

Cheshire East Local Plan

Site Allocations and Development Policies Document

Consultation Statement (Revised Publication Draft Version) [ED 56]

September 2020

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1. Introduction

Purpose of this statement

- 1.1 This document is the consultation statement required under Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It accompanies the revised publication version of the Site Allocations and Development Policies (SADPD) document.
- 1.2 The statement sets out how the council has engaged with stakeholders in the preparation of the Site Allocations and Development Policies Document (SADPD) under Regulation 18. It details the bodies and persons invited to make representations; how those bodies and persons were invited to make representations; a summary of the main issues raised by representations; and how representations have been taken into account in the preparation of the plan.
- 1.3 Following consultation on the Revised Publication Draft SADPD, the statement will be updated to include the number of representations made and a summary of the main issues raised at this stage (Regulation 20), prior to submission of the document to the Secretary of State.
- 1.4 Separate, more detailed reports of consultation have been produced following earlier stages of preparing the SADPD and these are referenced as relevant throughout this document.

Statement of Community Involvement

- 1.5 The council's Statement of Community Involvement¹ (SCI) sets out how the council will involve all sectors of the community in the planning process, explaining how and with whom the council will consult when carrying out its planning duties.
- 1.6 The first Cheshire East SCI was adopted by the council in June 2010 and a revised version, to reflect updated statutory requirements, national planning policy and guidance was approved on 21 December 2018.

Consultation bodies

- 1.7 The council maintains a comprehensive database of stakeholders for planning policy consultations. This database includes consultees from each of the following categories²

¹ Available at www.cheshireeast.gov.uk/pdf/planning/spatial-planning/cec-statement-of-community-involvement-2018.pdf

² General and specific consultation bodies and Duty to co-operate bodies are set out in Regulations 2 and 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

- Specific consultation bodies;
 - General consultation bodies;
 - Duty to co-operate bodies;
 - Other consultation bodies, individuals and other stakeholders.
- 1.8 Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by section 110 of the Localism Act 2011, has introduced a duty to co-operate in relation to the planning of sustainable development. The council has engaged constructively, actively and on an ongoing basis with other local planning authorities and bodies, as prescribed in regulation 4(1) of The Town and Country Planning (Local Planning) (England) Regulations 2012, on strategic matters to maximise the effectiveness of the preparation of the SADPD and supporting activities so far as it relates to a strategic matter.
- 1.9 A list of specific and general consultation bodies from each of the above categories is included in Appendix A 'Specific and general consultation bodies'.
- 1.10 The policies and proposals in the SADPD are of relevance across the whole borough; and consequently direct notifications have been sent to all registered consultees on the database at each consultation stage.
- 1.11 Any consultee who responds to a planning policy consultation is added to the consultation database, unless they specifically ask for their details not to be added. Over the course of the preparation and examination of the LPS, the database had grown to include more than 15,000 active consultee records. All of these consultees received notification of the SADPD Issues Paper consultation.
- 1.12 Following adoption of the Local Plan Strategy in July 2017, the council contacted everyone on the consultation database to ask them if they wished to continue receiving local plan updates and consultation notifications. Following this exercise, a large number of records were removed where consultees no longer wished to receive local plan updates and notifications, or where individuals did not respond to confirm that they did wish to continue receiving local plan notifications and updates. After this cleansing exercise was complete, the database comprised of around 1,600 active consultee records. All of these consultees received notification of the First Draft SADPD Consultation.
- 1.13 As at August 2019, there were over 3,000 active consultee records in the database. All of these consultees received notification of the initial Publication Draft SADPD consultation. This included all those who made comments on the previous SADPD Issues Paper and the First Draft SADPD.

1.14 The Strategic Planning Privacy Notice³ gives details of personal information that is processed in the preparation of plans.

Local Plan Strategy

1.15 The first part of the council's Local Plan is the Local Plan Strategy. This was adopted by the council on 27 July 2017 and provides the overall vision, strategic objectives, spatial strategy and strategic policies for the borough to 2030. This includes setting out the amount and location of new housing and employment development as well as the identification of a number of strategic sites.

Site Allocations and Development Policies Document

1.16 The purpose of the SADPD is to provide further detailed and non-strategic planning policies and land allocations to deliver the overall strategy set out in the LPS over the period to 2030. It has been prepared to support the policies and proposals of the LPS by providing additional policy detail. The amount of housing and employment land needed is clearly identified in the LPS and the SADPD will not include any policies that alter or amend these requirements.

1.17 Once adopted, the SADPD will replace the remaining saved policies from the Congleton Borough Local Plan First Review (adopted January 2005), the Borough of Crewe and Nantwich Local Plan (adopted February 2005) and the Macclesfield Borough Local Plan (adopted January 2004).

2. Consultation during plan preparation

2.1 A principal priority of the planning system is to engage local people in the development of Local Plans enabling local planning authorities to better reflect the identified priorities of local communities. The council has actively engaged with the borough's key stakeholders and local communities throughout the preparation of the SADPD.

2.2 This consultation statement provides details of consultation carried out in the preparation of the SADPD, as part of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, summarised in the Table below.

Consultation	Scope	Dates
SADPD Issues Paper	The issues paper set out the range of issues that the SADPD is likely to address, with the opportunity to provide feedback on each of the issues and to highlight any other matters that the SADPD should address.	27 February 2017 to 10 April 2017.

³ https://www.cheshireeast.gov.uk/council_and_democracy/council_information/website_information/privacy-notices/spatial-planning-including-neighbourhood-planning-team-privacy-notice.aspx

Call for Sites	The call for sites invited local residents, landowners, developers and other parties to put forward sites that they consider to be suitable and available for future development in the borough – for housing, commercial, employment or other development (excluding minerals and waste uses).	27 February 2017 to 10 April 2017, and extended to 30 June 2017.
Draft Sustainability Appraisal Scoping Report	The SA Scoping Report identifies the scope and level of detailed information to be covered in the Sustainability Appraisal report. It includes relevant environmental, economic and social issues against which potential policies and proposals can be tested. Feedback on the draft report was invited.	27 February 2017 to 10 April 2017.
Town and parish councils informal meetings (series 1)	All town and parish councils were invited to an individual meeting to discuss policies, proposals and options within the emerging first draft of the SADPD.	March – May 2018.
First Draft SADPD	This consultation presented the first draft of the SADPD document and was published to seek feedback on its policies and proposals, to help shape the policies and proposals in the Publication Draft document. It also allowed interested parties to submit further sites for consideration or to add additional information on sites already put forward through the call for sites exercise in 2017.	11 September – 22 October 2018.
Interim Sustainability Appraisal	The interim SA assessed the degree to which the emerging plan would help to achieve relevant environmental, economic and social objectives, when judged against reasonable alternatives. Feedback on the interim SA was invited.	11 September – 22 October 2018.
First Draft SADPD Habitats Regulations Assessment	The HRA assessed the impact of the First Draft SADPD on internationally-designated nature conservation sites, both alone and in combination with other plans and projects.	11 September – 22 October 2018.
Gypsy and Traveller and Travelling Showpeople call for sites	The sites identified in the First Draft SADPD addressed part of the accommodation needs identified in the Gypsy and Traveller Accommodation Assessment. The call for sites invited parties to put forward sites they consider to be suitable and available for Gypsy and Traveller and Travelling Showperson use.	11 September – 22 October 2018.
Town and parish councils informal meetings (series 2)	All town and parish councils were invited to an individual meeting to discuss policies, proposals and options within the first draft of the SADPD.	02 and 04 October 2018.
Town and parish councils informal meetings (series 3)	All town and parish councils were invited to an individual meeting to discuss policies, proposals and options within the emerging publication draft of the SADPD	May – June 2019.

Table 1: SADPD Regulation 18 consultations

- 2.3 Each of the above Preparation (Regulation 18) stages were subject to a period of public consultation in accordance with the relevant planning regulations and the council's SCI. All comments received during these stages were recorded and taken into account in the preparation of the SADPD.
- 2.4 The following sections include a more detailed overview of the consultation carried out and the responses received.

Issues paper consultation 2017 and Call for Sites

- 2.5 The SADPD Issues Paper consultation was carried out in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations, which required local planning authorities to notify general and specific consultation bodies of the subject of the local plan inviting them to make representations about what the local plan ought to contain.
- 2.6 The decision to approve the SADPD Issues Paper for publication and consultation was made at a meeting of the Cabinet Member for Housing and Planning on 20 February 2017. The consultation document set out the proposed scope of the SADPD and set out a series of issues that it was likely to address. It asked a series of questions to seek views on the proposed form and content of the plan.
- 2.7 At the same time, consultation also took place on the draft sustainability appraisal scoping report, setting out the environmental, economic and social issues against which SADPD policies and proposals will be tested. The 2017 consultation also included a 'call for sites' exercise, whereby interested parties were invited to submit sites for consideration to inform future land allocations in the SADPD.

Consultation process

- 2.8 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 Statement of Community Involvement⁴.
- 2.9 Comments were invited on the SADPD Issues Paper; the Draft SA Scoping Report and the Call for Sites form. In addition to the consultation documents, a consultation guidance note, formal notices (statement of representations procedures), and comments form were also published.
- 2.10 Copies of all these documents were deposited in the council's headquarters buildings, customer service centres, planning helpdesk and all public libraries in the borough (including the mobile library service). All of the documentation was also available on the council's consultation portal, accessed via its website.

⁴ Consultation was carried out in accordance with the previous 2010 Statement of Community Involvement, which was the approved document at the time.

2.11 Responses were accepted using the consultation portal, by email, by post, or by hand to the council headquarters.

Notifications

2.12 Notification of the consultation was sent to all stakeholders on the council's local plan consultation database. This consisted of over 15,000 emails and letters. 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 (as amended).

2.13 Separate letters were also sent 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.

Website and publicity

2.14 The Cheshire East Council website homepage⁵ signposted the consultation in the 'Have Your Say' section. The Local Plan page⁶ also signposted the consultation in a prominent position.

2.15 A press release was issued in the week before the start of the consultation period, which resulted in a number of associated articles being published in the local and regional media outlets, both in printed and online form.

2.16 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 document deposit locations.

2.17 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.

