in the policy that would allow for a financial contribution to deliver the alternative playing field as opposed to a physical provision.

• Concerns that the site won’t deliver 25 dwellings.

• No discussions have taken place with the Poynton Sports Club or Jones Homes in relation to off-setting any playing field loss at Poynton High School on Poynton Sports Club’s relocation site, which will be privately owned land.
and is being purchased with the full intention of meeting Poynton Sports Club's existing and growing needs; not further deficiencies elsewhere.

- There should be no assumption that there is 'spare land' available in the Poynton Sports Club relocation site.

- Poynton High School should demonstrate the ability to address planning policy and Sport England's requirements by securing appropriate land to provide equal or better facilities than those being lost.

- Poynton Sports Club's relocation site is the correct place for a 3G pitch as the Club will have the firm funding to deliver it.

- The provision of a 3G pitch at Poynton High School is dependent on generating the funds. The prospect for funding is dependent on whether there is spare, allotted, capital available once Vernon Infant School has been sold.

- The sale of Vernon School has not taken place.

- Query as to whether it has been demonstrated 25 units can be achieved with associated on site open space/affordable housing policy requirements, that land sale would fund the 3G pitch and 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 as the school cannot rely on any other funding.

- The water main easement located on the southern boundary of the site should be considered as part of any future proposal.

- The site includes water and wastewater infrastructure; any applicant should clearly establish a detailed constraints plan to inform any development layout.

- The proposed loss of school playing fields is contrary to the Government’s national priority agenda of promoting physical activity in children.

- Poynton has an identified shortfall of sports facilities, including grass football pitches.

- Development of the site would prevent the school from meeting the sports needs of its future pupils.

- The site should be retained for improvements/future expansion of the Leisure Centre.

- The allocation is premature.

- The playing field offers visual amenity; there is no evidence base to support the loss.
The requirement to re-provide the existing sports facilities on the site offers protection, it is positive that the policy refers to the PPS and mentions the requirement of a sinking fund and FA testing should a 3G pitch be provided.

The policy could be amended to allow for improvement or enhancement of the sports facilities to address some of the recommendations contained in the PPS action plan to meet current and additional demand created by the new housing provision.

Policy amendments suggested with regards to ball strike and effects on the functionality and capacity of the playing field.

For playing fields to be allocated for development a replacement site should be identified and allocated.

If the loss is offset by transfer to site PYT2 it will increase the size of the sport facilities at PYT2, and will mean that the school will have to provide for managing the movement of children to and from PYT2, which raises safety issues

The sewer and water mains and open space provision will reduce the developable area, leading to a high-density development, which may be out of character with the local area.

The ability to deliver the development depends on the ability of PHS to provide alternative provision for the sports facility lost. The funding and ability to meet planning policy and Sport England’s tests regarding the loss of the sports facility are not demonstrated.

The site would not align with the latest proposals in the Poynton Neighbourhood Plan as there is some potential for a conflict with the emerging policies for the retention of existing playing fields in the Poynton Neighbourhood Plan.

**Site PYT 4 ‘Former Vernon Infants School’**

**Summary of key points:**

- The playing fields are still used by local members of the community; a local football club uses the location.

- It is presumed that any redevelopment would also restrict on-site parking for use by future residents only and not to be used by people accessing the playing fields.

- A very high-density scheme would seem at odds with the character of the surrounding area.

- There is no indication whether an alternative location for the playing field has been found or whether Sport England has approved the proposals in principle.
There is no facility in the policy that would allow for a financial contribution to deliver the alternative playing field as opposed to a physical provision, so the requirements of the policy are strict.

No discussion has taken place with Poynton Sports Club/Jones Homes in relation to off-setting any playing field loss at Vernon School on Poynton Sports Club's relocation site, which will be privately owned land and is being purchased with the full intention of meeting Poynton Sports Club's existing and growing needs.

There should be no assumption that there is capacity at the Poynton Sports club relocation site to accommodate further shortfalls generated by the proposal at Vernon infant school.

It should be demonstrated national, local and Sport England's policy requirements in relation to loss of playing fields can be met without relying on facilities at the Poynton Sports Club Relocation site.

The draft Neighbourhood Plan states that the site would only deliver 25 dwellings.

The supporting information makes reference to a culvert running through the site and confirms that the route has not been identified as yet, which has the potential to be a significant constraint.

Any development proposal that offers to deculvert this section of the watercourse is welcomed and adequate justification should be provided should an alternative course of action be taken.

Support for the policy requirement to re-provide the existing sports facilities on the site as this offers protection and it is positive that the policy refers to the PPS.

The policy could be amended to allow for improvement or enhancement of the sports facilities to address some of the recommendations contained in the PPS action plan to meet current and additional demand created by the new housing provision.

Policy amendments suggested with regards to ball strike and effects on the functionality and capacity of the playing field.

For playing fields to be allocated for development a replacement site should be identified and allocated.

If the loss is offset by transfer to site PYT2 it will increase the size of the sport facilities at PYT2.

A good case could be put forward for reopening this building to function as a school in order to meet the increasing demand for school places as a consequence of the new housing developments.
The delivery of the allocation is in doubt as there is 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 site would align with the latest proposals in the Poynton Neighbourhood Plan.

Sandbach (general issues)

Summary of key points:

- Whilst the Council's position is that no further residential development is required in Sandbach to meet the minimum housing requirement for the settlement, the figure set out in policy PG 7 of the CELPS is not a ceiling and additional allocations would assist the Council in being able to meet the 36,000 dwelling figure.

- More housing is required to: assist in terms of the five year housing land supply; to accommodate the dwellings which were to be provided on the larger strategic sites but will now not be delivered in the plan period; to provide flexibility in the event that HS2 is committed to come to Crewe by 2027; to assist the Council in meeting the requirement to identify 10% of the housing requirement on sites of 1 ha or less; and to acknowledge the continuing need to boost the supply of housing generally and because the requirement should be regarded as a minimum.

- There is no information on land situated to the south of the Arclid Brook towards Heath Road which is identified as LPS53. This site should not be allocated in the new Local Plan/the allocation should be removed.

- The development of housing in Sandbach has already exceeded expected development levels; there is therefore no requirement for this additional housing allocation at LPS53.

- Several sites put forward for consideration:
  - Land to the rear of Park Lane and Crewe Road.
  - Land South of Old Mill Road, Sandbach
  - Land at The Hill, Sandbach (these sites are located to the east of Sandbach and are to the north and south of The Hill (A533), off School Lane and Houndings Lane).
  - Marsh Green Farm, Vicarage Lane, Sandbach
  - Land west of Bradwall Road, Sandbach
  - Land to the rear of Twemlow Avenue and Malborough Drive, Sandbach. This should be included within the settlement boundary.
Wilmslow (general issues)

Summary of key points:

- Several sites put forward for consideration:
  - Land at Stockton Road/Welton Drive
  - Land at Rotherwood Road (Green Belt, 22 homes)
  - Land at Maple Farm, Strawberry Lane (4.3ha, housing)
  - Land at Rotherwood Road (Green Belt, 26 homes)
  - Land at Mobberley Road and Sandy Lane (Green Belt, 20 homes)
  - Land at Sunny Bank Farm

- The Council is placing undue reliance on a snapshot of housing land supply to inform decisions that will continue to take effect until 2030.

Alderley Edge (general issues)

Summary of key points:

- Several sites put forward for consideration:
  - Land to the north of Beech Road (Green Belt, 75 homes) - CFS 130b
  - Land at Mayfield, Wilmslow Road (Green Belt, 8-10 homes, 0.35ha)
  - Additional land at Ryleys Farm, Chelford Road
  - Whitehall Meadow, Wilmslow Road (Green Belt, 50 homes, 3.4ha)
  - Land to the west of Heyes Lane (Green Belt, housing) – CFS 366
  - Land to the west of Congleton Road (Green Belt, housing) – CFS 359/400
  - Land to the east of Heyes Lane (Green Belt, housing) – CFS 370

- CFS 130b and ALD 2 should be assessed as the same for settlement boundary impact.

- Flood zones 2 and 3 do not cover the whole of CFS 130b.

- The number of dwellings and safeguarded land to be distributed to Alderley Edge should be increased.

- Insufficient land has been identified to meet the 250 homes requirement.
The housing requirement for Alderley Edge is disproportionately low and is not commensurate with its scale and function.

Alderley Edge is not so constrained environmentally that it could not deliver any development.

Allocations should be made in Alderley Edge consistent with the LPS ‘flexibility factor’ for LCS of an additional 193 dwellings.

There is no clear rationale or explanation of reasons for accepting site ALD4 while rejecting Whitehall Meadow.

The land at Whitehall Meadow does not form an ‘essential gap’ between Alderley Edge and Wilmslow.

With a strengthening of the site boundaries with further tree planting, it is considered that land to the west of Heyes Lane should be placed in a lower Green Belt contribution category.

Access opportunities from Congleton Road are available for land to the west of Congleton Road.

During the consultation process for the Bypass, the residents of Alderley Edge were given assurances that there would be no “Infill Building” between the current housing areas at the time and the Bypass.

Assurances were given that Wilmslow and Alderley Edge would not be allowed to be joined up by development projects.

Land for development should be allocated on a “Brownfield First” basis and that land should only be considered for release from the Green Belt once this option has been exhausted.

Development of Green Belt should only be supported where the development makes a direct and positive contribution to local infrastructure needs as identified in the Neighbourhood Plan.

The junction at Brook Lane and Wilmslow Road should have a mini roundabout or traffic lights, and the A34 should have more exits, enabling parents taking and collecting their children to and from school to avoid driving into the village.

Alderley Edge currently suffers from limited resources (parking, infrastructure and schools) for its population.

