Cheshire East Local Plan

Report of Consultation:
Site Allocations and Development Policies
Document – Issues Paper (including Draft Sustainability Appraisal Scoping Report and Call for Sites)

July 2017

Contents
1. Introduction ............................................................................................................ 2
2. Consultation Documents......................................................................................... 2
3. Notification of the Consultation ............................................................................. 3
4. Other Publicity ........................................................................................................ 4
5. Representations Received....................................................................................... 4
6. Next Steps ............................................................................................................... 7
Appendix 1: Screen Shots from the Consultation Portal ............................................... 9
Appendix 2: Notification Letter and Email ................................................................. 12
Appendix 3: Screen Shots from the Council Website ................................................. 15
Appendix 4: Press Release dated 21 February 2017 .................................................... 18
Appendix 5: Formal Notices (Statement of Representations Procedure) ................. 19
Appendix 6: Summary of SADPD Issues Paper Key Issues ....................................... 21
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. The Inspector’s final report on the first part of the new Local Plan (the Local Plan Strategy) has now been received and we hope to be able to adopt the Local Plan Strategy in July 2017.

1.2. The Site Allocations and Development Policies Document ("SADPD") will form the second part of the Local Plan. It will allocate additional sites for development and set out more detailed planning policies to guide decisions on planning applications in Cheshire East.

1.3. Consultation on the Issues Paper was the first opportunity for stakeholders to tell us what they think it 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. Consultation also took place on the Draft Sustainability Appraisal Scoping Report, which included relevant environmental, economic and social issues against which potential policies and proposals will be tested. At the same time, there was also a ‘call for sites’ exercise, whereby interested parties were invited to submit sites for consideration to inform future land allocations in the SADPD.

1.4. This Statement of Consultation sets out the details of consultation and publicity carried out on the SADPD Issues Paper, Draft Sustainability Appraisal Scoping Report and call for sites exercise. It also reports the key issues raised through the consultation.

1.5. Consultation on the SADPD Issues Paper took place for six weeks from 27 February to 10 April 2017. The consultation was carried out in accordance with the requirements of the Cheshire East Council Statement of Community Involvement.

1.6. The decision to approve the SADPD Issues Paper for publication and consultation was made at a meeting of the Cabinet Member of Housing and Planning on 20 February 2017.

2. **Consultation Documents**

2.1. Comments could be made on the following documents:

- Draft Sustainability Appraisal Scoping Report; and
- Call for sites form.

2.2. In addition, the following supporting documents were published:

- Consultation guidance note;
- SADPD formal notice (statement of representations procedure);
Draft Sustainability Appraisal Scoping Report formal notice (statement of representations procedure);
SADPD Issues Paper comments form; and
Draft Sustainability Appraisal Scoping Report comments form.

2.3. Copies of the consultation documents and supporting documents were available for inspection at:

- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ;
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA;
- Municipal Buildings, Earle Street, Crewe CW1 2BJ;
- Westfields, Middlewich Road, Sandbach CW11 1HZ; and
- All public libraries in Cheshire East (including the mobile library service).

2.4. All of the documentation was available on the Council’s Consultation Portal, accessed via www.cheshireeast.gov.uk/localplan. The Consultation Portal also allowed representations to be submitted online. Screen shots of the Consultation Portal are included in Appendix 1.

2.5. Responses were accepted:

- using the Consultation Portal accessed via a link from www.cheshireeast.gov.uk/localplan;
- by email to localplan@cheshireeast.gov.uk;
- by post to Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ; and
- by hand to the Council Offices, Westfields, Middlewich Road, Sandbach CW11 1HZ.

3. Notification of the Consultation

3.1. Notification of the consultation was sent to all stakeholders on the Council’s Local Plan consultation database. This consisted of 3,971 hard copy letters sent on 24 February and 11,270 emails sent on 27 February. 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.

3.2. Copies of the notification email and letter are included in Appendix 2.

3.3. Separate letters were also send to Natural England, Historic England, the Environment Agency and Natural Resources Wales as statutory consultees. Email letters were sent to all Cheshire East Councillors, all Town and Parish...
Councils in Cheshire East and all MPs whose constituencies lie partly or wholly within Cheshire East Borough.

3.4. Town and Parish Councils adjoining Cheshire East in neighbouring authority areas are included in the general consultation database and received the letter / email as detailed in paragraph 3.1.

4. **Other Publicity**

4.1. The Cheshire East Council website homepage ([www.cheshireeast.gov.uk](http://www.cheshireeast.gov.uk)) signposted the consultation in the ‘Have Your Say’ section. The Local Plan page ([www.cheshireeast.gov.uk/localplan](http://www.cheshireeast.gov.uk/localplan)) also signposted the consultation in a prominent position. Screen shots from these two pages, and the dedicated Local Plan Consultations page are shown in Appendix 3.

4.2. A press release title ‘Local Plan moves forward with consultation on blueprint details’ was issued on 21 Feb 2017. A copy of the press release is included in Appendix 4.

4.3. The press release resulted in a number of associated articles being published in the local and regional press, both in printed and online form including:

- Alderleyedge.com (22 February)
- Wilmslow.com (22 February)
- The Business Desk (22 February)
- North Staffordshire Sentinel (24 February)
- Audlem Online (27 February)
- Macclesfield Express (1 March)
- Crewe Chronicle (1 March)
- Congleton Chronicle (1 March)
- Sandbach Chronicle (1 March)
- Alsager Chronicle (1 March)

4.4. A formal notice (statement of representations procedure) was produced for each of the SADPD Issues Paper and the Draft Sustainability Appraisal Scoping Report and displayed in the public notices section of the Council website and in all the deposit locations listed in paragraph 2.3. Copies of the formal notices are included in Appendix 5.

4.5. The consultation was also highlighted in the February and March editions of the Council’s ‘Spatial Planning Update’, which is sent to all Town and Parish Councils and displayed on the Council’s website.

5. **Representations Received**

   **Site Allocations and Development Policies Document Issues Paper**

5.1. In total, responses to 1,478 questions were received from 183 different parties.
5.2. The method of submission is set out in Table 1.

<table>
<thead>
<tr>
<th>Method</th>
<th>Representations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Online consultation portal</td>
<td>500</td>
</tr>
<tr>
<td>Via email</td>
<td>975</td>
</tr>
<tr>
<td>By post</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,478</strong></td>
</tr>
</tbody>
</table>

Table 1: Method of Submission

5.3. The number of comments received on each question is shown in Table 2.

<table>
<thead>
<tr>
<th>Number</th>
<th>Question</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Question 1</td>
<td>How do you think that the SADPD should be laid out?</td>
<td>49</td>
</tr>
<tr>
<td>Question 2</td>
<td>Do you agree with this approach or do you think that further guidance is required in the SADPD specifically regarding sustainable development?</td>
<td>58</td>
</tr>
<tr>
<td>Question 3a</td>
<td>What approach do you think should be taken towards the apportionment of the overall development requirement across Local Service Centres?</td>
<td>84</td>
</tr>
<tr>
<td>Question 3b</td>
<td>What approach do you think should be taken towards meeting development requirements across Other Settlements and Rural Areas?</td>
<td>55</td>
</tr>
<tr>
<td>Question 3c</td>
<td>Are there any other issues related to meeting development needs across Local Service Centres and Other Settlements and the Rural Area that should be included in the SADPD?</td>
<td>43</td>
</tr>
<tr>
<td>Question 4</td>
<td>Do you agree with the approach set out for determining whether further adjustments to the Green Belt boundary are required around Macclesfield and the Key Service Centres inset within the North Cheshire Green Belt (Handforth, Knutsford, Poynton and Wilmslow)?</td>
<td>62</td>
</tr>
<tr>
<td>Question 5a</td>
<td>Do you agree with the approach set out for determining whether alterations to the Green Belt boundary are required around the Local Service Centres inset within the Green Belt (Alderley Edge, Bollington, Chelford, Disley, Mobberley and Prestbury)?</td>
<td>54</td>
</tr>
<tr>
<td>Question 5b</td>
<td>What approach do you think should be taken towards apportioning the remaining requirement for safeguarded land?</td>
<td>42</td>
</tr>
<tr>
<td>Question 6a(i)</td>
<td>Do you agree with the proposed approach to determining whether villages should be ‘inset’ within or ‘washed over’ by the Green Belt?</td>
<td>42</td>
</tr>
<tr>
<td>Question 6a(ii)</td>
<td>Do you agree with our interpretation of NPPF paragraphs 86 and 83 in terms of meeting the ‘exceptional circumstances’ test for altering Green Belt boundaries to exclude a village from the Green Belt?</td>
<td>22</td>
</tr>
<tr>
<td>Question 6b</td>
<td>Are there any other Green Belt matters that need to be addressed in the SADPD?</td>
<td>26</td>
</tr>
<tr>
<td>Number</td>
<td>Question</td>
<td>Responses</td>
</tr>
<tr>
<td>--------</td>
<td>--------------------------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Question 7</td>
<td>Do you agree that this is an appropriate way forward for defining Strategic Green Gap boundaries and are there any other issues related to Strategic Green Gaps that should be considered?</td>
<td>48</td>
</tr>
<tr>
<td>Question 8</td>
<td>Do you agree that this is an appropriate way forward for identifying Local Green Gaps? Are there any other issues related to potential Local Green Gaps that should be considered?</td>
<td>46</td>
</tr>
<tr>
<td>Question 9a</td>
<td>What role should Neighbourhood Plans play in defining Local Green Gaps?</td>
<td>55</td>
</tr>
<tr>
<td>Question 9b</td>
<td>Should Local Green Gaps-type policies be left to Parish and Town Councils to determine through Neighbourhood Plans, perhaps supported by a ‘toolkit’ prepared by Cheshire East Council?</td>
<td>30</td>
</tr>
<tr>
<td>Question 9c</td>
<td>Should the SADPD include any further policy to support the identification of Local Green Gaps in Neighbourhood Plans? If so, what should it say?</td>
<td>29</td>
</tr>
<tr>
<td>Question 10</td>
<td>Have we identified the key settlement boundary issues that the SADPD should address?</td>
<td>102</td>
</tr>
<tr>
<td>Question 11</td>
<td>Do you think that further planning policy guidance regarding the Jodrell Bank Observatory should be included in the SADPD? If you do, what should its scope be?</td>
<td>47</td>
</tr>
<tr>
<td>Question 12</td>
<td>Do you think that there should be a single policy or small number of policies that cover a range of requirements generally applicable to all (or at least most) forms of development?</td>
<td>61</td>
</tr>
<tr>
<td>Question 13</td>
<td>Do you think that these are the issues that the SADPD should look to address regarding the natural environment, climate change and resources?</td>
<td>50</td>
</tr>
<tr>
<td>Question 14</td>
<td>What policy detail regarding the historic environment do you think should be included in the SADPD?</td>
<td>39</td>
</tr>
<tr>
<td>Question 15</td>
<td>Do you think that these are the issues that the SADPD should look to address regarding employment development?</td>
<td>65</td>
</tr>
<tr>
<td>Question 16</td>
<td>Do you think these are the relevant housing issues for the SADPD to address?</td>
<td>93</td>
</tr>
<tr>
<td>Question 17</td>
<td>Do you think that these are the issues that the SADPD should look to address regarding town centres and retail development?</td>
<td>35</td>
</tr>
<tr>
<td>Question 18</td>
<td>Are these the transport and infrastructure issues that the SADPD should address?</td>
<td>52</td>
</tr>
<tr>
<td>Question 19</td>
<td>Do you agree that these are the issues that the SADPD should address regarding recreation and community facilities?</td>
<td>47</td>
</tr>
<tr>
<td>Question 20</td>
<td>Do you agree with the proposed approach to the Local Plan Policies Map?</td>
<td>51</td>
</tr>
<tr>
<td>Question 21</td>
<td>Do any additional monitoring indicators need to be included in the SADPD? If you think additional monitoring indicators are needed, where would the information for these indicators come from?</td>
<td>35</td>
</tr>
<tr>
<td>Number</td>
<td>Question</td>
<td>Responses</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------------------------------</td>
<td>-----------</td>
</tr>
<tr>
<td>Question 22</td>
<td>Are there any other issues that the SADPD should address?</td>
<td>43</td>
</tr>
<tr>
<td>Question 23</td>
<td>Do you agree with the approach set out above towards identifying sites for Gypsy and Traveller and Travelling Showpeople’s accommodation?</td>
<td>13</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>1478</td>
</tr>
</tbody>
</table>

Table 2: Number of Comments by Question

5.4. All comments are available to view on the Council’s consultation portal at [http://cheshireeast-consult.limehouse.co.uk/portal/planning/cs/sadpd/issues](http://cheshireeast-consult.limehouse.co.uk/portal/planning/cs/sadpd/issues).

5.5. A summary of the key issues raised for each question is set out in Appendix 6.

Draft Sustainability Appraisal Scoping Report

5.6. In total, 37 comments were received by 11 contributing consultees.


Call for Sites

5.8. Local residents, landowners, developers and other stakeholders were invited to put forward sites to the council that they considered to be suitable and available for future development in the Borough for housing, commercial, employment or other development. This excluded minerals and waste sites which were subject to a separate consultation associated with the minerals and waste issues paper.

5.9. Approximately 600 sites were submitted to the council over the consultation period. In order to inform the council’s site selection process, a further period from the 10 April until 01 July 2017 enabled interested parties to submit sites to the council using an online survey form. Through this process, a further 33 sites were submitted to the council.

6. Next Steps

6.1. All comments received on the SADPD Issues Paper will be fully considered in the production of the first draft version of the Site Allocations and Development Policies Document. There will be further public consultation on this draft SADPD before producing a revised draft for publication, further public consultation and submission to the Secretary of State for an independent examination.
6.2. The responses to the SA Scoping Report were considered and a number of minor changes were identified and made to the SA Scoping Report as part of the consultation process. The SA Scoping Report has now been published on the Council’s website.

6.3. Sites submitted to the council through the call for sites will now be considered through the site selection process, utilising the council site selection methodology alongside other evidence including Sustainability Appraisal, where appropriate. The outcomes of the site selection process will be consulted on, in the form of the draft Site Allocations and Development Policies document in due course.
Appendix 1: Screen Shots from the Consultation Portal

SADPD Issues Paper Consultation Portal Screen Shot:

Site Allocations and Development Policies Document: Issues Paper

The Local Plan Strategy will be the first part of the new Local Plan to be put in place. This Site Allocations and Development Policies Document (SADPD) will form the second part of the Local Plan. It will:

- Allocate additional sites for development to make sure that the overall development requirements set in the Local Plan Strategy are met. These allocations will generally be for non-strategic sites, less than 5 hectares in size (or 150 homes). Allocations will be for housing, employment, retail, leisure and other types of development.
- Set more detailed policies to guide decisions on planning applications in the Borough. Land that needs particular protection will be designated, for example because of its importance to wildlife or the historic environment.

The issues paper is the first consultation in the preparation of this document and it outlines a range of matters that the SADPD is likely to address. The consultation seeks your views on these matters and there is an opportunity to tell us if there are any other matters you think the document should cover.

Consultation Documents

- Site Allocations and Development Policies Document: Issues Paper (PDF, 635 KB)

The production of the SADPD document will be informed by Sustainability Appraisal, to assess the social, environmental and economic impacts. A Draft Sustainability Appraisal Scoping Report identifying the scope and methodology for the Sustainability Appraisal is the subject of a separate consultation. A valid Fair Notice to inform the allocation of development sites is also the subject of a separate consultation.

Guidance on Submitting Comments

This is the first stage in proposing the SADPD, seeking views on the matters it should address, the issues paper does not contain any specific policy or site proposals. It sets out a series of issues related to the SADPD and asks specific questions on those issues. This includes a question on whether there are any other issues that should be addressed.

You can submit your comments online using the consultation portal, click the Read and Comment on Document button below. There are a series of questions set out throughout the document; click 'Add Comment' on the relevant question to submit your response. If you have not done so already, the system will ask you to log-in or register before submitting your comments.

If you have previously commented on any Local Plan consultation whether through the consultation portal or not, you will already have a registered account. Please contact us by email (clplan@chesideast.gov.uk) or phone (01797 655939) if you need to know your log-in details.

Alternatively, you can submit comments by email or in writing. Information is contained in the Statement of Representations Procedure (PDF, 102 KB).

Comments must be received by 5.00pm on Monday 10 April 2017 and the consultation portal will not accept comments after this date.

What Happens Next?

We will consider all the comments received before writing a draft version of the SADPD. There will be public consultation on this draft SADPD before producing a revised draft for further consultation and submission to the Secretary of State for an independent examination.

Other Current Consultations

This is the consultation on the Site Allocations and Development Policies Document: Issues Paper. We are currently running a number of consultations related to planning policy documents. To submit comments on these other documents, please follow the links:

- Community Infrastructure Levy: Preliminary Draft Charging Schedule (consultation ends 5pm on 10 April 2017).
- Call for Sites consultation ends 5pm on 10 April 2017.

Further information on all these consultation documents is available in our Consultation Guidance Note (PDF, 140 KB).

Submit Comments on Site Allocations and Development Policies Document: Issues Paper
Local Plan Draft Sustainability Appraisal Scoping Report 2017

Sustainability Appraisal (SA) informs production of plans and is a process to assess the social, environmental and economic impacts of a plan.
SA is required under the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004.
The integrated process of SA in Cheshire East also incorporates the requirements of:
- Strategic Environmental Assessment (European Directive),
- Equality Impact Assessment,
- Disability Impact Assessment, and
- Risk-proofing.

The purpose of a SA Scoping Report is to set out the social, environmental and economic issues to be considered and identify the scope and methodology for carrying out the Sustainability Appraisal of plans. A previous SA Scoping Report was produced in June 2012, which informed the Sustainability appraisal for the Local Plan Strategy.

This new SA Scoping Report will make sure the social, environmental and economic issues previously identified are up to date and will identify the scope and methodology for the Sustainability Appraisals of the Site Allocations and Development Policies Document, and the Minerals and Waste Development Plan Document.

Consultation Document
- Local Plan Draft Sustainability Appraisal Scoping Report (PDF, 2.2 MB)

Guidance on Submitting Comments

The Draft Sustainability Appraisal Scoping Report sets out the proposed scope and methodology for carrying out Sustainability Appraisal on plans. It does not contain planning policies or proposals in itself. We have no specific questions to ask on this document, but we seek views on its content and approach.

You can submit comments online using this consultation portal - click the 'Read and Comment on Document' button below. You can add comments on any particular part of the document (Paragraphs / Tables / Figures). If you have not done so already, the system will ask you to log-in or register before submitting your comments.

If you have previously commented on any Local Plan consultation (whether through the consultation portal or not), you will already have a registered account. Please contact us by email or phone (details below) if you need to know your log-in details.

Alternatively, you can submit comments by email or in writing. Information is contained in the Statement of Representations Procedure (PDF, 102 KB).

Comments must be received by 6pm on Monday 19 April 20107 and the consultation portal will not accept comments after this time.

What Happens Next?

We will consider all comments received before writing the final version of the Sustainability Appraisal Scoping Report. This will set the scope and methodology for the Sustainability Appraisals of the Site Allocations and Development Policies Document and the Minerals and Waste Development Plan Document during the production of those documents. There will be further consultations on the Sustainability Appraisals as part of the production of those documents.

Other Current Consultations

This is the consultation on the Draft Sustainability Appraisal Scoping Report. We are currently running a number of consultations related to planning policy documents. To submit comments on these other documents, please follow the links below:
- Local Plan Strategy - Proposed Main Modifications (consultation ends 5pm on 22 March 2017);
- Site Allocations and Development Policies Document - Issues Paper (consultation ends 5pm on 10 April 2017);
- Community Infrastructure Levy, Preliminary Draft Charging Schedule (consultation ends 5pm on 10 April 2017); and
- Call for Sites (consultation ends 5pm on 10 April 2017).

Further information on all these consultation documents is available in our Consultation Guidance Note (PDF, 140 KB).

Submit Comments on Draft Sustainability Appraisal Scoping Report
Call for Sites Consultation Portal Screen Shot:

Site Allocations and Development Policies ‘Call for Sites’

1. Site location and your contact details

The Council is updating its land availability assessments which will help to inform any further land allocations for development that are made through the Site Allocations and Development Policies Document. In addition, the Housing and Planning Act 2016 requires the Council to publish a ‘Brownfield Register’ of previously developed sites that are assessed as being suitable for housing development. There may also be a future requirement to produce a ‘Small Sites Register’ to support development on smaller sites and make it easier for interested parties to identify sites for self-build and custom housing.

As a result, the Council invites local residents, landowners, developers and other parties to put forward sites they consider to be suitable and available for future development in the Borough. These can be for housing, commercial, employment or other types of development, but not for minerals and waste uses as these will be invited via a separate call for minerals and waste sites later in 2017.

For more information please visit www.cheshireeast.gov.uk/locplan or email SH-LLA@cheshireeast.gov.uk.

The call for sites runs from 27 February 2017 to 5:00pm on 16 April 2017.

Please note that all responses will be available for public inspection and will be placed on the Cheshire East website. This will include your name and post town. Anonymous responses will not be accepted. If provided, we will not publish details of other site owners.

Your personal information will be held and used in line with the Data Protection Act 1998. Your personal data will not be sold on to third parties and we will use the data you give solely for the purpose of preparing the Cheshire East Local Plan or other Spatial Planning Policies.

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. The Council is seeking to prepare its land availability assessment fresh, to make sure the information is as up-to-date and reliable as possible. We currently hold lots of information about sites that cannot be automatically relied upon because it is incomplete or was received some time ago. As a result, we are asking interested parties to submit sites that are considered to be suitable and available, even if this information has previously been submitted to us.

What Happens Next

The Council will use the information received to:

- Update its land availability registers;
- Inform the preparation of the draft Site Allocations and Development Policies Document;
- Inform the Brownfield Register; and
- Inform the Small Sites Register.

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 or identified in any of the registers.
Appendix 2: Notification Letter and Email

Letter sent 24 February 2017 to 3,971 recipients:

Cheshire East Council

Spatial Planning
Westfields, C/O Municipal Buildings
Earle Street
Crewe, Cheshire
CW1 2BJ
Tel: 01270 665893
Email: localplan@cheshireeast.gov.uk

Our ref: Consult[ref ]

Date: 24 February 2017

Dear [Name]

Consultation on the Local Plan Site Allocations and Development Policies Document, and the Community Infrastructure Levy.

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

The Council is committed to putting a comprehensive set of up-to-date planning policies in place to guide development, support infrastructure delivery and protect important environmental and historic features. This will support our ambition to make the Borough an even better place to live, work and visit.

The Local Plan Strategy (first part of the new Local Plan) is nearing the end of its examination process and consultation is currently underway on Local Plan Strategy proposed changes (Main Modifications) until 5:00pm on Monday 20 March 2017.

We have now started work on the second, more detailed part of the Local Plan and a number of documents are published for public consultation from Monday 27 February to 5:00pm on Monday 10 April 2017:

- Site Allocations and Development Policies Document: Issues Paper;
- Community Infrastructure Levy: Preliminary Draft Charging Schedule;
- Draft Sustainability Appraisal Scoping Report; and
- Call for Sites.

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 localplan@cheshireeast.gov.uk or by post to Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by 5:00pm on Monday 10 April 2017.

A brief explanation of each of the consultation documents is set out overleaf.

Further information can be obtained by telephone on 01270 665893, from the Council's website www.cheshireeast.gov.uk/localplan by email to localplan@cheshireeast.gov.uk

Yours sincerely

Adrian Fisher
Head of Planning Strategy

All other enquiries 0300 123 5500

www.cheshireeast.gov.uk
Site Allocations and Development Policies Document: Issues Paper

The Local Plan Strategy will be the first part of the new Local Plan and this Site Allocations and Development Policies Document (SADPD) will form the second part. It will:

- Allocate additional sites for development to make sure that the overall development requirements set out in the Local Plan Strategy are met. These will generally be ‘non-strategic’ sites, less than 5 ha in size (or 150 homes), for housing, employment, retail, leisure and other types of development.
- Set more detailed policies to guide decisions on planning applications in the Borough. Land that needs particular protection will be designated, for example because of its importance to wildlife or the historic environment.