Responses

2.18 In total, 1,478 responses to SADPD Issues Paper questions were received from 183 different parties. The number of responses to each question is shown in the Table below.

Number	Question	Responses
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⁵ www.cheshireeast.gov.uk

⁶ www.cheshireeast.gov.uk/localplan

Number	Question	Responses
Question 1	How do you think that the SADPD should be laid out?	49
Question 2	Do you agree with this approach or do you think that further guidance is required in the SADPD specifically regarding sustainable development?	58
Question 3a	What approach do you think should be taken towards the apportionment of the overall development requirement across Local Service Centres?	84
Question 3b	What approach do you think should be taken towards meeting development requirements across Other Settlements and Rural Areas?	55
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?	43
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)?	62
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 (Alderley Edge, Bollington, Chelford, Disley, Mobberley and Prestbury)?	54
Question 5b	What approach do you think should be taken towards apportioning the remaining requirement for safeguarded land?	42
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?	42
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?	22
Question 6b	Are there any other Green Belt matters that need to be addressed in the SADPD?	26
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?	48
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?	46
Question 9a	What role should Neighbourhood Plans play in defining Local Green Gaps?	55
Question 9b	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?	30

Number	Question	Responses
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?	29
Question 10	Have we identified the key settlement boundary issues that the SADPD should address?	102
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?	47
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?	61
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?	50
Question 14	What policy detail regarding the historic environment do you think should be included in the SADPD?	39
Question 15	Do you think that these are the issues that the SADPD should look to address regarding employment development?	65
Question 16	Do you think these are the relevant housing issues for the SADPD to address?	93
Question 17	Do you think that these are the issues that the SADPD should look to address regarding town centres and retail development?	35
Question 18	Are these the transport and infrastructure issues that the SADPD should address?	52
Question 19	Do you agree that these are the issues that the SADPD should address regarding recreation and community facilities?	47
Question 20	Do you agree with the proposed approach to the Local Plan Policies Map?	51
Question 21	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?	35
Question 22	Are there any other issues that the SADPD should address?	43
Question 23	Do you agree with the approach set out above towards identifying sites for Gypsy and Traveller and Travelling Showpeople's accommodation?	13
	TOTAL	1478

Table 2: SADPD Issues Paper responses by question

- 2.19 All of the SADPD Issues Paper comments are available to view on the council's consultation portal⁷.
- 2.20 On the Draft Sustainability Appraisal Scoping Report, 37 comments were received from 11 contributing consultees and these are also available to view on the consultation portal⁸.
- 2.21 Approximately 600 sites were submitted through the call for sites during the consultation period. In order to inform the site selection process, a further period from 10 April to 01 July enabled parties to submit a further 33 sites for consideration.
- 2.22 A summary of the main issues raised and how they have been taken into account in the preparation of the plan is provided in Appendix B 'SADPD Issues Paper consultation main issues'

Report of consultation

- 2.23 A detailed report of consultation on the SADPD Issues Paper (including Draft Sustainability Appraisal Scoping Report and Call for Sites) was published on the council's website in July 2017⁹ and a separate Sustainability Appraisal Scoping Report consultation statement was published in June 2017¹⁰.

First draft SADPD consultation 2018

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

⁷ Responses to the SADPD Issues Paper can viewed at:

<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/issues>

⁸ Responses to the Draft Sustainability Appraisal Scoping Report can be viewed at:

<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sascope17>

⁹ The detailed SADPD Issues Paper report of consultation (2017) is available at:

<https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/sadpd-issues-paper-report-of-consultation-jul17.pdf>

¹⁰ The Sustainability Appraisal Scoping Report consultation statement is available at:

<https://www.cheshireeast.gov.uk/pdf/planning/local-plan/sa-sco-rep-consult-stat-with-cover.pdf>

- 2.25 The decision to publish the first draft SADPD together with its supporting evidence for public consultation was made by the Portfolio Holder for Housing, Planning and Regeneration on 31 August 2018.
- 2.26 The consultation was an important opportunity to help shape the policies and proposals in the SADPD. Consultation also took place on the Interim Sustainability Appraisal and Habitats Regulations Assessment documents, which look at the first draft SADPD's contribution to sustainable development and its impact of internationally-designated nature conservation sites. At the same time, the council also carried out a further 'call for sites' that may be suitable for Gypsy, Traveller and Travelling Showpeople accommodation.

Consultation process.

- 2.27 Consultation on the First Draft SADPD took place for six weeks between 11 September and 22 October 2018. The consultation was carried out in accordance with the requirements of the Cheshire East Statement of Community Involvement¹¹.
- 2.28 Comments were invited on the following documents:
- First Draft Site Allocations and Development Policies Document;
 - First Draft SADPD Interim Sustainability Appraisal;
 - First Draft SADPD Habitats Regulations Assessment; and
 - Gypsy, Traveller and Travelling Showpeople 'call for sites' form.
- 2.29 An extensive series of supporting documents, background evidence and reports was also published.
- 2.30 Copies of all the consultation documents were deposited in the council's headquarters, customer service centres and all public libraries in the borough. They were also available on the council's consultation portal, accessed via its website. Copies of all the supporting documents were deposited in the council's headquarters and were also available on its consultation portal. Copies of selected key supporting documents and background evidence were deposited in the council's customer service centres and public libraries.
- 2.31 Responses were accepted using the consultation portal, by email and by post. Information on how to submit comments was included on the consultation portal; in the foreword of the printed and PDF versions of the first draft SADPD; and on the printed comments form.

Notifications

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

¹¹ Consultation was carried out in accordance with the previous 2010 Statement of Community Involvement, which was the approved document at the time.

- 2.33 Following this database cleansing exercise, notification of the consultation was sent to all stakeholders on the council's local plan consultation database. This consisted of over 1,600 letters and emails. 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 (as amended).
- 2.34 Separate email letters were also sent to Natural England, Historic England, the Environment Agency and Natural Resources Wales as statutory consultees, as well as all town and parish councils in Cheshire East and all MPs whose constituencies lie partly or wholly within Cheshire East Borough. Cheshire East councillors were notified through an 'all member bulletin' issued by the Portfolio Holder for Housing, Planning and Regeneration.
- 2.35 A further 141 email notifications were sent to those people that had submitted sites during the 2017 'call for sites' exercise but who were not included in the council's local plan consultation database.

Website and publicity

- 2.36 A number of pages on the Cheshire East Council website provided information and links to the consultation. These pages included:
- The homepage (in the 'have your say' section)¹²
 - The Cheshire East Council Consultations page¹³
 - The Cheshire East Local Plan page¹⁴
 - The Site Allocations and Development Policies Document page¹⁵
 - The Local Plan consultations page¹⁶
- 2.37 Two press releases were issued, informing people of the consultations (one before the start of the consultation period and a second in the first week of the consultation). These resulted in a number of articles on the consultation being published in the local and regional media outlets, both in printed and online form.
- 2.38 The consultation was also highlighted in the September edition of the council's 'Spatial Planning Update' newsletter which is sent to all town and parish councils and displayed on the council's website. In addition, there was an article in the September / October edition of the Connected Communities

¹² www.cheshireeast.gov.uk

¹³ www.cheshireeast.gov.uk/council_and_democracy/council_information/consultations

¹⁴ www.cheshireeast.gov.uk/localplan

¹⁵ www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx

¹⁶ www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/local_plan_consultations

newsletter, which was distributed at the end of September and is also available on the council's website.

Town and parish council engagement

- 2.39 A series of 'drop-in' sessions for town and parish councils to discuss the SADPD and other planning documents with officers from the Spatial Planning Team were held on 02 and 04 October.
- 2.40 Invitations were sent directly to all town and parish councils the invitation was repeated in the 'Spatial Planning Update' which was sent out to all town and parish councils on 21 September.

Responses

- 2.41 In total, 3,042 comments on the First Draft SADPD were received from 756 different parties. The number of comments received on each policy / section of the first draft SADPD is shown in the Table below.

Section / policy / site (number of comments)
Chapter 1: Introduction (91)
Chapter 2: Planning for growth (introduction) (8) <ul style="list-style-type: none"> • Policy PG 8 'Spatial distribution of development: local service centres' (246) • Policy PG 9 'Settlement boundaries' (87) • Policy PG 10 'Infill villages in the open countryside' (54) • Policy PG 11 'Green Belt boundaries' (39) • Policy PG 12 'Safeguarded land boundaries' (14) • Policy PG 13 'Strategic green gaps boundaries' (19) • Policy PG 14 'Local green gaps' (12)
Chapter 3: General requirements (intro) (1) <ul style="list-style-type: none"> • Policy GEN 1 'Design principles' (20) • Policy GEN 2 'Security at crowded places' (0) • Policy GEN 3 'Advertisements' (3) • Policy GEN 4 'The recovery of infrastructure costs and deferred planning obligations' (24) • Policy GEN 5 'Adopted policies map' (13)
Chapter 4: Natural environment, climate change and resources (intro) (8) <ul style="list-style-type: none"> • Policy ENV 1 'Ecological network' (28) • Policy ENV 2 'Ecological implementation' (21) • Policy ENV 3 'Landscape character' (12) • Policy ENV 4 'River corridors' (6) • Policy ENV 5 'Landscaping' (6) • Policy ENV 6 'Trees, hedgerows and woodland implementation' (40) • Policy ENV 7 'Climate change mitigation and adaptation' (16) • Policy ENV 8 'District heating network priority areas' (3) • Policy ENV 9 'Wind energy' (14) • Policy ENV 10 'Solar energy' (10) • Policy ENV 11 'Proposals for battery energy storage systems' (4) • Policy ENV 12 'Air quality' (12)