**Site ALD 1 ‘Land adjacent to Jenny Heyes’**

**Summary of key points:**
• Developers should be required to provide affordable housing in the village boundary in compliance with the Local Plan, deliver exceptional standards of design and incorporate effective technologies to help reduce CO2 emissions

• Heyes Lane is already a very busy road and the proposed site is adjacent to a 60 mph section.

• This end of Heyes Lane from Granthams shop to Hough Lane is very narrow, with many parked cars and some degree of rush hour traffic to the Emerson Offices.

• The new access point is not safely achievable; this site is not deliverable as there is no safe vehicular and pedestrian access point to the land.

• Constraints and the need to propose a development on the site that respects its surroundings on the Green Belt fringe means there is no prospect that the site could deliver 10 dwellings.

• The site is remote from existing transport and social infrastructure.

• The potential flood risk constraints means that there may be viability issues to delivery and/or a reduced quantum of development on the site with little or no opportunity to provide affordable housing.

• The site is of such small scale that there is no opportunity to provide any other complementary uses on the land.

Site ALD 2 ‘Ryleys Farm, north of Chelford Road’

Summary of key points:

• Development of the site may lead to disproportionate traffic impact on one part of the village; Congestion will cause serious problem as it will funnel higher volumes of traffic through school areas and into the centre of the village with no simple option of accessing the A34.

• The site assessment states that it is enclosed by development on two sides. In reality this is not the case, with the site bounded by agricultural land on three sides, albeit with a farmhouse on a short part of one side, and a semi-rural road on one short side.

• The site boundary should be amended to accommodate vehicular access to the appropriate standards.

• The site should be extended to accommodate more dwellings, provide a stronger and durable Green Belt boundary.

• There is scope to reduce the landscape buffer in relation to the impact on heritage assets.
• The site has a poor relationship with the existing urban area and would not represent rounding off of the settlement pattern.

• The boundaries of the site are less well contained leading to potential further encroachment into open countryside.

• The scale of development proposed on the site is in excess of that supported by the local community and parish council who would prefer to see smaller allocations around the town.

• There are no proposals to provide any public car parking in the site, nor would it be appropriate to do so given the relative distance of the land from the railway station and the heart of the town centre.

• The proposal appears to concentrate almost the entire allocation of new housing in a single site, with one builder, which fails to provide the variety of styles, sizes and designs required to maintain the village character and heritage.

• Concern regarding air pollution, harm to heritage assets and their setting and impact on infrastructure.

• A sufficient space for an environmental barrier should be allowed between the houses and existing property.

• The impact of the proposed development on Landscape, Settlement Character and Urban Form has not been accurately assessed.

Safeguarded land ALD 3 ‘Ryleys Farm (safeguarded)’

Summary of key points:

• In relation to the site assessment, the site is not bounded on 2 sides.

• Concern regarding the impact on heritage assets, traffic, air pollution, infrastructure,

• The proposal appears to concentrate almost the entire allocation of new housing in a single site, with one builder, which fails to provide the variety of styles, sizes and designs required to maintain the village character and heritage.

• The impact of the proposed development on Landscape, Settlement Character and Urban Form has not been accurately assessed.

• A substantial green barrier should be retained between the proposed houses and the current safeguarded Green Belt that surrounds the edge of Sutton Road, Haddon Close and Wilton Crescent.
Safeguarded land ALD 4 ‘Land at Horseshoe Lane’

Summary of key points:

- The site is brownfield and forms part of the curtilage of an active commercial use.

- The majority of the site cannot be safeguarded for future development as it is already developed.

- ALD 4 is 1.12ha, not 0.75ha as stated in the policy. The existing buildings, and the approved associated car parking and landscaping areas within the premises’ immediate surrounds, accommodates circa 0.8ha of the 1.12ha total.

- The development was originally an agricultural usage and changed to office. It is in a residential area and was granted planning permission on the basis that there was no activity outside 8am to 6pm to disrupt the community. This caveat should remain in place.

Audlem (general issues)

Summary of key points:

- Parish Council broadly supportive of policy. However there is concern about the development of a 2 metre wide footway from the development site to the junction with Heathfield Road. Little Heath Green is also designated as a protected green space. In addition there is no footpath on the east side of Cheshire Street on the other side of Heathfield Road.

- Designation of Audlem as a Local Service Centre is supported.

Site AUD 1 ‘Land South of Birds Nest’

Summary of key points:

- The previous application to build 20 houses on the site was refused by Cheshire East Council and dismissed at appeal. Why are both these decisions now being challenged?

- The 2m wide footpath was previously withdrawn. Why is it being proposed again? A more sensible solution to the village access would be to form a pedestrian crossing from near the end of Heathfield Road going west side of Cheshire Street.

- The green is designated Open Space in the Audlem Neighbourhood Plan and as Amenity Greenspace in Cheshire East’s Open Spaces Assessment 2012. This should be left alone.
On the previous application it was considered essential to provide a 2m wide wildlife corridor along the length of the boundary between the two fields and further to the south and adjacent field to the east. A road between the two would render the wildlife corridor ineffective.

**Site AUD 2 ‘East View’**

**Summary of key points:**

- On the previous application it was considered essential to provide a 2m wide wildlife corridor. A road or footpath between the two fields would nullify its effect and require the possible removal of trees/hedging, ditch and pond. The corridor was required for all wildlife and not just newts.

**Bollington (general issues)**

**Summary of key points:**

- See BOL 1 for a comprehensive summary of general points also

- More sites should be allocated in the Draft SADPD

- Support for draft allocation BOL 3 by owner who confirms that the site benefits from access rights via Greenfield Road. Furthermore, the road is wide enough to accommodate vehicles.

- Owners of Hollin Hall Hotel wish to put forward their land for removal from the Green Belt and allocation of a small parcel of the land for residential development

- Various residents suggest the BC Transport site as a possible mixed-use site - the firm BC Transport was sold to a large national haulier, Kinaxia Logistics, who currently own a total of nine companies, including BC Transport and William Kirk Ltd., who are based on the nearby Adlington Trading Estate with much better access to main roads. Suggest that the company will seek to obtain the highest efficiency and will look for opportunities to rationalise its operations. Suggest that the company has indicated that it will seek to move the BC Transport operation to a more convenient location and hence the site owners will seek to dispose of the site within the remaining period of the Local Plan.

- Vacant properties in town

- Bollington Town Council – comprehensive representation covering the following (also reflects many of the points raised by residents):
  - The approach towards allocating housing numbers to the various Local Service Centres – considered defective
  - Need for more involvement of Town Council
Call for sites process - Despite the deficiencies of relying only on sites submitted in response to the call for sites, significantly larger numbers of potential sites have been submitted in LSCs other than Bollington, which have lower levels of constraint including Green Belt category than Bollington. In some cases, comments have been submitted in connection with other LSCs expressing the view that they need a higher level of development.

Density – Bollington high density compared to other LSCs

The Town Council feels that a more appropriate allocation for Bollington would be between 330 - 350 dwellings, which with 318 approved and built would leave between 12 and 32 to build before 2030

Failure to demonstrate special circumstances re green belt release

Failure to observe the Bollington Neighbourhood Plan

ONS figures mean figure of 400 should be revisited

Dwellings at East Tytherington should be counted

Needs consideration of types of housing and design

Sites put forward will exacerbate traffic and safety problems

Traffic Light Assessments flawed

Clough Bank BC Transport - It is essential that CEC/BTC hold discussions with Kinaxia, the site owners and their planning advisers to establish their intentions over the next 12 years. It should also be noted that the Neighbourhood Plan will require “no net loss of employment numbers” and a mixed-use approach to developing the land but this should not be difficult on this large site.

Site BOL 3 – concern re access

Site BOL 4 – unacceptable to review GB assessment (major to significant), traffic concerns and landscape

Site BOL 1 and 2 - concerns re contamination, drainage, highways, ecology, separation of Bollington Cross & Lowerhouse, previous 2013 SHLAA rating was unsuitable, private land at Springbank

Ample opportunity to meet needs through brownfield sites

- Consultation portal ridiculously obstructive and difficult to use

- Proposals instigated by developers; why only look at sites put forward by developers
• Not local need housing
• Special nature of Bollington should be retained
• Proximity to Peak District
• No explanation regarding why new housing/development good for business and employment

• If the envisaged 400 houses cannot be built without taking Bollington green belt this is not a problem because there is no intrinsic reason why they are needed in Bollington. Many sites in the North of East Cheshire would be as good or better for commuting to Greater Manchester/Stockport and so lower value sites can be selected

• Bus service data out of date
• Capacity of the settlement is the key issue
• Lack of open space
• 350 houses more than adequate – need justification for 400

• Sites put forward:
  o Land at Shrigley Road (amended site boundary) – site put forward for mixed use development including 38 houses (including affordable)
  o Land at Dyers Court Mill Pond, Ingersley Vale, Bollington
  o Land at Hollin Hall Hotel
  o Land at Jackson lane and Grimshaw Lane (2 parcels)

**Site BOL 1 ‘Land at Henshall Road’**

• Summary of key points:

  Owner of site supports the allocation and has provided detailed supporting information both previously as part of the Call for Sites exercise in April 2017 and SHLAA information in March 2017. This previous information is summarised in the representation. New information considers flooding and drainage, the sewer crossing the site and the site’s impact on the Green Belt.

  o Flooding and drainage: As United Utilities had made comments regarding the wastewater system, the owner has commissioned a site specific drainage assessment. This states that any development of the site could be delivered without increasing flood risk elsewhere, and flow control could be used with on site attenuation to accommodate storm events up to and including the 1 in 100 year plus climate change event. With regard to foul drainage, the attached report includes a pre-
development enquiry response from United Utilities, who confirm that “foul will be allowed to drain to the public combined / foul sewer network at an unrestricted rate/ The connection(s) to the public sewer can be at a point(s) convenient to yourself”. The report by Waterco confirms that gravity discharge appears to be feasible.