The issues paper is the first consultation in the preparation of this document and it identifies a range of matters that the SADPD is likely to address. The consultation seeks your views on these matters and there is an opportunity to tell us if there are any other matters you think the document should cover.

Community Infrastructure Levy: Preliminary Draft Charging Schedule

The Community Infrastructure Levy (CIL) is a planning charge that can be used to support the development of the local area. It allows local authorities to raise funds from developers of new building projects. The money can be used to help fund a wide range of infrastructure that is needed as a result of development.

CIL is charged as a fixed rate per square metre of new floor space. The rate is set by local authorities in consultation with local communities and developers, and is tested through an independent examination.

Cheshire East Council intends to introduce a CIL Charging Schedule for new development. We have prepared evidence related to the viability of introducing a charge, a list of potential infrastructure projects to be funded and a preliminary draft charging schedule, which is now the subject of consultation.

Draft Sustainability Appraisal Scoping Report

Sustainability Appraisal (SA) informs production of plans and is a process to assess the social, environmental and economic impacts of a plan. It is required under the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004.

The purpose of a SA Scoping Report is to set out the social, environmental and economic issues to be considered and identify the scope and methodology for carrying out the Sustainability Appraisal of plans. A previous SA Scoping Report was produced in June 2012, which informed the Sustainability Appraisal for the Local Plan Strategy.

The purpose of this new SA Scoping Report is make sure the issues previously identified are up to date and to identify the scope and methodology for the Sustainability Appraisals of the Site Allocations and Development Policies Document, and the future Minerals and Waste Development Plan Document.

Call for Sites

The Council is updating its land availability assessments which will help to inform any further land allocations for development that are made through the Site Allocations and Development Policies Document. In addition, the Council will publish a ‘Brownfield Register’ of previously developed sites that are assessed as being suitable for housing development. There may also be a future requirement to produce a ‘Small Sites Register’ to support development on smaller sites and make it easier for interested parties to identify sites for self-build and custom housing.

As a result, the Council invites local residents, landowners, developers and other parties to put forward sites they consider to be suitable and available for future development in the Borough. These can be for housing, commercial, employment or other types of development, but not for minerals and waste uses as those will be invited via a separate call for minerals and waste sites later in 2017.

Local Plan Strategy: Main Modifications

The Local Plan Strategy (LPS) is the first part of the new Cheshire East Local Plan. It sets strategic priorities for the development of the area, along with planning policies and development sites to guide development up to 2030. The LPS is at an advanced stage of production and this consultation seeks views on the changes required before the plan can be adopted in its final form.

The Inspector will consider all duly made representations before publishing his final report into the legal compliance and soundness of the Cheshire East Local Plan Strategy. Please note that the Local Plan Strategy Consultation ends at 5:00pm on Monday 20 March.
Email sent 27 February 2017 to 11,270 recipients:

From: LOCAL PLAN
Sent: 27-Feb-2017 09:57
To: LOCAL PLAN
Subject: Consultation on Cheshire East Local Plan Site Allocations and Development Policies Document, and the Community Infrastructure Levy
Attachments: Consultation Guidance Note.pdf
Follow Up Flag: Follow up
Flag Status: Completed

To whom it may concern,

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

The Council is committed to putting a comprehensive set of up-to-date planning policies in place to guide development, support infrastructure delivery and protect important environmental and historic features. This will support our ambition to make the Borough an even better place to live, work and visit.

The Local Plan Strategy (first part of the new Local Plan) is nearing the end of its examination process and consultation is currently underway on Local Plan Strategy proposed changes (Main Modifications) until 5:00pm on Monday 20 March 2017.

We have now started work on the second, more detailed part of the Local Plan and a number of documents are published for public consultation from Monday 27 February to 5:00pm on Monday 10 April 2017:

- Site Allocations and Development Policies Document: Issues Paper;
- Community Infrastructure Levy: Preliminary Draft Charging Schedule;
- Draft Sustainability Appraisal Scoping Report; and
- Call for Sites.

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 localplan@cheshireeast.gov.uk or by post to Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by 5:00pm on Monday 10 April 2017.

Information on each of the consultation documents is provided in the attached 'Consultation Guidance Note'.

Further information can be obtained from the Council’s website www.cheshireeast.gov.uk/localplan, by email to localplan@cheshireeast.gov.uk or by telephone on 01270 685893.

Yours faithfully,

Adrian Fisher
Head of Planning Strategy
Cheshire East Council
Appendix 3: Screen Shots from the Council Website

Home page ([www.cheshireeast.gov.uk](http://www.cheshireeast.gov.uk)):
Cheshire East Local Plan

The Local Plan sets out how the Borough will develop over the next 10 years. It is the statutory plan for Cheshire East and the basis for deciding planning applications. This page contains information on the new Local Plan for Cheshire East, which is currently being prepared and will guide development up to 2030.

A new Local Plan will cover a range of matters including the number and location of new homes, amount and location of employment land, protection and improvement of important open areas and provision of new open spaces. Provision of new infrastructure and improvement of existing centres and community facilities in the Borough.

New Local Plan for Cheshire East

The new Local Plan will cover 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 and provision of new open spaces, provision of new infrastructure and improvement of existing centres and community facilities in the Borough.

The new Local Plan strategy is the first statutory document to ensure that new development is balanced and sustainable. It is currently undergoing an independent examination to determine whether it is sound and legally compliant.

There are three rounds of examination hearing sessions in 2014, 2015 and 2016, with consultation on the Council’s proposed changes to the Local Plan Strategy. In March and April 2016, the Inspector is currently considering all the issues raised through the examination and we have recently consulted on the Local Plan Strategy: Proposed Main Modifications between Monday 6 February 2017 and 5.00pm Monday 20 March 2017.

For further information on the progress of the examination, please see the Examination Page.

Local Plan documents

The new Local Plan will consist of three key documents:

1. The Local Plan Strategy
2. The Site Allocations and Development Policies document
3. The Minerals and Waste Development Plan document

The new Local Plan will be supported by an adopted policies map which will show sites, policies and environmental heritage designations on an ordnance survey map, it will also be accompanied by an Infrastructure Delivery Plan which will set out future infrastructure needs and how these will be
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 previous 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
Work is in progress on a number of new planning policy documents to set out planning policies in the Borough:

- Site Allocations and Development Policies Document issues paper
  - Monday 27 February - 5.00pm Monday 10 April
- Call for sites
  - Monday 27 February - 5.00pm Monday 10 April
- Community Infrastructure Levy: preliminary draft charging schedule
  - Monday 27 February - Monday 10 April
- Draft Sustainability Appraisal Scoping Report
  - Monday 27 February - Monday 10 April

Further information on each of these consultations is available in our consultation guidance note (PDF, 152 KB).

Future consultations
We are currently working on the Minerals and Waste Development Plan Document issues paper. There will be public consultation on the issues paper and a call for minerals and waste sites starting in Spring 2017.

Previous consultations
Local Plan Strategy - Proposed Main Modifications
Having considered the issues raised through the Local Plan strategy examination process, the Inspector issued his views on further modifications needed on 12 December 2010. Representations were invited on “proposed main modifications to the Cheshire East Local Plan strategy” between 08 February and 30 March 2011. Further information and all responses are available to view on the Council’s consultation portal: Local Plan Strategy - proposed main modifications.

Local Plan Strategy - Proposed Changes Version
Following the consultation in 2014, the Local Plan Strategy was submitted to the Secretary of State for Communities and Local Government on 20 May 2014.

The examination of the Local Plan Strategy is currently in progress and following two rounds of examination hearing sessions in 2014 and 2015, the council consulted on its proposed changes to the Local Plan Strategy in March and April 2016.

For further information and to view all responses, please see the Local Plan Consultation Portal.

Minerals call for sites (July - September 2014)
As part of preparation for the Local Plan Site Allocations and Development Policies Document, the council conducted a call for sites seeking details of potential mineral sites and areas from interested parties. In addition, comment was sought on the proposed methodology by which sites will be assessed.

The call for sites was targeted at those groups/individuals with interests in potential land allocation for mineral development as well as those who may wish to comment on the assessment methodology.
Local Plan moves forward with consultation on blueprint details

February 21, 2017

Cheshire East Council is launching a consultation on the second part of its blueprint for development in the borough.

The authority’s Local Plan Strategy sets out the strategic framework for development and has been broadly backed by a planning inspector, subject to some necessary changes. Now the council is seeking views on its ‘daughter document’ – the Site Allocations and Development Policies (SADP) – which provides much of the detail.

This new planning document will give the borough a much finer grain of planning guidance and will also allocate some smaller sites for development within town centres, the larger villages and rural areas.

Councillor Ainsley Arnold, Cheshire East cabinet member for housing and planning, said: “Now that the Local Plan Strategy is nearing completion we want to press on and complete the second, more detailed stage of the plan. This will provide our towns and villages with a greater depth of policies and proposals.

“At this point, it’s very much ‘early days’ in this particular process and so we are encouraging all who have an interest in development and who care about the future of our borough to get involved in the consultation.

“The Local Plan is the council’s most important tool for shaping development in Cheshire East to 2030, so I would encourage people to take the time to share their views.”

The Site Allocations and Development Policies’ ‘issues document’ will be subject to a six-week consultation from Monday, 27 February until 10 April 2017. Following this, an initial draft plan will be prepared and further consultation will follow.

In the meantime, the document launch is accompanied by a ‘call for sites’ so the council can gain an up-to-date picture of what land is potentially available for future development.

Landowners and developers with suitable sites are being asked to put them forward during the consultation process. This call for sites will replace previous versions – and particular encouragement is given to smaller sites at this stage of plan preparation.

Full details can be found here Cheshire East local plan.
Appendix 5: Formal Notices (Statement of Representations Procedure)

Statement of Representations Procedure:

Local Plan Site Allocations and Development Policies
Document: Issues Paper Consultation

Subject Matter: The Local Plan Strategy will be the first part of the new Local Plan to be put in place. This Site Allocations and Development Policies Document (SADPD) will form the second part of the Local Plan. It will:

- Allocate additional sites for development to make sure that the overall development requirements set out in the Local Plan Strategy are met. These allocations will generally be ‘non-strategic’ sites, less than 5 hectares in size (or 150 homes). Allocations will be for housing, employment, retail, leisure and other types of development.
- Set more detailed policies to guide decisions on planning applications in the Borough. Land that needs particular protection will be designated, for example because of its importance to wildlife or the historic environment.

The issues paper is the first consultation in the preparation of this document and it identifies a range of matters that the SADPD is likely to address. The consultation seeks your views on these matters and there is an opportunity to tell us if there are any other matters you think the document should cover.

Area Covered: Whole of Cheshire East Borough, excluding the part within the Peak District National Park.

Representation Period: A six week period from Monday 27 February 2017 to 5:00pm on Monday 10 April 2017. To be valid, all comments must be submitted within this period and received by the Council at Westfields, Middlewich Road, Sandbach CW11 1HZ by 5:00pm on Monday 10 April 2017. Comments received after this deadline and anonymous representations will not be considered.

Comments: Can be made electronically on the Council’s consultation portal, accessed from its website www.cheshireeast.gov.uk/localplan or in writing on a comments form available from the locations listed below. Comment forms must be returned to: Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by 5:00pm on Monday 10 April 2017.

Location of Documents for Inspection: The Site Allocations and Development Policies Document: Issues Paper is available for inspection at the locations below. Comment forms can also be obtained from these locations:

- Cheshire East Council website: www.cheshireeast.gov.uk/localplan
- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ (Mon, Wed, Thu, Fri 8:45am - 5:00pm; Tue 8:45am - 4:00pm)
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA (Mon - Fri 8:45am - 5:00pm)
- Municipal Buildings, Earle Street, Crewe CW1 2BJ (Mon - Fri 9:00am - 5:00pm)
- Westfields, Middlewich Road, Sandbach CW11 1HZ (Mon - Fri 9:00am - 5:00pm)
- All public libraries in Cheshire East (locations and opening times can be obtained by telephoning 0300 123 5018 or online at http://www.cheshireeast.gov.uk/libraries/libraries_opening_hours.aspx)

Further information and paper copies of all documents can be requested from the Spatial Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 685893. Please note that a reasonable charge will be made to cover printing and postage costs.
Statement of Representations Procedure:

Consultation on Draft Sustainability Appraisal Scoping Report

Subject Matter: Comments are invited on the Draft Sustainability Appraisal Scoping Report. Sustainability Appraisal (SA) informs production of plans and is a process to assess the social, environmental and economic impacts of a plan.

SA is required under the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004.

The integrated process of SA in Cheshire East also incorporates the requirements of:
- Strategic Environmental Assessment (European Directive);
- Equality Impact Assessment;
- Health Impact Assessment; and
- Rural proofing.

The purpose of a SA Scoping Report is to set out the social, environmental and economic issues to be considered and identify the scope and methodology for carrying out the Sustainability Appraisal of plans. A previous SA Scoping Report was produced in June 2012, which informed the Sustainability Appraisal for the Local Plan Strategy.

The purpose of this new SA Scoping Report is make sure the social, environmental and economic issues previously identified are up to date and to identify the scope and methodology for the Sustainability Appraisals of the Site Allocations and Development Policies Document, and the Minerals and Waste Development Plan Document.

Area Covered: Whole of Cheshire East Borough, excluding the part within the Peak District National Park.

Representation Period: A six week period from Monday 27 February 2017 to 5:00pm on Monday 10 April 2017. To be valid, all comments must be submitted within this period and received by the Council at Westfields, Middlwich Road, Sandbach CW11 1HZ by 5:00pm on Monday 10 April 2017. Comments received after this deadline and anonymous representations will not be considered.

Comments: Can be made electronically on the Council’s consultation portal, accessed from its website www.cheshireeast.gov.uk/localplan or in writing on a comments form available from the locations listed below. Comment forms must be returned to: Cheshire East Council, Spatial Planning, Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ by 5:00pm on Monday 10 April 2017.

Location of Documents for Inspection: The Draft Sustainability Appraisal Scoping Report is available for inspection at the locations below. Comment forms can also be obtained from these locations:
- Cheshire East Council website: www.cheshireeast.gov.uk/localplan
- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ (Mon, Wed, Thu, Fri 8:45am - 5:00pm; Tue 8:45am - 4:00pm);
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA (Mon - Fri 8:45am - 5:00pm)
- Municipal Buildings, Earle Street, Crewe CW1 2BJ (Mon - Fri 9:00am - 5:00pm)
- Westfields, Middlewich Road, Sandbach CW11 1HZ (Mon - Fri 9:00am - 5:00pm)
- All public libraries in Cheshire East (locations and opening times can be obtained by telephoning 0300 123 5018 or online at http://www.cheshireeast.gov.uk/libraries/libraries_opening_hours.aspx)

Further information and paper copies of all documents can be requested from the Spatial Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 585893. Please note that a reasonable charge will be made to cover printing and postage costs.

20
Appendix 6: Summary of SADPD Issues Paper Key Issues

Question 1: How do you think the SADPD should be laid out?

This question set out two options and invited respondents to highlight the advantages and disadvantages of each approach. The two options were:

a. under topic-based chapters such as 'Housing', 'Employment' and 'Transport' and 'Infrastructure', or

b. under chapter headings that reflect those in the Local Plan Strategy (LPS).

Out of the 49 respondents, 28 were in favour of a topic-based approach whilst 16 favoured an approach that reflected the chapter headings in the LPS. Five respondents expressed no strong preference.

The points made in support of following each approach are set out below. Other comments that were made by respondents to this question are also then listed.

Key issues raised:

1. **Topic-based – points in support**
   - Clearer to understand
   - More ‘user-friendly’ / easier format for the lay-person
   - Better way of setting out more detailed, non-strategic policies
   - More closely reflects the format of Neighbourhood Plans
   - Better approach but some matters will fit under more than one topic so will need to be flexibility
   - Most appropriate approach, however there should still be individual chapters on each Local Service Centres and a chapter covering Other Settlements and Rural Areas too
   - Easier to follow but SADPD policies should still be cross-referenced to LPS policies
   - LPS and SADPD serve different purposes. The LPS is laid out to justifying the wider strategy for the Borough. The SADPD is used more directly in considering individual planning applications and, as such, topic-based chapters work more effectively in steering developers to policies relevant to specific types of development.

2. **LPS chapter based – points in support**
   - The SADPD follows the LPS and should be aligned with it so the two documents read cohesively
   - Ensures comparability with the LPS so residents and others can see how the SADPD relates to the wider LPS
• Allows easier cross-referencing between the LPS and SADPD (Sport England)
• There should also be a clear ‘roadmap’ that demonstrates the consistency between SADPD policies Local Plan Strategy policies.
• LPS chapter based approach should be followed, however topic-based sub-chapters should be included where relevant.

3. Other points raised by respondents
• There should be no cap on the size of sites allocated in the SADPD. Sites should not be limited to 150 homes or 5ha in size, provided that they broadly respond to the spatial strategy set out in the LPS. Instead the primary objective of the SADPD should be to ensure that sufficient land is identified and allocated to meet the residual development needs of LSCs.
• Further Green Belt boundary change will need to take place around Poynton to meet its remaining housing requirement.
• The SADPD will need to take account of the LPS Inspector’s findings, where appropriate.
• The SADPD should allow for: proposed jobs growth within the Cheshire Science Corridor Enterprise Zone; the confirmation of HS2 Phase 1; the growth aspirations of the Constellation Partnership; the Cheshire and Warrington Strategic Economic Plan refresh (and the changes that have occurred since the 2014 version including Brexit, the Northern Powerhouse, confirmation as Crewe as a hub station and the creation of Transport for the North); the opening of the Knutsford to Bowden A556 dual carriageway in March 2017; and flexibility generated by potential lapse rates associated with committed development.
• The Planning and Compulsory Purchase Act 2004 requires all Local Plans to be fully reviewed in the light of the designation of an Enterprise Zone as soon as practicably possible.
• The SADPD should refer to neighbourhood plans that have been made.
• It is a shame that the LPS was not laid out in an easy to follow manner using topic based chapters.
Question 2: Do you agree with this approach or do you think that further guidance is required in the SADPD specifically regarding sustainable development?

Key issues raised:

1. Please ensure that the definition of ‘sustainable development’ is clarified in plain English is provided. **CPRE Cheshire** recommends the Brundtland Commission definition: "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs". It contains two key concepts:• the concept of "needs", in particular the essential needs of the world's poor, to which overriding priority should be given; and• the idea of limitations imposed by the state of technology and social organization on the environment's ability to meet present and future needs."

2. The **National Trust** agree that the above noted LPS policies set a suitable strategic framework for the achievement of sustainable development in the borough. Clearly, more work is needed to ensure that these strategic statements can be translated into a practical and applicable policy framework – notably in regard to Quality of Place, landscape character, green infrastructure, and cultural heritage (see later comments). We agree that the Council’s proposed approach is sound in principle.

3. Ensure that there is clear guidance in the SADPD on how all these policies should be delivered and not just “focus on reflecting particular aspects of sustainable development in its thematic policies.”

4. **Historic England**; Any preferred approach should ensure that the Plan contains appropriate detailed policies to deal with the historic environment

5. Cross referencing to extant policy documents does not allow the framing, or strategic balancing of ‘sustainable development’ within the context of the individual themes within the SADPD. ‘Sustainable development’, as a concept is likely to have differing interpretations and must be defined and explained by section.

6. Sustainable development appears to read as “positively seeking opportunities to meet the development needs of the area.” This must be clarified to mean the specific area, such as Sandbach, otherwise this could be taken as referring to any shortages in other areas or Cheshire East as a whole. Key distances to services, such as schools, train stations, should be access road measured, i.e the actual distance a person would have to travel, and not linear measurements taken from a map. Access distances can increase dramatically.

7. When receiving statistical information directly from developers, such as travel distances, traffic movements, perceived trends etc., when justifying ‘sustainable development’, particularly for larger scale developments,
Cheshire East should seek confirmation of this information from independent sources, ensuring both use the same criteria. This must be accompanied by an open and transparent process which allows a robust challenge.

8. Developers should also consider the implications on air quality and air pollution across the town or settlement not just the area of the development. The cumulative effect on the area should also be included.

9. Sustainable development should be assessed based on individual local issues in conjunction with National Planning Policy and Borough-wide Local Plan Strategy policies.

10. The ‘Sustainable Development’ concept may vary across Local Service Centres which, calls for specific guidance. The generalised statements in the local Plan need particular emphasis for sustainable development. We consider that The SADPD requires a policy that clarifies how the LPS policy commitment will be translated into development management decisions and clarify how applications at the Local Service Centres will be determined; in particular how the needs of LSCs will be calculated; positively worded so that sustainable development should be approved, even where these targets are exceeded i.e. not capping delivery.

11. Sustainable Development needs to take into account the presence or absence of local services as well as an assessment of whether a development will result in more ‘commuting’ by road. In Goostrey any harm to JBO also needs to be taken into account as it provides employment, education, research and tourism facilities.

12. We endorse the extent of guidance on sustainable development contained within the SADPD and policies MP1, SD1 and SD2 of the emerging Local Plan Strategy which is set out through national policy ( material consideration).

13. The SADPD is a follow on document to the Local Plan Strategy and, therefore further guidance specifically regarding sustainable development is not necessary it simply need to cross reference to policies MP1 and SD2 of the LPS. If additional policies were included in the SADPD, there would be a risk of unnecessary duplication/ distortion and confusion.

14. A very simple overview / introductory paragraph in the document may be helpful as the LPS is not easy to navigate.

15. Support the view that further guidance is not necessary as the Neighbourhood Plan offers scope for more detailed interpretation of sustainable development as set out in the NPPF as applied to the Green Belt and areas inset within it.

16. Sustainable development guidance in relation to specific site allocations should be provided where appropriate to ensure sustainability remains at the forefront of future development, and to ensure that future development reflects the NPPF.

17. Site allocations within rural areas and smaller settlements, such as Burleydam will need to be considered on a site by site basis to ensure that rural areas are protected and enhanced. Sustainability for rural areas will be somewhat varied
to sustainability within key service centres. This may conflict with Policy SD1 of the Local Plan Strategy which seeks to direct development to the “most accessible and sustainable locations”; however, Policy PG6 does support growth in rural areas. The alternative to development is clearly no development. However, we should not pretend that ‘no development means no change’. Change is a fact of life. Clearly, without thought, partnership and investment the change may not be what you or I want. It may well be empty shops, failing infrastructure or the migration of younger people. It may be necessary to direct development in other settlements and rural areas to sites which are not the “most” sustainable, as is often the case in rural areas, to protect the long term future of the rural villages.

18. There is a presumption in favour of sustainable development in the NPPF and it is important that any plan has an up to date clear definition of sustainability including criteria which is updated and the tested, particularly car usage and the economic and social benefits strengthened.

19. Sustainable Development issues in other Settlements and Rural areas are different from those applicable in Principal Towns, Key Service Centres and Local Service Centres. The provision of modern Sewage Treatment Plants negate the need for mains drainage, The provision of Super Fast Broadband and Internet shopping removes the need for shops in the Community or other services. Life in Rural Areas will generally need to provide for the use of motor vehicles and therefore public transport is unnecessary. The SADPD provides an opportunity to assess these differences and incorporate them in future policy in favour of Sustainable Development.

20. Opportunities exist for sustainable development within Knutsford town without further incursion into the Green Belt. The allocation of zero Urban Potential to Knutsford underestimates the potential to renew and revivify town and village centres and avoid out of town, lookalike retail and housing areas.