Section / policy / site (number of comments)
<ul style="list-style-type: none"> • Policy ENV 13 'Aircraft noise' (9) • Policy ENV 14 'Light pollution' (11) • Policy ENV 15 'Surface water management and flood risk' (13) • Policy ENV 16 'Protecting water resources' (12)
<p>Chapter 5: The historic environment (intro) (11)</p> <ul style="list-style-type: none"> • Policy HER 1 'Heritage assets' (15) • Policy HER 2 'Designated heritage assets' (5) • Policy HER 3 'Non-designated heritage assets' (7) • Policy HER 4 'Conservation areas' (6) • Policy HER 5 'Listed buildings' (4) • Policy HER 6 'Historic parks and gardens' (2) • Policy HER 7 'World heritage site' (10) • Policy HER 8 'Archaeology' (3) • Policy HER 9 'Enabling development' (13)
<p>Chapter 6: Rural issues (intro) (5)</p> <ul style="list-style-type: none"> • Policy RUR 1 'New buildings for agriculture and forestry' (6) • Policy RUR 2 'Farm diversification' (2) • Policy RUR 3 'Agricultural and forestry workers dwellings' (3) • Policy RUR 4 'Essential rural worker occupancy conditions' (2) • Policy RUR 5 'Best and most versatile agricultural land' (18) • Policy RUR 6 'Outdoor sport, leisure and recreation in the open countryside and Green Belt' (6) • Policy RUR 7 'Equestrian development' (5) • Policy RUR 8 'Visitor accommodation' (3) • Policy RUR 9 'Caravan and camping sites' (1) • Policy RUR 10 'Employment development in the open countryside' (6) • Policy RUR 11 'Extensions and alterations to buildings in the open countryside and Green Belt' (11) • Policy RUR 12 'Residential curtilages in the open countryside and Green Belt' (7) • Policy RUR 13 'Replacement buildings in the open countryside and Green Belt' (10) • Policy RUR 14 'Re-use of rural buildings for residential use' (6)
<p>Chapter 7: Employment and economy (intro) (0)</p> <ul style="list-style-type: none"> • Policy EMP 1 'Strategic employment areas' (7) • Policy EMP 2 'Employment allocations' (17)
<p>Chapter 8: Housing (intro) (38)</p> <ul style="list-style-type: none"> • Policy HOU 1 'Housing mix' (39) • Policy HOU 2 'Specialist housing provision' (8) • Policy HOU 3 'Self and custom build dwellings' (26) • Policy HOU 4 'Houses in multiple occupation' (1) • Policy HOU 5 'Gypsy, Traveller and Travelling Showpersons provision' (5) • Policy HOU 6 'Optional technical standards' (29) • Policy HOU 7 'Subdivision of dwellings' (1) • Policy HOU 8 'Backland development' (8) • Policy HOU 9 'Extensions and alterations' (3) • Policy HOU 10 'Amenity' (3) • Policy HOU 11 'Residential standards' (18) • Policy HOU 12 'Housing density' (28) • Policy HOU 13 'Housing delivery' (37)

Section / policy / site (number of comments)

- Policy HOU 14 'Small sites' (19)

Chapter 9: Town centres and retail (intro) (0)

- Policy RET 1 'Retail hierarchy' (18)
- Policy RET 2 'Planning for retail needs' (7)
- Policy RET 3 'Sequential and impact tests' (9)
- Policy RET 4 'Shop fronts and security' (5)
- Policy RET 5 'Restaurants, cafés, pubs and hot food takeaways' (6)
- Policy RET 6 'Neighbourhood parades of shops' (7)
- Policy RET 7 'Ensuring the vitality of town and retail centres' (19)
- Policy RET 8 'Residential accommodation in the town centre' (9)
- Policy RET 9 'Environmental improvements, public realm and design in town centres' (10)
- Policy RET 10 'Crewe town centre' (4)
- Policy RET 11 'Macclesfield town centre' (5)

Chapter 10: Transport and infrastructure (intro) (8)

- Policy INF 1 'Cycleways, bridleways and footpaths' (13)
- Policy INF 2 'Public car parks' (4)
- Policy INF 3 'Highway safety and access' (13)
- Policy INF 4 'Manchester Airport' (6)
- Policy INF 5 'Aerodrome safeguarding' (3)
- Policy INF 6 'Airport public safety zone' (3)
- Policy INF 7 'Airport car parking' (5)
- Policy INF 8 'Protection of land and routes for proposed infrastructure' (7)
- Policy INF 9 'Hazardous installations' (0)
- Policy INF 10 'Telecommunications infrastructure' (3)
- Policy INF 11 'Utilities' (2)
- Policy INF 12 'Canals and mooring facilities' (4)

Chapter 11: Recreation and community facilities (intro) (3)

- Policy REC 1 'Green/open space protection' (26)
- Policy REC 2 'Indoor sport and recreation implementation' (20)
- Policy REC 3 'Green space implementation' (31)
- Policy REC 4 'Day nurseries' (0)
- Policy REC 5 'Community facilities' (11)

Chapter 12: Site allocations (intro) (123)

- Crewe (general) (17)
 - Site CRE 1 'Land at Bentley Motors' (5)
 - Site CRE 2 'Land off Gresty Road' (1)
- Congleton (general) (15)
 - Site CNG 1 'Land off Alexandria Way' (0)
- Middlewich (general) (4)
 - Site MID 1 'Land off St. Ann's Road' (1)
 - Site MID 2 'East and west of Croxton Lane' (5)
- Poynton (general) (11)
 - Site PYT 1 'Poynton Sports Club' (16)
 - Site PYT 2 'Land north of Glastonbury Drive' (16)
 - Site PYT 3 'Land at Poynton High School' (11)
 - Site PYT 4 'Former Vernon Infants School' (10)
- Alderley Edge (general) (28)
 - Site ALD 1 'Land adjacent to Jenny Heyes' (9)

Section / policy / site (number of comments)
<ul style="list-style-type: none"> ○ Site ALD 2 'Ryleys Farm, north of Chelford Road' (32) ○ Safeguarded land ALD 3 'Ryleys Farm (safeguarded)' (20) ○ Safeguarded land ALD 4 'Land at Horseshoe Lane' (5) ● Audlem (general) (1) <ul style="list-style-type: none"> ○ Site AUD 1 'Land south of Birds Nest' (2) ○ Site AUD 2 'East View' (2) ● Bollington (general) (101) <ul style="list-style-type: none"> ○ Site BOL 1 'Land at Henshall Road' (208) ○ Site BOL 2 'Land at Greg Avenue/Ashbrook Road' (205) ○ Site BOL 3 'Land at Oak Lane/Greenfield Road' (165) ○ Site BOL 4 'Land to the east of 41a Shrigley Road' (168) ● Chelford (general) (4) <ul style="list-style-type: none"> ○ Site CFD 1 'Land off Knutsford Road' (7) ○ Safeguarded land CFD 2 'Land east of Chelford Railway Station' (11) ● Disley (general) (6) <ul style="list-style-type: none"> ○ Site DIS 1 'Greystones allotments' (12) ○ Safeguarded land DIS 2 'Cloughside Farm' (112) ● Holmes Chapel (general) (7) <ul style="list-style-type: none"> ○ Site HCH 1 'Land east of London Road' (3) ● Prestbury (general) (26) <ul style="list-style-type: none"> ○ Site PRE 1 'Land south of cricket ground' (10) ○ Site PRE 2 'Land south of Prestbury Lane' (25) ○ Safeguarded land PRE 3 'Land south of Prestbury Lane (safeguarded)' (20) ● Gypsy, Traveller and Travelling Showpersons sites (general) (3) <ul style="list-style-type: none"> ○ Site G&T 1 'Land east of Railway Cottages, Nantwich' (2) ○ Site G&T 2 'Land at Coppenhall Moss, Crewe' (20) ○ Site TS 1 'Lorry park, off Mobberley Road, Knutsford' (6)
Chapter 13: Monitoring and implementation (6)
Chapter 14: Glossary (8)
Appendix A: Housing and employment monitoring (3)
Appendix B: Related documents and links (3)

Table 3: First Draft SADPD responses by section

- 2.42 All of the comments on the First Draft SADPD are available to view on the council's consultation portal¹⁷.
- 2.43 On the Interim Sustainability Appraisal, 8 comments were received from 6 consultees and these are also available to view on the consultation portal¹⁸.
- 2.44 For the Habitats Regulations Assessment, 14 comments were received from 4 consultees and these are also available to view on the consultation portal¹⁹.

¹⁷ Responses to the First Draft SADPD can be viewed at:

<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/firstdraft>

¹⁸ Responses to the Interim Sustainability Appraisal can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/firstdraft>

¹⁹ Responses to the First Draft SADPD Habitats Regulations Assessment can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/fdhra>

- 2.45 One additional site was submitted in response to the Gypsy, Traveller and Travelling Showpeople call for sites exercise.
- 2.46 A summary of the main issues raised and how they have been taken into account in the preparation of the plan is provided in Appendix C ‘First Draft SADPD consultation main issues’.

Report of consultation

- 2.47 A detailed report of consultation on the First Draft SADPD²⁰ was published on the council’s website in February 2019 and revised in March 2019 to include details of a petition received after the consultation period had ended.

3. Publication consultation

- 3.1 Following consideration of all the responses submitted under the Regulation 18 consultations, a Publication Draft of the SADPD was prepared. This section of the report provides details of the consultation carried out under Regulations 19 and 20.

Consultation	Scope	Dates
Initial Publication Draft SADPD	The initial Publication Draft SADPD was published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and representations were invited under Regulation 20. Following consideration of the representations made, a series of changes were made to the initial Publication Draft SADPD. There will be further consultation on the Revised Publication Draft SADPD under Regulation 19 and further representations will be invited under Regulation 20. When the plan is submitted to the Secretary of State under Section 20 of the Planning and Compulsory Purchase Act 2004, the Regulation 20 representations submitted to both the initial Publication Draft SADPD and the Revised Publication Draft SADPD will be submitted.	19 August – 30 September 2019.
Initial Publication Draft Sustainability Appraisal	The initial Publication Draft SA assessed the degree to which the emerging plan would help to achieve relevant environmental, economic and social objectives, when judged against reasonable alternatives. Representations on the SA were invited.	19 August – 30 September 2019.
SADPD Habitats Regulations Assessment (initial Publication Draft version)	The HRA assessed the impact of the initial Publication Draft SADPD on internationally-designated nature conservation sites, both alone and in combination with other plans and projects.	19 August – 30 September 2019.