- **Sewer:** Regarding the sewer crossing the site any future development could be laid out and provided to facilitate any necessary easements that may be required. Now that additional drainage information has been obtained from United Utilities, the masterplan will be updated to demonstrate that the sewer that crosses the site would not act as an impediment to any future development of the proposed allocation and that the site continues to be a deliverable allocation.

- **Green Belt:** Should the site be removed from the Green Belt, then boundaries to the Green Belt would be readily recognisable and permanent. Extensive residential development already exists to the south, west and east of the site, and the northern boundary of the site is constrained by its topography and a group of mature trees. These constraints form a natural line between the periphery of the existing development of Hall Hill to the west and Springbank to the east, providing a natural “rounding off” of the settlement in this location.

- **In conclusion** - 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. It is therefore respectfully requested that the LPA continue to propose BOL1 as a housing allocation in the next draft of the Site Allocations DPD

- **United Utilities** – concerns about wastewater infrastructure; first preference would be other sites within the Borough under consideration but welcome early dialogue to discuss concerns; imperative that any proposal is for foul only flows connecting to the public sewer. There is wastewater infrastructure that passes through these sites and therefore it will be important that any applicant clearly establishes a detailed constraints plan to inform any development layouts.

- **There are drainage issues with large drainage pipes/culverts under the sites and United Utilities have stated that they would prefer development to take place on other sites.**

- **There is persistent local flooding on the north east side adjacent to Springbank**

- **Object strongly to the proposal by Cheshire East Council (CEC) to take the parcels of land identified as BOL1,2,3,4 out of the green belt as shown in the Sites Allocation Development Policies Document. This plan does not clearly state exceptional circumstances for the use of green belt and has not adequately evidenced nor justified these proposed alterations with their supporting documents**
• The suitability assessments of the sites are flawed and inaccurate, not enough detail has been ascertained on the strains on the current infrastructure, including roads/schools/medical and the environmental/ecological issues.

• Green Belt reasons for objection:
  o These sites act as a check for the urban sprawl of Bollington.
  o Prevent the distinct areas of Bollington from merging into each other.
  o Provide green areas within the urban confines of Bollington.
  o Provide green areas for recreation
  o The green belt as it is, promotes urban regeneration by the recycling of derelict urban land.
  o From previous documents, the sites are referred to as Sites BT11, and BT19, were assessed independently as having a significant contribution to the green belt. (CEC Green Belt Assessment 2015).
  o There is absolutely no case for release of Green Belt land for development. Any such release will lead to unacceptable overdevelopment and destruction of the amenities of the town.
  o Many more potential development sites were submitted for a number of the other Local Service Centres than for Bollington in the SADPD ‘Call for Sites’ exercise and other Local Service Centres have more lower grade Green Belt areas than Bollington. The required total of 3,500 houses can easily be found from other sites without any need to release Green belt at significant or major grading in Bollington.
  o No attempt appears to have made to look for alternative sites that have been proposed following the Call For Sites a year ago in other LSAs that have lower gradings of Green Belt allocated to them.
  o The traffic light assessments to assess the level of Green Belt do not appear to place enough weighting on the landscape, environmental issues and therefore, health and well-being on the existing local population.

• Infrastructure concerns:
  o The infrastructure of Bollington has not been upgraded in respect of growth in the last 25 years.
  o Bollington Cross and Dean Valley schools are heavily subscribed and additional dwellings will add pressure upon the schools and surrounding infrastructure. Including GP surgery.
The Constraints to Development put the figure at ZERO, and there is no amount of other factors that can fit housing into an infrastructure and service provision that can take ZERO more new builds. Bollington’s water system, for example is SINGLE pipe, not double; it is therefore already over used and should not be taking additional load.

- Housing figure for Bollington questioned /Housing Issues:
  
  o 400 houses seems to be an arbitrary figure that is not adequately derived by CEC in their discussions.

  o The Spatial Distribution Disaggregation Report (FD05) is contradictory and contains errors. Statements are made, and numbers produced, without any method shown as to how they have been derived.

  o The allocation of 400 dwellings in Bollington is overwhelmingly out of proportion when the density of population is considered. It is vital that you demonstrate a transparent review of the proposed allocations in other Local Service Centres that are less densely populated. (Bollington has the highest housing density of the Local Service Centres at 5.92 dwellings/hectare, whereas Prestbury has a housing density of 1.24 houses/hectare, Chelford 1.24 houses/hectare, and Alderley Edge 5.83 houses/hectare.)

  o It should be noted that this site was included in the 2013 SHLAA considerations and was ranked as unsuitable, not achievable and not developable though available

  o Over the 8-year period of the Plan since 2010, sites have been found in Bollington for commitments of 318 houses, approximating 40 houses/year. There is a further 12 years to go in the Plan and other brownfield, windfall and infill sites are certain to come forward to meet the reasonable and appropriate development needs of the town.

  o The allocation of 400 houses to Bollington is unfair and out of proportion to the proposed allocations for other Local Service Centres: In particular, it is ridiculous that Bollington should be allocated 400 houses and has already had to accept commitments of 318 houses 40% of the way through the Plan period when Prestbury has been allocated an overall total of 130 houses, Alderley Edge 250 houses, Chelford 235 houses and Disley 258 houses for the whole plan period.

  o Serious deterioration of the town over the last 15 years brought about by rapid over-development.

  o Justification for housing figure was based on the ONS population predictions which have since been revised downwards.

  o The NP assessment of future needs has been revisited and now finds a figure of 350 houses more than adequate for future requirements, including allowance for an ageing population.
Each of the six numerical options for calculating the division of 3,500 dwellings between the 13 Local Service Centres is flawed, and the seventh option adopted is completely arbitrary. Insufficient account is taken of constraints and previous history.

No attempt whatever has been made in the SADPD part of the CEC Local Plan to assess the actual development needs of Bollington. The whole exercise is based on dividing up the allocation of 3,500 dwellings between the Local Service Centres without consideration of what is best for each of them. They have only considered sites submitted by owners/developers in the 'Call for Sites' and not tried to identify the most suitable places.

There is no need for Bollington to accommodate additional housing, as evidenced by the considerable length of time existing properties take to sell, in some cases as much as several years. Whilst landowners will obviously wish to build it is not clear where the demand to purchase such houses will come from. I would also note that the substantial number of houses recently built in Bollington West but misallocated to Macclesfield’s share would, if correctly attributed, meet the entirely arbitrary quota for Bollington without further permissions being required. That the council is not minded to correct this misallocation does not alter the fact that these houses have been built in Bollington.

If the arbitrary quota for housing is to be met it makes more sense to build where needed (closer to the areas, such as Stockport and Manchester, that they will ultimately serve).

- Highway issues:
  - Safe road access to the sites is difficult and additional houses would make this worse. Particularly when exiting onto the single main road through Bollington.
  - Highways access to both (Hall Hill) sites will significantly exacerbate already significant traffic problems.
  - The addition of 40 houses with say 2 cars/house exiting onto the main B5090 road with restricted sight lines on a bend will exacerbate traffic safety and congestion.
  - The main arterial road is lined throughout with houses that do not have facilities for parking. This leads to the necessity for house owners to park on the main road and this combined with the increasing numbers of cars travelling through the town is leading to localised congestion and pollution particularly affecting those that live in the immediate facility.
  - Need for new roads as well as houses.
In addition, there is only footpath on one side of the main Bollington road at this point, access for school children walking to Tytherington School is required, as part of the local transport strategy. This has not been considered alongside the increase in traffic flow through Bollington putting extra risk on those children walking to school.

- More traffic dangerous for cyclists

- Brownfield sites:

  - Within the Local Plan period 2010-2030 Bollington has built more dwellings than required, and any future housing needs can be met from brownfield sites, as indicated in the Bollington Neighbourhood Plan. Have the right density of housing @ circa 6 per hectare.

  - Within the next decade, brownfield sites will become available, should there be a rational and appropriate need for development in Bollington.

  - BC Transport Site: In the next few years, the BC Transport site is rumoured to becoming available for redevelopment. Certainly local discussions have taken place, and the council have been involved, yet this has failed to be taken into account. This site could link up with other sites and provide a regeneration corridor through Bollington. (Brownfield development should come before greenbelt!)

  - Use derelict buildings

  - The SADPD should consider other sites that have not been submitted by developers and interested parties that do not encroach on greenbelt. For example, what is happening to the site of St John’s Church on Church Street? There are surely other brownfield sites in Bollington that can be utilised.

- Ecology/Environment:

  - In the survey by Cheshire Wild Life Trust for the Neighbourhood Plan, the whole of the site was assessed as being a wild life corridor and having medium habitat distinctiveness with high distinctiveness in the northern part. Ecologically rich.

  - Migration to and from Hall Hill to the Lowerhouse Pool area of hundreds of frogs and toads. Should building be carried out their habitat would be lost. In addition, there are many bats who feed on the insects around Hall Hill. We cannot afford to lose any more of the animals and invertebrates that inhabit our town. I wonder if a survey of the flora and fauna on Hall Hill has been carried out?

  - Is one of Bollington’s precious green lungs of which there is a deficit.

  - Separates Bollington Cross from Bollington and Lowerhouse wish to retain land as part of its historic value.
The proposed development would result in the unnecessary destruction of hundreds of large mature trees together with the associated wildlife habitat. The removal of the trees would also have a significant effect on the visual attractiveness of the surrounding area.