21. No (further guidance required) The SADPD should include a specific policy making clear that the growth of existing business will be supported and given great weight when applying planning balance. In this regard, the SADPD should build on Policy MP1 and SD2 of the LPS and clearly state that the growth of existing businesses will be encouraged and supported. The allocation of sites for employment will acknowledge existing uses, allowing for future growth of existing businesses and for new businesses. Opportunities for growth will focus on those sites that are within or immediately adjacent to existing service centres, and in particular those that are within a short walk (<1km) from a train station and a range of shops and services. This increases accessibility of jobs to the community and also the contribution of businesses to the local economy, capturing expenditure of the business, employees and visitors.

22. “The SADPD could now focus on reflecting particular aspects of sustainable development in its thematic policies.” If this is done, KCHG recommends that one “particular aspect” is Mixed use development.
23. There should be no need for further guidance but there should be a clear reference to the SA Scoping Report
**Question 3a: What approach do you think should be taken towards the apportionment of the overall development requirement across Local Service Centres?**

Key issues raised:

1. Confirmed/submitted Neighbourhood Plans should guide the vision of the SADPD and be afforded greater significance.
2. Apportionment should not be influenced by the housing requirements set in made or emerging Neighbourhood Plans as these have come forward well before the SADPD has been produced and the methodology for apportioning the number of dwellings required in each of the LSCs has been consulted on.
3. Potential factors may vary between sites, skewing results and making cross-comparisons meaningless. Weightings could be set for each factor specific to each LSC; the Neighbourhood Plan can provide information on this.
4. Housing and employment allocations should be looked at as a whole over all LSCs – not on a piecemeal site by site basis.
5. Other factors e.g. infrastructure, need a baseline date to be established. The infrastructure baseline needs to set a minimum infrastructure requirement for each of the LSCs from a fixed future date to guide the extra infrastructure built.
6. A reviewed methodology should be published showing how each issue is judged and the results used to develop the proposed level of development.
7. There is no recognition of the outcome of the call for sites exercise; LSCs should be consulted on the sites.
8. The apportionment and distribution of new housing between the LSCs should reflect land availability, environmental and policy constraints (e.g. Green Gap) and the proximity/capacity of supporting services and facilities.
9. There should be flexibility to make sure the overall requirement is delivered, particularly if there is capacity in certain LSCs to accommodate more development.
10. The approach to identifying sites should take into account market conditions and whether there is market demand, particularly for employment uses in that particular location.
11. Densities appropriate to the character of each area should be used.
12. Sites in the SHLAA that have been refused planning permission or dismissed at appeals in the last 5 years should be excluded.
13. Policy SE14 (Jodrell Bank) should be given significant weight, especially for the Inner Consultation Zone where the ITU threshold is already breached.
14. Prorating of housing allocation based on existing housing should not be used; if it is, then the correct ONS 2011 Census figures should be used.
15. Completions and commitments should be brought up to date and taken into account before allocating sites e.g if an extension is proposed by the SADPD to a settlement boundary.

16. The housing need figure should be calculated irrespective of commitments and completions.

17. New dwellings completed outside the settlement zone lines should be counted towards the LSC requirement and not rural; it conflicts with Neighbourhood Plans.

18. The majority of completions and commitments have taken place in the LSC’s to the south, where new development opportunities are not constrained by Green Belt; some of these significantly exceeded the average or mean distribution of the LSC housing requirement.

19. If the residual requirement of 1,125 dwellings is directed to the southern LSC’s, it will continue to undermine the achievement of sustainable development across the plan and all of the northern LSC’s.

20. The allocation of growth should be proportionately higher to the Local Service Centres in the north of the Borough given the persistent lack of under-provision, and the impacts this has had on the demographic profile in settlements such as Prestbury.

21. A review of Green Belt boundaries is necessary to make sure that there is an appropriate distribution of housing to each northern LSC.

22. The overall LSC housing requirement of 3,500 dwellings should not be rigidly adhered to if exceeding is necessary to ensure that each LSC accommodates its needs; apportionment needs to be flexible.

23. Alderley Edge and Chelford are sustainable locations, with a need for new housing.

24. Development should meet the requirements of the LSCs; they should be considered in turn and not a one size fits all approach; the LSCs have different characteristics.

25. Development should be directed towards sustainable settlements, with excellent transport links.

26. Development should be considered in the context of the LSC, e.g. built form, housing needs (which need to be assessed), and existing tenure mix.

27. Wynbunbury should be a LSC given the services available in the village and its ability to serve a wider network of smaller nearby settlements.

28. Consider the ability of a site/settlement to meet the social, economic and environmental components of sustainable development.

29. Consider the ability of the site to be accommodated either in or next to a settlement without adversely impacting on its character.

30. Consider that sites are of an appropriate scale in relation to the size and function of the settlement.

31. Consider that development in the settlement maintains or enhances local services and facilities, including those located outside of a settlement that serves the settlement and its outlying areas.
32. Is capable of providing appropriate mitigation to minimise any significant adverse impacts that future development may have on the site or settlement.

33. Considering the apportionment of development to the LSCs solely in relation to the percentage increase of growth to a settlement is not a sound or appropriate approach.

34. Growth figures associated with individual settlements should be expressed as minimum figures.

35. Consider whether settlements that are not constrained by Green Belt can accommodate an increased housing requirement. If they can’t then consider Green Belt release.

36. Submitted assessment of LSCs taking into account Neighbourhood Plans, housing completions and commitments, green gap, SHLAA etc: Audlem 105 dwgs; Bunbury 150 dwgs; Goostrey 50 dwgs; Haslington 75 dwgs; Holmes Chapel 100 dwgs; Shavington 125 dwgs; Wrenbury 50 dwgs; Alderley Edge 200 dwgs; Chelford 70 dwgs; Disley 75 dwgs; Mobberley 0 dwgs; Prestbury 0 dwgs; Bollington 130 dwgs.

37. Take into account a) the population size and proportionate infrastructure of each LSC; b) availability of, and access to, local employment; c) ease of access to good public transport to larger centres of employment at normal commuting times; d) maintenance of green gaps between settlements.

38. Housing demand is greatest in the north of the area, which should be reflected in the spatial distribution across the Local Service Centres.

39. Prestbury is in a strong market area and a sustainable location.

40. There is a demonstrable lack of developable/brownfield land within settlement boundaries of the Local Service Centres inset in the Green Belt.

41. The apportionment should be proportionate.

42. Divide the 3,500 by 13, giving 270. If LSCs have already met this figure then the remainder needs to be equally distributed amongst the other LSCs.

43. Development should be apportioned based on the degree of need, including sustainability and availability of suitable sites, using the SDUR.

44. Goostrey is constrained by Jodrell Bank, Mobberley by noise issues from Manchester Airport, Prestbury by an Area of Special County Value, and Bollington has a challenging topography.

45. The housing need for Mobberley must be met in a settlement within the same Housing Market Area.

46. The LPS should seek to identify a sustainable housing figure for each Local Service Centre from a starting point of 3,500, not 1,125.

47. The policy should allow for the minimum requirement to be exceeded where developments would provide supporting infrastructure and other key benefits to the LSCs, which may have been identified in Neighbourhood Plans or by Parish Councils.

48. Green Belt should not be a reason for a lower housing requirement where needs have been identified.
49. The amount of development in the north of the Borough should be limited due to Green Belt, and infrastructure limitations.

50. Additional land (e.g. safeguarded land) should be identified through the Site Allocations DPD to ensure that there is greater choice and opportunity of sites to deliver the homes needed in each of the housing market sub areas.

51. The realistic, deliverable capacity of suitable sites located outside of the Green Belt should be understood.

52. Particular weight should be given to the socio-economic profile of the settlement and the need for sustainable development.

53. Unique factors such as the presence of a major employer should be factored in.

54. Some of the commitments may lapse, therefore a buffer should be considered.

55. Every committed site should be subject to Sustainability Appraisal as they may not be the most sustainable/ideal pattern of development.

56. There should be formal allocations of sites in the ‘Other settlements and rural areas’; a criteria based policy may fail to meet the needs of the settlements in the north of the Borough.

57. Infrastructure provision should include Royal Mail who have a statutory duty to maintain a universal service pursuant to the Postal Services Act 2011.

58. There has not been a demonstrable process undertaken in the Local Plan or its evidence base to clarify the level of need in the LSCs.

59. The needs can be met through allocations and windfall.

60. Take into account demographic changes and their effect on maintaining the population of each LSC, outstanding affordable housing needs, and trends of decline of local services or facilities that should be addressed through additional development.

61. Need to consider the programme for the completion of commitments.

62. Known development opportunities should be seen as priority.

63. Consider the scope to extend or improve infrastructure.

64. Consider scope to address a flood issue.

65. Consider deliverability and viability.

66. There may be an exceptional circumstance where a key/significant site or development opportunity should be given more weight than the Vision and strategy.

67. Consider flood risk assessments, historic patterns of development, settlement boundaries, size of the LSC, landscape setting and characters, the effect on KSCs, PTs and other settlements.

68. Proposed growth compared to existing housing numbers should be considered in relation to societal impact on health and well-being.

69. Infrastructure should include road network (size, type, ‘pinch points’/known issues for access) – with specific reference to highways/road infrastructure; foul drainage; internet access; connected public transport; safe pedestrian/cycle transport routes; electricity supply outages.
70. Consider the importance of the LSC in the wider network of smaller villages and rural hinterlands.

71. Holmes Chapel should gain a large allocation of growth given that it is the second largest LSC with a large rural catchment.

72. This LSC classification should be subject to an early review, in line with the White Paper’s recommendations, to accommodate the additional growth that will ensue from High Speed Rail 2 (HS2), the Northern Gateway Partnership and Greater Manchester Spatial Development Framework.

73. Mobberley and Prestbury are sustainable settlements and should have a higher proportion of growth targeted towards them, especially in light of the small levels of historic housing delivery.

74. Higher levels of growth should be targeted towards Disley and Alderley Edge, which are well placed to deliver higher levels of housing growth as borderline Key Service Centres, and have had low levels of housing growth relative to their position as high performing Local Centres.

75. Some villages have delivered significant housing numbers, whilst others have under-delivered; the emerging SADPD should take action to rectify this imbalance.

76. Somerford is well connected to the services of Congleton.

77. The next version of the SADPD should acknowledge the need for employment development across Local Service Centres and Principal Towns to ensure that the target of 380 hectares of land for employment use, as identified in Policy PG1 of the Local Plan Strategy, is met and exceeded.

78. Further allocations in Alsager should be identified to deliver a minimum of 257 dwellings within the Plan period, incorporating a 10% allowance for flexibility for provision in Alsager.

79. The chosen site for Middlewich Railway Station must be easily connected to the town centre, and accessible, with sufficient parking provision, pedestrian and cycling links, whilst not having any adverse effect on the flow of vehicular traffic through and around the Town.

80. No additional development apportioned to Basford East, SCGV, Wychwood Park, and Gawsworth Parish.

81. Phasing of development linked to the delivery of infrastructure, with housing delivery phased over the whole Plan period.

82. Policies to encourage the redevelopment of brownfield sites as a priority.

83. The introduction of a policy to prevent ‘co-location’ of new development.

84. Consider local traffic congestion and lack of public transport, and the suitability of local roads to accommodate the likely increase in traffic.

85. Air and noise pollution.

86. Loss of high quality agricultural land that is in agricultural production.

87. Car parking provision to reflect the lack of public transport and the scale of car ownership.

88. A sequential approach to Green Belt release should be taken.
89. Sites that are free of constraints and retain the integrity of the Green Belt and Green Gap should be favoured.

90. Reduce the need to travel long distances.

91. There must be an assessment of accessibility and connectivity to rail, the quality of bus services, the choice of job opportunities in the area, range of higher order services and connectivity by non-car modes.

92. The allocation of land should maximise the use of public transport corridors.

93. Those settlements closest to the HS2 infrastructure project should be highlighted as requiring more land for housing and employment uses.

94. In the context of Alderley Edge it is considered that consideration should be given to whether a better, sustainable development case, including the ability to provide affordable housing, is made to potentially apportion any requirement into part of the southern area of Wilmslow.

95. The 1,250 homes that are to be shared across LSC's should be allocated on a pro-rata basis using a criteria based on existing population and housing numbers.

96. Need to understand green infrastructure requirements, cultural heritage (and the setting of heritage assets), and what stakeholders and the local community consider to be the ‘Spirit of Place’ of an area. (National Trust)

97. Land should not be removed from the Green Belt in parcels which provide a significant contribution limiting encroachment/ preventing merging by providing key separation between built up areas.

98. Any preferred options should be carefully balanced against the other elements of sustainable development including conservation and enhancement of the historic environment as required by the NPPF (Historic England).

99. At least 2.5 ha of employment land should be allocated to Alderley Edge, which benefits from high levels of accessibility (locally and globally via the airport) and can complement the employment offer along the Wilmslow - Alderley Edge corridor.

100. Existing policy allocations that are now dated should be given no weight. Rather, the Council use the Call for Sites exercise to refresh the knowledge base, allocating those sites in the most sustainable locations.

101. Alderley Edge should have between 15% and 20% share of the housing requirement.

102. It is not necessary to allocate a contingency above the 3,500 target as this figure has already been increased from the original of 2,500 and agreed with the Inspector. Any shortfall can be covered by windfall.

103. A modest increase in housing, accompanied by support for employment (to reduce out-commuting) must also take account of the projected increase in numbers of older persons who are likely to require smaller houses than those appropriate for larger families.

104. Take account of the topography of any area on drainage flows and requirements where steep gradients may cause flash flood events.

105. Numerous site proposals submitted.
Question 3b: What approach do you think should be taken towards meeting development requirements across Other Settlements and Rural Areas?

Key issues raised:

1. There is a need to focus on brownfield land, including under-used or redundant employment sites; develop brownfield sites before greenfield. Consider NLUD data and the Brownfield Register.
2. The factors and considerations for LSCs should apply equally to rural areas and other settlements. Priority should be given to causing least harm to Green Belt, meeting local needs to sustain communities and be in the most sustainable travel locations.
3. Need to consider existing commitments and completions since 2010 before determining further allocations.
4. Development in other settlements and rural areas should be small scale (not more than 10 dwellings) and sustainability factors should be an important consideration.
5. The data presented in the Weston & Basford Neighbourhood Plan should be taken into account as part of a criteria-based policy.
6. The five-year housing needs survey completed to inform the Wybunbury Ward Combined Parishes Neighbourhood Plan should be taken into account when considering allocations in other settlements and rural areas.
7. It is expected that the scale of new development at villages within the Wybunbury ward will be quite limited, reflecting their place in the settlement hierarchy.
8. Green Belt status should not preclude appropriate and proportionate allocations to other settlements and rural areas in the Green Belt. The Strategic value of Green Belt should be recognised.
9. Significant transport infrastructure will impact on the rural character of the Wybunbury ward. Areas to the south of Crewe need to be considered in the context of Strategic Green Gaps.
10. Preferred options should be carefully balanced against other elements of sustainable development, including conservation and enhancement of the historic environment (Historic England).
11. Densities appropriate to the character of each area should be used; not a blanket approach of 30dph.
12. Sites refused permission in the past five years should not be included.
13. Due to the presence of the Jodrell Bank observatory, Goostrey should not have any new housing as all applications will raise radio interference above ITU threshold, having a cumulative impact.
14. Sustainability and availability of services should be considered; consider the access to and impacts on the infrastructure of other nearby centres. A criteria-based approach which identifies existing services and facilities would enable identification of suitable locations for new housing. Need to consider availability of mains drainage, superfast broadband, public transport and retail facilities. Infrastructure and services should be provided alongside new development. Settlements with key services should see population growth to ensure vital services are maintained.

15. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

16. Housing should not be distributed proportionately, based on the existing number of dwellings in a settlement.

17. Neighbourhood Plans should be given significant weight.

18. The Local Plan (and Neighbourhood Plans) defines LSCs as the entire parish or a larger area outside the settlement zone line, so housing completions outside the settlement zone line should be counted towards the LSC’s target.

19. If the SADPD proposes an extension to the existing settlement boundary, the completions and commitments within the new settlement boundary should count towards that settlement’s total.

20. The scale, location and function of development in other settlements and rural areas should not undermine the vitality and viability of other nearby higher order centres.

21. The capacity of villages to accept infill development should be assessed and prioritised over extension of settlement boundaries.

22. Allocations should be focussed in and around the LSCs.

23. The scale of the existing settlement and impacts on local infrastructure must be considered. Development should be directed to villages that already have a range of services and facilities – focussing on existing settlements will re-enforce and sustain local services (Weston is a sustainable settlement and should have modest growth).

24. Allocation of employment sites should be focussed on Alderley Edge and allocations in other settlements and rural areas are not required.

25. All villages should contribute to the housing requirement, diluting the effect on the rural community. Development immediately next to the built-up limit of a village should be treated as infill development.

26. There should be no encroachment onto prime agricultural land or Areas of Special County Value.

27. The 1,250 dwellings is a substantial need which is unlikely to be met through windfall sites within established settlement boundaries, and there is a need to review settlement boundaries and allocate housing sites in the other settlements and rural areas.

28. Neighbourhood Plans should be consistent with the SADPD and made plans that do not account for sufficient levels of development to accord with the SADPD should be reviewed. The SADPD should not avoid making further
allocations in areas with made Neighbourhood Plans. Apportionment of development should not be influenced by the housing requirements set out in Neighbourhood Plans.

29. If villages that already offer a reasonable range of services and facilities should be the focus for additional growth, then the SADPD should identify ‘sustainable villages’ as originally intended by the LPS. A separate consultation could be undertaken to identify these sustainable villages. A large proportion of the development requirement should be met in named settlements in this fourth tier of the settlement hierarchy as set out in Table 8.2a of the LPS.

30. The approach should not focus solely on the larger villages as this would lead to the decline of other smaller rural villages.

31. Follow an environmental capacity based approach, which considers, inter alia, local landscape and townscape character/capacity, cultural heritage and the setting of cultural heritage assets, and ecological sensitivity.

32. The potential to enhance the sustainability of smaller settlements through new development should be considered. Mixed-use developments should be considered and affordable housing and employment requirements of smaller communities addressed. A new village should be created at Cholmondeley which will provide significant public benefits and maintain the future prosperity of the Cholmondeley Estate.

33. Brereton green is a sustainable settlement and has had limited growth in the last 20 years – greenfield land outside the settlement boundary is required.

34. The approach for identifying employment sites should take market conditions into account and whether there is demand for employment uses in the particular location.

35. Haughton should be designated as a village where appropriate-scale development can come forward.

36. Hough is a sustainable settlement and has had limited growth in the last 20 years – greenfield land outside the settlement boundary is required.

37. The policies of the SADPD should seek to ensure that, support is given to development that can proceed within rural areas where it is of a proportionate scale commensurate with the function and character of the settlement, rather than looking to resist or restrict it out of hand.

38. There is a risk of underperforming housing delivery in the Green Belt. Where reasonable and sustainable, a proportion of the 1,250 homes should be re-assigned to LSCs.

39. A suitable buffer should be built into the permissions to account for those that may lapse and the delivery of all 2,950 dwellings should be fully mapped out in the SADPD.

40. The settlement around Mobberley Station is separate from Mobberley and should be placed on the list of candidate settlements in the ‘Determining the Settlement Hierarchy Report’.
41. Adlington is a suitable settlement to direct a good proportion of the residual housing requirement.

42. Middlewood has a centrally developed area that may warrant being inset within the Green Belt.

43. Plumley is a suitable settlement to direct a good proportion of the residual housing requirement.

44. Styal may warrant being inset within the Green Belt.

45. A settlement boundary for Higher Poynton has been drafted for the purposes of monitoring commitments and completions.

46. 1,250 dwellings should be apportioned to villages considering sustainability issues (services and facilities) and constraints (Green Belt and Jodrell Bank Observatory). The apportionment should also consider where there have already been completions and commitments.

47. Marton is well serviced to accommodate a large portion of the outstanding 1,250 minimum target.

48. The statement that ‘the scale of new development at any of these villages will be quite limited’ should be deleted as they have differing levels of services and facilities and the LPS states that the size of new developments in settlements in this category should be reflective of the village’s scale, form and function.

49. The 1,250 should be a minimum and the SADPD should reflect increased support for small and medium sites in these settlements to support thriving rural communities.

50. Criteria-based approach should support development that addresses the three strands of sustainable development, is within or well-located to a settlement, is an appropriate scale, can enhance or maintain local services and can provide mitigation for any significant adverse impacts.

51. LPS Policy PG 2 requires new develop in other settlements and rural areas to be confined to small scale development and conversions. These settlements are therefore unlikely to deliver 1,250 homes and more development should be directed to the LSCs.

52. Services can also be accessed on a cross-border basis so need to also consider the impact of development proposals in adjacent areas.
Question 3c: Are there any other issues related to meeting development needs across Local Service Centres and Other Settlements and the Rural Area that should be included in the SADPD?

Key issues raised:

1. Confirmed/submitted Neighbourhood Plans should guide the vision of the SADPD and be afforded greater significance.
2. Housing and employment allocations should be looked at as a whole over all LSCs – not on a piecemeal site by site basis.
3. Other factors e.g. infrastructure, need a baseline date to be established. The infrastructure baseline needs to set a minimum infrastructure requirement for each of the LSCs from a fixed future date to guide the extra infrastructure built.
4. Potential factors may vary between sites, skewing results and making cross-comparisons meaningless. Weightings could be set for each factor specific to each LSC; the Neighbourhood Plan can provide information on this.
5. There is no recognition of the outcome of the call for sites exercise; LSCs should be consulted on the sites.
6. The residual housing need should be allocated in named settlements in the rural area.
7. Completions and commitments since the start of the plan period should be taken into account, and be up to date.
8. Allocations in settlements that have a made Neighbourhood Plan should not be avoided; any restrictions to development could impact on the sustainable pattern of housing delivery.
9. All settlements will need to be assessed for their capacity, sustainability (ranked against criterion) and suitability.
10. Brereton Green is suitable for housing development; it has been subject to limited growth.
11. Densities appropriate to the character of each area should be used.
12. Sites in the SHLAA that have been refused planning permission or dismissed at appeals in the last 5 years should be excluded.
13. Policy SE14 (Jodrell Bank) should be given significant weight, especially for the Inner Consultation Zone where the ITU threshold is already breached.
14. Local Plan policies should be considered.
15. Consider sustainability, availability of services, and good design.
16. Prorating of housing allocation based on existing housing should not be used; if it is, then the correct ONS 2011 Census figures should be used.
17. New dwellings completed outside the settlement zone lines should be counted towards the LSC requirement and not rural; it conflicts with Neighbourhood
Plans. They should also be included if they are within a proposed boundary extension to a settlement.

18. Develop brownfield sites before greenfield.

19. In sequentially seeking to ensure development is directed towards brownfield land and at the same time protecting the intrinsic character and beauty of the countryside, policies inadvertently resist appropriate and beneficial development in rural areas.

20. Consider a criteria based approach to policy that sets out the type and scale of development that could be permitted, including sufficient flexibility so as not to preclude development that may appear inappropriate, but upon detailed consideration is the most appropriate location.

21. Development should be apportioned to meet local need.

22. Settlements should be looked at individually.

23. Development should be directed towards sustainable settlements.

24. Apportionment should be considered in the context of the settlements’ existing development.

25. There should not be a one size fits all approach; the LSCs have different characteristics.

26. There has been an overprovision of new homes in the south of the Borough, and a need for housing in the north of the Borough.

27. If the residual LSC requirement is not directed to settlements in the north of the Borough, those settlements which are constrained by Green Belt will decline relative to those in the south.

28. It is appropriate to review Green Belt boundaries when development needs justify such an approach.

29. There is a lack of brownfield land in the northern LSCs.

30. The overall LSC housing requirement of 3,500 dwellings should not be rigidly adhered to if exceeding is necessary to ensure that each LSC accommodates its needs; apportionment needs to be flexible.

31. Alderley Edge is a sustainable location for development, with a need for new housing.

32. The amount of development distributed to the LSCs and Other Settlements and Rural Areas should be expressed as a minimum to support continued growth.