²⁰ The First Draft SADPD Report of Consultation can be viewed at <https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/first-draft-sadpd-report-of-consultation.pdf>

Initial Publication Draft SADPD consultation 2019

- 3.2 Following the First Draft SADPD consultation, an initial Publication Draft SADPD was published to invite representations before submitting to the Secretary of State for examination by an independent planning inspector.
- 3.3 Following consideration of the representations made, the initial Publication Draft SADPD was not submitted to the Secretary of State under Section 20 of the Planning and Compulsory Purchase Act 2004. Instead, a number of amendments were made to the initial Publication Draft SADPD, which will be the subject of further consultation under Regulation 19.
- 3.4 Whilst the document consulted on was titled the “Publication Draft SADPD”, it is referred to as the “initial Publication Draft SADPD” in this report, to distinguish it from the “Revised Publication Draft SADPD” which has now been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.5 The decision to publish the initial Publication Draft SADPD together with its supporting evidence for public consultation was made by a meeting of the council’s Cabinet on 06 August 2019.

Consultation process

- 3.6 Consultation on the initial Publication Draft SADPD took place for six weeks between 19 August and 30 September 2019. The consultation was carried out in accordance with the requirements of the Cheshire East Statement of Community Involvement.
- 3.7 Comments were invited on the following documents:
 - Initial Publication Draft Site Allocations and Development Policies Document;
 - Initial Publication Draft SADPD Sustainability Appraisal; and
 - Initial Publication Draft SADPD Habitats Regulations Assessment.
- 3.8 An extensive series of supporting documents, background evidence and reports was also published. Comments could be made on any of the other supporting documents by relating them to the resulting paragraph, policy or site in the SADPD.
- 3.9 Copies of all the consultation documents were deposited in the council’s headquarters, customer service centres and all public libraries in the borough. They were also available on the council’s consultation portal, accessed via its website. Copies of all the supporting documents were deposited in the council’s headquarters, customer service centres and were also available on its consultation portal. Copies of selected key supporting documents and background evidence were deposited in public libraries.
- 3.10 Responses were accepted using the consultation portal, by email and by post. Information on how to submit comments was included:

- on the consultation portal;
- on the printed comments form;
- in a guidance note placed on the consultation portal and in the council's headquarters, customer service centres and all public libraries in the borough; and
- in a formal 'statement of representations procedure' notice placed on the consultation portal; in the council's headquarters, customer service centres and all public libraries in the borough; and placed in a number of local newspapers.

Notifications

- 3.11 Notification of the consultation was sent to all active stakeholders on the council's local plan consultation database. This consisted of over 2,300 letters and emails. The stakeholders on this consultation database include local residents, landowners and developers, along with the 'specific consultation bodies', 'general consultation bodies', and 'residents and other persons carrying on business in the Local Planning Authority's area' as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The list of consultees included everyone who had responded to the 2017 issues consultation, 2017 call for sites, and 2018 First Draft SADPD consultation (unless they had specifically indicated that they did not want to be contacted). The consultees also included the statutory consultees (Natural England; Historic England; the Environment Agency; and Natural Resources Wales).
- 3.12 Notifications were also sent directly to all town and parish councils in Cheshire East and all MPs whose constituencies lie wholly or partly in Cheshire East.

Website and publicity

- 3.13 A number of pages on the Cheshire East Council website provided information and links to the consultation. These pages included:
- The homepage (in the 'have your say' section)²¹
 - The Cheshire East Council Consultations page²²
 - The Cheshire East Local Plan page²³
 - The Site Allocations and Development Policies Document page²⁴
 - The Local Plan Public Notices Page²⁵
- 3.14 Three press releases were issued informing people of the consultations (two before the start of the consultation period and one on the first day of the

²¹ www.cheshireeast.gov.uk

²² www.cheshireeast.gov.uk/council_and_democracy/council_information/consultations

²³ www.cheshireeast.gov.uk/localplan

²⁴ www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx

²⁵ www.cheshireeast.gov.uk/planning/spatial_planning/local-plan-notices/local-plan-public-notices.aspx

consultation). These resulted in a number of articles about the consultation being published in the local and regional media outlets, both in printed and online form. A series of messages highlighting the consultation were also sent from the council's Twitter account to reach users of social media.

- 3.15 The consultation was also highlighted in the September 2019 edition of the council's 'Strategic Planning Update' newsletter, which is sent to all town and parish councils, all Cheshire East councillors and is also available on the council's website.
- 3.16 A formal 'statement of representations procedure' notice was placed in a number of local newspapers, including the Crewe Chronicle; Macclesfield Express; Congleton Chronicle Series (including Sandbach, Biddulph Chronicle); Wilmslow and Knutsford Guardian; and the Northwich Guardian (Mid-Cheshire Guardian).

Responses

- 3.17 In total, 2,698 representations on the initial Publication Draft SADPD were received from 774 different parties. The number of representations received on each policy / section of the initial Publication Draft SADPD is shown in the Table below.

Section / policy / site (number of comments)
Chapter 1: Introduction (57)
Chapter 2: Planning for growth (introduction) (22) <ul style="list-style-type: none"> • Policy PG 8 'Spatial distribution of development: local service centres' (267) • Policy PG 9 'Settlement boundaries' (58) • Policy PG 10 'Infill villages' (40) • Policy PG 11 'Green Belt boundaries' (314) • Policy PG 12 'Safeguarded land boundaries' (12) • Policy PG 13 'Strategic green gaps boundaries' (15) • Policy PG 14 'Local green gaps' (8)
Chapter 3: General requirements (intro) (1) <ul style="list-style-type: none"> • Policy GEN 1 'Design principles' (19) • Policy GEN 2 'Security at crowded places' (1) • Policy GEN 3 'Advertisements' (3) • Policy GEN 4 'The recovery of infrastructure costs and planning obligations reduced on viability grounds' (18) • Policy GEN 5 'Aerodrome safeguarding' (3) • Policy GEN 6 'Airport public safety zone' (2)
Chapter 4: Natural environment, climate change and resources (intro) (6) <ul style="list-style-type: none"> • Policy ENV 1 'Ecological network' (24) • Policy ENV 2 'Ecological implementation' (25) • Policy ENV 3 'Landscape character' (18) • Policy ENV 4 'River corridors' (4) • Policy ENV 5 'Landscaping' (6) • Policy ENV 6 'Trees, hedgerows and woodland implementation' (31) • Policy ENV 7 'Climate change mitigation and adaptation' (20)

Section / policy / site (number of comments)

- Policy ENV 8 'District heating network priority areas' (3)
- Policy ENV 9 'Wind energy' (11)
- Policy ENV 10 'Solar energy' (6)
- Policy ENV 11 'Proposals for battery energy storage systems' (3)
- Policy ENV 12 'Air quality' (9)
- Policy ENV 13 'Aircraft noise' (7)
- Policy ENV 14 'Light pollution' (5)
- Policy ENV 15 'New development and existing uses' (3)
- Policy ENV 16 'Surface water management and flood risk' (17)
- Policy ENV 17 'Protecting water resources' (4)

Chapter 5: The historic environment (intro) (1)

- Policy HER 1 'Heritage assets' (6)
- Policy HER 2 'Heritage at risk' (4)
- Policy HER 3 'Conservation areas' (6)
- Policy HER 4 'Listed buildings' (6)
- Policy HER 5 'Historic parks and gardens' (2)
- Policy HER 6 'Historic battlefields' (0)
- Policy HER 7 'Non-designated heritage assets' (5)
- Policy HER 8 'Archaeology' (1)
- Policy HER 9 'World heritage site' (10)

Chapter 6: Rural issues (intro) (1)

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

Chapter 7: Employment and economy (intro) (5)

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

Chapter 8: Housing (intro) (22)

- Policy HOU 1 'Housing mix' (38)
- Policy HOU 2 'Specialist housing provision' (8)
- Policy HOU 3 'Self and custom build dwellings' (27)
- Policy HOU 4 'Houses in multiple occupation' (1)
- Policy HOU 5 'Gypsy, Traveller and Travelling Showpersons provision' (9)
- Policy HOU 6 'Accessibility, space and wheelchair housing standards' (21)
- Policy HOU 7 'Subdivision of dwellings' (4)

Section / policy / site (number of comments)

- Policy HOU 8 'Backland development' (4)
- Policy HOU 9 'Extensions and alterations' (2)
- Policy HOU 10 'Amenity' (2)
- Policy HOU 11 'Residential standards' (14)
- Policy HOU 12 'Housing density' (32)
- Policy HOU 13 'Housing delivery' (23)
- Policy HOU 14 'Small and medium-sized sites' (12)

Chapter 9: Town centres and retail (intro) (3)

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

Chapter 10: Transport and infrastructure (intro) (3)

- Policy INF 1 'Cycleways, bridleways and footpaths' (13)
- Policy INF 2 'Public car parks' (2)
- Policy INF 3 'Highway safety and access' (8)
- Policy INF 4 'Manchester Airport' (5)
- Policy INF 5 'Off-airport car parking' (3)
- Policy INF 6 'Protection of existing and proposed infrastructure' (5)
- Policy INF 7 'Hazardous installations' (0)
- Policy INF 8 'Telecommunications infrastructure' (4)
- Policy INF 9 'Utilities' (4)
- Policy INF 10 'Canals and mooring facilities' (3)

Chapter 11: Recreation and community facilities (intro) (1)

- Policy REC 1 'Green/open space protection' (22)
- Policy REC 2 'Indoor sport and recreation implementation' (10)
- Policy REC 3 'Green space implementation' (12)
- Policy REC 4 'Day nurseries' (1)
- Policy REC 5 'Community facilities' (4)

Chapter 12: Site allocations (intro) (80)

- Crewe (general) (13)
 - Site CRE 1 'Land at Bentley Motors' (2)
 - Site CRE 2 'Land off Gresty Road' (3)
- Congleton (general) (11)
 - Site CNG 1 'Land off Alexandria Way' (1)
- Middlewich (general) (3)
 - Site MID 1 'Land off St. Ann's Road' (2)
 - Site MID 2 'East and west of Croxton Lane' (6)
 - Site MID 3 'Centurion Way' (5)
- Poynton (general) (4)
 - Site PYT 1 'Poynton Sports Club' (18)