It is important to note that nightingales are regular summer visitors to the Hall Hill site.

The site supports priority habitats and semi-natural habitats of medium distinctiveness. Any proposals to develop this site must be accompanied by a detailed ecological appraisal undertaken at the appropriate time of year. In line with Local Plan Policy SE3 and national planning guidance (as set out in the NPPF 2018) the areas of priority habitat should be retained, enhanced and buffered. (CWT)

A biodiversity net gain assessment for the proposed development should be undertaken (NPPF 174b and 175d) and the residual impacts should be calculated, including any indirect impacts. We advise that due to the presence of extensive areas of semi-natural habitat the overall impact is likely to be substantial and it is unlikely that this could be mitigated/compensated for on site. Off site provision will probably be required to ensure net gain for biodiversity in line with the relevant planning policies and published guidance (Local Plan policy SE3, NPPF paragraphs 118a, 170d, 174b, 175d, 25 Year Plan for the Environment Chapter 1, policy 1 - Michael Gove 2018, Nerc Act 2006). (CWT)

- Contamination:
  
  The site is heavily contaminated with chemicals and rusting drums from its previous use for tipping by Bollington Print Works up to about 1980.

  During a local Bollington meeting, it was stated that metal drums were stacked 50 drums high on top of each other. These containers include contaminants arsenic, cadmium, and other inks containing a multitude of toxic heavy metals. Residents remember witnessing the dumping of pipe lagging which was contaminated with asbestos.

  Suggest cyanide among the contaminants

  A stream leaches toxic waste from the higher Henshall Lane site to the lower Ashbrook road site.

  Contaminated land issue – will affect insurance and ability to get mortgages

  Concerned that disturbance of the ground for new house building will adversely affect existing neighbouring residences.
If extensive restoration required will affect costs and sale of properties so may be fewer affordable homes plus remediation works will result in increased traffic movements

- Bollington has made a Neighbourhood Plan, which has been accepted in a local referendum by a substantial majority. Within the plan, over 90% of the people who responded from Bollington have stated categorically that they don’t want the green belt to be built upon.

- No account is taken of the Neighbourhood Plan findings concerning this piece of land as a separator between the historic communities of Bollington Cross, Bollington and Lowerhouse or of the results of the Questionnaire in which over 70% of respondents considered it very important, important or were neutral that this site was an important open space and over 65% of respondents disagreed strongly, disagreed or were neutral that development should be permitted on this area.

- Neighbourhood Plan ignored.

- The CEC Plan is in conflict with the Bollington NP Policies in the following sections:
  - VI, Community Attributes
  - HO.PI, HO. P2, HO.P3, HO.P4, New dwellings, Housing Location/allocation, Housing type and design
  - EGB.PI, Released Green Belt
  - NE.PI, NE.P2 Natural environment and
  - MA.PI Moving around.

- It should be noted that a public meeting was held at Bollington Cross School May 2016 at which the owner's agent presented plans for developing this site with 36 bungalows. The meeting was attended by about 80 persons and there was total opposition to the proposals by those present.

- The natural boundary for any useable part of this site (for community or other use) is a line between the corner of the Hall Hill housing estate and the southern side of the turning head at the end of Springbank at No. 28 Springbank. The strip of land between the site and Springbank is privately owned and there is no possibility of access to this site from Springbank.

- It also appears to be highly likely that a further “landgrab” of site CFS352 from existing Green Belt would be initiated in the future since it forms part of the same overall green area.

- Please withdraw the CEC proposals for green belt alterations in Bollington.

- Re-instate the railway
On the issue of lowering our carbon footprint: in order to meet our climate targets we should not be building new fossil-fuel dependent housing. We should be looking for conversions of existing structures and use of brownfield. Any new build should be geared to renewable energies and sustainable build designs.

Against green belt development - Bollington is on the edge of the peak district and has a large number of visitors to the village who enjoy the fact it is a characterful village with green spaces within it and around it to enjoy.

Support - agree that the Henshall Road site (561) should be developed. Over the last twenty or thirty years, this site has become overgrown and is now something of an eyesore. The current owner has, perhaps deliberately, let the site deteriorate, and building houses on it would improve the environment. As a quid pro quo for the windfall of his land being approved as building land, the owner should be required to restore site 352, rebuild the wall running down Moss Brow, and donate the land to Bollington.

Site BOL 2 ‘Land at Greg Avenue/Ashbrook Road’

Summary of key points:

- See BOL 1 for general points regarding green belt, infrastructure, housing figures etc.

- The junction of Ashbrook Road and Henshall Road is highly dangerous and any additional traffic on Ashbrook Road would aggravate both this and the junctions with Springbank and West Close.

- The natural boundary for any useable part of this site (for community or other use) is a line between the corners of the Greg Avenue and Springbank housing estates. The wooded close to the west of this line is part of a wild life corridor having medium habitat distinctiveness with some high distinctiveness. Animals such as badgers, foxes and bats are frequently seen in the area.

- The wild life on this green field site is more diverse than the Middlewood Way. Distinctive wet and dry grassland creates micro habitats. Insect life is prolific including, elephant hawk moths, cinnabar moths, six spotted burnetts, small blues, to name just a few. Mammals and bird life is thriving - nightingales, wood peckers, tree creepers, nut hatches, Cliff chaffs, red kites, sparrow hawks, peregrines, buzzards and tawny owls thrive. The ecosystem this space creates is significant and adds to the nature corridors which support wildlife. A healthy population of amphibians exist in the wet parts of the field.

- Many residents use this field for recreation and have done for years. The green spaces in Bollington are short of the governments recommended allowance.

- The proposed site will require access via Ashbrook Rd, this road is already beset by parking problems from residents’ cars. The decision to site the Veterinary Services in Ashbrook road has worsened the situation. In the
evenings a number of cars from residents of Henshall Road (a main road on which they choose not to park) further accentuate the problem. Access for emergency vehicles would be severely limited by this parking. At times it can prove difficult to get a car through the parked cars.

- This site has very restrictive access particularly the Ashbrook Road end. When Ashbrook Road was developed the developers built driveways which are so steep cars are unable to park safely. Cars become a danger to pedestrians as vehicles slip down these slopes very easily. Therefore the only option available is parking on the road. When cars are parked upon both sides of the bottom part of the road it leaves half a cars gap in-between. This is prohibitive to accessing the said site.

- Resident suggests that the fire station have also suggested that Greg Avenue would be a problem with access for them.

- It is noted that Ashbrook Avenue is rated as Amber in the CFS352a allocation and acknowledged as narrow. On this basis, it is again surprising that the same access is given a Green rating for this site. The use of Ashbrook Avenue would be extremely problematic for refuse and emergency vehicle access. A turning head would need to be provided which would have a significant impact upon the developable land within the site. Due to the length of Ashbrook Avenue and its potential to be blocked by on-street parking, a further emergency access should be provided via Greg Avenue but this is presumably subject to third party land constraints. It is considered that a more suitable rating for this site would be 'Amber'.

- Traffic again a problem whether via Ashbrook Road or Greg Avenue. I ask you again more traffic on a narrow road with 2 schools, one nursery, a fire station, a mill and a tip at the bottom. This is lunacy from a safety point.

- Drainage - parts of Ashbrook Road already suffer from major problems requiring many call outs to suppliers to attend and rectify the problems. To add further housing on to the end of this sewage/water system would cause further more serious problems.

- Again highly unsuitable for building with bogs springs and lots of sinking mud.

- Underground stream

- The water courses run across the site originating from the old tip. Contaminates of organic and inorganic chemicals will have seeped into the Ashbrook Road site over many years. Residents playing in the tip when open have highlighted the chemicals they saw being dumped. Arsenic, printing inks, millpond waste from Shrigley Dyers and asbestos stripped from the pipes of mills in Bollington. Late night unregulated dumping of chemical waste happened regularly.

- Metal drums were piled fifty high, containing contaminates which will be eroding and leaching its poisonous cocktail downhill towards the Ashbrook site.
In the past the developer has had the site tested for methane release which we believe presented him with serious difficulties historically.

Flooding regularly happens at the bottom end of Ashbrook road as the culvert and drainage systems have caused the utilities endless problems.

A school is situated close to this site excavating the land would pose a serious health risk to children.

Other brownfield sites must be developed before green-belt sites are built upon - Macclesfield has such areas in its town centre that must be used first before the Green Belt is used for housing

Site BOL 3 ‘Land at Oak Lane/Greenfield Road’

Summary of key points:

- see BOL 1 for general points
- This site has been the subject of repeated pressure from the owner for release from the Green Belt for some years. This has been resisted on the principle that it lies in the Green Belt. In the traffic light assessment, item 16 (Greenfield) is ranked red, items 2, 6, 11 and 13 are ranked amber and all other items green. There is considerable doubt about suitable access to this site and opposition from local residents to the potential additional congestion that would be caused on Greenfield Road
- Possible sighting of Great Crested Newt that requires investigation
- Suggestion that there is an old mine under the site and no right of access
- Greenfield Road is very narrow with parked cars therefore difficult to navigate – more housing will exacerbate traffic problems
- Severe ecological and environmental impact
- Response from owners of land that may be required to facilitate access: “The purpose of this letter is to bring to your attention that we are the owners of the land that will be required for access and potentially also for drainage, and that we have not been approached or consulted in any way by the promotor and specifically we did not consent to this land being included in any response to the call for sites. That said, we can confirm that if the site does receive an allocation and come forward for residential development we may reluctantly, and subject to contract, allow our land to be included.”
- Previous refusals for permission
- Loss of green lung land/open space
- Increased traffic – affects those walking children to school or walking to work
• Overdevelopment of site

• Overlooking for surrounding properties

• Why change a lovely bridle track down to the canal which horse riders use and walkers and runners

• How can you accommodate the houses and retain boundary trees and hedges and widen track

• If houses must be built is not possible to build fewer and at the very least include a small play area for the local children to enjoy, safe in the knowledge they won't get run over? A couple of swings, a slide and a roundabout are all that would be required, as a minimum, and that could easily be installed within the boundary of a small house. This would benefit the local area for years to come

• Will any widening of the track incur into the “preservation area” of Kerridge?