33. Proposals that address the criteria provided should be approved in accordance with para 14 of the NPPF.

34. LSCs to have the opportunity to give feedback on and/or be made aware of planning applications in their Ward because of the knock-on impact on local services and infrastructure.

35. Consider cross-border demand on infrastructure and services for those locations adjacent to county borders.

36. Services available in another settlement nearby may address the needs of residents in other settlements with fewer services.
37. Development must not impact on the Wybunbury Conservation Area and leaning tower.
38. Development will be limited around Wybunbury Moss due to the impact of surface run-off.
39. Wynbury ward is in the Nature Improvement Area for Meres and Mosses; consider the appraisal of the Meres and Mosses by Shropshire Wildlife Trust.
40. An uplift of the overall housing and employment land requirements generated by the positive impacts of the Cheshire Science Corridor EZ should be examined and evidenced. Target such growth to the north of the Borough e.g. Ashley.
41. Consider needs for retail, leisure, community, health care, hospitality etc.
42. Refer to the potential benefits of mixed-use developments and enabling developments e.g. at Mobberley.
43. Set out an approach to assessing the sustainability of smaller rural areas to make sure that these smaller areas do not decline due to a lack of investment, outmigration and closure of local facilities from stagnation and lack of growth.
44. Assess local service centres and other centres and rural areas to establish if there is a need for more housing to ensure that the existing services remain viable in those settlements going forward, and apportion housing as required.
45. Consider individual housing sites and the cumulative impact when locating new housing development using the emerging Playing Pitch Strategy and Built Facilities Sports Strategy. (Sport England)
46. The Green Gap is important and an extension to a Local Green Gap has been proposed in the Weston and Basford Neighbourhood Plan.
47. Test the ability of developers to deliver their proposals in the timescales; they should voluntarily agree a two year timescales for the submission of reserved matters, and then be time limited by a s106 agreement to build the houses.
48. Green Belt purposes must remain. It protects local character, heritage, and green spaces.
49. Windfalls should be based on past delivery.
50. A sequential approach to Green Belt release should be taken.
51. Village boundaries must be distinct where development is considered.
52. Where there is no significant encroachment into the Green Belt smaller developments should be approved without the need for special circumstances.
53. Where developments will make little difference to the character of the Village or to the Green Belt then the SADPD should consider a presumption in favour of development.
54. Consider a provision that where land has not been used for agriculture for a specific period of time (e.g. 10 years) the land can be considered available for development if it is adjacent to the built up limits of a Village.
55. Define settlement boundaries defining areas where normal planning controls will apply that surround the built up area of the village (not necessarily incorporating the extent of the Village).
56. Consider environmental impact, loss of landscape views and creeping urbanisation of countryside through to loose an interpretation of permitted development.
57. Settlements closest to the HS2 infrastructure project should require more land for housing and employment uses.
58. Commit to further explore the potential for a Holmes Chapel Relief Road.
59. Growth to settlements should be of sufficient scale to deliver tangible benefits rather than to create isolated pockets of new housing that bring little or no benefits.
60. Consider the mechanism for the delivery of small sites in the Green Belt.
61. Consider reassigning housing into the LSCs or KSCs to ensure housing supply is boosted and provided in sustainable locations.
62. Consider physical and perceptual environmental constraints by understanding local character. (National Trust)
63. Support legitimate requirements for farming and the rural economy in appropriate locations.
64. Preferred options should be carefully balanced against the other elements of sustainable development, including the conservation and enhancement of the historic environment. (Historic England)
65. Review LSC boundaries tightly constrained by Green Belt (e.g. Prestbury) or Open Countryside to resolve anomalies.
66. Make clear that infrastructure requirements arising from development in Local Service Centres and Other Settlements and Rural Areas will be taken into account in deciding infrastructure provision also of Principal Settlements and Key Service Centres.
67. Any allocation of increased housing must be accompanied by proper planning and funding of infrastructure e.g. highways.
68. Consider Changing demographics, Housing type, mix and density.
69. Retain the character and setting of settlements.
70. Several site proposals submitted.
**Question 4:** Do you agree with the approach set out for determining whether further adjustments to the Green Belt boundary are required around Macclesfield and the Key Service Centres inset within the North Cheshire Green Belt (Handforth, Knutsford, Poynton and Wilmslow)?

Key issues raised:

1. The LPS only considered sites of 150 dwellings or more; therefore unless additional smaller sites are considered through the SADPD, it is not possible to assess whether the plan as a whole is justified.

2. The SADPD should consider further Green Belt adjustments in Macclesfield and the Key Service Centres to accommodate further growth; not just limited to meeting the residual development requirements. A flexibility rate of 20% should be applied to each settlement’s requirement, in line with the LPEG report. Some commitments may lapse and a buffer should be included to address this issue, meaning that further land will be needed. An uplift to development requirements should be considered as a result of the positive impacts of the Cheshire Science Corridor Enterprise Zone.

3. In a number of cases, the Green Belt covers large areas of developed land; the SADPD should review all boundaries in the context of NPPF para 85 and “not include land which it is unnecessary to keep permanently open”. A large area of Wilmslow’s urban form is washed over by and should be removed from the Green Belt.

4. Boundaries should be clearly defined using physical features which are readily recognisable and likely to be permanent; the SADPD should amend existing boundaries to fit this requirement.

5. Further Green Belt Assessments should be carried out on the smaller sites, rather than relying on the GBAU assessments of the larger parcels within which they sit. The GBAU should be updated, including public consultation so that the most up to date information is used in site selection. The parcels assessed in the GBAU are excessively large and take no account of ownership boundaries. They should be subdivided to make sure that no sites are missed in the site selection process.

6. Distribution of development should include smaller settlements and rural areas; non-Green Belt sites should take precedent over Green Belt land.

7. Site-specific comments supporting the release of particular sites for development.

8. Safeguarded land should be utilised before any further Green Belt land is considered for release. Safeguarded land should be considered for site allocations.
9. The HWP prioritises support to small and medium housebuilders and therefore the SADPD emphasis must be on small sites.

10. Additional smaller sites in Knutsford would provide flexibility to ensure the requirement for Knutsford is delivered.

11. Instead of releasing land from the Green Belt, further development should be directed to non-Green Belt settlements including Sandbach.

12. Release of poorer-performing Green Belt sites around Poynton to meet local needs is preferable to building on valuable open spaces within the urban area. The draft Poynton Neighbourhood Plan identifies that the LPS strategic sites may only deliver 300 units, not 450 as intended and there may therefore be a need for additional land to be found in Poynton.

13. The additional 200 units in Poynton should be identified through the Poynton Neighbourhood Plan, mainly through brownfield development. Allocation of sites through the SADPD would mean further Green Belt release.

14. It is unclear why additional Green Belt land is required in some settlements but not others, given that the total requirement does not consistently represent the proposed level of development.

15. Further land should be released in strong market areas such as Knutsford to account for slower than envisaged rates of development on strategic sites. There is an over-reliance on strategic sites and more land should be released through smaller sites to enable flexibility.

16. Commitments should only be considered where the sites have been subject to Sustainability Appraisal and determined suitable for allocation in a Local Plan.

17. The NPPF does not require that the sites released are those that make the lowest contribution to Green Belt purposes; whilst this is an important consideration, other sustainability factors should be considered.

18. No adjustments should be considered for the South Cheshire Green Belt.

19. It is possible, based upon the exceptional circumstances test, that small re- apportionments of the residual requirements be redistributed based between the settlements.

20. The data for completions and commitments should be brought up to date, and its accuracy confirmed by an independent third party.

21. Consideration must also be given to Green Belt adjustments around Alsager and Congleton, which are adjacent to the Green Belt. Newcastle-under-Lyme Borough does not have a five year housing supply and the Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan may well reveal a requirement for adjacent Councils to accommodate housing from the Potteries and a more proactive approach to Green Belt release in South Cheshire should be adopted.

22. The Urban Potential Study should be refreshed to make sure that its assumptions are up to date and to consider any new sites.

23. The proposed approach is top-down – the SADPD should consider where appropriate sites exist and their capacity first. The requirements are minimums and there is no cap on the amount of housing and employment land that can be allocated.
24. No provision is made for any use other than housing and employment land.
25. Key Service Centres may need to meet the needs of Other Settlements and Rural Areas where they will not meet their own needs.
26. The additional 1.49ha of employment land in Knutsford will need to be found from within the Green Belt.
27. The use of a site for sport should be considered as a constraint.
28. The overall amount of residual development in Handforth should be increased from 15 to 57 dwellings to meet the overall 2,200 requirement.
29. The development requirements are too high, there is a lack of ambition on brownfield regeneration and there are no exceptional circumstances to release Green Belt land.
30. Priority should be given to increased densities and brownfield sites.
31. The Macclesfield employment land requirement is small scale and can be met by retaining existing sites in employment use instead of granting permission for alternative uses. No allowance has been made for home working.
32. There must be a critical review of the GBAU as it was commissioned and presented to assist in identification of strategic sites; the understanding of sites at a lesser scale is insufficient. The approach to review and consider sites in sequence, starting with the least contribution to Green Belt purposes will be flawed from the outset.
33. The residual figures for Handforth, Wilmslow and Alderley Edge should be considered as one, due to their proximity.
34. Further Green Belt release at Wilmslow cannot be justified.
35. The site selection methodology should also consider spirit of place, landscape character, cultural heritage and green infrastructure issues, as well as the setting of National Trust properties. (National Trust).
36. Development of any Green Belt land should minimise harm but also seeks enhancements to those factors identified as key to spirit of place.
37. Anomalous sites should not be identified; local input via neighbourhood Plans can assist.
38. It is important to recognise that where the LPS has identified sufficient opportunities to meet the full requirements, the SADPD will not need to identify further land.
39. If Green Belt is required, then further Green Belt should be designated to replace the areas lost.
Question 5a: Do you agree with the approach set out for determining whether alterations to the Green Belt boundary are required around the Local Service Centres inset within the Green Belt?

Key issues raised:

1. The approach explained does not appear to properly take into account changes to the Green Belt proposed under Part One of the Local Plan process and where these will bring settlements closer together.
2. Where a Local Service Centre has made a significant contribution to development requirements through brownfield sites, it should not have Green Belt alterations.
3. Policy should require all non-Green Belt sites to be utilised first.
4. Alterations should only be made where there is an urgent need identified through the neighbourhood planning process.
5. The sequential approach should apply across all LSCs together, i.e. sites making a lower contribution to Green Belt purposes should be considered across all LSCs before looking at higher contribution sites.
6. Town and parish councils should be involved in the peer review stage of the site selection methodology.
7. There are no exceptional circumstances to alter Green Belt around Bollington.
8. The Green Belt Assessment Update should have considered the contribution that Green Belt around Mobberley makes to the setting of the historic town of Knutsford.
9. The cumulative impact of proposals, including those in the Greater Manchester Spatial Framework should be considered.
10. The approach is haphazard and depends on promoted sites; there should be a strategic analysis to determine where release of sites will do the least damage to that community.
11. Development should be delivered in the right locations where it is most needed; this is likely to involve release of Green Belt land around certain settlements in preference to non-Green Belt sites elsewhere.
12. A significant proportion of housing allocations should go to those LSCs with good access to public transport, shops and services.
13. There is no need to demonstrate exceptional circumstances. It is only once established (i.e. after the SADPD) that boundary changes should be exceptional.
14. Consideration of development sites and allocations should take into account the impact on key service centres and principal towns where strategic allocations have already been determined in the Local Plan Strategy.
15. Cumulative impact of proposals, including Greater Manchester Spatial Framework proposals, should be considered.
16. Alderley Edge should have been designated as a Key Service Centre. It is the largest Local Service Centre and should be the focus of employment growth within the LSCs.

17. Various sites are promoted for development.

18. The required housing numbers should be divided as evenly as possible between all LSCs.

19. The site selection methodology should include sites used, or last used, for sport as a constraint (Sport England).

20. There should be a further review of the Green Belt surrounding Alderley Edge, Disley, Mobberley and Prestbury. The council should undertake a review of Green Belt around Alderley Edge, Bollington, Chelford, Disley, Mobberley and Prestbury to establish how these Local Service Centres will meet their own needs.

21. The existing evidence base supports further Green Belt release in the north of the borough.

22. Need to consider the need to promote sustainable patterns of development. A number of Green Belt sites are in highly sustainable locations.

23. Safeguarded land should be spread proportionately around settlements.

24. Land should not be removed from the Green Belt where it provides a key separation between urban areas.

25. Exceptional circumstances have already been established – it is not necessary to revisit this point where the residual requirement requires the release of a site in the Green Belt.

26. Identified development requirements must not be distorted by the prospect of having to release Green Belt.

27. Green Belt boundaries should all be reviewed in accordance with paragraph 85 of the NPPF. The Council should not include land which it is not necessary to keep permanently open; safeguarded land should be identified; the Green Belt boundary should not be altered again at the end of the plan period and boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent.

28. Whilst the GBAU can be a basis for the SADPD process, further assessments will need to be undertaken.

29. Comments on various assessments of Green Belt parcels in the GBAU.

30. Where there are opportunities for development within a settlement, this should not preclude a wider assessment to ascertain whether a more sustainable pattern of development could be achieved by taking land out of the Green Belt.

31. There is a need to release Green Belt land around Prestbury and exceptional circumstances exist for this. There is no non-Green Belt land to deliver new development.

32. Sites should be assessed on a settlement by settlement basis with a view to meeting the needs of each LSC.
33. Land should be allocated in excess of the residual development requirements to give flexibility and greater market choice.
34. The commitments and completions figures should be brought up to date.
35. The Housing White Paper states that when undertaking releases local planning authorities should look first to land which “…surrounds transport hubs…”.
36. All options for the release of land outside of the Green Belt should be explored, including in higher tier settlements such as Sandbach.
37. A more in depth analysis of the Green Belt around Prestbury has been submitted to assist with this exercise.
**Question 5b: What approach do you think should be taken towards apportioning the remaining requirement for safeguarded land?**

Key issues raised:

1. The approach is haphazard and depends on where sites are put forwards rather than being a strategic approach.
2. Neighbourhood Plans should inform decisions.
3. The use of a weighted mechanism, including physical constraints and accessibility should be employed.
4. The amount of safeguarded land proposed for LSCs will be insufficient to meet their longer-term needs and will not ensure that Green Belt boundaries endure beyond the plan period. Therefore, significantly more Safeguarded Land should be identified.
5. Safeguarded Land should be apportioned to LSCs, based on their relative size, role and function within the settlement hierarchy, sustainability, and likely future development needs.
6. A trigger policy should be included to allow for release of sites from the safeguarded supply in order to maintain flexibility throughout the plan period (such as the West Lancashire example).
7. Safeguarded Land should be directed to the more sustainable locations. Sustainable patterns of growth should be considered, looking at past rates of delivery and commitments.
8. Areas of Safeguarded Land should have no overriding technical or environmental constraints that would prevent development.
9. Representations supporting release of specific sites for safeguarded land.
10. All settlement should identify land suitable for safeguarding.
11. The LPS identifies that a further 24 ha of safeguarded land is required around the Local Service Centres. The full 24ha should be identified, rather than just the remaining 12.6ha.
12. Prestbury should provide its proportionate share of safeguarded land.
13. Population figures and other sustainability factors should be considered in the distribution. Alderley Edge is one of the most sustainable LSCs and many of the other northern LSCs have a range of constraints which limit the availability of sites. The majority of the 24ha should be apportioned to Alderley Edge.
14. The Issues Paper states that 187.4ha of safeguarded land is identified in the LPS and there is 12.6ha left to find. The LPS actually designates 186.4ha and therefore there is 13.6ha remaining.
15. LSCs Neighbourhood Plans should contribute to identifying areas of Safeguarded Land.
16. Land which meets the main purposes of Green Belt should not be designated as safeguarded as the exceptional circumstances cannot be known for development needs beyond the plan period.
17. The 12.6ha should be a minimum identified to incorporate a buffer.
18. Safeguarded Land should be brought forwards to fulfil needs before 2030.
19. A similar approach to the LPS approach should be employed.
20. The suitability and availability of sites put forward should be considered when apportioning the requirement.
21. The apportionment of safeguarded land in the SADPD should be more heavily weighted to the northern areas of the Borough.
22. A Borough-wide approach should be adopted to also consider safeguarded land for settlements in the south of the Borough, such as Alsager and Congleton.
23. The economic projections are too high, there is too much employment land proposed and the housing requirements are too high. Consequently, the amount of safeguarded land is too high and in any case it is not required by NPPF.
24. There should be a full strategic Green Belt review and where land serves any of the five purposes of Green Belt, it should be retained in the Green Belt.
25. Gawsworth Parish already has a large amount of safeguarded land from the South West Macclesfield proposal and should not have any more.
26. There is no need for further safeguarded land as residual housing requirements can be met on windfall sites and by increased densities.
27. The need for development does not constitute exceptional circumstances.
28. Proposals for safeguarded land should consider the impact on KSCs and Principal Towns where strategic allocations have already been determined.
29. The apportionment is likely to follow the method for disaggregating the overall housing need amongst LSC.
30. The total amount of safeguarded land should reflect the anticipated needs of individual LSCs beyond 2030.
31. Any preferred options should be carefully balanced against the other elements of sustainable development including the conservation and enhancement of the historic environment as required by the NPPF (Historic England).
32. Land to be safeguarded for employment uses should be well located in terms of access to road and rail infrastructure and existing businesses, supporting agglomeration and efficiencies of scale that are important to business growth.
33. Concern that the area of safeguarded land will produce over-development in the future given the very optimistic forecasts in the plan.
**Question 6a(i): Do you agree with the proposed approach to determining whether villages should be 'inset' within or 'washed over' by the Green Belt?**

Key issues raised:

1. The role of Green Belt in protecting historic village areas should be considered as part of the analysis.
2. Settlements should be separate from Green Belt and settlements being inset is the preferred approach.
3. The decision to inset or wash-over should be evidenced and consistent across the Borough.
4. Exceptional circumstances require consideration of all other reasonable options for meeting identified development requirements; Green Belt village boundaries should only be amended in development requirements cannot be met in other parts of the rural area.
5. Various site specific comments supporting the release of certain sites for development.
6. The approach does not have regard to Neighbourhood Plans or local consultation.
7. Objection to consideration of Higher Poynton in the Green Belt Villages Study as it lacks essential facilities and would detract from the open character of the Green Belt.
8. The study should consider all candidate settlements from the ‘Determining the Settlement Hierarchy’ report and any other settlements put forward for consideration including the settlement around Mobberley Station.
9. A settlement does not need to have its own services and facilities to be defined as a village, as development in one village may support services in a village nearby. Access to sustainable transport modes is important in defining villages.
10. There should be on the methodology to define a village.
11. Ashley, Middlewood, Plumley, Styal and the settlement around Mobberley Station represent the most sustainable locations to accommodate housing needs and some if not all of these settlements should be inset.
12. Mottram St Andrew should be assessed against para 86 of the NPPF.
13. Villages should be regarded as contributing to the character of Green Belt land unless residents accept otherwise. Other measures such as Conservation Areas should not be relied upon for protection. There should be open consultation with Parish Councils and Neighbourhood Planning Teams. Settlements affected should make their own decisions in this regard. A Steering Group, involving selected parishes in North Cheshire should be established to oversee the study.
14. The assessment on whether land should be released from the Green Belt should take into consider the historical use of the land, the planning history and past correspondence with the Council.

15. Lyme Green Settlement should be inset within the Green Belt.

16. Adlington should be inset within the Green Belt.

17. The SAPDD should give consideration as to whether allowing some development within these settlements through allocations would assist in achieving sustainable development.

18. A draft proposals map should be published so that the consideration can be given to whether the result is reasonable in practice.

19. If villages are excluded from the Green Belt it would make it easier for community facilities such as small scale sport and physical activity facilities to be developed (Sport England).

20. Pickmere should be washed-over by Green Belt to increase the level of planning control.

21. The review must be based on evaluation of the land against the five Green Belt purposes.

22. There must be full public consultation on the study.

23. Under the Duty to Co-operate, CEC must evidence full co-operation with neighbouring planning authorities who share the Green Belt.

24. In accordance with NPPF paragraph 85 planning authorities are required to ‘define boundaries clearly’. The review should therefore divide up the Green Belt into notional ‘parcels’ of land with clear, defensible boundaries.

25. The review should consider environmental qualities and other relevant factors including CPRE’s tranquillity maps, ‘Green Belts: A Greener Future’, flood risk, agricultural, geological, heritage and nature conservation.

26. CEC would be the subject of a costly legal challenge if it proceeds with the notion that ‘exceptional circumstances’ would automatically be constituted should the Study find a village currently included in the Green Belt should now be excluded from it. We also think this move would prejudice the progress that has been made by Neighbourhood Plans now, and in the future.

27. It would be appropriate to revisit the settlement boundaries, but to retain the settlements as “washed over”. There is no need to change this, as there is no need to find more land for housing and employment in these largely unsustainable locations. The only case for “inserting” such settlements would be where there is a Neighbourhood Plan in place, which has identified sites for development.

28. In identifying which villages are to be assessed, consideration must be given to the availability of mains drainage, shops, superfast broadband, public transport and utility standards including mobile telephone reception. The presence of listed buildings should also be taken into account.

29. The proposed approach should be informed by an understanding of Spirit of Place and landscape character (National Trust).
30. Any preferred options should be carefully balanced against the other elements of sustainable development including the conservation and enhancement of the historic environment as required by the NPPF (Historic England).

31. The current criteria are too narrow, not adequately drafted and could be problematic in their practical application.

32. By definition a village comprises built form and is unlikely to make a contribution towards the openness of the Green Belt.

33. The role of the green belt in protecting historic village areas needs to be emphasised as part of the analysis of rural villages within the Green Belt.

34. Butley Town should remain ‘washed over’.
Question 6a(ii): Do you agree with our interpretation of NPPF paragraphs 86 and 83 in terms of meeting the 'exceptional circumstances' test for altering Green Belt boundaries to exclude a village from the Green Belt?

Key issued raised:

1. Reviewing Green Belt release based upon Paragraphs 86 and 83 is too narrow, and does not pay due consideration to the policy tolerance and guidance identified in Paragraphs 89 and 85 of the NPPF, which allows for limited infilling in the Green Belt.
2. There is no requirement to alter Green Belt boundaries at Higher Poynton.
3. In general terms, villages should be inset rather than washed-over.
4. The approach must ensure that the inset boundary is firm and clear.
5. Due to the subjective nature of openness, there must be consultation with Parish Councils and Neighbourhood Plan teams.
6. It will still be necessary to demonstrate exceptional circumstances and a material change in circumstances since the Green Belt boundaries were previously adopted.
7. Church Lawton should be inset.
8. The Council should not be so quick to sacrifice Green Belt land. The Local Plan should explore ways of designating more Green Belt land and consider how to open up the accessibility of the Green Belt.
9. The purpose of the SADPD is to identify land to meet a building quota and this is not an exceptional circumstance.
10. The interpretation does not take into account local views expressed through Neighbourhood Plans.
11. The approach should be informed by an understanding of Spirit of Place and landscape character.
12. Need to consider alternatives to developing Green Belt, such as using brownfield sites and developing beyond the Green Belt boundary.
13. It is essential that boundaries around the LSCs are reviewed as part of the SADPD. Do not agree that the NPPF requires exceptional circumstances to be presented to warrant a review of a Green Belt boundary as part of the Local Plan review, but rather an assessment of the role and function of the land.
14. Exceptional circumstances is not the relevant test. The Council should take this opportunity to review the existing boundaries around settlements such as Prestbury to identify sites suitable to accommodate sustainable growth.
Question 6b: Are there any other Green Belt matters that need to be addressed in the SADPD?