Section / policy / site (number of comments)
<ul style="list-style-type: none"> ○ Site PYT 2 'Land north of Glastonbury Drive' (19) ○ Site PYT 3 'Land at Poynton High School' (9) ○ Site PYT 4 'Former Vernon Infants School' (5) ● Alderley Edge (general) (11) <ul style="list-style-type: none"> ○ Site ALD 1 'Land adjacent to Jenny Heyes' (11) ○ Site ALD 2 'Ryleys Farm, north of Chelford Road' (10) ○ Safeguarded land ALD 3 'Ryleys Farm (safeguarded)' (7) ○ Site ALD 4 'Land north of Beech Road' (12) ● Audlem (general) (1) <ul style="list-style-type: none"> ○ Site AUD 1 'Land south of Birds Nest' (1) ● Bollington (general) (187) <ul style="list-style-type: none"> ○ Site BOL 1 'Land at Henshall Road' (175) ○ Site BOL 2 'Land at Oak Lane/Greenfield Road' (63) ○ Site BOL 3 'Land at Jackson Lane' (63) ● Chelford (general) (2) <ul style="list-style-type: none"> ○ Site CFD 1 'Land off Knutsford Road' (4) ○ Safeguarded land CFD 2 'Land east of Chelford Railway Station' (2) ● Disley (general) (7) <ul style="list-style-type: none"> ○ Site DIS 1 'Greystones allotments' (42) ○ Safeguarded land DIS 2 'Land off Jacksons Edge Road' (185) ● Holmes Chapel (general) (3) <ul style="list-style-type: none"> ○ Site HCH 1 'Land east of London Road' (6) ● Mobberley (general) (2) <ul style="list-style-type: none"> ○ Site MOB 1 'Land off Ilford Way' (11) ○ Safeguarded land MOB 2 'Land north of Carlisle Close' (4) ● Prestbury (general) (13) <ul style="list-style-type: none"> ○ Site PRE 1 'Land south of cricket ground' (9) ○ Site PRE 2 'Land south of Prestbury Lane' (62) ○ Safeguarded land PRE 3 'Land off Heybridge Lane (safeguarded)' (10) ● Gypsy, Traveller and Travelling Showpersons sites (general) (2) <ul style="list-style-type: none"> ○ Site G&T 1 'Land east of Railway Cottages, Nantwich' (12) ○ Site G&T 2 'Land at Coppenhall Moss, Crewe' (1) ○ Site G&T 3 'New Start Park, Wettenhall Road, Nantwich' (8) ○ Site G&T 4 'Three Oakes Site, Booth Lane, Middlewich' (4) ○ Site G&T 5 'Cledford Hall, Cledford Lane, Middlewich' (18) ○ Site G&T 6 'Land at Thimswarra Farm, Moston' (2) ○ Site G&T 7 'Land at Meadowview, Moston' (2) ○ Site TS 1 'Lorry park, off Mobberley Road, Knutsford' (10) ○ Site TS 2 'Land at Firs Farm, Brereton' (5)
Chapter 13: Monitoring and implementation (3)
Chapter 14: Glossary (3)
Appendix A: Related documents and links (6)

Table 4: Initial Publication Draft SADPD responses by section

- 3.18 All of the representations on the initial Publication Draft SADPD are available to view on the council's consultation portal²⁶.
- 3.19 On the initial Publication Draft SADPD Sustainability Appraisal, 9 representations were received from 9 different consultees and these are also available to view on the consultation portal²⁷.
- 3.20 For the Habitats Regulations Assessment, one representation was received and this can be viewed on the consultation portal²⁸.
- 3.21 A summary of the main issues raised and how they have been taken into account in the preparation of the plan is provided in Appendix D 'Initial Publication Draft SADPD consultation main issues'

Report of consultation

- 3.22 A detailed report of consultation on the initial Publication Draft SADPD was published on the council's website in May 2020²⁹.

Revised Publication Draft SADPD consultation

- 3.23 The Revised Publication Draft SADPD has now been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and representations have been invited under Regulation 20.
- 3.24 All documentation related to the Revised Publication Draft consultation can be viewed on the council's consultation portal³⁰.
- 3.25 Following the publication consultation, this consultation statement will be updated to include details of the consultation undertaken and a summary of the main issues raised.
- 3.26 When the SADPD is submitted to the Secretary of State under Section 20 of the Planning and Compulsory Purchase Act 2004, representations made under Regulation 20 to both the initial Publication Draft SADPD and the Revised Publication Draft SADPD will be submitted alongside it.

²⁶ Responses to the initial Publication Draft SADPD can be viewed at

<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubsadpd>

²⁷ Responses to the initial Publication Draft SADPD Sustainability Appraisal can be viewed at

<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubsustapp>

²⁸ The response to the initial Publication Draft SADPD Habitats Regulation Assessment can be viewed at

<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubhra>

²⁹ The initial Publication Draft SADPD Report of Consultation can be viewed at

https://www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx

³⁰ The Revised Publication Draft SADPD consultation can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/revpubsadpd>

Appendix A: Specific and general consultation bodies

The following list of consultees is based on the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The local planning authority must consult the specific and general consultation bodies set out in Regulation 2 (as appropriate) as well as such residents or businesses in the local area as appropriate.

Specific consultation bodies

- The Coal Authority;
- The Environment Agency;
- Historic England;
- The Marine Management Organisation;
- Natural England;
- Network Rail Infrastructure;
- Highways England;
- Relevant authorities whose area is within or adjoining the local planning authority's area (including town and parish councils; parish meetings; neighbouring unitary, district and county councils; the Peak District National Park Authority; and the Greater Manchester Combined Authority);
- Neighbourhood forums within or adjoining the local planning authority's area;
- Persons to whom the electronic communications code applies or who owns or controls electronic communications apparatus in the local planning authority's area;
- NHS Clinical Commissioning Groups and the NHS Commissioning Board;
- Electricity license holders;
- National Grid Gas;
- United Utilities; and
- Homes England.

General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the local planning authority's area;
- Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area;
- Bodies which represent the interests of different religious groups in the local planning authority's area;
- Bodies which represent the interests of disabled persons in the local planning authority's area; and
- Bodies which represent the interests of persons carrying on business in the local planning authority's area.

Appendix B: SADPD Issues Paper consultation main issues

The SADPD Issues Paper consultation took place between 27 February and 10 April 2017. This included consultations on the Call for Sites and the Draft Sustainability Appraisal Scoping Report. This Appendix sets out the key issues raised in each of these consultations, and how these have been taken into account.

Issues Consultation

The tables below include a summary of the main issues raised through the SADPD Issues Paper consultation and how these have been taken into account.

Question 1: SADPD layout

How do you think the SADPD should be laid out?

Summary of main issues raised:	How the main issues have been taken into account
<p>Preferences for a topic-based layout. This would be clearer to understand for a non-expert and more closely reflect the format of Neighbourhood Plans. However, 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. There should still be individual chapters on each Local Service Centres and a chapter covering Other Settlements and Rural Areas.</p>	<p>The Revised Publication Draft SADPD is presented using a topic-based layout which is considered to be a more appropriate approach given the non-strategic nature of its policies. Each policy is cross-referenced to the appropriate LPS policies to assist in understanding the links between the documents. Policies in the SADPD generally apply across the borough and detailed policies applying to single local service centres are best applied through neighbourhood plans. The Revised Publication Draft SADPD includes a 'Rural issues' chapter which addresses issues in the other settlements and rural areas.</p>
<p>Preference for a layout based on the LPS chapters. The SADPD follows the LPS and should be aligned with it so the two documents read cohesively and it is clear how the SADPD relates to the wider LPS. The LPS chapter based approach should be followed, however</p>	<p>The LPS chapter-based approach has not been followed as the topic-based approach is considered to be easier to understand and more suited to the non-strategic policies of the SADPD. However, the Revised Publication Draft SADPD does include an initial 'planning for</p>

<p>topic-based sub-chapters should be included where relevant.</p>	<p>growth' chapter to add non-strategic detail to the 'planning for growth' policies of the LPS. In addition, the Revised Publication Draft SADPD includes extensive cross-references to the relevant LPS policies.</p>
<p>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</p>	<p>All sites submitted for consideration through the Call for Sites (2017), the First Draft SADPD (2018), and the initial Publication Draft SADPD (2019) consultations have been considered in accordance with the site selection methodology for potential allocation in the SADPD, including those capable of accommodating more than 150 dwellings or larger than 5 ha.</p>
<p>The SADPD will need to take account of the LPS Inspector's findings, where appropriate.</p>	<p>The Revised Publication Draft SADPD has been prepared in the context of the adopted LPS and takes full account of the findings of the LPS inspector.</p>
<p>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</p>	<p>The SADPD is a part 2 plan that adds non-strategic detail to the strategic policies of the LPS. Its draft policies are in conformity with the LPS, which includes the overall levels of housing and employment growth planned for. The future plan review (required to be completed within 5 years from adoption of the LPS) should consider whether the overall levels of planned growth remain appropriate. Consequently, the Revised Publication Draft SADPD plans for the levels of growth set out in the LPS.</p>
<p>The SADPD should refer to neighbourhood plans that have been made</p>	<p>The Revised Publication Draft SADPD makes numerous references to neighbourhood plans but it does not list all made neighbourhood plans as there are a large number of plans either made or in preparation. Any list of made neighbourhood plans would inevitably become out of date very quickly. Full details of all neighbourhood plans are available on the council's website.</p>

Question 2: Sustainable development

Do you agree with this approach or do you think that further guidance is required in the SADPD specifically regarding sustainable development?