• Land has a Kerridge address and should not qualify to meeting Bollington’s needs

• This comment rebuts the Traffic Light Assessment score issued for Highways Access for Site BOL 3:
  
  o The limitations of access to this plot are acknowledged in the Traffic Light Assessment but I would rate these as more severe than the ‘Amber’ score given in the assessment. There is an existing ‘pinch point’ at the junction with Greenfield Drive adjacent to no. 37 which prevents two cars passing or the required forward visibility to form safe access. The ‘pinch point’ is approximately 3.7m wide which is insufficient for two cars to pass (as outlined in Manual for Streets page 79). To provide the required forward visibility and widening discussed above would either require third party land through the acquisition of part of the driveway to no. 37 Greenfield Road, or further incursion into greenbelt land. Both of these are unlikely to be achievable and on this basis I would suggest a more appropriate score for highways access would be ‘Red’.

• Support for allocation of site from owner for the following reasons:
  
  o Logical infill and rounding off opportunity; fills in gap and rounds off settlement

  o Site surrounded on three sides by existing built development and settlement boundaries

  o Long history regarding possible release of site – considered for release in 1994

  o Defensible green belt boundary would be established along the track
Site BOL 4 ‘Land to the east of 41a Shrigley Road’

Summary of key points:

- The site behind 41a Shrigley Road lies in the Peak Park Fringe and was assessed in the Arup Green Belt Review as part of parcel BT01 and graded as making a major contribution to the Green Belt. It is unacceptable that CEC should seek to peel off a part of a site assessed by independent consultants and revise the grading downwards to suit an unjustified housing allocation. This site is at the northern end of Bollington and any development here will lead to increased traffic flow through the length of the Town.

The traffic problems along Shrigley Road are huge, with heavy lorries trying to pass parked cars. Building more housing at 41A Shrigley Road would make the problem much worse, with an exit road from the site needed to join Shrigley Rd. In particular, the proposed site to the rear of 41a Shrigley Road (15 dwellings) will exacerbate an already congested parking situation on Shrigley Road. Presently parking extends as far as the former abattoir site effectively rendering a significant length of Shrigley Road as a single track. The addition of 15 dwellings is likely to further increase the number of vehicles that are parked on the road taking into account the vehicles per property in addition to visitor's vehicles. This potentially would encourage parking on both sides of the road and inevitable encroachment onto the pavement. This is currently evident on Shrigley Road outside properties 9 to 15 up to the post box.

- The land was for many years a hen farm & flower farm & has recently been used to graze sheep and chickens; the Valley sweeps down from Charles Head, via the Harrop Valley and on into Bollington - Imagine this with a block of 15 houses stuck in the centre of it; would be sorry to see our lovely countryside spoilt

- The drains are ancient and probably inadequate.

- Concerns regarding removal of additional sewerage and surface water. In periods of moderate rainfall the sewer in Shrigley Road is severely stressed
resulting in heavy water flows down the road gutters. Concern with respect to development of more dwellings up Shrigley Road is the aspect of water removal by a sewer which is clearly inadequate for current flow rates without any loading from additional property development.

- The development behind 41a Shrigley Road makes inroads into an area identified some years ago as prime green belt and the protection of it, along with other green belt, was included in the Bollington Local Plan, subsequently accepted/adopted by CEC

- This is not a case of rounding off the Green Belt boundary where there is existing development on 3 sides of the land - this proposed development has heritage-style houses to the west side, a Listed Building to the south, and open countryside to the north and east. The proposed development would actually produce a spur of housing jutting out into the Green Belt which would be particularly visible from Shrigley Road. There would be no natural boundary to the north, and it would open up the way for further development of the remainder of BT01 in another "rounding-up" exercise.

- This area of Bollington (like the rest of it) has a chronic parking problem and most house-holders in Shrigley Road are forced to park up the road in a line as far as the old abattoir. At peak travel times and during waste-collections, the resulting single lane working with almost no passing places can lead to severe congestion and long delays - often drivers resort to mounting and running along the pavement to pass each other. Another 30 more cars commuting through Bollington to the main road will not help.

- This would be very much a "Backland Development" subject to Housing Policy HOU 8 and 10 which calls amongst other things for sympathetic development with the existing surroundings - this is unlikely be achieved: a) the existing dwellings would lose a great deal of their privacy, light and outlook, b) there would be an increase in "human noise-pollution" at the back of the dwellings, c) the look of the new dwellings is unlikely to blend in effectively with the existing styles and the Old Vicarage.

- Prominent site – will take many years for trees to screen site.

- Increase in hardstanding and reduction of natural habitats

- Design – need to be in keeping with traditional Bollington style

- The service infrastructure in Bollington dates back up to 200 years adding more stress to this will merely cause further breakdowns, note water pipes bursting several times in last few years on corner of Church Street and Ingersley Vale and the emergency work about to start on Palmerston Street amongst others

- The site is essential for local wildlife with owls, foxes, badgers, squirrels, hares and bats regularly seen in the area in question
• Conservation Area will be impacted by the development; re-enforcement of wire fencing insufficient to mitigate impact

• The area of this site is included as significant ecologically in the Bollington Neighbourhood Plan.

• This comment rebuts the Traffic Light Assessment score issued for Highways Access for Site BOL 4 in the supporting documentation.
  
  o The rating of ‘Green’ for highways and access in this location is considered to be overly optimistic.
  
  o May be reliant on third party ownership
  
  o Visibility splays of 2.4m x 43m (in accordance with Manual for Streets) - would be required from the site access point. In the southbound direction it is likely that vehicle speeds will exceed this as they travel on a downhill gradient and the 43m distance may need to be increased.
  
  o Parking restrictions may be needed
  
  o On the above basis, we would consider that ‘access would be difficult to achieve’ would be a more accurate description and on this basis it should be awarded a ‘Red’ score

• The pavement needs improving to be safe, especially if more starter homes for young families are to be built on the site - which I certainly think they should

• Concerns regarding conflict of traffic around the bus stop

• This site lies adjacent to a Local Wildlife Site designated for its species-rich grassland, deciduous woodland and the aquatic habitats associated with Sowcar brook. Any proposals should ensure there are no indirect impacts on the Local Wildlife Site. These may include light pollution, invasive species introduction (via the disposal of garden waste), polluted ground water run-off, or predation by domestic pets. We advise that to reduce the indirect impacts a buffer zone of at least 15m is required. A biodiversity net gain assessment for the proposed development should be undertaken (NPPF 174b and 175d) and the residual impacts should be calculated, including any indirect impacts. Any residual impacts following mitigation will need to be addressed so that biodiversity net gain is achieved in line with local and national planning policies (NPPF 118a, 170d, 174b, 175d, Local Plan policy SE3, 25 Year Plan for the Environment Chapter 1, policy 1, Nerc Act 2006). (CWT)

Bunbury (general issues)

Summary of key points:

• The proposed settlement boundary should be amended to include Bunbury Heath
• Given Bunbury’s limited services, provision of 110 dwellings is too high. This should be a maximum of 60, with the remaining allotted to Shavington.

• The following sites should not be included within the proposed settlement boundary:
  o Bunbury Playing Fields
  o paddock between the extant permissions at Land off, Hill Close, and no.6 Bunbury Lane

• Several sites have been put forward for consideration:
  o land to the south of Bunbury
  o land adjacent to Wyche House

Chelford (general issues)

Summary of key points:

• Additional information submitted for site CFS 342 (Mere Hills Farm) including a response to the Council’s Green Belt Site Assessment

General comments

• Chelford has already received its quota of new homes

• Dissatisfaction with approach to safeguarded land in relation to the following matters:
  o Approach to reallocating Bollington’s safeguarded land requirements to Chelford
  o Level of safeguarded land allocated has no relationship to the future needs of Chelford
  o Approach is not reflective of the ‘hybrid option’ in the spatial distribution report
  o Selection of safeguarded land site (CFD2) on basis of location, scale, loss of Green Belt land and highways impacts

• No justification for the overall numbers allocated to Chelford.

• Decision making is neither objective nor justified in the evidence. Examples include the weight attributed to the Red/Amber/Green ratings applied to sites and other relevant factors that influenced decision making.

• Some of the terminology used in the reports requires further definition and explanation.
- Chelford does not have the relevant services to cope with an increase in population
- Levels of development proposed do not fit with the vision for a local service centre – ‘modest increase’
- Chelford’s current planned total of housing, represents a 36% increase in housing stock and population, which will rise to 40% should the proposed site off Knutsford Road go ahead.

**Site CFD 1 ‘Land off Knutsford Road’**

**Summary of key points:**
- Site promoter has provided further information regarding site CFD 1

**General comments**
- Land should remain as car parking alongside the bowling green & local shops used by the community
- Object to the development of the site, as it is in Green Belt
- Limited difference, in Green Belt terms, from site CFD 1 and CFS 342 at Mere Hills Farm
- Pressure on local surgery and cumulative impact on traffic and general infrastructure

**Safeguarded land CFD 2 ‘Land east of Chelford Railway Station’**

**Summary of key points:**
- Further information has been provided by the site promotor

**General comments**
- 7.8 hectares and the loss of Green Belt land is excessive
- The number of houses that could be built on this land would have a significant impact on Chelford which is a relatively small village with little infrastructure. The size of this safeguarded land could increase the number of houses again by yet another 50-70% which is unacceptable.
- Dangerous from road safety aspects
- Proposal would result in a loss of agricultural land
- Impact on services and local infrastructure will be considerable. Current housing developments in Chelford will already result in an increase of over
40% in the housing stock and the village would not benefit from more large scale development

- Large scale development in Chelford will increase out commuting and will turn into a dormitory village. The majority of out commuting does not occur via public transport but by private car.