Key issues raised:

1. Green Belt release based upon Paragraphs 86 and 83 is too narrow, and does not pay due consideration to the policy tolerance and guidance identified in Paragraph 89 and 85 of the NPPF, which allows for limited infilling in the Green Belt.
2. The housing requirement may not be met due to lack of choice and competition of sites in the north of the Borough – additional sites should be allocated through the SADPD including consideration of Safeguarded Land in the LPS.
3. Need policies to identify additional housing land if housing is not being delivered in accordance with the identified need.
4. In general terms, villages should be inset rather than washed-over.
5. Need to allocate more Green Belt land or designated AONB in the rural area surrounding Wrenbury.
6. Due to the subjective nature of openness, consultation with Parish Councils and Neighbourhood Plan teams will be required. Neighbourhood Plans should be taken into account.
7. The SADPD must consider whether further non-strategic Green Belt sites are required around Alsager.
8. The SADPD should consider Green Belt boundary changes whether there is currently significant development in the Green Belt or unclear boundaries. In some cases, built-up areas of KSCs are washed over by Green Belt. Green Belt boundaries around settlements should be re-assessed given changes since they were designated.
9. The LPS only considered altering Green Belt boundaries for new development; the SADPD should also consider whether existing boundaries are correct on a local level, e.g. whether they should include or exclude a residential garden.
10. The 4ha of employment land required in Other Settlements and Rural Areas could involve the release of Green Belt land.
11. There are a number of farmsteads that could be allocated for employment use.
12. Specific sites promoted for release from Green Belt and allocation.
13. The Wardle Employment Improvement Area will only deliver 46ha of employment land (not 61ha); therefore the rural requirement is actually 19ha (not 4ha).
14. Many outdoor sports facilities require Green Belt land (especially sports pitches and equestrian uses). NPPF para 89 refers to outdoor sport and recreation as an exception to inappropriate development, there have been
several appeals and high court rulings made that consider outdoor sport to be inappropriate development. It would be helpful to have a set of criteria that explains what the Council considers to be appropriate development for outdoor sport use that retains the openness of the Green Belt. (Sport England)

15. The Local Plan could explore ways of designating more Green Belt land and should consider how to best open up the accessibility of Green Belt for recreation and leisure.

16. Paragraphs 79-92 of the NPPF provides the appropriate level of guidance in relation to development in the Green Belt. It would be inappropriate for the SADPD to attempt to introduce policies which are not in conformity with the national guidance.

17. The character of Areas of Special County Value should not be compromised by inappropriate development. The provision of prime agricultural land must be preserved.

18. Utilisation of redundant agricultural and other buildings within the Green Belt for conversion to residential use should be considered.

19. Need to consider the extent to which the setting of LSCs and villages contributes to their sense of place and unique selling points.

20. The Council should review the Green Belt boundary around Alderley Edge.

21. If the SADPD is to propose Safeguarded Land it should clarify that such is removed from the Green Belt on SADPD adoption.

22. The SADPD should clarify also that a description of land as “Protected Open Space” does not confer the same degree of protection from development as land designated Green Belt which is the subject of NPPF policies.

23. The SADPD should usefully re-state the particular relevance to Cheshire East of the Green Belt in contributing to the quality of place valued by the Borough’s businesses, residents and visitors and to the economic, social and environmental dimensions of sustainable development.

24. A windfall allowance should be factored into the amount of Green Belt land to be released.
Question 7: Do you agree that this is an appropriate way forward for defining Strategic Green Gap boundaries and are there any other issues related to Strategic Green Gaps that should be considered?

Key issues raised:

1. The SADPD should refine and define the SGG policy
2. The SGG policy does not have the policy status of Green Belt and exceptional circumstances test is inappropriate. It is suggested that the definition of the detailed boundaries should be based on recognised and sound planning considerations such as:
   a. existing and physical characteristics;
   b. identifying logical and consistent boundaries that follow identifiable features and reflect adjoining development/land-uses;
   c. recognise sustainable development opportunities (e.g. previously developed land; limited infilling/rounding off; etc);
   d. reflecting the overall development and spatial strategy of the Local Plan and the requirement for additional land to be available to meet identified development requirements.
3. The definition of the detailed SGG boundaries should not be considered in isolation. Rather, it should be part of an overall exercise which also considers settlement boundaries in the context of the overarching development and spatial strategy
4. The green gap should be reviewed against permissions already granted and that a cumulative assessment is made of the erosion of the Green Gap to date,
5. CPRE would recommend CEC considers properly the creation of new Green Belt designation in accordance with Paragraph 82 for these important Green Gaps to be kept permanently open.
6. As a consequence of approved developments there has been a significant reduction in the overall volume of area that was protected under the saved Policy NE4.
7. The Green Gap boundary work should consider the role, function and performance of the land in terms of meeting the objectives of policy PG4a.
8. The Council should not seek to retain within the Green Gaps (and thus place a restrictive landscape designation upon) land which is not necessary to maintain the strategic gaps between the settlements.
9. Sport England - agrees with the principle of identifying Local Green Gaps as long as they do not prejudice the use of existing sport and recreation areas, or prevent small scale ancillary development that supports the sustainability of that sport/recreation use, or provision of new outdoor sports facilities where they are required to meet an identified need within that community.
10. Neighbourhood Plans should not be provided an opportunity to revisit strategic matters

11. Do not agree that the boundaries should “follow, as closely as possible, the extent of the hatched areas identified in Figure 8.3a that accompanies Policy PG4a in the LPS”. Those boundaries have not been considered or examined by the Inspector in the preparation of the Local Plan Strategy. Therefore it appears that the Council is approaching the strategic gaps from a predetermined starting point, rather than properly considering the detailed boundaries as required.

12. The Nantwich Bypass is a very strong permanent physical boundary

13. CHALC in partnership with Parish Councils in the south of the borough presented alternative Green Gap areas to the Inspector at the Local Plan Inquiry Processes in October 2016. These proposals identify a re-consideration of the Strategic Green Gap including a 'replacement' area that utilises current defined boundaries (A500, Newcastle Road, County Boundaries) to define rural South Cheshire from urban and sub-urban Crewe to both the South and West of Crewe. This offers a robust differentiation of Crewe from Nantwich, of Crewe from Shavington to the South-West of Crewe utilising what remains of the current SGG, and Shavington from Wybunbury and Weston. The SGG is important to ensure important definition between urban and rural village communities, but to also protect important nationally designated areas (NIA: Meres & Mosses, SSSI/RAMSAR site at Wybunbury Moss).

14. A full assessment must be undertaken across the whole of the Green Gap to establish parcels of land that do not perform a Green Gap function. It is critical that a thorough assessment is undertaken to ensure development needs can be achieved without compromising the aims and objectives of Green Gap Policy.

15. It is critical that details site surveys (from site visits) are undertaken to establish on the ground the areas that do, and do not perform a Green Gap function.

16. National Trust - There appears to be an overreliance upon physical features in defining the proposed boundaries. A wider understanding of aesthetic and perceptual factors, and how these relate to Spirit of Place, as well as green infrastructure and habitat provision should also inform the Council’s approach

17. The boundaries should be considered in the same way that Planning Inspectors – and the Council itself – have considered those areas hatched purple when granting planning permission and allocating sites in terms of whether individual parcels of land meet the purposes of the Strategic Green Gaps set out in policy PG4a of the LPS.

18. Needs to consider HS2

19. The HBF would anticipate further work is undertaken to justify the extent of the Strategic Green Gap. This study should consider the relative contribution of different parcels of land to maintaining the setting and separate identity of settlements
20. The purpose of the Green Gap is to ensure that the separation distance between Crewe and its surrounding settlements endures. Therefore, land which comprises logical infill development and which does not erode further the Gap between Crewe and other areas should be excluded.

21. It is also recommended that the mistakes of the past are not repeated and the settlement is not ‘shrink wrapped’.

22. The proposed approach is potentially highly restrictive and the LPA has not demonstrated why this policy is necessary.

23. Should the LPA progress with the designation of Strategic Green Gaps we also wish to emphasise that provision must be made to ensure that a sufficient range of development land is available and includes sites suitably located in relation to the existing urban edge of larger centres, such as Crewe, in order to meet future housing requirements. This will require land to be excluded from the Green Gap.

24. The Strategic Green Gap does not need to extend from Sydney Road to Haslington to appropriately prevent coalescence. Following the extent of the hatched area in Policy PG4a will unnecessarily restrain growth to the east of Crewe irrespective of whether the land is wholly necessary for the protection against coalescence and protection of the setting and separation of settlements. With respect to the physical boundary to the east of Crewe, this should be extended to the A34 which acts as a strong physical feature separating the settlements of Haslington and Crewe.
**Question 8: Do you agree that this is an appropriate way forward for identifying Local Green Gaps? Are there any other issues related to potential Local Green Gaps that should be considered?**

Key issues raised:

1. There needs to be a clearer recognition of establishing ‘Green Gaps’ around LSC’s and within nearby settlements. The factors identified in the New Green Belt and Strategic Open Gap Study published by the Council in September 2013 to inform the LPS need to be reviewed and revised in the context of ‘made’ Neighbourhood Plans and existing development commitments. We believe there is a need to establish ‘Green Gaps’ around Holmes Chapel and Goostrey to particularly protect Jodrell Bank and to further protect the erosion of open countryside between us and other neighbouring communities.

2. Historic England - Any preferred options should be carefully balanced against the other elements of sustainable development including the conservation and enhancement of the historic environment as required by the NPPF.

3. We support this (and the criteria which include open countryside, settlement character, landscape character, settlement separation). However, these gaps can also exist ‘within’ a settlement, not just between settlements.

4. Candidate Green Belt areas or/and Local Green Gaps could be assessed in a similar way to Strategic Green Gaps, using the factors identified in the New Green Belt and Strategic Open Gap Study published by the Council in September 2013 to inform the LPS.

5. The study is now 4 years old and both the Local Plan and various appeal decisions have ‘moved the goal posts’. We would suggest that the Council should commission a new piece of work, involving local councils and bodies such a Cheshire Wildlife Trust to fully understand the role and local importance of the existing Green Gaps and extend their Local Green Gaps.

6. Local communities are best placed to review and recommend the boundaries and extent of their local Green Gaps. The Council can then be responsible for the wider Borough view joining up green gaps where they cross Parish and Town boundaries in consultation with those communities.

7. We have significant concerns with regard to the designation of LGGs. Simply using the same methodology would suggest that such areas should have been strategic green gaps in the first place.

8. Inconsistency and the evidence that is required to ensure policies are robust and show why existing countryside polices are not sufficient. The risk is yet another layer of designations, using differing methodology that potentially undermines the policy for having Green Gaps in the first place.
9. The concern is that NPs may use Local Green Gaps in certain locations to frustrate development, i.e. by establishing extensive areas as pseudo Green Belt, rather than to prevent localised issues of coalescence. This is not the positive planning envisaged in the NPPF.

10. Sport England - As the aim of a Local Green Gap is similar to that of the Green Belt, Sport England would like to ensure there is no unintended consequences of these designations on existing or proposed new outdoor sport and recreation facilities. Many outdoor sports facilities require large swathes of greenfield land including local open space designations to operate sustainably, especially if the use is sports pitches or equestrian. As greenfield areas provide recognised sport and recreation opportunities it would be useful to include that as an explicit purpose of the Local Green Gap designation. It would also be helpful to have a set of criteria that explains what the Council considers to be appropriate development for outdoor sport use that retains the openness of the designation.

11. The introduction of such a restrictive approach is contrary to the NPPF – particularly in relation to paragraph 55, which seeks to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities. It is also contrary to the Housing White Paper, which seeks to promote growth.

12. Agree in principle to the criteria identified in the document referred to above; "New Green Belt and Strategic Open Gap Study: CEC, 2013)" in terms of identifying a Local Green Gaps Policy. However this seems somewhat perverse when the same document makes a cogent case for using these same criteria for classifying areas to the South, East & West of Crewe as Green Belt.

13. We do not consider there is any justification for introducing new green gaps in Cheshire East. These gaps would essentially seek to prevent development both in the plan period and beyond in the same way that the Green Belt does.

14. Since the New Green Belt and Strategic Open Gap Study was prepared in 2013, it is noticeable that there have been a number of developments between Haslington and Sandbach, specifically between Winterley and Wheelock, resulting in some coalescence. A local green gap policy should be developed as soon as possible to protect the individual settlement areas. Wheelock itself is an integral part of Sandbach, and is included in the Sandbach Neighbourhood Development Plan (SNDP) and its policies.

15. The LPS sets the approach towards delivery of Local Green Gaps, and the SADPD therefore needs to provide the mechanisms to bring forward that opportunity, however the SAPDP should be setting a very clear and rigid policy structure in respect of the criteria which may be used to justify the adoption of Local Green Gap. Failure to do so will undermine the ability of the plan to deliver its statutory requirements in terms of development opportunities.

16. No evidence as to why normal open countryside policies do not provide sufficient protection to justify a Local Green Gap policy.
17. There is no evidence provided by CEC as to where these Local Green Gaps would be allocated, nor the extent of these or the level of protection to be provided to such areas. At present the proposed identification of such sites is unjustified and unsound.
Question 9 a. What role should Neighbourhood Plans play in defining Local Green Gaps?

Key issues raised:

1. Neighbourhood plans should identify Local Green Gaps, and have a tool kit to guide the process based on a clear methodology.
2. The preservation of historic places should be supported when the local prerequisite is there.
3. Definitions of settlement separation and Local Green Gap need further clarification.
4. Local Green Gaps should be defined by the Local Authority through community engagement and feedback. Villages may go beyond the defined neighbourhood area and this needs to be taken into consideration.
5. Clearer definition of Local Green Gap is needed with a clear evidence base to ensure consistency between neighbourhood plans and SADPD.
6. A similar process of Local Green Space allocation is already in place in neighbourhood plans.
7. The principle of defining LGG is acceptable if it aligns with paragraph 77 and not prevent sustainable growth.
8. Neighbourhood Plans are well positioned to identify Local Green Gaps in consultation with parishes and towns.
9. Neighbourhood Plans are there to guide housing development to the most relevant areas. Local Green Gaps are about protecting settings and identity with other settlements.
10. The LGG should be in accordance with the NPPF and a neighbourhood plan does not have enough scope to do this.
11. Neighbourhood plans should support local development and therefore, devolving LGG powers to neighbourhood plans contravenes this position.
12. Steering groups are well places to be proactive in sharing evidence.
13. Steering groups may have their own agendas and priorities which may contradict development priorities.
14. There is a possibility of discord between strategic and local level.
15. There is a risk of inconsistencies between neighbourhood areas.
16. Local green gaps should not be designated through Neighbourhood Plans. This is not appropriate.
17. Local Green Gaps should be approved in non Green Belt areas.
18. Local Green should not be approved through the SADPD and should be approved by the Local Plan strategy.
19. Neighbourhood Plans have a role in Green Gap planning in conjunction with Cheshire East, however this requires robust and clear delivery.
20. Many parts of the Borough are already restricted in regards to development.
21. There is no evidence to support a Local Green Gap policy and there is no justification to introduce further Green Gap policy – only reference in the LPS is para 8.3f. This will be a further barrier to development.

22. This LGG proposal contravenes para 55 of the NPPF and the Housing White paper in regards to sustainable growth.

23. Neighbourhood Plans already echo the LPs and SADPD. The Green Gaps are already established within the SADPD and LPS, therefore the there is no need for NP to present new GG areas.

24. Climate change mitigation and farming should be a consideration.

25. Local Green Gaps should be indicated in the SADPD to prevent inconsistency and reaffirm conformity.

26. Neighbourhood Plans should be the driving force to define LGG.

27. Neighbourhood Plans and should play a key/lead role in GG policy and should be made together with the CELPS.

28. Collaborative working is vital between local communities and CE to meet the aims of the NPPF.

29. LGG left to Neighbourhood Planning leaves the scheme open to bias.

30. This policy would be helpful for southern Crewe.

31. The guide should be written in a user friendly way, jargon free.

32. LGG should be managed at the Part 2 allocation stage.

33. The resources of Neighbourhood Plans are limited and do not have the same professional input to analyse evidence.

34. Some LGG might be missed by Neighbourhood Plans.

35. The regulation 15 submission includes proposal and review and extend LGG.

36. This should be actioned as a pilot study.

37. CPRE is an advocate of Neighbourhood Planning and appreciate the value of their input in managing development. There is scope for NP’s to define Green Belt and LGG and good urban design is influenced by the environment (CPRE).

38. Local plans should not undermine the role of greenfield and housing (CPRE).

39. Appropriate – but does not apply to other settlements and rural areas within the North Cheshire Green Belt.

40. Is the desire there from NP groups to do this work?

41. Views of local communities are key to establishing Spirit of Place. Supports local people shaping local policy (National Trust).

42. Preferred options should be balanced against sustainable development – eg. conservation/enhancement of the historic environment as required in the NPPF (Historic England).

43. The success of GG is influenced by the local planning authority development management decisions. Parish Councils and Town Councils may become frustrated in this process. NP’s developments can be slow, political and non professional (Knutsford Conservation and Heritage Group).

44. Neighbourhood Plans should state they have considered LGG within their plan.
9.b. Should Local Green Gaps-type policies be left to Parish and Town Councils to determine through Neighbourhood Plans, perhaps supported by a 'toolkit' prepared by Cheshire East Council?

Key issues raised:

1. Neighbourhood plans should have a key role but not all work should be devolved to them. More analysis is needed.
2. Parish councils are best place to decide green gaps through NP’s.
3. Yes to NP’s with tool kit, but does this impact previous NP’s?
4. Settlement separations are the same.
5. ‘CPRE is concerned at the gung ho attitude of Cheshire East’ (CPRE).
6. Concerned Cheshire East is being ‘overly prescriptive and undermining localism’ (CPRE).
7. Neighbourhood plans are a big commitment for small parish councils and there may be barriers to creating NP’s.
8. It is not likely there will be an NP for Crewe.
9. Tool Kit policies should be left to Parish and Town councils. A toolkit approach would be helpful.
10. When Town Councils and Parishes have made a decision to make a neighbourhood plan, Cheshire East can support in GG and other issues.
11. Not all councils have the resources to do assessments even with a tool kit.
12. There is a role for both Local Plans and NP’s, however definition of Local Green Gaps should be referred to Parish and Town Councils only when there is no coverage in the CELPS. Otherwise there is risk of sporadic coverage of areas that are better in a strategic approach.
13. Previous NP’s must have direction so they can revise the plan; and tool kits available for NP’s in progress.
14. It might be too ambitious for local communities to lead on this (National Trust).
15. Local green gaps overlap parish boundaries and NP’s may not be prepared at the same time. LGG related to settlement boundaries will be to allocations in the Local Plan.
16. Policies to consolidate green gaps and identify local green gaps, what is the difference. Should be developed in the Local Plan.
17. Parish and town councils with professional support – not just a toolkit- are best placed to reflect local priorities.
18. Cheshire East should provide a toolkit for Parish Councils that can be customised and tailored for their NP priorities.
19. Method and adoption policies may be disjointed for developers and local residents. Clear consistent methods of approach by CE are needed for across the borough, as this could undermine the process.

20. It is not appropriate for CE to allocate LGG through the SADPD whatever approach is put forward. The LPS is the most appropriate platform and a reliance on NP’s is not. NP’s are a material consideration and repeated polices would be unnecessary. It risks the needs of the Borough housing and growth priorities not being met. It is not justified and no evidence by CE is provided as to where these sites will be allocated.

21. LGG would need to be justified by robust evidence by national guidance. The council would need to set out the test for NP’s re: para 77.

22. NP’s should align with LDP’s. The overarching role of the LDP’s

23. LGG should be determined by the Local Planning Authority through local engagement.

24. LGG gaps should meet a proper planning purpose through evidence. Inconsistency is a concern.

25. Local ownership of the process is positive, rather than top down. Where NP’s are already made this would need revising. Some interim protection to potential green gaps is needed.

26. The policies should be set by the council but be unrestrictive. The aim of LGG is to protect the setting and the identity with other settlements.

27. Both strategic and LGG should be investigated and supported. Settlement boundaries once established – re: sustainable development should be protected by policy.

28. A toolkit should be designed with help to establish LGG.
**Question 9c. Should the SADPD include any further policy to support the identification of Local Green Gaps in Neighbourhood Plans? If so, what should it say?**

Key issued raised:

1. Should be used in areas where there are planning constraints for development such as Jodrell Bank.
2. The SADPD should include a policy which includes guidance on NP’s allocating Local Green Gaps/ Areas of separation - supporting principles based on the evidence pertaining to the Local Plan/NPPF – (that steering groups can use).
3. Toolkit - good idea for NP’s and councils - but how does this affect NP’s that are in place from before.
4. Can be both – Goostrey NP settlement boundaries the same as LGG.
5. Neighbourhood Plans should assess sites and decide where land should be kept open. Policy should ensure speculative planning applications are resisted. Applications for inappropriate development should contravene the LP. The LP will hopefully stop speculative development of off local plan sites (CPRE).
6. The primary purpose of LGG should be clear in the SADPD Re: protection of vulnerable open spaces between adjacent settlements (vulnerable to development).
7. The SADPD should be clear with its policy- to prevent NP’s restricting growth and preventing housing targets being met as outlined in the CELPS (English Land).
8. This issue has been addressed sufficiently within the SADPD approach.
9. Communities should be able to address this in NP’s with cooperation from CE. It is particularly relevant for south Cheshire - however the toolkit needs to be in easy English so it does not require professional guidance to implement.
10. Green Gaps should be preserved between settlements.
11. Settlements affected should seek relevant advice.
12. Robust policy is required in relating how completed NP’s maybe revised in order to incorporate LGG policy.
13. See other comments, re: other questions - on Spirit of Place and landscape character (National Trust).
14. There is not enough information to comment.
15. Lack of consistency is a primary concern.
16. Do not support this. A more practical approach is needed with the preparation of the SADPD re: LGG. With the SADPD providing the core guidelines that NP’s need to follow.
17. NP should have some influence and consideration given from communities but under the umbrella of the LP and guidance of Local Authorities.
18. LGG should be given interim protection from development if they are to be included in new or revised NP’s.
Question 10: Have we identified the key settlement boundary issues that the SADPD should address?