Summary of main issues raised:	How the main issues have been taken into account
<p>Please ensure that the definition of ‘sustainable development’ is defined and clarified in plain English.</p>	<p>Sustainable development is defined in the National Planning Policy Framework. The objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Para 7 of the NPPF and Resolution 42/187 of the United Nations General Assembly). This is reflected in the definition of sustainable development included in the glossary of the Revised Publication Draft SADPD.</p>
<p>The LPS policies set out a suitable strategic framework for the achievement of sustainable development in the borough. More work needed to ensure that these strategic statements are translated into a practical framework – including quality of place, landscape character, green infrastructure and heritage.</p> <p>Clear guidance is needed in the SADPD on how sustainable development policies can be delivered</p>	<p>The Revised Publication Draft SADPD is the second part of the local plan and adds non-strategic detail to the strategic policies of the LPS. It addresses a number of topic areas, including housing, rural issues, the natural and built environment amongst other areas. When read as a whole, the Revised Publication Draft SADPD, alongside the LPS sets out a suitable and practical framework for the considerations of planning applications in the borough.</p>
<p>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.</p>	<p>The Revised Publication Draft SADPD is the second part of the local plan and adds non-strategic detail to the strategic policies of the LPS. Policies in the Revised Publication Draft SADPD clearly make reference to the relevant strategic policies in the LPS, where relevant.</p>
<p>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</p>	<p>Para 8 of the NPPF notes that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p>

<p>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.</p>	<p>a) an economic objective; b) a social objective; and c) an environmental objective The Revised Publication Draft SADPD is considered, when read as a whole, alongside the policies contained in the LPS to be consistent with this intention of delivering sustainable development in the borough. LPS Policy SD 2 ‘Sustainable development principles’ and the associated Table 9.1 (Access to services and facilities) sets out the recommended distances to services and facilities for residential development.</p>
<p>When receiving statistical information directly from developers, such as travel distances, traffic movements, perceived trends etc. and 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.</p>	<p>This issue is considered to relate to individual decision taking and the implementation of policies rather than plan making.</p>
<p>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</p>	<p>Revised Publication Draft SADPD Policy ENV 12 ‘Air quality’ asks that proposals that have an impact on local air quality will be required to provide an air quality assessment. The policy notes that when undertaking the air quality assessment, it should consider cumulative impacts with other planned or committed development.</p>
<p>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.</p>	<p>Strategic policies in the LPS including PG 2 ‘Settlement hierarchy) and PG 7 ‘Spatial distribution’ consider development at different levels of the settlement hierarchy. PG 7 is clear that the indicative levels of development set out are neither ceilings nor targets.</p> <p>Revised Publication Draft SADPD Policy PG 8 ‘Spatial distribution of development: local service centres’ considers the approach to individual local service centres. Given that the plan period started in 2010, the distribution to individual local service centres has been informed by the existing levels of completions and commitments..</p>
<p>Sustainable Development needs to take into account the presence or</p>	<p>LPS Policy SE 2 ‘Sustainable development in Cheshire East’ requires</p>

<p>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.</p>	<p>development to provide access to a range of forms of public transport, opens spaces and key services and amenities. It also requires development to incorporate measures to encourage travel by sustainable modes of transport.</p>
<p>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.</p>	<p>Noted. The Revised Publication Draft SADPD has not proposed additional specific sustainable development policies but when the policies in the SADPD are read as a whole, alongside the Local Plan Strategy then this will help deliver sustainable development across the borough.</p>
<p>A very simple overview / introductory paragraph in the document may be helpful as the LPS is not easy to navigate</p>	<p>A short introductory section to the Revised Publication Draft SADPD has been included alongside an introductory paragraph to each topic area / section included in the document.</p>
<p>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.</p>	<p>Noted.</p>
<p>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.</p>	<p>The Revised Publication Draft SADPD includes specific policy guidance for each site that is proposed for allocation. However, the plan is intended to be read as a whole and proposals will also be considered against the other relevant LPS and SADPD policies.</p>
<p>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 PG 6 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</p>	<p>The approach to rural areas is considered in the ‘Provision of housing and employment land and approach to spatial distribution’ report [ED 05] and the ‘other settlements and rural areas’ report [ED 46]. The Revised Publication Draft SADPD includes a suite of policies related to the rural areas to help facilitate sustainable and appropriate development in those areas.</p>

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.	
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.	LPS Policy EG 3 ‘Existing and allocated employment sites’ seeks to protect existing employment sites. LPS Policy EG 1 ‘Economic prosperity’ supports employment development within Principal Towns, Key and Local Service Centres and on sites allocated in the development plan, subject to the consideration of policies in the development plan and other material considerations.
There should be no need for further guidance but there should be a clear reference to the SA Scoping Report	The Revised Publication Draft SADPD is supported by the Revised Publication Draft SADPD Sustainability Appraisal [ED 03].

Question 3a: Apportionment of development requirements to Local Service Centres

What approach do you think should be taken towards the apportionment of the overall development requirement across Local Service Centres?

Summary of main issues raised:	How the main issues have been taken into account
Made/submitted Neighbourhood Plans should be afforded greater significance. Conversely, 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. New dwellings completed outside the settlement zone lines should be counted towards the LSC requirement and not rural; it conflicts with Neighbourhood Plans.	All the made and emerging LSC NDPs were reviewed in considering the disaggregation, as stated in Chapter 8 of the Local Service Centres Spatial Distribution Disaggregation Report (LSCSDDR) [PUB 05], which informed the initial Publication Draft SADPD. However, as set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing figure to individual LSCs due to the level of completions and commitments. However, neighbourhood plans will still be able to set figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.

<p>Disaggregation should take into account land availability; environmental and policy constraints (e.g. Green Gap); proximity/capacity of supporting services and facilities; population size (including demographic changes) and proportionate infrastructure of each LSC; availability of, and access to, local employment; good public transport links; traffic congestion; degree of need; existing housing tenure mix; flood risk assessments; historic patterns of development; settlement boundaries; size of the LSC; landscape setting and characters (including density); the effect on KSCs, PTs and other settlements; market conditions and demand; Jodrell Bank; ability to meet the social, economic and environmental components of sustainable development; topography in relation to flood risk; socio-economic profile; presence of major employers; deliverability and viability; societal impact on health and well-being; conservation and enhancement of the historic environment; HS2; agricultural land; the importance of the LSC in the wider network of smaller villages and rural hinterlands; key/significant sites or development opportunities; programme for completion of commitments; green infrastructure requirements, cultural heritage (and the setting of heritage assets); what stakeholders and the local community consider to be the 'Spirit of Place' of an area</p>	<p>To inform the initial Publication Draft SADPD, the LSC spatial distribution disaggregation considered many factors, as set out in the LSCSDDR [PUB 05], including settlement profiles, deliverability and viability, policy and physical constraints, Green Belt, development opportunities, Jodrell Bank Observatory, aircraft noise and sustainability. The Options were also subjected to a Sustainability Appraisal [PUB 03]; the findings of which are included in the LSCSDDR [PUB 05]. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable employment sites. This new approach was subjected to a SA [ED 03]; the findings of which are included in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>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.</p>	<p>The overall development figures that the LSC area is expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the Local Plan Strategy (LPS). This has been considered at length through the LPS examination process and was found to be sound. To inform the initial Publication Draft SADPD, the preferred option set out in the LSCSDDR [PUB 05] for the distribution of those figures took the individual characteristics of the LSCs into consideration. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable</p>

	employment sites.
Apportionment needs to be flexible. 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. Some of the commitments may lapse, therefore a buffer should be considered. Growth figures associated with individual settlements should be expressed as minimum figures.	The overall development figures that the LSC area is expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the LPS and are expressed as 'in the order of'. As stated in ¶8.73 of the LPS, 'these figures are intended as a guide and are neither a ceiling nor a target.'
SHLAA site that have been refused planning permission or dismissed at appeals in the last 5 years should be excluded. Existing policy allocations that are now dated should be given no weight. The Call for Sites should be used.	The results of the call for sites exercise held by the Council between 27 February 2017 and 10 April 2017 were taken account of in the disaggregation of the spatial distribution, as set out in Chapter 10 of the LSCSDDR [PUB 05], which informed the production of the initial Publication Draft SADPD. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable employment sites.
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. 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. 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. The 1,250 homes to be shared across LSC's should be allocated on a pro-rata basis using a criteria based on existing population and housing numbers. The apportionment should be proportionate.	To inform the initial Publication Draft SADPD, the preferred option for the disaggregation of the spatial distribution, as set out in the LSCSDDR [PUB 05], was based on a consideration of development opportunities, constraints, services and facilities and NDPs. It involved professional judgement and made sure that all of the relevant factors were properly considered across all the LSCs in determining a justified spatial distribution. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable employment sites.

	The overall development figures that the LSCs are expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the LPS.
Completions and commitments should be brought up to date and taken into account before allocating sites. The housing need figure should be calculated irrespective of commitments and completions. 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.	Completions and commitments were updated between the publication of the First draft SADPD and the Initial Publication Draft SADPD [PUB 01] and between the Initial Publication Draft SADPD and the Revised Publication Draft SADPD [ED 01]. As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], it is these updated completions and commitments figures that have informed the revised approach to the spatial distribution for the LSCs.
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. The allocation of growth should be proportionately higher to the LSCs 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. Housing demand is greatest in the north of the area, which should be reflected in the spatial distribution. Green Belt should not be a reason for a lower housing requirement where needs have been identified.	To inform the initial Publication Draft SADPD, the preferred option for the disaggregation of the spatial distribution, as set out in the LSCSDDR [PUB 05] was based on a consideration of development opportunities, constraints, services and facilities and NDPs. It involved professional judgement and made sure that all of the relevant factors were properly considered across all the LSCs in determining a justified spatial distribution. The distribution resulted in development being directed to the north of the borough at settlements surrounded by Green Belt. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable employment sites.
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.	An Infrastructure Baseline Report was published as part of the evidence base for LPS, along with an Infrastructure Delivery Plan. Infrastructure was also been taken into consideration when determining the LSC disaggregation for the initial Publication Draft SADPD, as set out in Chapter 9 of the LSCSDDR [PUB 05]. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has

	changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable employment sites.
Consider the scope to extend or improve infrastructure. Infrastructure should include road network; foul drainage; internet access; connected public transport; safe pedestrian/cycle transport routes; electricity supply outages; Royal Mail (have a statutory duty to maintain a universal service pursuant to the Postal Services Act 2011).	An Infrastructure Baseline Report was published as part of the evidence base for LPS, along with an Infrastructure Delivery Plan. Infrastructure was also been taken into consideration when determining the LSC disaggregation in the initial Publication Draft SADPD, as set out in Chapter 9 of the LSCSDDR [PUB 05]. However, as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach has changed in the Revised Publication Draft SADPD; it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs due to the level of completions and commitments and lack of suitable employment sites.

Question 3b: Meeting development requirements in Other Settlements and Rural Areas

What approach do you think should be taken towards meeting development requirements across Other Settlements and Rural Areas?