- Suggestion that linkages could be made to the main settlement areas through a railway line crossing would place a large cost on development.

- The land east of the railway line has no access to main sewers. Again this would enhance developer costs. Such costs would do little to meet a reduction in the housing affordability ratio for Chelford.

- The decision to add additional land in Chelford as safeguarded because of a loss of such sites in Bollington bears little resemblance to objectivity.

- The distinction between major and significant contributions to green belt is unclear and made all the more confusing by the everyday definition of significant which suggests having a major effect.

- Development on this land will impact negatively on the settlement character and urban form, the visual amenity, its openness and character and on the character of the village

- Mitigation as an answer is simply a means of deflecting attention away from the fundamental planning issues

- The scenario painted by the planners on how Chelford would benefit from more large scale development, is over optimistic and speculativ

- A study of the cumulative effects of developments on the road network is desperately required

**Disley (general issues)**

**Summary of key points:**

- Several sites put forward for consideration:
  - Bentside Farm Parcel A (part of CFS 112)
  - Bentside Farm Parcel B (part of CFS 113)
  - Lymewood Drive (CFS 275 plus possible extra land)

- A bypass or tunnel is needed to address pollution levels in Disley centre.

- Brownfield sites should be considered.
The air quality at Redhouse Lane / A6 junction is already unacceptable and more houses would make this worse.

Local schools are over capacity.

Nurseries, doctors and dentists are all full.

With the new road links and employment opportunities at Manchester Airport the demand for housing in Disley will go up.

**Site DIS 1 ‘Greystones Allotments’**

**Summary of key points:**

- Object on the grounds that a replacement site for the allotments would have to be found and this would have to be in the Green Belt. There are other sites in the Green Belt that are preferable in terms of access to services and facilities.

- The replacement sites identified by the parish council all make a major contribution to the Green Belt and one is not nearby.

- Although not in the Green Belt, the replacement allotments would still require development in the Green Belt.

- The parish council has stated that there is no guarantee that the site will actually be developed.

- There are other sites available in more sustainable locations.

- The site is constrained by traffic and railway noise as well as air quality.

- Replacement allotments would have an impact on plot holders; soil quality should be considered; plot holders should be consulted about the replacement.

- There is no problem with drainage or parking for the allotments at this site.

**Safeguarded land DIS 2 ‘Cloughside Farm’**

**Summary of key points:**

- Release of Green Belt would set a precedent for more Green Belt land to be developed in Disley and beyond.

- Access is difficult; the access point is between two blind corners. It is not clear whether a suitable access can be created.

- The canal bridge is old and narrow; visibility is poor; it is unsuitable for construction traffic; parking is difficult; the local road network is made up of country lanes and is unsuitable.
Concerns over safety issues on Redhouse Lane.

Pedestrian access is difficult; the current lane is dangerous for walkers.

The air quality at Redhouse Lane / A6 junction is already unacceptable (AQMA) and more houses would make this worse as well as the new A6-Manchester Airport road.

The new houses south of the canal have already increased traffic levels; the new traffic lights cause congestion and pollution issues.

Local schools are over capacity.

Nurseries, doctors and dentists are all full.

There is flooding on Waterside Road and more houses will impact on the drainage.

Ecology issues. The land currently supports wildlife including badgers, weasels and deer.

The land is in agricultural use.

Building here would spoil the scenic views; impact of development on the character of the canal.

This is a popular area for walking and cycling.

There are other sites available which are more accessible to the services and facilities in Disley.

The canal forms a current defensible Green Belt boundary.

Impacts on White Cottage which is a listed building.

The fields lie downhill of the canal bank and excavation of this area could cause rupture of the canal bank; the area is at risk of flooding if the canal breaks its banks.

The verdant valley of the Goyt in this area is a valuable asset.

The neighbourhood plan seeks no release of Green Belt.

**Goostrey (general issues)**

**Summary of key points:**

- One site put forward for consideration:
  - Land adjacent to 51 Main Road (6 dwellings) - CFS 296
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.

Goostrey should have further development to accord with the Local Plan Strategy and the Framework.

The population figure was queried.

Haslington (general issues)

Summary of key points:

- Land east of Slaughter Hill should be considered for allocation (CFS195) to meet the requirement for Haslington.

Holmes Chapel (general issues)

Summary of key points:

- Several sites put forward for consideration:
  - Land north and south of Middlewich Road (22ha mixed use inc 6.8ha residential, 10.9ha employment) – CFS 425
  - Land east of Manor Lane (flexible use area – B1, B2, B8, C1, C2, C3, D1, D2) – part of CFS 108 and CFS 272
  - Land at London Road (north of Recipharm) (brownfield, housing)
  - Land at London Road (north of Dunkirk Farm) (70 dwellings) – part of CFS 139, 140 and 257
  - Land off Manor Lane (specialist homes, 4.37ha) – CFS 428
  - Land south of Middlewich Road (housing and employment, 49.3ha) – includes all of CFS 280 and CFS 421 and part of CFS 425

- Holmes Chapel is the Local Service Centre with the most capacity for growth.

- The SADPD should enable the delivery of growth to Holmes Chapel and seek to safeguard land to address the fundamental concerns relating to the settlements’ highways infrastructure, and other principal infrastructure concerns.

- The vision for Holmes Chapel is flawed and short-sighted as it allocates housing and employment land that has already been granted or is already a commitment.

- Holmes Chapel’s role is far more akin to a Key Service Centre than a Local Service Centre.
Holmes Chapel has the capacity to grow, but the existing village centre has limited green space, is extremely short of parking facilities, and is heavily built up, so there is an acute need to expand in both an eastern and western direction to accommodate this growth.

A significant proportion of the housing commitments for Holmes Chapel only benefit from outline permission.

An appropriate level of flexibility should be provided locally to meet housing need, to account for the realistic probability that not all existing planning commitments will come forward in the plan period.

There should be no further significant development permitted in Holmes Chapel until a full appraisal of the Village’s current infrastructure and facilities has been undertaken and proposals for augmenting those, in line with projected additional demand, have been developed and agreed.

Concerns that the expected pupil growth has not been considered correctly.

Holmes Chapel possesses limited constraints to further development.

Holmes Chapel is the most sustainable settlement in the LSC tier.

The community aspires for Holmes Chapel to grow and develop into a Key Service Centre.

The community has identified development needs through the Neighbourhood Plan 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.

**Site HCH 1 ‘Land east of London Road’**

**Summary of key points:**

- Suggested policy wording amendment to criterion 4 to better reflect the Council’s intention regarding cycling connectivity.

- Concern that the approach taken in terms of site selection and proposed end-use constrains the scope of economic and employment growth that could otherwise be attracted to Holmes Chapel, and brings into question the responsiveness of the SADPD towards meeting identified employment needs.

- It is unclear what area of the site would be needed by Sanofi for its expansion, and if and when any expansion would actually take place.

- The allocation simply responds to the needs of one particular industry.

- Workers living in Holmes Chapel, not employed in the pharmaceutical industry, will have no option other than to continue to travel greater distances out of Holmes Chapel to access job (as no other new jobs will be provided for).
It will increase the reliance of Holmes Chapel on the pharmaceutical industry, effectively seeing the settlement evolve into a one industry settlement (if Sanofi were to expand).

There has been a loss of several employment sites across the settlement in recent years.

The future expansion on Sanofi could be secured by way of a planning application, as per Bentley.

Sanofi Aventis and its related land are now owned by Recipharm.

The allocation should be extended to include the large field to the north east, otherwise a long term view is not taken about future employment land development requirements.

**Mobberley (general issues)**

**Summary of key points:**

- Several sites submitted for consideration:
  - Pavement Lane Mobberley
  - Land off Ilford Way Mobberley
  - Knutsford Road Mobberley
  - Ryecroft Lane, land south of Mobberley

- The decision not to propose allocated sites for housing sites in Mobberley, based on the potential impact of aircraft noise, without presenting robust conclusions from an aircraft noise assessment, questions the soundness of the plan.

- Site being prompted at Ryecroft Lane, land south of Mobberley land interest, 4.45ha Capable of delivering 180 or C2

- These representations seek to allocate the land east of Pavement Lane for new residential development between the southern edge of the existing defined settlement and the north side of Pavement Lane Farm which consists of barns which have been converted into dwellings

- Land at Ilford Way Mobberley represents an important underused brownfield development resource that offers the potential to deliver employment and residential and potentially other uses in the form of a high quality mixed use sustainable development.

- Land at Warford Park, Faulkners Lane, Mobberley and specifically the proposed allocation of land for C2 purposes.
Prestbury (general issues)

Summary of key points:

- Several sites put forward for consideration:
  - Land off Heybridge Lane, Prestbury Road (CFS 331a)
  - Area A, land at Bridge Green (CFS 154)
  - Area B, land at Bridge Green (CFS 155)
  - The Bowery (CFS 391 plot 4 plus additional land)
  - Butley Heights (CFS 391 plot 5 plus additional land)
  - Land at Heybridge Lane (PH Properties) (new site)
  - Land north of Withinlee Road (CFS 576)
  - Yew Tree Barns (part of site CFS 331b)
  - Land off Macclesfield Road, Prestbury (part of site CFS 331b)
  - Abbey Mill extension (CFS 58)
  - Oaklands, Heybridge Lane (CFS 331a plus additional land)

- The allocations proposed in Prestbury are insufficient to meet the residual needs of the settlement.