Key issues raised:

1. Need to consider planning constraints (such as the Jodrell Bank Observatory) before fixing settlement boundaries.
2. Sweeping phrases such as “within the built up limits of the village” and “immediately adjacent to the built up limits of the village” should not be applied as all settlement have important open areas within them. Need to take account of the setting of settlements, views into and out, and the historic development pattern.
3. It is not clear whether existing open countryside could be considered for inclusion within settlement boundaries.
4. The SADPD should also consider settlement boundaries for smaller villages.
5. Definition of the settlement boundaries should be part of a combined exercise to define the Strategic Green Gap boundaries.
6. The criteria should not exclude the possibility of including greenfield land at the edge of the settlement within the settlement boundary – this would limit the potential for small and medium sized developments. Logical opportunities for infill and rounding off should also be considered.
7. Need to consider extending settlement boundaries in those areas with limited brownfield capacity such as Knutsford.
8. Various sites promoted for inclusion within settlement boundaries.
9. Proposals for settlement boundaries should be discussed with town and parish councils.
10. If settlement boundaries do follow the Green Belt boundary then safeguarded land would be within the settlement boundary, at odds with the LPS policy which treats it as open countryside.
11. Safeguarded land should be included in settlement boundaries.
12. Key to smart growth is making sensible (easily defendable based on geographic features) yet sensitive (to protect the heritage setting) boundary changes.
13. It is important to define settlement boundaries for small villages. This is necessary to support the full delivery of housing needs.
14. This work should be completed as part of the neighbourhood planning process.
15. Settlement boundaries should be defined across the borough in a consistent manner through the SADPD; it is not appropriate for neighbourhood plans to do this.
16. Neighbourhood Plan settlement boundaries should be adopted in the SADPD.
17. Settlement boundaries should not follow the existing Green Belt boundary.
18. Villages washed over by the Green Belt do not require settlement boundaries. They contribute to the Green Belt by their open nature.
19. The draft proposals map should be published for consultation.
20. There should be consultation on the methodology for identifying settlement boundaries.
21. Settlement boundaries will need to be amended and reviewed to include further sites released from the Green Belt.
22. Policies should be clear over what comprises or adjoins a settlement and how this will be interpreted to enable future sustainable development.
23. Settlement boundaries should not be determined until other allocations have been identified.
24. Recognisable physical features should be used to prevent urban creep.
25. There is a need to understand Spirit of Place and landscape character when seeking to define settlement boundaries. (National Trust).
26. Where Green Gap policies are in place, settlement boundaries should follow the same line irrespective of physical features.
27. Settlement boundaries should be drawn in a transparent and robust way with reference to the methodology.
28. The wording for policy in the absence of a settlement boundary is too vague and open to interpretation.
29. In the case of Brereton Parish the Settlements Boundaries should be the ones shown on Key Maps C20a and C20b of the Brereton Neighbourhood Plan.
30. The Civil Parish of Sandbach is covered by the SNDP and no changes to its boundaries are considered necessary.
31. The Sandbach Neighbourhood Plan does not represent a planned process of determining a logical settlement boundary and should be reviewed.
32. The Alderley Edge settlement boundary should only be redrawn to accommodate changes in Green Belt.
33. Settlement boundaries should be drawn based upon issues such as sustainability and character of the settlement rather than the boundary simply being based upon existing or proposed development.
34. The NPPF, paragraph 14, clearly outlines the need for plans to be flexible and the approach should ensure that settlements can grow appropriately.
35. The settlement boundary review should consider existing infill development and ensure that this is included within the settlement boundary to ensure the development of sustainable and logical sites. Infill development is defined as sites surrounded on 3 sides or more by residential development. This will assist the council in ensuring they have settlement boundaries which endure.
36. The approach risks unreasonably excluding sites from the settlement boundary which should be included but are not classed as previously developed such as landfill, lagoon etc.
37. Settlement boundaries should not be changed.
38. Local Service Centres should not have defined settlement boundaries – development limits should be flexible and able to respond to future uncertainties.
39. The SADPD should review all villages that are ‘washed over’ by open countryside policy to determine whether they require a settlement boundary.
40. Where open countryside is entirely within the built-up limits of a town it should be included in the settlement boundary.

41. The Middlewich settlement boundary should be reviewed in consultation with Cheshire West and Chester Council.

42. It is appropriate to have settlement boundaries in settlements washed over by the Green Belt.

43. The Council should identify settlement boundaries for the ‘Other Villages’, but should recognise that these are flexible and may change over the plan period to reflect housing need.

44. Settlement boundaries should be reviewed on a regular basis to ensure housing needs continue to be met throughout the plan period.

45. Developers look at their planned development as a 'logical extension' of the boundary, whether a defined settlement boundary or a looser definition of 'built up limits'. On that basis, all proposed development adjacent to a settlement boundary is a 'logical extension'. The wording needs to be very tightly defined.

46. Areas of existing development washed over by the Green Belt but adjacent to the inset boundary should be included in the settlement boundary and excluded from the Green Belt.

47. All named settlements within the settlement hierarchy considered as sustainable and/or suitable for further development within the Plan period should have settlement boundaries identified regardless as to whether or not they are currently within the open countryside or Green Belt.

48. There must be a clear policy on what size of rural settlement becomes a village and merits a settlement boundary.
Question 11: Do you think that further planning policy guidance regarding the Jodrell Bank Observatory should be included in the SADPD? If you do, what should its scope be?

Key issues raised:

1. Jodrell Bank should be fully protected within the SADPD. That protection should be drafted in close consultation with the relevant scientific bodies.
2. Guidance is needed but it should reflect the cumulative impact of development on Jodrell Bank efficiency, not just assess the merits of a single application.
3. No permissions for development should be allowed if JBO object at any level, including “relatively minor” impact.
4. Guidance needs to strike a balance between safeguarding the efficiency of the telescope and the general need which exists for further housing sites to come forward within the Consultation Zone to meet remaining housing requirements.
5. Guidance is needed on how development precisely impacts on the function of the Jodrell Bank Observatory.
6. There is currently a lack of clarity within the development plan or supporting documentation regarding how a planning balance will be arrived at.
7. Any policy needs to be flexible and not be a blanket restriction but enable development to come forward providing appropriate mitigation is provided.
8. CEC has been inconsistent in its approach. The Council supports the development of LPS Strategic Site allocations within the Consultation Zone, however planning applications that aim to address the Council’s short-term housing land shortages have been refused.
9. Policy SE14 should be revised to provide for greater flexibility when considering the impact on Jodrell Bank, with only those schemes found to have a severe/significant impact required to demonstrate significant benefits to outweigh the evidenced harm.
10. It would be helpful if JBO could provide guidance on:
   - which areas are acceptable/not acceptable for development (or likely/unlikely to be acceptable), and
   - areas where the ITU threshold for radio telescopes is already breached and where ‘path loss’ is lowest.
11. New residential development delivered in close proximity to the Observatory may have potential to adversely impact upon its operation. This should not, however, trigger a widespread objection to the principle of all new residential development in such locations, firstly because it would prevent local housing needs being met and cause the decline of the settlements affected and, secondly because it is possible to carry out mitigation measures to limit radio
wave emissions from devices. Guidance is needed that strikes an appropriate balance.

12. It is understood that JBO has undertaken extensive work to be able to establish where development can be located without impairing the efficiency of the telescopes. It is imperative that this work is published and that it informs the SADPD. There may be specific policies that can be applied to certain parts of Cheshire East and the current JBO consultation zone, setting out how much development would be appropriate and what form it should take. There may also be certain restrictions that could be imposed via SADPD policies, again, ensuring that the telescopes are not impaired. It is important the SADPD is transparent on this matter and that it provides definitive guidance on where development would not be capable of complying with LPS policy SE14.

13. Areas within settlement boundaries should be removed from the Consultation Zone to enable the development/redevelopment of land which is normally considered appropriate.

14. Further guidance is required within the SADPD especially in light of the fact that the Square Kilometre Array project will not be impinged by developments within the consultation zone.

15. The extent of the Jodrell Bank Consultation Zone over the plan period also requires review, as part of the SADPD process, especially when considering that the consultation zone was established 44 years ago and has not been reviewed since. The review should take account of global developments in terms of radio telescopes, and technology to address potential impacts.

16. The JBO Consultation Zone should be reviewed if it is to remain, greater distinction should be made between the ‘inner’ and ‘outer’ Jodrell Bank Radio Telescope Consultation Zone which should be defined more scientifically as the impact is not the same in all directions.

17. The open-landscape setting of Jodrell Bank is tremendously important, as a nationally significant visitor attraction. It is a Grade 1 Listed structure and it is on the UK shortlist (the ‘Tentative List’) for UNESCO World Heritage Site status. The Local Plan should have a specific policy for Jodrell Bank and it should restrict development, with an explanation of the reasons that it is to be kept permanently open and free from man-made intrusions.

18. The extent of the Jodrell Bank consultation zone and the zones of impact within that consultation zone should be marked on the Local Plan. This would enable appropriate consideration of the impact of those safeguarding zones on development. At present, such issues only arise during the course of planning application consultation.

19. Protection for the important work of Jodrell Bank Observatory is essential. Might it be possible to enhance this by specifying additional tree planting/enhancement between new development and the observatory?

20. Either the policy or an associated SPD should provide parameters which developers can reply upon so far as is possible over the location, form and construction of development. The costs of the measures required should be
proportionate to their value in ensuring the efficient operation of the telescopes. Developers will also benefit from site-specific guidance at an early stage, and the policy should commit the Council to providing timely and reliable pre-application advice, acting as an intermediary between developers and the University of Manchester. Such guidance is considered necessary to ensure consistency in decision making when determining applications.

21. The University welcomes the opportunity to work with the Council in the development of any such guidance which is deemed appropriate and or necessary and would envisage that this is likely to include (but is not limited to) the provision of technical analysis of the potential impact of development sites on the efficient operation of Jodrell Bank Radio Telescopes.

22. There is already a commitment in the LPS that the SADPD will provide this guidance.

23. Historic England considers that there should be specific policy guidance regarding the Jodrell Bank Observatory. It should cover the heritage assets, guidance to inform development proposals and the potential outstanding universal value of the site.
Question 12: Do you think that there should be a single policy or small number of policies that cover a range of requirements generally applicable to all (or at least most) forms of development?

Key issues raised:

1. A general requirements policy is required so that new development meets high environmental standards
2. A clear migration is needed from the saved policies in the legacy local plans
3. Needs to include the use of electric / hybrid vehicles
4. Historic England - Any preferred options should be carefully balanced against the other elements of sustainable development including the conservation and enhancement of the historic environment as required by the NPPF.
5. Every dwelling should have appropriate storage space
6. Minimum width of garage is important
7. All houses should conform to Buiding for Life 12 and Lifetime Homes Design Guide
8. Support of policies in relation to Manchester Airport
9. The local plan must set out the general requirements for all new development. This should include minimum environmental standards (set at a high bar) and for design to be in harmony with what already exists.
10. There needs to be a definition of ‘over development’ to ensure that urban areas with already concentrated development are protected from further pressure that makes development unsustainable on grounds of safety, health and amenity.
11. The general requirements policies need to be covered in some detail
12. Need to prioritise pedestrian use
13. Employment sites need to provide adequate onsite car parking
14. Needs to consider housing mix and reflect an ageing population
15. Needs to consider importance of local character, built form, ecology, historical context and environment of an area
16. Need to consider the needs of existing and attracted new businesses which is often overlooked
17. The policies should reflect 21st Century living such as broadband use, mobile phone and personal car reliance
18. This should be set out within a single development management policy which avoids prescription and allows a level of flexibility to allow for design innovation and variation across the Borough.
19. Neighbourhood Plans provide a further opportunity to bring forward locally specific general requirement policies, provided the basic test can be met.
20. Sport England – principles of active design (10) should be employed
21. In light of the recent Housing White Paper, any such general development management tool should recognise the importance of appropriate densities on new housing developments and Nationally Described Space Standards. Central to any such policy should be a clear recognition of the challenges of viability and recognition of the commercial needs for sensible payments triggers within any Planning Obligation, which proactively drives the delivery of new development to ensure the Plan can achieve its objectives.

22. Cross reference to any SPDs should be made in the policy itself
23. Avoid repetition of any policies in the LPS
24. Canal and River Trust provide an example policy for waterside development
25. A general requirement policy should be deleted as unnecessary given policies in the LPS
26. National Trust - It would be appropriate to include a single ‘Standards of Design and Amenity’ policy in the SADPD in our view. This could provide a single point of reference, but the supporting text should signpost the linkage to further, detailed policies throughout the Plan. The suggested content noted above is appropriate in our view.

27. The SAPD policies should retain the protection to villages and Open Countryside afforded by Congleton Borough Local Plan Policies PS8, H5 and H6.
28. The list should not be overly long or complex
29. The issue of neighbouring land uses and their compatibility, including potential environmental / amenity impacts, is fundamental to Royal Mail
30. The following should be added to the general requirements set out in paragraph 3.3 of the Issues Paper:
   a. Provision of necessary off-road parking
   b. Fast broadband
   c. Air quality across the wider area
   d. Limits of building heights
   e. Energy exploration/capture
   f. Site design and lay-out
   g. Housing design in keeping with characteristics of the area
   h. Housing density
   i. Shop front design
31. It is important that the SADPD contain policies appropriate to local areas
32. The HBF would welcome a rationalisation of the current saved policies into a single or small number of policies.
33. The Cheshire West and Chester Part Two: Land Allocations and Detailed Policies DPD Preferred Approach Consultation Aug 2016 has developed a good example of a generic development control policy (DM1 - Development Management) which is clear and signposts to other policies within the plan.
34. Manchester Airport considers that there should be policies within the SADPD that cover the general requirements relating to development. As you have identified within the Issues Paper, there will be a need to include some specific
policies relating to Manchester Airport, including the safe and efficient operation of the airport: The need to ensure the safe and efficient operation of Manchester Airport has some implications for land and development within Cheshire East and the following policies are therefore required:

a. Control of Development in Public Safety Zones – No new or replacement development, or change in use is generally permitted within the public safety zone (PSZ). PSZ’s are designated areas of land at the end of runways at the UK’s major airports, within which development is restricted to prevent an increase in the number of people living, working or congregating in these areas, and over time existing numbers within the PSZ should be reduced. Government guidance is contained within Department for Transport (DfT) Circular 1/2010 – Control of Development in Airport Public Safety Zones.

b. Aerodrome Safeguarding – Development which would adversely affect the operational integrity or safety of Manchester Airport or Manchester Radar will not be permitted.

c. Airport Operational Area: Part of Manchester Airport’s Operational Area lies within Cheshire East and we seek to retain the status of the Operational Area within Cheshire East.

d. Off-Airport Car Parking: It may be necessary for you to consider a policy related to off-airport car parking in recognition of the off-airport parking market that is sustained within Cheshire East.

e. Noise Considerations: 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.

f. The policy should reflect guidance contained within the National Planning Policy Framework (NPPF) and Noise Policy Statement for England (NPSE).

35. Existing Saved Policies should be retained if they are compatible with the Cheshire East Local Plan and NPPF.

36. Neighbourhood plans have increased importance

37. Viability and air quality issues are an important consideration here

38. Natural England stress the importance of natural assets being protected, conserved and enhanced. Natural England would expect biodiversity and geodiversity, soils, priority habitats, ecological networks, protected species to be covered under the heading of the natural environment and within other policy areas. Issue 12: The need for a policy or policies setting out general requirements for all development Natural England encourages net gain.

39. Policies should be developed to address the range of settlement types in the LPS
Question 13: Do you think that these are the issues that the SADPD should look to address regarding the natural environment, climate change and resources?

Key issued raised:

1. Need to plan for fast broadband access across the whole of the Borough.
2. Recognition of protection of rights of way, open space for a variety of purposes, and particular landscapes which contribute to health and fitness and mental well-being.
3. Conflicts of interest need to be recognised and policies written to prevent them e.g., wind farms and blight on the landscape.
4. It is recommended that the SADPD does not overlap and cause duplication with policies already contained by the LPS and/or the NPPF.
5. It might be beneficial for these issues to be addressed in greater detail in, for example, a Sustainable Development SPD.
6. Development policies that relate to ‘Energy Efficient Developments’ should not impact on the viability of development proposals.
7. Consider meres and moses landscape when identifying any stepping stones/ecological networks and areas of habitat creation. (Natural England)
8. Consider the Great Crested Newt district licencing project in the context of ecological networks. (Natural England)
9. Add water catchment areas for designated sites to the Policies Map (Issue 20) to help assess where there may be watery impacts. (Natural England)
10. Give appropriate weight to the roles performed by the areas soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. (Natural England)
11. Safeguard the long term capability of best and most versatile agricultural land. (Natural England)
12. Beneficial to allocate areas to enhance green infrastructure to deliver the functions in the ‘The Cheshire East Landscape Scale Partnership Project Final Report August 2016’ – a strategic green infrastructure network would enable the LPA to do this. (Natural England)
13. Consider protected species. (Natural England)
14. Policies should include safeguards regarding the environmental and visual impact of large solar voltaic and wind power schemes; criteria included to protect residential amenity and the wider countryside, farming, tree planting and bio-diversity.
15. LLD’s should undergo a full review as part of the SADPD due to changes to the baseline, and a more detailed analysis.
16. The Bollin Valley and Parklands should not be co-joined as they have very different landscape characteristics. This does not mean to say that they cannot be connected via footpaths and recreational route.

17. The extent of the designations generally run along footpaths and local roads and could potentially be ‘rolled back’ to other tighter more contextual routes in the landscape.

18. Several sections of the Bollin Valley and Parklands designation are no longer relevant in that, due to past and recent development they are compromised and no longer display the special landscape qualities which deserve to be conserved and should be either removed or formally reviewed along the length of the river corridor and changed through the SADPD subject to consultation on the new evidence and new policies.

19. Gateways to Alsager should be improved and Cheshire East Council should fund open spaces and habitat restoration.

20. Further policy required on restoration not just preservation of our natural environment.

21. South Cheshire East landscape report should be undertaken to support a potential AONB designation, support policies and decision making and inform the preservation and improvement of a locally important ‘dark sky’ environment.

22. Expand policies to include greater protection for areas registered as ‘ancient woodlands’; buffer zones are insufficient, and wildlife corridors.

23. Protect mature and semi-mature woodland.

24. Policies covering wind turbines, including suitable locations, number and size and the impact relating to visitor destinations and holiday accommodation as sensitive receptors.

25. Air pollution and ‘fracking’ is of increasing importance, requiring careful monitoring and control.

26. Need a clear policy on fracking.

27. Landscape: Must be done on a borough-wide basis and not simply ‘north’ Cheshire East.

28. Combined heat and power: If fuel source is non-natural, then placement in close proximity to residential areas must be avoided, taking into account weather/wind conditions.

29. The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal; this would also remove any potential land instability problems. (Coal Authority)

30. Planning processes in coalfield areas need to take account of coal mining legacy issues. (Coal Authority)

31. Land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. (Coal Authority)
32. The Coal Authority would expect any proposed site allocations to be included in this document to be considered against the relevant data provided to the LPA in respect of the defined Development High Risk Area and Surface Coal Resource. (Coal Authority)

33. The wildlife corridor designation at Forge Lane, Congleton (Congleton Local Plan Policy NR4) should be reviewed as a number of sites in the corridor have recently or will soon be developed.

34. Fabric first is the most effective method of energy reduction and the most visually appealing way of designing energy efficiency into homes.

35. The land stability and contamination policy should not be solely focused on potential underground land stability issues; recognition should be given to above ground stability issues. (Canal and River Trust)

36. In terms of flood risk and water management, the Canal and River Trust waterways could receive surface water from development. However the Trust is not a land drainage authority, and such discharges are not granted as of right - where they are granted, they will usually be subject to completion of a commercial agreement. (Canal and River Trust)

37. A clause inserted into any wind turbine policy that requires a Sports Impact Assessment to be submitted with any proposal that is within sight of a sports facility. (Sport England)

38. All applications should consider air quality, the protection of high quality agricultural land, the protection and retention of trees and hedgerows and areas of local importance for nature conservation and biodiversity.

39. Reference should also be made to the 14 Nature Improvement Areas in the Borough including the Mosses and Meres.

40. Further policy detail is required on several matters like flood risk, contamination, and telecommunications masts.

41. Full consultation should take place on the 2016 Landscape Study before its recommendations are incorporated into a draft SADPD.

42. Include policies to protect long-distance and significant vistas.

43. Policy should not subsume climate change mitigation in favour of visual aspect particularly when the natural environment is not permanently impaired by initiatives such as wind turbines, photovoltaics and so on that are temporary in nature.

44. Consider energy storage requirements as an equal partner in the climate change challenge.

45. Greenspace loss should be monitored and windfall development restricted in those areas where landscape character and function is impacted by cumulative development.

46. Reference could be made to the underlying importance of soil type for land capability. Would like to see a conservation policy and programme for peatland soils in the former mosslands of Cheshire East.

47. Recognise that impact of development on farm structure can be at least as significant as direct loss of farmland to development.
48. Biodigestion/biogas schemes should be added to the list for further policy detail.

49. More detailed guidance on Conserving Countryside Character” by ensuring that development fully respects this “quality of place”, and giving special priority to maintaining the character and condition of locally distinctive landscapes e.g River Valleys and Lindow Moss.

50. LUC work and recommendations should be reflected in the SADPD.

51. The recommendations of the joint CEC/NT landscape work are followed. (National Trust)

52. Opportunities to generate, and pool, funding should be maximised to help facilitate positive planning. Planning obligations monies could be used for improvements to the constituent elements of ‘Spirit of place’, including the strategic green infrastructure network. (National Trust)

53. Develop a green infrastructure strategy, identifying shortfalls and opportunities, and a CIL charging regime that acknowledges the importance of green infrastructure. (National Trust)

54. Robust application of planning standards in relation to air quality, water quality, drainage and access to the public need to be specifically identified in line with the relevant legislation and Natural England (& Wildlife Trust) advice & Guidance.

55. Solar Photovoltaics are welcomed in principle but not in the form of solar farms. Priority should be given (in line with government policy) to industrial roof mounted panels. Agricultural land and the rural landscape is an important asset in terms of Cheshire East's 'Quality of Place' and unless land is of 'inherently' poor quality (ie unable to be cultivated), solar farms should not compromise the wider rural economic 'offer'.

56. The issues should be linked to a collection of other policies e.g. sustainable transport.

57. The delivery of enhancements to the natural environment require a holistic approach, allocating sites for development that can deliver such improvements.

58. Policy for protecting long-distance and/ or strategic views of significance.

59. Identify sources of air pollution in the SADPD.

60. Re-state the importance to Cheshire East of its environmental quality – significant for the Borough’s residents, businesses and visitors.

61. Ecological networks should be mapped and incorporated into the policies map. (Cheshire Wildlife Trust)

62. The study ‘Cheshire East Landscape Scale Partnership Project Final Report August 2016’ is focussed on the north of Cheshire East. A similar exercise is now required for other areas. (Cheshire Wildlife Trust)

63. Identify the District Heating Priority Areas as mentioned in 4.4. These should not be limited to urban areas as potentially they could have significant benefits for smaller areas such as LSC’s.
64. There are a number of areas close to Holmes Chapel where wind power could be implemented without any significant adverse conditions being generated.
65. Environmental capacity should be referenced.
Question 14: What policy detail regarding the historic environment do you think should be included in the SADPD?

Key issues raised:

1. Clear guidance on the protection of historic assets should be given. The role of Green Belt in protecting these must be emphasized. Historic towns identified in the ARUP report on the Green Belt should be acknowledged and designated as such in the SADPD.
2. The ‘setting’ of listed buildings should be protected as indicated in the NPPF. The Local List should be updated. It is 6 years old, missing some important historic properties. Historic hedges and field boundaries should be protected. Policies Map should show listed buildings.
3. There must be a clear and specific function which does not overlap with existing policies in the emerging LPS. SADPD should not identify in policy or on the Policies Map areas of “archaeological potential”. Archaeological remains are typically underground and therefore it’s impossible to identify them all accurately.
4. There is a Scheduled Ancient Monuments within Taylor Wimpey’s site at Middlewich Road, the Moated Site and Fishpond North East of Wood Farm which must be preserved through appropriate development policies within the SADPD.
5. Sites and buildings of local importance within the SADPD should be included where they are not incorporated on a national list but do merit protection.
6. Locally-listed buildings are expected to be listed in 5.3
7. Cheshire East Local Access Forum: The adoption of the Report of the Cheshire East Landscape Scale Partnership is welcomed accompanied by the intent to explore how the report’s recommendations can be developed through the SADP and how this may be extended to the whole of Cheshire East.
8. Policies Map should show the location of designated and non-heritage assets.
9. Canal & River Trust: Both the designated and non – designated heritage assets associated with the waterways within the borough (Some are designated conservation 3 areas) should be recognised within the policies of the plan. The listed locks, bridges and structures should also be catered for within the plan.
10. Areas of local significance should be included to be protected as part of the heritage assets. These could include footpaths like the All Saints Way which passes through the Weston and Basford Parish.
11. CPRE would like more information on rural heritage walks should be provided. There must be some associated local trails related to farming and mills in the area.
12. A more detailed guidance on what weight will be applied to different heritage assets should be included.
13. Listed buildings which are in need of restoration should have policy considerations given to them in order to encourage their development into residential use, preventing further decline.
14. The unique contribution made by Jacquard Looms in their original site at Paradise Mill, Macclesfield should be recognized in policy detail.
15. There should be a section referring to the policies regarding advertisement consent. For example the presumption against illuminated signs and A boards in conservation areas.