Summary of main issues raised:	How the main issues have been taken into account
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.	The overall development requirements figure for the other settlements and rural areas tier of the settlement hierarchy was established through the LPS Policy PG 7 'Spatial distribution of development' which established that the other settlements and rural areas tier of the settlement hierarchy should deliver in the order of 2,950 homes and 69 hectares of employment land.
Need to consider existing commitments and completions since 2010 before determining further allocations.	The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other settlements and rural areas report' [ED 46] consider the completions since the start of the plan period in 2010 and commitments as at 31 March 2020.

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<p>Green Belt status should not preclude appropriate and proportionate allocations to other settlements and rural areas in the Green Belt.</p>	<p>The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other settlements and rural areas report' [ED 46] consider the need for allocations in rural areas in the Revised Publication Draft SADPD. Taking into account the high level of development already completed and committed in OSRA,, it is recommended that no sites should be allocated in the SADPD for development in the other settlements and rural areas tier of the settlement hierarchy.</p>
<p>Densities appropriate to the character of each area should be used; not a blanket approach of 30dph.</p>	<p>Policy HOU 12 'Housing density' in the Revised Publication Draft SADPD includes reference to residential development that will <u>generally</u> be expected to achieve a net density of at least 30 dwellings per hectare. It also sets out the factors that could be taken into account to determine an appropriate density in the borough including considerations of landscape and townscape character.</p>
<p>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.</p>	<p>The overall development requirements figure for the other settlements and rural areas tier of the settlement hierarchy was established in LPS Policy PG 7 'Spatial distribution of development' which established that the other settlements and rural areas tier of the settlement hierarchy should deliver in the order of 2,950 homes and 69 hectares of employment land.</p> <p>The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other settlements and rural areas report' [ED 46] consider the need for allocations in the SADPD. Taking into account the high level of development already completed and committed in OSRA, it is recommended that no sites should be allocated in the SADPD for development in the other settlements and rural areas tier of the settlement hierarchy.</p>
<p>Where there are groups of smaller settlements, development in one village may support services in a village nearby.</p>	
<p>Follow an environmental capacity approach</p>	
<p>Housing should not be distributed proportionately, based on the existing number of dwellings in a settlement.</p>	
<p>Potential to enhance the sustainability of smaller settlements through new development should be considered</p>	

Neighbourhood Plans should be given significant weight.	Once made, neighbourhood plans form part of the development plan which forms the basis for determining planning applications..
The capacity of villages to accept infill development should be assessed and prioritised over extension of settlement boundaries.	Infill boundaries have been proposed for a number of villages in the other settlements and rural areas tier of the settlement hierarchy. Policy PG 10 'Infill villages' sets out the policy approach and lists the villages where infill boundaries are defined. The approach has been informed by the 'Settlement and infill boundaries review' [ED 06] prepared to evidence the proposals contained in the Revised Publication Draft SADPD.
Allocations should be focussed in and around the LSCs.	The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers the need for allocations at the LSC tier of the settlement hierarchy and individual settlement reports have been prepared for each Local Service Centre to inform the Revised Publication Draft SADPD.
There should be no encroachment onto prime agricultural land or Areas of Special County Value.	The Revised Publication Draft SADPD includes Policy RUR 5 'Best and most versatile agricultural land' which adds details to policies included in the LPS (such as Policy SD 1 'Sustainable development in Cheshire East' which requires development to protect the best and most versatile agricultural land where possible). Updated evidence has been prepared to support the SADPD including ED 10 (Cheshire East Landscape Character Assessment) and ED 11 (Local Landscape Designation Review). This builds on LPS Policy SE 4 'The landscape'. Areas of Special County Value have now been replaced by Local Landscape Designations, the extent of which is shown on the Draft adopted policies map [ED 02].
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.	The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other settlements and rural areas report' [ED 46] consider the need for allocations in the SADPD. Taking into account the high level of development already completed and committed in OSRA, it is recommended that no sites should be allocated in the SADPD for development in the other settlements and rural areas tier of the settlement hierarchy.

<p>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.</p>	<p>The development requirements for other settlements and rural areas are established through LPS Policy PG 7 'Spatial distribution of development'. The approach to this tier of the settlement hierarchy in the SADPD is considered in the 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other settlements and rural areas report' [ED 46] which have been prepared to support the Revised Publication Draft SADPD.</p>
<p>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.</p>	<p>The settlement hierarchy has been established by LPS Policy PG 2 'Settlement hierarchy' and has informed the spatial distribution figures set in LPS Policy PG 7 'Spatial distribution of development, including the overall figure for the other settlements and rural areas tier of the settlement hierarchy. The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other settlements and rural areas report' [ED 46] consider the need for allocations in the Revised Publication Draft SADPD. Taking into account and balancing the high level of development already completed and committed in OSRA, it is recommended that no sites should be allocated in the SADPD for development in the other settlements and rural areas tier of the settlement hierarchy.</p>
<p>A number of settlements have been identified where further development should be directed: Brereton Green; Haughton; Hough; Adlington; Plumley; Styal; Marton</p>	
<p>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.</p>	<p>The approach towards housing supply flexibility in the Revised Publication Draft SADPD is considered in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>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'.</p>	<p>The settlement hierarchy and their definitions were established in LPS Policy PG 2 'Settlement hierarchy', informed by the 'Determining the Settlement Hierarchy Report' published as part of the LPS evidence base.</p>

Question 3c: Other issues on meeting development needs in LSCs and OSRA

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?

Summary of main issues raised:	How the main issues have been taken into account
<p>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.</p>	<p>The approach to allocations is considered in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05], the individual settlement reports and the ‘Other settlements and rural areas report; [ED 46]. It is not necessary to make further housing allocations in LSCs or OSRA to facilitate the levels of development set out in the LPS.</p>
<p>All settlements will need to be assessed for their capacity, sustainability (ranked against criterion) and suitability.</p>	<p>The approach to allocations is considered in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05], the individual settlement reports and the ‘Other settlements and rural areas report; [ED 46]. It is not necessary to make further housing allocations in LSCs or OSRA to facilitate the levels of development set out in the LPS.</p>
<p>Consider availability of services, good design, needs for retail, leisure, community, health care, hospitality, potential benefits of mixed-use developments and enabling developments, physical and perceptual environmental constraints by understanding local character, environmental impact, loss of landscape views and creeping urbanisation of countryside.</p>	<p>The approach to allocations is considered in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05], the individual settlement reports and the ‘Other settlements and rural areas report; [ED 46]. It is not necessary to make further housing allocations in LSCs or OSRA to facilitate the levels of development set out in the LPS.</p>
<p>It is appropriate to review Green Belt boundaries when development needs justify such an approach. A sequential approach to Green Belt release should be taken. Green Belt purposes must remain. Review LSC boundaries tightly constrained by Green Belt or Open Countryside to resolve anomalies.</p>	<p>The consideration of the exceptional circumstances required to review Green Belt boundaries for making further site allocations is set out the ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] and consideration of exceptional circumstances required to alter Green Belt boundaries to identify safeguarded land is set out in the LSC safeguarded land distribution report [ED 53].</p>
<p>The amount of development distributed to the Other Settlements and</p>	<p>The overall development figures that the OSRA area is expected to</p>

Rural Areas should be expressed as a minimum to support continued growth.	accommodate is set out in Policy PG 7 ‘Spatial Distribution of Development’ of the LPS and are expressed as ‘in the order of’. As stated in ¶8.73 of the LPS, ‘these figures are intended as a guide and are neither a ceiling nor a target.’
Proposals that address the criteria provided should be approved in accordance with para 14 of the NPPF.	Applications for planning permission should be determined on their merits. ¶14 (now ¶11) of the NPPF is a material consideration, where relevant, in the determining of planning applications.
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.	It is not the role of the SADPD to revisit strategic policy. The overall development figures that the OSRA area is expected to accommodate is set out in Policy PG 7 ‘Spatial Distribution of Development’ of the LPS. This has been considered at length through the LPS examination process and was found to be sound.
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. Assess other settlements 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.	‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] and the Other Settlements and Rural Areas Report [ED 46] demonstrate how the overall indicative development figure for OSRA in LPS Policy PG 7 will be met. The settlement and infill boundaries review [ED 06] considers smaller villages to determine whether they should have a boundary within which infilling will be allowed.
Consider individual housing sites and the cumulative impact when locating new housing development using the emerging Playing Pitch Strategy and Built Facilities Sports Strategy.	The Cheshire East Playing Pitch Strategy and Action Plan [ED 19] and the Cheshire East Indoor Built Facilities Strategy [ED 20] form part of the evidence base for the SADPD.
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). Village boundaries must be distinct where development is considered.	The approach to defining settlement boundaries has been considered through the development of the Settlement and Infill Boundaries Review [ED 06].
Where there is no significant encroachment into the Green Belt smaller developments should be approved without the need for special circumstances. 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. Consider the mechanism for the delivery of small sites in the Green	Any development proposals that encroach into the Green Belt will be considered against policies in the Development Plan, taking into account material considerations where relevant.

Belt.	
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.	Whether land is available for development is dependent in the intentions of the landowner. It will be important to retain the best and most versatile agricultural land, as set out in policy RUR 5 of the Revised Publication Draft SADPD.
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.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], the levels of growth set out in LPS Policy PG 7 for OSRA can comfortably be met and exceeded from completions during the plan period and commitments at 31 March 2020. The levels of growth set out for LSCs can be met from completions and commitments plus a small amount of further windfall development expected over the remaining 10 years of the plan period.
Consider reassigning housing into the LSCs or KSCs to ensure housing supply is boosted and provided in sustainable locations.	It is not the role of the SADPD to revisit strategic policy. The overall development figures that the OSRA area is expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the LPS.
Support legitimate requirements for farming and the rural economy in appropriate locations.	Chapter 6 'Rural issues' of the Publication Draft SADPD contains policy relating to agriculture, the rural economy and rural buildings. Policy EG 2 'Rural Economy' of the LPS also relates to the rural economy.
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.	The provision of infrastructure is covered in LPS Policies IN 1 'Infrastructure' and IN 2 'Developer Contributions'. Chapter 10 'Transport and infrastructure' of the Revised Publication Draft SADPD contains policy relating to infrastructure.

Question 4: Green Belt boundary alterations around Macclesfield and Key Service Centres

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)?