- A flexibility factor should be applied to the requirements for Prestbury.

- Further housing sites are required in Prestbury.

- The housing requirement for Prestbury should be increased.

- The Prestbury housing requirement should be expressed as a minimum, not “in the order of”.

- Object to the proposed Abbey Mill extension development (CFS 58): traffic implications; parking issues; safety concerns; loss of Green Belt; ecology issues; currently used for leisure uses; air pollution.

- Support for the Cognatum scheme to deliver retirement homes and a new car park for the bowling club (CFS 58)

- There is a need for starter homes and affordable family housing in Prestbury.

- The lack of employment sites undermines the sustainability of the village.
There have only been 18 completions so far in the plan period. Demolitions are common in Prestbury and the net completions figure may be lower than 18.

There is a need to allocate land for self-build plots in Prestbury.

A number of representation seek removal the of Green Belt designation from particular sites.

The site selection process is over reliant on the call for sites exercise and should be more proactive in bringing forward brownfield sites.

The plan takes insufficient account of developments nearby in Greater Manchester (e.g. Woodford).

The commitments and completions data shows that Prestbury is on target to meet its 130 requirement without site allocations.

Objection to the loss of Green Belt at the King’s School site.

The highways network in Prestbury is under considerable strain at peak hours and highway improvements and new developments will create a fundamental change in travel routes to the north and south of Prestbury.

Safe pedestrian access to sites and amenities must be kept at the forefront of the process.

The density of the Prestbury character areas should be respected.

Given the reduced housing requirement under the government’s standard methodology and the ‘in the order’ wording in the LPS and SADPD, there is no absolute requirement for Prestbury to accept a fixed number of new houses.

Community benefits should be the primary consideration in choosing sites, not Green Belt factors.

Sites should be accessible to the village centre and facilities to benefit young families and over-55s to help maximise the use of facilities and rejuvenate the village.

There is pent-up demand for retirement accommodation, which would help to release larger properties for families.

Suggestion that the Macclesfield Rugby Club site should be used for Prestbury’s housing needs.

Brownfield sites in Macclesfield should be used instead.

The need for new housing is questionable given the uncertainty of Brexit and the departure of AstraZeneca.
Site PRE 1 ‘Land south of cricket ground’

Summary of key points:

- Concerns over delivery due to access issues and potential for ball-strike from the cricket club.
- Concerns of traffic problems
- Safety issues resulting from its remoteness to the village
- The site doesn’t deliver any community benefits
- The land at no. 2 Castle Hill is not within the site promoter’s ownership and should be excluded.
- Given the access constraints and surrounding low density area, the development should be reduced to 10 units. Given the historic planning approvals, the low density housing policy and access constraints, the number of units should be reduced to between two and eight.
- It will be difficult to deliver a safe vehicle access to this site.
- Pedestrian access is via a narrow footpath.
- The policy should require that any proposed housing layout ensures there is indirect impact that would result in an adverse effect on the functionality and capacity of the playing fields.
- The roads could not cope with the additional traffic.
- The strip of land between 2 Castle Hill and the Westbrook Field is not within the site promoter’s ownership and should be excluded.
- The cricket club car park and its access road from Spencer Mews should not be included.
- The unadopted road off Castle Hill is unsuitable for access and cannot be mitigated.

Site PRE 2 ‘Land south of Prestbury Lane’

Summary of key points:

- Objection to the site on the basis that the parish council has not expressed its support.
- The site would not increase the sustainability of the settlement.
- The delivery of 30 dwellings on this site is not achievable or in line with market demand given that plot sizes in Prestbury are generous.
- Concerns of traffic problems
- Safety issues resulting from its remoteness to the village
- The site doesn’t deliver any community benefits
- Would not help to maximise the use of village centre shops and facilities due to its remoteness.
- Pedestrian access via the public footpath would be dangerous – unlit, steep and slippery with a dangerous crossing at Heybridge Lane. The footpath over the railway is also dangerous and the pavement across the railway road bridge is narrow and unsuitable.
- Prestbury Lane junctions are accident hotspots; any improvements to the junctions would increase its use as a rat run. It is a very narrow road. Whilst provision to improve the junctions would be welcomed, it is not considered that this could be achieved.
- Improvements to Prestbury Lane should be carried out regardless of whether this site is allocated.
- The proposed development would not be in keeping with the surrounding low density area.
- The site makes a major contribution to the Green Belt as evidenced in the 2013 Green Belt Assessment.
- The traffic light assessments are inaccurate with a number of suggestions for changes.
- The marshy land provides habitats for frogs, toads, newts, bats, mice, butterflies, herons, ducks, foxes, badgers, birds, birds of prey, squirrels plus insects.
- The site has great natural beauty and there would be significant landscape impacts. Development would be highly visible from London Road, Prestbury Lane and the surrounding countryside.
- The higher, southern end of the plot is a ‘bog’ that doesn’t drain all year round. The former farm was called ‘Bog Farm’ and the bottom of this plot floods in prolonged heavy rain.
- Support the proposals for new houses together with safety improvements to Prestbury Lane to improve the traffic problems and dangerous junctions.
- The mitigation measures required may mean the site is not economically viable.
- Affordable housing here would not be affordable in real terms.
• Traffic will increase with the development of the new King’s School which may affect air quality.

• Concerns over water and wastewater infrastructure and drainage in the local area.

• Local services (including the school) are at full capacity or oversubscribed.

• Public transport is not within walking distance as there are no available footpaths.

• The site should be expanded and include PRE 3.

• It appears that no air quality assessment of the potential impact of the development has been done.

• The field is used for agriculture (housing cows).

Safeguarded land PRE 3 ‘Land south of Prestbury Lane (safeguarded)’

Summary of key points:

• Objection to the site on the basis that the parish council has not expressed its support.

• The site would not increase the sustainability of the settlement

• Concerns of traffic problems

• Safety issues resulting from its remoteness to the village

• The site doesn’t deliver any community benefits

• Would not help to maximise the use of village centre shops and facilities due to its remoteness.

• Pedestrian access via the public footpath would be dangerous – unlit, steep and slippery with a dangerous crossing at Heybridge Lane. People have been killed and injured crossing Heybridge Lane.

• Prestbury Lane junctions are accident hotspots; any improvements to the junctions would increase its use as a rat run. It is a very narrow road. Whilst provision to improve the junctions would be welcomed, it is not considered that this could be achieved.

• Improvements to Prestbury Lane should be carried out regardless of whether this site is allocated.

• The site is overlooked on three sides and the proposed development would not be in keeping with the surrounding properties.
• The site makes a major contribution to the Green Belt as evidenced in the 2013 Green Belt Assessment.

• The traffic light assessments are inaccurate.

• The marshy land provides habitats for frogs, toads, newts, bats, mice, butterflies, herons, ducks, foxes, badgers, birds, birds of prey, squirrels plus insects.

• The site has great natural beauty and there would be significant landscape impacts. Development would be highly visible from London Road, Prestbury Lane and the surrounding countryside.

• The higher, southern end of the plot is a 'bog' that doesn't drain all year round. The former farm was called 'Bog Farm' and the bottom of this plot floods in prolonged heavy rain.

• Support the proposals for new houses together with safety improvements to Prestbury Lane to improve the traffic problems and dangerous junctions.

• The mitigation measures required may mean the site is not economically viable.

• Affordable housing here would not be affordable in real terms.

• Traffic will increase with the development of the new King’s School which may affect air quality.

• Concerns over water and wastewater infrastructure and drainage in the local area.

• Local services (including the school) are at full capacity or oversubscribed.

• Public transport is not within walking distance as there are no available footpaths.

• The site should be included with PRE 2 and allocated for housing.

• It appears that no air quality assessment of the potential impact of the development has been done.

• The field is used for agriculture (housing cows).

Shavington (general issues)

Summary of key points:

• No additional requirements in relation to housing and employment land are supported.
- Proposed settlement boundary should not include a substantive area of the Wybunbury Ward, Wybunbury Parish and the Wybunbury Combined Parishes neighbourhood plan area.

- The principle of reviewing the settlement boundary is supported.

- The housing requirement for Shavington should be increased.

- The following sites should be (re)considered for housing:
  - Grove Farm
  - 414 Newcastle Road
  - 272 Newcastle Road
  - Land off Gresty Lane.
  - 199 Crewe Road,
  - Land rear of 199 Crewe Road,
  - Land south of the A500,
  - Depot and land west of Crewe Road
  - Rope Lane

**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. The site was considered suitable for development within the ‘Site Assessment Report’ (May 2018) prepared by AECOM in support of the emerging Wrenbury Neighbourhood Plan.