16. **National Trust**: Policy SE7 provides a good basis to ensure that the historic environment is properly conserved and understood. Key aspects of the historic environment are not currently addressed by specific designation. For example the Spirit of Place/landscape scale work highlighted the red brick vernacular farm buildings that are characteristic of the area as being important to the community/stakeholders. Not all of these buildings are listed and/or lie within a Conservation Area. As noted, one of the recommendations of the Spirit of Place work is the Development of a Building Design SPD. This would help to address the above point. The National Trust also wishes to ensure policy extends to the surroundings of the heritage assets not just the buildings themselves. With regard to Local Lists, it is relevant to note that such lists are updated regularly. There is therefore a need to ensure that this is acknowledged. One way of doing this could be through developing a web-based resource, which is cross referred to in Local Plan policy.

17. **Historic England**: Key Issues to be considered that have not already been mentioned include registered parks and gardens, important views and vistas, landscape character and the public realm.

18. Standards in conservation have dropped over the years due to a lack of enforcement. Policies to promote compliance/standards and upgrades would be welcomed.

19. There is a need to include Sites of Special Scientific and Historic importance such as Lindow Common/Lindow Moss.

20. The historic environment comprises the historic built environment, the historic natural environment and the historic cultural environment. SADPD should recognise this explicitly, and seek the protection of each element as appropriate, as being “a good thing” in itself on merits, and contributing to sustainable development, quality and distinctiveness of place, and the visitor economy. There is also scope and need for more effective co-ordination between CEC’s spatial planning and development management and CEC’s asset management.

21. Bollington’s Neighbourhood Plan is recommending an extension to the Bollington Cross Conservation Area to include the historic area of Lowerhouse. If this is approved it should be included in the SADPD. SADPD should also include land reserved for use as allotments in the non-designated assets.

22. A policy to ensure all conservation areas are reviewed at reasonable intervals, to ensure a consistent approach is adopted should be included. This is because Holmes Chapel has never been subject to appraisal.
Question 15: Do you think that these are the issues that the SADPD should look to address regarding employment development?

Key issues raised:

1. Policies for employment development should take infrastructure impacts into account.
2. More detail is needed on employment related to the distribution of goods – policies should encourage yet control this type of development.
3. Need policies specific to the North Cheshire Science Corridor.
4. Better transport links are needed between Macclesfield and Manchester Airport.
5. Policies should support the visitor economy and encourage facilities such as hotels, car parks, public toilets etc.
6. Inadequate recognition of the very high and growing level of home-working. This should be factored into employment land calculations and the design of new homes. Should also consider small businesses run from home. Need a home-working study and engage with parish councils on this matter.
7. Policy should allow for allocated employment sites to be developed for alternative uses where there is no realistic prospect of an employment use; and should set out the information that would be required to demonstrate this.
8. The allocation of further sites should reflect market requirements, based on demonstrable employment needs.
9. There should be consultation on the proposed site selection methodology.
10. Policy wording should be flexible to market conditions.
11. Policy should detail the requirements for public transport, highways, communications and other facilities required by modern businesses.
12. The Bentley Strategic Employment Area as shown in the LPS should be extended to include all of Bentley’s landholding.
13. Policies should support the rural economy, encourage farm diversification and agricultural buildings where appropriate.
14. Important to provide a range of employment opportunities in the right locations to meet anticipated needs, providing accommodation for small, medium and large enterprises.
15. The plan should recognise that employment sites should be able to accommodate waste management facilities where appropriate.
16. Policies should take account of employment / local economy information identified in neighbourhood plans.
17. Policy should allow existing employment sites to be regenerated to provide opportunities for a combination of new business with some residential development, whilst retaining or increasing the number of people employed on
the site. Policy should allocate sites as mixed-use rather than solely for employment, to allow for enabling development.
18. More detail is required on the site selection process, including residential amenity, infrastructure, access to the major road network etc.
19. Any preferred options should be carefully balanced against the other elements of sustainable development including the conservation and enhancement of the historic environment as required by the NPPF. (Historic England).
20. The SADPD should consider also that settlements may be in a strong, neutral or weak position to contribute towards Cheshire East employment growth by the types and range of employment available.
21. Policy should refer to sustainable transport modes as facilitating commuting.
22. The evidence base for employment land is flawed; the 0.7%/year jobs growth rate is too high.
23. Not enough information on the cumulative impact of jobs growth in Cheshire East, Greater Manchester and elsewhere.
24. Crewe Town Council would, in principle, welcome further employment allocations.
25. The policy should be a supportive framework that supports any development that creates employment opportunities rather than being unduly specific when identifying the type of business.
26. The need for roadside facilities and associated commercial uses should be considered.
27. Policy should include sport as a form of employment in its own right. The principles of Active Design should be incorporated into all developments. (Sport England).
28. Long term protection of sites allocated for employment use should be avoided and land allocations must be regularly reviewed.
29. Need additional policy to avoid landowner / developer led strategies; infrastructure should precede development.
30. Employment development in open countryside must not undermine the ‘quality of place’ which contributes to the borough’s economy.
31. There should be clear policies about the number and scale of industrial processes that might be permissible in any given rural area, to avoid large ugly factories on the rural scene.
32. Employment development in the countryside should not adversely affect agricultural production.
33. Policy should seek to enhance the employment sustainability of each Local Service Centre.
34. A policy is required to reflect existing employment areas within settlement boundaries.
35. Various sites promoted for employment and other uses.
36. Employment policies should also consider the number of jobs to be created by development, as different forms of employment development support different numbers of jobs.
37. The cap of 150 dwellings / 5ha employment land in the site allocations process is unnecessary and all scale of development should be considered.

38. ‘Low intensity’, high quality, small scale employment opportunities, which do not have an impact on the rural aspect or environment, should be encouraged and any ‘high intensity’ development prevented by policy. In rural areas, this would also extend to intensive agricultural processes such as ‘mega-dairies’ and chicken broiler units.

39. The plan must ensure that emerging technologies (such as energy storage and other battery storage within existing and new salt caverns) are not restricted but should be encouraged.

40. Need to consider the impacts and consequences of the North Cheshire Science Corridor Enterprise Zone which will lead to a requirement for more employment land. There is a need to better describe the overall area covered by the EZ and its role and function. There is scope for additional sites in the arc/cluster/collation to contribute to the objectives of the EZ and the SADPD should set out what considerations would be taken into account and what weight would be applied to proposals that added to the EZ objectives.

41. The SADPD should consider the future of numerous golf courses in the borough given viability issues affecting the sector.

42. Alsager has fulfilled its employment land obligations and should not provide additional employment land.

43. Policy should support major inward investment in key sectors of the knowledge economy and support expansion of major employers in the borough.

44. The evidence shows that employment allocations should be focused in the south of the borough, Macclesfield and Wilmslow. There is no need for employment allocations in Handforth.

45. Further development in the north of the Borough should be limited due to Green Belt constraints.

46. Policy must take account of mitigation for climate change including travel distances and methods of transport used, for road conditions, for air quality and for the sensitivities of possible sites to unneighbourly activity.

47. The Council should apply flexibility to the employment land requirement in Crewe of 65 hectares and seek to identify more land.
Question 16: Do you think these are the relevant housing issues for the SADPD to address?

Key issues raised:

1. Delivery of 36,000 homes is a challenge – the SADPD should encourage smaller housebuilders through the allocation of smaller sites;
2. Lack of consideration of Neighbourhood Plans – with all LSCs required to prepare a Neighbourhood Plan which make small scale allocations;
3. Due consideration should be given through the planning application process to ensure a housing mix and to promote good design;
4. Accelerated Delivery as promoted by the HCA is supported;
5. SADPD Issues Paper fails to recognise and include other types of market housing such as care homes, assisted living or elderly persons accommodation;
6. Goostrey needs be closely considered in relation to its proximity to Jodrell Bank, recent planning application refusals, sustainability and subsequent LSC categorisation;
7. To encourage building to take place, Council Tax should be charged on all granted planning permissions from 2 years (on the total number of approved dwellings) whether they have been built or not;
8. Site Allocations has been ‘fixed’ at 3,335 units however it is likely that more than this will be required to be allocated, to ensure flexibility (which they comment should be at 20%), cover any slippage, in line with the Housing White Paper. As such further sites should be allocated through the SADPD;
9. Issues surrounding 5 year supply – can only demonstrate 5.3 years at present and there are a number of sites included which are not deliverable (under Footnote 11 of the NPPF), lack of evidence of number of outlets, lead in, delivery rates, issues over s.106 agreements;
10. Whilst the Inspector has concluded that a 5 year supply can be achieved (as at 31st March 2016) this will need to updated annually in line with the NPPF;
11. Slippage will be key – there is unlikely to have been 2,910 units delivered during 2016/17 and some sites (where at the LPS hearings it was stated that applications should now have been received) have not taken place;
12. There is presently an over reliance on Strategic Sites – the SADPD should ensure that 10% of allocated sites are on smaller sites in line with the emerging HWP;
13. Request that Land East of Hilbre Bank, Alpraham is considered for an allocation and Land off Nantwich Road, Alpraham (15/4922N) is included as a residential / community facility allocation;
14. Using local standards for housing density must be robustly evidenced and must include a degree of flexibility to respond to the needs of the market;
15. Accelerated implementation – CEC should use the newly published HWP to understand the implications of this on the local level;
16. National Described Space Standards are to be reviewed and the SADPD needs to be aware of this and flexible to future changes;
17. Promotion of site on Middlewich Road, Crewe (Taylor Wimpey);
18. Support further work on evidence base for housing mix policies – utilising the SHMA to ensure that the different types of housing required across different parts of the borough can be delivered. Policies should avoid being overly prescriptive to allow for flexibility and responding to local conditions and changing markets;

19. Support self build and custom build but should be encouraged on smaller sites and should not be imposed on larger housebuilders;

20. Higher density development in sustainable locations where appropriate and will be an efficient way to ensure meeting the housing requirement;

21. Do not consider that the application of a high density (or a minimum density requirement) as advocated within the HWP, would be appropriate in Cheshire East and so should not be included within the SADPD;

22. Developer’s should be allowed flexibility in density to meet with locational specific characteristics;

23. Concern that the inclusion of space standards in the SADPD would be unsound and unjustified in light of the changing guidance from the Government;

24. Developers should be allowed the utmost flexibility in order to adapt to changing market conditions and ensure development remains viable and deliverable;

25. The SADPD should focus on sites between 10 and 50 units to help rebalance the size of housebuilders active in Cheshire East;

26. Policy covering self build housing would be welcomed. Self build plots should be tested through the Council’s viability testing;

27. Mechanism should be put in place where if the self build plots aren’t taken up within a certain period that they should revert back to open market housing;

28. Using the Warwick example, Cheshire East should be more ‘permissive’ in relation to their policy for the open countryside (Policy PG5) and what is appropriate development, this overly restrictive approach is contrary to the framework and will constrain the future development of rural villages;

29. Significant fines should be imposed where start and completion dates (as agreed with the LPA) are not met;

30. Concerns that the SADPD has a lack of scope for non-strategic allocations in Congleton and that there is a lack of flexibility as a result;

31. Comments relating to slippage of Strategic Sites in Congleton and a lack of knowledge on their delivery / timescales;

32. Infrastructure has been confirmed but issues surrounding the over negotiation of affordable housing is an issue;

33. Representations for a site at Macclesfield Road (Eaton Cottage) for 55 dwellings;

34. Site Selection Methodology for Greenbelt is too ‘broad brush’ and needs updating to provide a more detailed micro-analysis of Local Service Centres in order to identify sustainable parcels of land (in line with the work Planit IE did for Prestbury);

35. Those elements which are to be covered within the SADPD will be ambitious but some of the matters can more appropriately be dealt with through Neighbourhood Plans;

36. It will be necessary for the density of housing development to reflect existing nearby residential areas, and the character of proposed developments across the Borough. An element of flexibility should be included within any policy.
proposed, to ensure that lower densities imposed would not hinder development and prevent the delivery of housing within the Borough;

37. Acceleration of the implementation and completion of permitted housing schemes can be achieved through flexibility in the application of policies which set out requirements for development so as to streamline the time taken for planning permission to be achieved, incentives for developers to build out schemes at a quicker rate and streamlining the discharge of conditions;

38. Policies within the SADPD should not only acknowledge the need for more home ownership models but specifically the rent to buy model;

39. Density must be reflective of local circumstances;

40. Cheshire East will need justifiable evidence to introduce any of the optional housing standards, the criteria for which is set out in the PPG, the Council must have a full grasp of this before applying;

41. Cap to allocations of 150 units / 5 ha is unnecessary and that all scale of development should be considered to contribute towards meeting the identified residual housing and employment needs;

42. Clear need for future allocations to be made in Holmes Chapel;

43. Due regard must be given to viability issues when preparing the evidence base to support Policy SC4 (Residential Mix);

44. Policy should be included in the SADPD that better manages the issue of ‘Garden Grabbing’;

45. Housing mix policies should reflect local demand and will vary between geographical areas, the SHMA will only provide a snapshot in time;

46. Rigid requirements would not be appropriate in a diverse area such as Cheshire East – viability, site characteristics and market demand must also be taken in to consideration;

47. Any minimum density requirements must build in sufficient flexibility;

48. Policies such as open space provision, internal space standards, parking provision and separation distances will all impact upon the density which can delivered upon site;

49. Recommended that the Council discusses delivery issues and potential barriers with developers / promoters of individual sites;

50. Accelerating the delivery and implementation of existing permissions is likely to be difficult, however there is some merit in seeking to streamline elements of the process going forward;

51. Blanket introduction of space standards is likely to reduce choice in the market and this in turn will impact on rates of delivery. The Council will need to have a full understanding of the issues and how this will have an effect;

52. Former local plan policies (Crewe & Nantwich) policies should continue to be utilised, strengthening the preservation of open countryside and settlement boundaries;

53. Enforcement action should be strengthened;

54. Gypsy and Traveller accommodation should be identified in line with the Government guidance from 2015;

55. For those sites with full planning permission they will continue to have 3 years from the initial grant of planning permission of 12 months from the discharge of conditions and would speed up contractors in starting on site;

56. Site Selection Methodology for Greenbelt sites is too broad brush and needs to provide a more micro-analysis of Local Service Centres;
57. Neighbourhood Plans could plan to provide housing suitable for older households, such as bungalows;
58. Lees reliance on large scale housebuilders, need to encourage smaller builders can often achieve faster build out rates, provide greater flexibility and secure local jobs;
59. Policy PG5 needs to be supplemented within policy guidance in the SADPD to set out the scope for delivering housing in rural areas where there is a demonstrable local need;
60. Policies in relation to Housing Mix (SC4) are prescriptive enough in the LPS Part I. Market demand is key, if developers are forced to sell houses that are required ‘in theory’ but not sold in practice;
61. Density should be maximised to make the best use of land and reduce the amount of land release from the open countryside and Green Belt;
62. Using the space standards – making a house larger makes them more expensive to purchase as it is based on £ per metre – this may have implications for affordability;
63. LPAs now have a requirement to “consider the needs of people residing in or resorting to their district with respect to the provision of places on inland waterways where houseboats can be moored” – Canal and River Trust happy to discuss the implications of this further;
64. Unclear how the Council was influence market factors or smaller builders to acquire smaller allocations in a competitive market through policy alone, there is risk that this would go beyond the statutory functions of the SADPD;
65. Housing policies should be backed by the most up to date evidence and this will require frequent monitoring;
66. The SADPD should be explicit in its support for brownfield development;
67. Higher densities on urban land should be promoted to ensure more houses but on less land;
68. Needs to be further consideration of the acute shortages in affordable housing in the rural areas and the provision of smaller properties to meet this;
69. There is no need for additional housing allocations in the Other Settlements & Rural Areas in the North Cheshire Green Belt;
70. Allocations in LSCs need to have due regard to commitments and completions as well wider size and function during this process;
71. Definition of the Site Selection Methodology should be subject of a workshop or additional consultation as this was the subject of significant delay during the LPS EiP;
72. Publicly owned sites that are surplus to requirements and are suitable for housing should be identified;
73. Policy detail in relation to HMOs needs to be clarified;
74. Any preferred options should be carefully balanced against the other elements of sustainable development including the conservation and enhancement of the historic environment as required by the NPPF – Historic England;
75. Important to recognise that development (including Site Allocations) must be phased over the remainder of the plan period so as not to over saturate the market and stricter enforcement should take place to ensure implementation;
76. SADPD should allocations of a mixture of site sizes – focussed on small to medium size predominantly;
77. There should be stricter guidance in place for one planning applications are approve to incentivise development – no option to extend time for an outline
permission and RM must be received no later than 2 years into the outline permissions life; and

78. Prestbury’s Village Design Statement sets the format for an appropriate approach to density.
Question 17: Do you think that these are the issues that the SADPD should look to address regarding town centres and retail development?

Key issues raised:

1. Should be looking to consolidate central parts of retail areas but should be giving serious consideration to turning over failing peripheral retail areas to housing given impact of internet shopping – important to manage decline of town centre areas
2. Need to take account of changing nature of retail
3. Holmes Chapel support the development of retail uses in keeping with the needs of Holmes Chapel as defined by Neighbourhood Plan
4. Car parking is an issue
5. Policies to take account of local circumstances contained in Neighbourhood Plans
6. Good mix of day / night time economy required
7. Policies that support the local economy are important
8. Historic England – preferred options should take account of other elements of sustainable development – including the conservation and enhancement of the historic environment
9. Goostrey – neighbourhood plan only allows conversation of non-residential property to commercial use
10. Welcome town centre first approach
11. No current need for out of town shopping in Knutsford
12. Pedestrianised / shared spaces are important
13. Highways infrastructure provision is important
14. Need to restrict changes from public houses to housing – evidence that such a change is necessary is required.
15. Need policies to control the effect of entertainment services on town centre living
16. Need to protect the vitality and viability of Crewe Town Centre
17. Policies for Crewe Town Centre should comprise a mix including appropriate residential development to bring activity and expenditure to the area. Policies should also encourage the development of an evening economy
18. Local shopping centres perform an important function in Crewe, and where viable should be protected from inappropriate development
19. Only allocate sites in the town centre boundaries
20. Need to clearly identify town centre boundaries, primary shopping areas and retail frontages
21. Need to consolidate and enhance retail offer in Primary Shopping Area in Macclesfield – focused on Mill Street, Chestergate, Market Place, Castle Street and Grosvenor shopping centre

22. Out of centre retail development should be resisted

23. Eskmuir encourages CEC to recognise the importance of signage and advertisements to retail activity and the benefits this can provide in way finding and in promoting vitality and viability within town centres. As such, while development management policies on this matter would be prudent, the tests should not go beyond the amenity and public safety tests identified within the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).

24. National planning policy, through paragraph 26 of the NPPF, notes that a impact assessments will be required where town centre uses in excess of 2,500sqm are proposed outside of town centres, unless a lower threshold is set locally. The emerging LPS is silent on the matter and therefore looks to retain the 2,500sqm threshold. Eskmuir, however, encourages CEC to consider lowering this threshold through the SADPD, in line with the wider objectives of the LPS to protect the vitality and viability of existing centres. Eskmuir would suggest impact assessments be required for developments with floorspace in excess of 1,000sqm, consistent with the definition of a ‘major development

25. Sport England considers some forms of sport and leisure are appropriate facilities within town centres and retail areas as they can support the traditional retail facilities.

26. Policies are required to prevent an over-concentration of uses e.g. take-away uses in a particular area and prevent change of use in sensitive areas e.g. Conservation areas.

27. Encourage the Council through the SADPD, potentially in policy form, to acknowledge that new developments and the populations they would create can often benefit from small scale retail developments. These might be outside of designated town, district or local centres but of a scale that would not adversely affect them.

28. Provision of retail in villages should be market-driven not developer- driven

29. It is important that the SADPD addresses retail and other town centre use requirements through the allocation of sites. Just to be clear, that is not incumbent on in-centre and edge of centre sites being available. Indeed, where there is a demonstrable need, the Local Plan should be pro-active and also allocate out of centre sites. In certain settlements, this could require the release of further Green Belt land.

30. Support a SADPD policy that limits the number of takeaway food outlets in town centres and their proximity to schools, together with the number of licensed premises.

31. It is important to maintain a watching brief on the robustness of an evidence base document, in the light of any changes to provision of retail and other
main town centre uses and/or changes to economic conditions and commercial demand for floorspace

32. It is important that the SADPD considers qualitative in addition to quantitative need, the likely spatial distribution of the need for new floorspace and that there is often a need to identify sites outside of town centres where more central options will not come forward within a reasonable timeframe and to meet the modern requirements of operators.

33. Specific consideration should be given to how best to accommodate main town centre uses proximate to such areas of planned residential expansion.

34. Recognise the need for town centres to continue to strengthen their visitor ‘offer’ beyond just retail development, including provision for leisure and ‘food and drink’ uses.

35. Include policies that seek to prevent or limit changes of use in town centres and other shopping areas, for example policies that seek to maintain a proportion of ground floor properties in retail use.

36. Keep properties in active use and reduce the number of vacant properties.

37. Whether locally set thresholds should be included for assessing applications for retail, leisure and office development outside of town centres that are not in accordance with the Local Plan.

38. Policies relating to matters including advertisements, amusement centres, shop fronts and security, living above shops.

39. Whether policies are required on town centre environmental improvements.

40. Many of these matters are covered to some extent in existing Local Plan and emerging Neighbourhood Plans including that for Poynton. As with housing, it is important to include a community dimension to planning for town centres as local residents are essential to the future prosperity of every town centre.

41. The identification of these small village centres would demonstrate which villages should accommodate larger proportions of the 1,250 requirement.

42. Reference to the 2016 Retail Study has not been subject to public consultation, or consideration, as part of the process of the preparation of the Local Plan Strategy. This should be consulted upon before being relied upon to inform Part 2 of the Local Plan.

43. Any proposed policy should reflect the NPPF.

44. Retail policy should ensure that it does not impact on existing provision particularly local businesses and local organisations.

45. The ‘Cheshire Retail Study’ demonstrates a significant need for additional retail floorspace is in Knutsford given the level of growth in available expenditure and evidence of significant overtrading in existing facilities.

46. The Tatton Estate would be willing and able to meet such needs on their landholdings within and around the town and ensure development is mixed-use and sustainable. In particular, the land at NW Knutsford (Site CS 18 c North West Knutsford) and Parkgate (Site CS 19 Parkgate Extension, Knutsford) are both suitable to meet either a localised need generated by the new residential and commercial development that will be located in the area.
Question 18: Are these the transport and infrastructure issues that the SADPD should address?

Key issues raised:

1. The SADPD should include a vision and policies to capitalise on the benefits of HS2 for both the town of Crewe and the wider hinterland which will be affected by this major infrastructure proposal.
2. Secure cycle parking should be installed at all railway stations to encourage people to cycle to stations and use public transport.
3. More investment is required in improving the public realm to encourage walking particularly over short distances.
4. The excellence or otherwise of broadband connectivity is linked with transport (as it can reduce the need to travel) and should be recognised in the local plan as a form of infrastructure.
5. Roads make a huge impact on how an area appears. It is good maintenance in both residential and commercial areas which does more to lift an area than directing resources to new roads. We need to be smarter in improving the efficiency of existing roads especially to and from public transport hubs.
6. Holmes Chapel needs a by-pass and expanded comprehensive school. There should be site specific infrastructure policies included in the SADPD covering Holmes Chapel. Potential routes for a by-pass should be protected.
7. Detailed assessment of future rather than current infrastructure needs is required otherwise transport networks will become quickly overwhelmed after development has taken place.
8. Infrastructure should include local access to community hub facilities for the older population and access to health services for an increasing population.
9. Any allocation of increased housing must be accompanied by proper planning and funding of infrastructure, particularly on traffic, congestion and road safety, and on community support facilities including schools, medical care and Open Space. It is not acceptable to allocate new housing developments without provision of the necessary supporting infrastructure.
10. There should be an infrastructure investment plan to remedy existing capacity problems and provide for any further development.
11. Goostrey road improvement priorities (for safety reasons) are: Boothbed Lane junction; railway bridge and parking issues on Main Road. In addition, S106 payments are needed for any new development as the nearest Health Centre (Holmes Chapel) is full and the nearest Primary School (Goostrey) and secondary school (Holmes Chapel) are full in some years.
12. Knutsford has existing poor provision of, and years of under-investment including in, health, education and community facilities, public realm works and
highways management measures. Such considerations detract from Knutsford being a sustainable location for growth, albeit the town is a Key Service Centre.