**Other settlements and rural areas (OSRA) (general issues)**

**Summary of key points:**

- Several sites put forward for consideration:
  - Land to the north of the Main Road, Wybunbury (34 homes)
  - Land to the south of Church Way (south and east), Wybunbury (89 homes)
- Land to the west of Bridge Street, Wybunbury (21 homes)
- Land off Congleton Road South, Church Lawton (25 homes)
- Land at Big Stone Cottage, Middlewich Road, Cranage (30 homes)
- Land south of Monks Lane, Acton (52 homes)
- Land east of Chester Road, Acton (1.5ha, public house)
- Stable yard, Dorfold Hall (0.25ha, wedding and events venue)
- Yarwood Heath, Nr M56. (Green Belt, 9ha employment land)
- Land off Crewe Road, Winterley (55 homes)
- Crewe Road, Winterley (105 homes)
- Various sites at Siddington (part Green Belt)
- Land at School Lane, Marton (27 homes) - CFS 365 and 382
- Land at Marton Lane, Marton (Housing)
- Land at Congleton Road, Marton (housing)
- Monks Heath Hall workshops, Monks Heath (Green Belt, 1.21ha employment land) – CFS 206
- Tarmac, A536 Congleton Road, Eaton (15 homes)
- Land opposite Weaver View, Over Road, Church Minshull (20 homes)
- Former George and Dragon public house, Rainow Road, Higher Hurdsfield (6 homes)
- Land off Newcastle Road and Holmes Chapel Road, Brereton Green (135 homes)
- Boar’s Head Public House, 1 Wybunbury Road, Walgherton (40 homes)
- Haslington Hall, Holmshaw Lane, Haslington (1.76ha, housing)
- Land off Newcastle Road, Hough (29 homes)
- Bucklow Garage, Bucklow Hill (Green belt, 8 homes)
- Land off Crewe Road, Winterley (13 homes)
- Land off Monks Lane, Hankelow (2 homes)
Tweedale Farm, Wardle (12.5ha mixed use inc marina, tourist accommodation and retail/restaurants)

Land at Cemetery Road, Weston (Strategic Green Gap, 65 homes)

Land off Newcastle Road, Brereton Green (29 homes)

Land north of Bolshaw Farm Lane, Heald Green (Green Belt, 5 homes)

Windy Ridge, Greendale Lane, Mottram St Andrew

Alstonfield, Castle Hill, Prestbury

Eaton Cottage, Macclesfield Road, Congleton (54 homes).

Bucklow Garage, Bucklow Hill

Land at Warford Park, Faulkner Lane

Land east of Hilbre Bank, Alpraha

Land north and south of Clay Lane, Over Peover

Warmingham Brine Field

Buxton Road Depot, Disley

Stone Cottage, 14 Summerhill Road, Prestbury

- The true extent of the developable area of the Wardle Employment Improvement Area is overstated in the LPS and draft SADPD; 46ha is regarded as developable land.

- Sites should be allocated for development in the OSRA; the approach in the SADPD is inconsistent with the LPS and NPPF.

- Wybunbury displays the characteristics of a Local Service Centre.

- The shortfall of homes in OSRA is not based on up-to-date evidence.

- The OSRA requirement should be disaggregated; to not do so is contrary to the NPPF.

- The flexibility factor should be applied to OSRA.

- The level of development being proposed in Wardle has the potential to result in a significant traffic impact.

**Gypsy, Traveller and Travelling Showpersons sites**

**(general issues)**

**Summary of key points:**
• United Utilities welcome further engagement on the sites considered for allocation, following the further call for sites stage

• Historic England notes the importance of considering the historic environment in site allocations and Plan making. Reference made to guidance documents available on the Historic England website.

Site G&T 1 ‘Land east of Railway Cottages, Nantwich’

Summary of key points:

• United Utilities, site outside of drainage area and is rural in nature, where infrastructure may be limited

• This site could contribute towards meeting the Council’s requirement for a 5 year supply of sites. A demonstrated 5 year supply of sites could reduce the amount of sites, granted temporary planning permission across the borough.

Site G&T 2 ‘Land at Coppenhall Moss, Crewe’

Summary of key points:

• A planning application for a permanent Gypsy and Traveller site was withdrawn in 2012 and circumstances have not changed since then.

• Highway access into the site is not suitable.

• Highway safety and local traffic congestion is an issue.

• Development of houses in the local area has caused pressure on local facilities.

• Land owned by CEC and an opportunity to provide a sustainable site

• Area identified by HS2 as a construction compound / maintenance depot.

Site TS1 ‘Lorry Park, off Mobberley Road, Knutsford’

Summary of key points:

• Lorry park is extensively used and a valued facility

• A Travelling Showperson should not be located next to a tip

• The Lorry Park should be considered for an alternative community use.

• Objections received to the proposed allocation and potential loss of the Lorry Park.
Chapter 13: Monitoring and implementation

Summary of key points:

- Monitoring should also include improvements to train services, air quality, pollution from motor vehicles and aircraft noise.
- Monitoring should also be carried out on a settlement by settlement basis and Green Belt/ non Green Belt.
- Annual updates of housing and employment needs should be undertaken to address and review relevant policies. The Site Allocations and Development Policies Document should identify those policies from the Local Plan Strategy that will need to be reviewed should there be a shortfall/ uplift in housing completions or employment take up.
- The Site Allocations and Development Policies Document should include a list of triggers that would prompt a full review of the local plan.
- The host of agencies and partners involved in bringing forward the allocations in addition to those listed in the Local Plan Strategy should be listed in the Site Allocations and Development Policies Document.
- A policy should be included in the Site Allocations and Development Policies Document to enable safeguarded sites such as Booths Park to be brought forward for earlier housing delivery if strategic allocations are delayed.
- There should be a policy led approach that requires safeguarded land to be released before Green Belt sites are released.
- The Site Allocations and Development Policies Document does not contain a new monitoring and implementation framework and relies on the framework set out in the Local Plan Strategy. There are areas where actions could be improved upon and opportunities to further monitor proposed policies, for example the delivery of self or custom build homes.

Chapter 14: Glossary

Summary of key points:

- Revised NPPF definition of affordable housing should be reflected in the Glossary.
- The plan should include an entry level exceptions policy
- Infill boundary as well as infill village and infill development should be defined.

Appendix A: Housing and employment monitoring

Summary of key points:
Support for Table A.2: Housing distribution: key service centres. This should help protect Sandbach from further speculative development.

Further growth at LPS53: Land adjacent to J17 of M6, south east of Congleton Road, over and above 450 units should be restricted.

Table A.3 Housing Distribution: local service centres does not reflect current completions or commitments. For example, 318 dwellings already committed or completed for Bollington. There is a disconnect between expected demand and current projections of demand. New figures are available and these should be used.

Tilstone Industrial Limited, Radway Green should be allocated for B1, B2 and B8 uses to support its contribution to employment land supply and potential growth and investment. Policy EMP1 or EMP2 should be amended to include the site. By excluding the site, opportunities for the comprehensive redevelopment at Radway Green could be missed.

FD12 only reviewed existing employment allocations designated through legacy plans rather than a comprehensive review of employment sites. The last employment land review (2012) is now out of date.

The employment land requirement for Alsager has reduced (37.13 hectares) from that identified in the adopted Local Plan Strategy (40 hectares). It is unclear why the employment land allocation has reduced. Further clarification is required on windfall.

Policy PG1 identifies that a ‘minimum’ of 380 hectares of employment land is required over the plan period. This is not a ceiling and the council is not limited to the amount of employment land it can allocate.

Appendix B: Related documents and links

Summary of key points:

- Shavington Settlement Report (FD42) - object to the extension of Shavington Settlement Boundary (including the Shavington Triangle) as this includes land historically within the Wybunbury Ward, Wybunbury Parish and the Wybunbury and Combined Parishes Neighbourhood Plan area.

- Residents of Stock Lane, Dig Lane and Clannor Heath identify themselves as Wybunbury residents.

- The inclusion of parts of Wybunbury into Shavington results in development ‘creep’ and coalescence of the settlements. The proposed boundary should be amended so that Newcastle Road is the southernmost boundary.

- Shavington Triangle could become an infill village in its own right, of a similar size to Hough village with boundaries following the curtilages of dwellings on the west side of Dig Lane, Stock lane and Newcastle Road.
• While two parishes share the area of a proposed infill village at Wychwood Park, this does not set a precedent. Newcastle Road forms a clear enforceable boundary to the north of the Triangle.

• Documents FD03a, FD5, FD24 do not demonstrate the exceptional circumstances for Green Belt release at Bollington. The housing figure of 400 dwellings and balance of 82 are not justified. The traffic light assessment is flawed and contains inaccuracies. Insufficient consideration is given to highways, congestion, landscape impact, environmental/ ecology issues and impact upon infrastructure. There is no clear definition for the red, amber green system or weighting of criteria. There are other sites in local service centres in the Green Belt that have been sifted out. These sites should be reviewed.

• FD05 is not justified. There is no evidence to support the housing requirement of 3500 dwellings for the local service centres. Local service centres have a limited range of services and facilities and do not support the same level of growth as principal towns and key service centres.
Appendix 7: Addendum – site TS 1 petition

Site TS1 Lorry Park, Off Mobberley Road, Knutsford

Consultation on the First Draft Site Allocations and Development Policies document took place between 11 September and 22 October 2018.

Following the closing date of the consultation, on 29 November 2018, the council received notification of two petitions relating to site TS1, Lorry Park, Off Mobberley Road, Knutsford:

- A ‘hard copy’ petition of 140 signatures. The title of the petition was ‘Resident Petition Against Travelling Showpeople Residential Site Being Placed at Knutsford Lorry Park on Mobberley Road’.

- The council has also been made aware of an e-petition on the change.org website. The subject of the petition states ‘say no to a Travellers Showpersons site in Knutsford’. As at 13 March 2019, the website reports that 375 signatures have been made to the e-petition on the change.org website. However, the council is not able to verify the nature of the signatures reported on the system.

The petition(s) alongside comments received on the first draft SADPD, Interim Sustainability Appraisal, Habitats Regulations Assessment and the Gypsy, Traveller and Travelling Showpeople ‘call for sites’ will be considered and any further background research and evidence will be carried out as required to produce a further draft of the SADPD, which will be called the ‘Publication Draft SADPD’.

It is expected that a further six week period of consultation will take place on the Publication Draft SADPD in 2019. Following this consultation, it would be the intention to submit the Plan to the Secretary of State for independent examination.