13. Sustainable transport modes such as cycling and walking should be supported. Car usage in Cheshire East is set to increase significantly unless safe and reliable alternatives are developed. The Council should plan for more cycle infrastructure, such as safe cycle lanes, to encourage more people to safely cycle. Road speeds on the strategic highway linking settlements across Cheshire East are often exceeded, therefore we recommend that Quiet Lanes are promoted for quiet and safe enjoyment of rural places. Walking should be encouraged in all new development, with contribution from developers to footpaths and improvements to the public realm, such as provision of litter bins and seating to encourage more people to walk short distances.

14. The statements on infrastructure are very weak. There need to be much clearer policies on the levels of infrastructure required to support particular levels of housing in Local Service Centres where infrastructure is often limited and in some communities like Bollington already seriously overstretched. There needs to recognition of the importance of Assets of Community Value, how they are identified, registered and maintained.

15. Sufficient regard should be given to protection of routes used by other forms of traffic such as cyclists, horses and pedestrians so as to encourage access to the countryside in a sustainable way. Speed limits should be introduced in order to safeguard other users of unclassified lanes and vehicle restrictions should be put in place on all lanes designated as part of the Cheshire cycle way.

16. Regard needs to be had to the impact through traffic off the M6 has on local towns and villages (with junction priorities enabling the free flow of local traffic) in order to safeguard county lanes thereby encouraging people to walk and cycle etc.

17. It is important for policies to ensure excellent connectivity between Crewe station and the town centre by public transport, and for pedestrians to maximize the economic benefits to the town centre.

18. Infrastructure provision should include appropriate facilities for Higher Education in Crewe whether on the MMU campus or elsewhere.

19. Infrastructure should be delivered before or at the same time as development with minimum local disruption. Priority should be given to the needs of cyclists and pedestrians and to improve connectivity of the existing cycleway and footpath network. Car parking standards should realistically reflect the needs of residents and businesses reflecting the lack of public transport and high car ownership in the Borough.

20. Traffic speeds, rat running, high levels of car ownership and congestion during peak hours are increasing problems exacerbated by the lack of frequent and accessible public transport. Access to local health care and schools are an increasing problem.
21. The SADPD should address the systemic issues around school parking across the Borough and the provision of genuinely safe cycling and walking routes into schools.

22. The SADPD should discuss who is accountable for securing inward investment into the Borough's infrastructure through key funding bodies e.g. Sport England; what the Council's role is in this and how their statutory duties impact on potential opportunities.

23. All plans for improving the indoor and outdoor leisure infrastructure must enable growth in participation in sport (in % terms) in addition to population growth. In an era where investment in health is moving increasingly towards prevention, we need the right infrastructure to support future health spending.

24. Consideration should be given to roadside services (including Motorway Service Areas) and associated commercial development.

25. In the rural areas, best use should also be made of sustainable bus corridors to improve connectivity to higher order facilities. Opportunities for development sites to improve the existing road and bus networks should also be maximised as part of the approach.

26. Sport England would like to see currently lapsed/disused playing field sites identified as being in need of protection and used to meet future demand. If these sites are allocated within the SADPD then any future options for sites should have the priority order of options identified in the Playing Pitch Strategy embedded within the policy.

27. It is essential that existing roads and drainage are adequately maintained.

28. Specific mention should be made of the opportunity provided by canal towpaths to increase sustainable active travel. We would welcome the recognition of the need to protect, enhance and extend recreational routes with specific reference to canals and waterways. Where relevant, developers should contribute towards improvements to the canal infrastructure.

29. Car parking areas should be identified in a pro-active way to meet car parking needs in line with expected growth.

30. Greater emphasis should be afforded to the known health problems associated with air pollution caused by an ever-increasing number of vehicles on local roads and on the M6 motorway.

31. Consideration should be given to road network (size, type, ‘pinch points’/known issues for access); foul drainage; internet speed and 4G coverage; connected public transport; safe pedestrian/cycle transport routes; electricity supply outages. Specific to Wrenbury: this is a LSC but the development potential is severely restricted by the road network. The Parish would greatly benefit from an integrated transport system.

32. The rail station at Radway Green and Barthomley should be re-opened for commuters.

33. Opportunities to improve access to Manchester Airport should be explored. With regard to Manchester Airport’s Operational Area and future development aspirations, the parallel taxiway proposal is a potential long term extension to the
airfield and we would request that the land either requires safeguarding in the SADPD or is at least recognised as being a future development aspiration.

34. The importance of transport and infrastructure for the Poynton area should be recognised and given priority.

35. The SADPD should pursue the delivery of a new railway station at Middlewich in conjunction with the reopening of the Sandbach to Northwich railway line.

36. There is concern regarding the delivery of transport and other infrastructure in relation to the Strategic Housing Sites, both in terms of Macclesfield, and the Strategic Sites which are in the adjacent parishes.

37. The SAPD will need to give priority to conserving existing Public Rights of Way and to encouraging opportunities to strengthen that network through for example, links to new development and within Neighbourhood Plans.

38. Population figures support the need for increased cremation and burial sites and increased provision at cemeteries and crematoria.

39. We would like to see further evidence of any planned infrastructure enhancements in pinch point areas where there is potential for air quality impacts and contributions to increasing nitrogen levels that have the ability to impact upon designated sites. SUDs and other natural solutions to manage water within the built environment should be encouraged. A clear reference should be made to the importance of Green Infrastructure (Natural England).
Question 19: Do you agree that these are the issues that the SADPD should address regarding recreation and community facilities?

Key issues raised:

1. Development management policy needed to support Policy SC3 in relation to community facilities and their provision and protection.
2. Need for community facilities to meet the needs of elderly people.
3. Policies required covering the full range of infrastructure – community facilities, convalescent homes, medical facilities, allotments, parks etc.
4. Agree with issues raised in consultation paper.
5. Suggest that paragraph 10.3 regarding Local Green Spaces is confusing. The designation of such spaces should not be left to Neighbourhood Plans as not all Parishes will prepare them.
6. Designation of local green spaces important and need to understand process regarding their designation.
7. Local communities are best placed to decide what Local Green Spaces are important to them, however, the SADPD should contain an overarching policy to allow this to happen and to protect such spaces from development pressures securing contributions for their ongoing maintenance.
8. Local Green Space and Open Space designations should be done by Neighbourhood Plans rather than CEC but should be shown in the SADPD.
9. NPPF allows designation of local green space through local plans AND neighbourhood plans – not for LPA to decide. Can happen either way.
10. Important to take account of Neighbourhood Plans.
11. Local green spaces put forward by communities;
   - Bollington 6 sites proposed
   - Knutsford – the Heath and Little Heath
12. Consider that the SADPD must pay close attention to the increasing need for open space, access to the countryside and a range of sporting facilities. A detailed map is required of all such facilities in Cheshire East. All the expected requirements up to 2030 should be identified in the SADPD. Wildlife corridors important and designation of local green spaces.
13. Clarification required regarding outdoor sports provision and developer contributions.
14. More detail regarding open space calculations for play areas etc so that developers can proactively plan for their inclusion within development proposals.
15. Shared use of school sites should be encouraged and facilities improved though contributions.
16. The SADPD should address how the Council will work with both secondary and primary school Governing Bodies to ensure that these key community
facilities are fully utilised to facilitate growth in participation in sport and healthy lifestyles.

17. The Local Plan must ensure that adequate informal and formal green spaces are provided in the future to enable recreation and community activities in the natural and open environment. These designations can be further supported in Neighbourhood Plan policy and allocations as they are brought forward and ‘made’. Policies needed to improve the quality of our built and natural environment. (CPRE)

18. Need for liaison with other bodies such as Canals and River Trust, National Trust etc to ensure consistent policies.

19. Canal infrastructure important green infrastructure asset for health and recreation (Canal and River Trust).

20. Protection of urban green space important – need for local bodies (e.g Crewe TC) to be involved in the designation process.

21. Importance of protection and enhancement of green space for health and recreation.

22. More encouragement should be included in the SAPAD for onsite recreational facilities for children as part of wider green infrastructure across a site e.g small pocket play areas. This is particularly important where existing facilities are at a distance.

23. Issue of public access to private land through development allocations (Bollin Valley site given as an example).

24. Use of open space designation in association with development to protect important areas/approaches to settlements.

25. The issues identified will help support the strategic framework set out in policy SE6. In particular the Playing Pitch Strategy can help inform the specific policy detail in relation to pitch sports. (Sport England).

26. Highlight the need to consider green infrastructure in the wider sense, and the important recreational/community function it performs. (National Trust)

27. Green infrastructure network should be looked at the SADPD level with input from Neighbourhood Plans. The green infrastructure network should look at a range of functions and be designed to deliver these functions. (Natural England)

28. Needs of small villages to be addressed and problem of housing in villages with lack of facilities.

29. Upgrade of facilities at Macclesfield Rugby club needed to meet needs of club and the community. Suggest allocation in SADPD. (Current planning application for housing to fund improvements).

30. An up-to-date strategy, based on a quantitative assessment of community facilities, recreation and public open space, should be used to support any designations.

31. It is important that community facilities for recreation etc grow commensurate with development to accommodate increasing populations.

32. Alternative use of facilities should be considered if no longer required.
33. Policies required to protect Nantwich’s existing strategic green spaces, new open space and promote development of cycleway and footpath network.

34. Details provided regarding Sandbach’s requirements - e.g. extra swimming capacity needed. Support joint working – PCs/TCs and CEC.

35. Existing areas of open space should not be sold for housing.

36. Open space assessments important and protection of urban space – important shown on proposal’s map. (Poynton PC – detail regarding various sites)


38. Recreation and sporting facilities should not necessarily be accommodated in the main towns and key service centres but distributed in LSCs and throughout the Borough.

39. Cross boundary issues – CEC and CWAC and shared facilities (example of proposed housing site in Middlewich given).

40. Consider the release of green belt to meet the needs of the community in terms of community infrastructure.
Question 20: Do you agree with the proposed approach to the Local Plan Policies Map?

Key issued raised:

1. The approach taken to producing a proposals map is supported. It is important to identify areas of designation within Cheshire East to assist in the planning process going forward.

2. Policies Map should include:

   - the Inner and Outer Consultation zones from the Town and Country Planning (Jodrell Bank Direction) 1973
   - Jodrell Bank's mapping research (with their permission) on areas suitable and not suitable for development within the consultation zone
   - Listed Buildings and their settings
   - Flood Zone 3 (High Risk), Footpaths and Bridleways
   - Neighbourhood Plan area boundaries and policy areas (since ‘made’ plans are part of the Local Plan) including Local Green Spaces, Open Spaces, Settlement Separations, Green Fingers, Heritage Zones, important hedgerows, and possibly important views.
   - Local and Strategic Green Gaps
   - ‘Blue corridors’ to enable rivers to restore, re-naturalise and have space to meander
   - allocations, commitments and previously developed land on the edges of Principal Towns, KSCs and LSCs, so the spatial distribution of development can be clearly seen and examined
   - local landscape designations following their review
   - Open countryside designation
   - the Manchester Airport safeguarding zone
   - air quality management zones
   - infrastructure schemes (national and local)
   - sites from the Brownfield Register and Small Sites Register that have Permission in Principle
   - waterways green/blue infrastructure (Canal and River Trust)
   - town centre boundaries, Primary Shopping Areas, primary and secondary shopping frontages
   - Sites of Biological Importance
   - Historic Landscapes, Parklands & Gardens
   - National Improvement Area (NIA) Meres & Mosses
   - Manchester Airport noise contours
   - Safeguarded Land
3. Settlement boundaries, allocations and designations are reasoned and justified and, appropriate when considered in the context of their wider surroundings.

4. Including Impact Risk Zones (IRZs) on the policy map would help when assessing impacts/risk with regards to development and designated sites. Catchment areas for watery designated sites will also help with assessing risks and opportunities. The Impact Risk Zones (IRZs) are a GIS tool which can help to make a rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which the site is notified and indicate the types of development which could potentially have adverse impacts. (Natural England)

5. The approach proposed in relation to the Local Plan Policies Map is supported, as it will ensure that the policies of the various Development Plan documents are bought together and are clearly identifiable to prospective developers and landowners, which is likely to encourage development in the Borough. It may be beneficial in some circumstances for additional inset maps to be included which provide more detail for the certain settlements or areas where a number of different policies or site allocations are located close together.

6. There should be a series of maps in order that all the parameters can be seen clearly. One map could become jumbled and confusing.

7. A draft policies map is prepared at the same time as the next consultation version of the SADPD.

8. Sport England particularly welcomes the inclusion of playing pitches.

9. Any map(s) need to be clear and understandable.
Question 21: i. Do any additional monitoring indicators need to be included in the SADPD? ii. If you think additional monitoring indicators are needed, where would the information for these indicators come from?

Key issued raised:

1. The Neighbourhood Plan should provide an identification of the monitoring indicators.
2. Suggest regular annual review and update e.g. if the number or proportion of tenures being delivered falls below the target(s) this will induce the Council to review decisions on individual applications or to amend policy to ensure needs are being properly responded to.
3. Trigger policies put in place, whereby land can be released for development if there is a persistent under delivery of development, and the Council is failing to meet its housing target, negating the need for a formal plan review.
4. Should be monitoring the significant environmental effects of implementing the DPD, including biodiversity. (Natural England).
5. Suggested Biodiversity indicators (Natural England):
   - Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
   - Percentage of major developments generating overall biodiversity enhancement.
   - Hectares of biodiversity habitat delivered through strategic site allocations.
6. Suggested Landscape indicators (Natural England):
   - Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.
7. Suggested Green infrastructure indicators (Natural England):
   - Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
   - Length of greenways constructed.
   - Hectares of accessible open space per 1000 population.
8. Loss of Green Belt land monitored on a settlement wide and Borough wide basis.
9. Confirmation that all monitoring reports should be published in a more timely manner and that methodologies be included for the evidence provided.
10. Include monitoring of the proportion and quantity of the full range of affordable housing tenures so that the Council may properly understand how local needs are being met.
11. Annual if not half yearly housing completion figures are produced and published on the 31st March and 31st September and, information is published on the cumulative encroachment in the Green Gap on an annual basis.

12. The SADPD should list those policies from Part 1 of the Local Plan that will need to be reviewed, should there be a shortfall/uplift in housing completions, and an under/over performance in the net take up of employment land, for instance, especially considering the effects that the Cheshire Science Corridor EZ and HS2 will have on Local Plan policies.

13. The SADPD will involve a host of agencies and partners that the Council will be actively engaging with to bring forward the SADPD allocations in addition to those listed at paragraph 16.10 of Part 1 of the Local Plan, and these parties should be listed in SADPD.

14. Number of applications approved against PC recommendations.

15. Number of applications approved against CEC planners or Committee recommendations (i.e. at Appeal).

16. Air pollution and an on-going review of designated sites for air quality with published results.

17. Monitoring should be done on a settlement by settlement and Green Belt/non-Green Belt basis.

18. Adoption of Active Design Principles to achieve physical activity outcomes. The indicator can be obtained from individual planning applications (Design and Access Statements) that set out how the 10 principles of Active Design have been embedded in the proposals design. (Sport England)

19. Helpful if housing and other statistics were available on a 3 monthly and/or six monthly basis, particularly when fighting planning appeals.

20. Publish information on progress of delivery on the Strategic Sites, the delivery of associated infrastructure, the CIL spend against the identified Infrastructure delivery plan shortfall on an annual basis.

21. Maintain a Brownfield Register and a record of annual completions on previously developed land.

22. Complaints received could be tracked to evidence success or otherwise.

23. Greenspace loss should be monitored.

24. Include whether new development has conserved/enhanced key landscape characteristics or local vernacular building design. (National Trust)

25. Indicators for the historic environment can vary at different stages of the assessment process. However, it is important to devise indicators which will clearly demonstrate the impacts of the Plan on the historic environment. (Historic England)

26. A framework including an assessment of the sites suitability to deliver sustainable development, particularly those adjacent to LSC’s.

27. Quality of life indicators.

28. The proposed indicator EQ2 is ineffective at measuring ‘no net loss of biodiversity’ as it does not refer to biodiversity metrics or provide a definition of what/how much loss would trigger the listed remedial actions. Suggest
‘biodiversity accounting’ (using the Defra endorsed biodiversity impact calculator). All developments should be required to result in a positive biodiversity metric figure to ensure no net loss. (CWT)

29. A clearer picture on timescales for monitoring and implementation in the SADPD would be beneficial. How will the Local Plan, SADPD and Neighbourhood Plans be amended as time passes and revisions are sought?
Question 22: Are there any other issues that the SADPD should address?

Key issues raised:

1. Critical of the time taken to produce the local plan and consequential number of houses being built on greenfield rather than brownfield land.
2. SADPD should stress the need for an adequate building inspection regime.
3. Document of ‘fine words’ which do not match actions regarding building and environmental concerns – Government making terrible mess of our environment, and need to be held to account.
4. Site specific – Land adjacent to the River Dane, Off Viking Way designated within LPS as part of wider employment site. Request (4a) the SADPD recognises this designation and the ability of the site to deliver a strategic mixed use development (4b) site specifically identified for employment use recognising it could be suitable for waste related uses (4c) full extent of client’s ownership not reflected in Masterplan included within the LPS – Tithe Plan include – SADPD should include this land in order to provide a suitable access (4d) extent of Wildlife Corridor not precisely identified - request it is clearly shown as following the boundary of the Site of Biological Importance (refer Fig 15.27 Proposed Modifications to LPS).
5. Site specific – Site 2 – Land to the south of Viking Way (5a) area of land should be allocated for employment purposes. Given its location the site has the potential for a waste related use and should be recognised in the Plan given its designation in the adopted Waste Local Plan. (5b) site should be considered as a mixed allocation including for employment/retail use.
6. Site specific – Site 3 – Household Waste Recycling Centre junction of Viking Way and Barn Road – (6a) site designation should be considered as a mixed use with recognition that retail development acceptable (6b) requests SADPD recognises the current use is no longer appropriate to the surrounding area and any opportunity for relocation should be considered.
7. Site Specific – submitted land off London Road South, Poynton for a mixed use development – client broadly supports over supply of 43 dwellings in Poynton, however contingency provided in SADPD should be increased to 10%.
8. CEC Spatial Distribution Report (ref PS E035) is incorrect regarding the population of Goostrey which states it is much more than it is.
9. SADPD should stress the need for development to meet the Building for Life Standards.
10. SADPD must support and where necessary flesh out the aspirations and principles for (10a) Central Crewe (Policy SL1 of LPS), include clear policies to encourage redevelopment of brownfield land, provision of a mix of town
centre accommodation for young people and first time buyers. (10b) clear vision needed for Crewe Station and surrounding area to capitalise on the benefit of the HS2 Hub.

11. All Cheshire East villages should contribute to the development needs, however small to minimise the effect on the Green Belt and character of the Borough.

12. More consideration needs to be given to the impact any development has on both the immediate and neighbouring communities. Traffic problems are exacerbated with village roads being used as rat runs. Request improvements to the surface standard of existing footpaths in the area.

13. Emerging development plan policies should be positively written in such terms that in determining planning applications, the economic and social benefits of development proposals can be properly taken account, along with environmental matters.

14. Wish to discuss the merit of extending the RSA at Barthomley (M6 J16) to improve the offer and range of uses to road users, opportunity for greater job creation and upgrading.

15. Looking to work closely with Cheshire East on the GMSF and Trafford Local Plan particularly on Airport Gateway Strategic location Policy SL4 and improved infrastructure resulting from HS2 proposals.

16. SADPD should contain a robust policy dealing specifically with waterside development which maximises the potential that fronting a waterway can provide. The Canal & Rivers Trust consider there is sufficient justification for a standalone `waterside’ policy given the level of development proposed adjacent to waterways coupled with the existing built form.

17. Many of the policies in the Macclesfield, Congleton and Crewe and Nantwich Local Plans will be deleted when the LPS is adopted. Many will be retained often with conflicting policy amongst the former areas which make up Cheshire East. This is inconsistent and needs to be addressed.

18. It is not clear whether all 1,250 dwellings required within Other Settlements and Rural Areas will be allocated within the SADPD. Concerned that an overly prescriptive SADPD may prevent smaller sites from being developed during the plan period. The needs of small rural areas will change during the plan period and should the entire 1,250 dwellings be allocated, those smaller villages without the benefit of a small allocation could fall into decline and not meet the needs of growing populations and younger generations.

19. The National Trust would welcome specific acknowledgement that the Council will work jointly with key partners and adjoining LPAs where issues have landscape scale implications.

20. The matter of Roadside Facilities needs to be carefully considered and existing policies adequately replaced. There is a need for an allocation to provide facilities in relation to the A500 and specifically proposed land at Newcastle Road, Willaston for such. Site capable of delivering other uses including employment and/or housing.
21. The plan should consider the inclusion of policies which look at opportunities for energy storage and guide decision makers on the key issues of relevance and the sites which would be best positioned to help deliver it.

22. Hold the view that the Council will struggle to find the land required for 37,000 new dwellings and that this amount of housing development will adversely impact on the character of the Borough and County. The areas subject to most development pressure in the Borough to the south also have pressure on the existing infrastructure and are those areas where no charge is to be levied. It does not make sense to levy different rates across the Borough and a flat charge of £135 for each new dwelling would not appear unreasonable. Such a nominal charge will not discourage housebuilding nor will it affect the viability of a development.

23. Inconsistent manner in which Neighbourhood Plans are addressed through the Issues Paper. Clarity and consistency about the future role of Neighbourhood Plans particularly in respect of housing matters. Suggest a protocol or working arrangement between parish/town councils and the Borough Council may be needed.

24. Joint working with Cheshire West and Chester Council over development requirements of Middlewich and ongoing need to fulfil the Duty to Cooperate (Issue 10).

25. Submission of four sites for residential, employment use or mix of both. Site 1 – Land to the west of London Road, Site 2 – Land to the North of Legh Arms, Site 3 – Land adjacent to Adlington Station, Site 4 – Land to the South of Legh Road, Adlington.

26. Submission of the Blackden Manor site as suitable for development in the SADPD and should be identified in the brownfield register. Greater clarity required on the assessment of development proposals in relation to the Jodrell Bank Radio Telescope Consultation Zone.
Question 23: Do you agree with the approach set out towards identifying sites for Gypsy and Traveller and Travelling Showpeople’s accommodation?

Key issues raised:

1. Reference should be added to Jodrell Bank to the suitability matrix
2. Suitability should take account of the need for proposal in the local vicinity having regard the alternative local accommodation
3. Priority should be given to brownfield sites with access to local infrastructure / facilities
4. Sports England should like to see Sport and Recreation sites included within the Stage 2 suitability matrix
5. Support the Government’s reinterpretation of the definition of travellers and, consequently, we do not agree with the approach set out in the Appendix towards identifying sites for Gypsy and Traveller and travelling show-people accommodation.
6. The Gypsy and Traveller Accommodation Assessment should be updated in line with national policy requirements which have emerged since the assessment was prepared.
7. The same planning stance should be applied to proposals for such accommodation or sites as would be applied to proposals for more orthodox residential development in the Green Belt.
8. Stage 2 – Suitability and Availability Matrix - the broad suitability criteria should explicitly include the previous planning or enforcement history of the sites falling to be considered under the Matrix