Summary of main issues raised:	How the main issues have been taken into account
<p>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.</p>	<p>All sites submitted for consideration through the Call for Sites (2017); the First Draft SADPD (2018); and the initial Publication Draft SADPD (2019) consultations have been considered in accordance with the site selection methodology for potential allocation in the SADPD. As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], there are only a limited number of further site allocations required to facilitate delivery of the indicative levels of growth for each settlement / tier of the settlement hierarchy set out in LPS Policy PG 7. In accordance with the site selection methodology, non-Green Belt sites are considered first.</p>
<p>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.</p>	<p>Flexibility in housing supply has been taken into account through 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], which notes that the overall plan flexibility in housing supply has increased significantly since the adoption of the LPS in 2017. The non-strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy'</p>
<p>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. Boundaries should be clearly defined using physical features which are readily recognisable and likely to be permanent; the SADPD should amend</p>	<p>As required by the NPPF, Green Belt boundaries should only be altered in exceptional circumstances. The exceptional circumstances are set out LPS ¶8.48 and are "<i>the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so</i>". These exceptional circumstances allow for alterations where required to meet identified development</p>

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existing boundaries to fit this requirement.	requirements but do not extend to making changes for other reasons.
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.	As required by the Site Selection Methodology [ED 07], a Green Belt assessment of each site considered for removal from the Green Belt has been completed and is presented in the relevant settlement reports.
Site-specific comments supporting the release of particular sites for development.	All sites are considered in accordance with the Site Selection Methodology [ED 07].
Safeguarded land should be utilised before any further Green Belt land is considered for release. Safeguarded land should be considered for site allocations.	
Additional smaller sites in Knutsford would provide flexibility to ensure the requirement for Knutsford is delivered. The additional 1.49ha of employment land in Knutsford will need to be found from within the Green Belt.	The requirement for further sites in Knutsford is considered in the Knutsford Settlement Report [ED 34].
Instead of releasing land from the Green Belt, further development should be directed to non-Green Belt settlements including Sandbach.	The spatial distribution of development is set out in LPS Policy PG 7 and it is not the role of the SADPD to review strategic policies. 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers the need for further site allocations in each of the Principal Towns and Key Service Centres.
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. 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.	Site selection for Poynton is carried out in accordance with the Site Selection Methodology [ED 07] and is considered in the Poynton Settlement Report [ED 39].

Commitments should only be considered where the sites have been subject to Sustainability Appraisal and determined suitable for allocation in a Local Plan.	The Revised Publication Draft SADPD is informed by a comprehensive Sustainability Appraisal [ED 03], which has considered each of the sites proposed..
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.	All sites are considered in accordance with the Site Selection Methodology [ED 07], which included consideration of contribution to Green Belt purposes as well as sustainability factors, including through the traffic light assessments.
No adjustments should be considered for the South Cheshire Green Belt.	The Revised Publication Draft SADPD proposes no alterations to the boundary of the South Cheshire Green Belt.
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.	Duty to Co-operate issues are set out in the SADPD Duty to Co-operate Statement of Common Ground [ED 51].
The use of a site for sport should be considered as a constraint.	All sites are considered in accordance with the Site Selection Methodology [ED 07].
The overall amount of residual development in Handforth should be increased from 15 to 57 dwellings to meet the overall 2,200 requirement.	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the Handforth settlement report [ED 31] consider the need for further site allocations in Handforth.
Priority should be given to increased densities and brownfield sites.	As set out in the Site Selection Methodology Report, brownfield and other non Green Belt sites are considered first using the iterative approach to site selection. The Revised Publication Draft SADPD includes Policy HOU 12 'Housing density'.
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.	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the Macclesfield settlement report [ED 35] consider the need for further site allocations in Macclesfield.
Further Green Belt release at Wilmslow cannot be justified.	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the Wilmslow settlement report

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	[ED 43] consider the need for further site allocations in Wilmslow.
Development of any Green Belt land should minimise harm but also seeks enhancements to those factors identified as key to spirit of place.	The Revised Publication Draft SADPD does not propose any Green Belt sites for development. It does propose Green Belt boundary alterations to accommodate safeguarded land and its Policy PG 12 'Green Belt and safeguarded land boundaries' requires that, if allocated for development in the future, development proposals on those safeguarded land sites should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of their removal from the Green Belt.
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.	The requirement for further land to meet requirements on a settlement by settlement basis is considered in the relevant settlement reports and in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
If Green Belt is required, then further Green Belt should be designated to replace the areas lost.	Green Belt boundaries should only be altered to in exceptional circumstances. There are no identified exceptional circumstances to justify including new land in the Green Belt.

Question 5a: Green Belt boundary alterations around Local Service Centres

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?

Summary of main issues raised:	How the main issues have been taken into account
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.	As required by the Site Selection Methodology [ED 07], a Green Belt assessment for each Green Belt site under consideration has been completed and is presented in the relevant settlement reports. These assessments take into account the changes made the Green Belt boundary as part of the LPS.
Where a Local Service Centre has made a significant contribution to development requirements through brownfield sites, it should not have	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers the need for site

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Green Belt alterations.	allocations in LSCs. The Revised Publication Draft SADPD proposes no further Green Belt alterations for development sites, but does propose some sites for safeguarded land. The distribution of safeguarded land to each LSC is considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53] and sites are considered in accordance with the Site Selection Methodology [ED 07].
Policy should require all non-Green Belt sites to be utilised first.	Non Green Belt sites are considered for allocation first, using the iterative approach set out in the Site Selection Methodology [ED 07].
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.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], there is no requirement for site allocations in LSCs. The distribution of safeguarded land to each LSC is considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53] and sites are considered in accordance with the Site Selection Methodology [ED 07].
Town and parish councils should be involved in the peer review stage of the site selection methodology.	As evidenced through this consultation report (table 1), there has been engagement with town and parish councils during the development of the SADPD.
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.	The selection of sites is in accordance with the Site Selection Methodology [ED 07]. In addition the suitability of sites, it also considers their achievability which is largely dependent upon a willing landowner.
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.	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers the need for site allocations at LSCs and the selection of sites is in accordance with the Site Selection Methodology [ED 07].
A significant proportion of housing allocations should go to those LSCs with good access to public transport, shops and services.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], housing allocations at LSCs are not required to facilitate the indicative level of development set out in LPS Policy PG 7.
There is no need to demonstrate exceptional circumstances. It is only	Exceptional circumstances to make Green Belt boundary alterations

once established (i.e. after the SADPD) that boundary changes should be exceptional.	are considered in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the Local Service Centres Safeguarded Land Distribution Report [ED 53].
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.	The selection of sites is in accordance with the Site Selection Methodology [ED 07].
Cumulative impact of proposals, including Greater Manchester Spatial Framework proposals, should be considered.	Cross boundary strategic issues are considered through the SADPD Duty to Co-operate Statement of Common Ground [ED 51]
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.	The SADPD policies have been produced to be consistent with the strategic policies in the LPS, including LPS Policy PG 2 'Settlement hierarchy', which designates Alderley Edge as a Local Service Centre..
Various sites are promoted for development.	All sites have been considered in accordance with the Site Selection Methodology [ED 07].
The required housing numbers should be divided as evenly as possible between all LSCs.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], housing allocations at LSCs are not required to facilitate the indicative level of development set out in LPS Policy PG 7.
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.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], there is no requirement for site allocations in LSCs in set within the Green Belt. The distribution of safeguarded land to each LSC is considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53] and sites are considered in accordance with the Site Selection Methodology [ED 07].
Need to consider the need to promote sustainable patterns of development. A number of Green Belt sites are in highly sustainable locations.	Accessibility assessments for sites have been produced as part of the Sustainability Appraisal [ED 03] and considered in the relevant settlement reports in accordance with the Site Selection Methodology [ED 07].
Safeguarded land should be spread proportionately around settlements.	The distribution of safeguarded land is considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53].

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<p>Land should not be removed from the Green Belt where it provides a key separation between urban areas.</p>	<p>Each site has been subject to a Green Belt Site Assessment (presented in the relevant settlement report), which considers each of the purposes of Green Belt set out in the NPPF (¶134) including ‘to prevent neighbouring towns merging into one another’.</p>
<p>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.</p>	<p>Exceptional circumstances to make Green Belt boundary alterations are considered in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] and the Local Service Centres Safeguarded Land Distribution Report [ED 53].</p>
<p>Identified development requirements must not be distorted by the prospect of having to release Green Belt.</p>	<p>As required by the NPPF, Green Belt boundaries should only be altered in exceptional circumstances. As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05], there is no requirement for site allocations in LSCs inset within the Green Belt.</p>
<p>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.</p>	<p>As required by the NPPF, Green Belt boundaries should only be altered in exceptional circumstances. The exceptional circumstances are set out LPS ¶8.48 and are “<i>the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so</i>”. These exceptional circumstances allow for alterations where required to meet identified development requirements but do not extend to making changes for other reasons. The Green Belt Site Assessments of each site (presented in the relevant settlement reports) consider the requirement to define boundaries using physical features that are readily recognisable and likely to be permanent.</p>
<p>Whilst the GBAU can be a basis for the SADPD process, further assessments will need to be undertaken. Comments on various assessments of Green Belt parcels in the GBAU.</p>	<p>As required by the Site Selection Methodology [ED 07], a Green Belt assessment of each site has been completed and is presented in the relevant settlement reports.</p>
<p>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.</p>	<p>‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] considers the need for allocations at LSCs. The Local Service Centres Safeguarded Land Distribution Report considers the distribution of safeguarded land around the LSCs</p>

	and the Prestbury settlement report [ED 40] considers the need for safeguarded land in Prestbury.
Sites should be assessed on a settlement by settlement basis with a view to meeting the needs of each LSC.	The need for site allocations at LSCs is considered in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]
Land should be allocated in excess of the residual development requirements to give flexibility and greater market choice.	Flexibility in housing supply has been taken into account in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The Housing White Paper states that that when undertaking releases local planning authorities should look first to land which "...surrounds transport hubs...".	The NPPF (¶138) requires first consideration to be given to land which has been previously developed and/or is well served by public transport. In line with the Site Selection Methodology [ED 07], each settlement report considers those Green Belt sites that are previously developed and/or well-served by public transport before those Green Belt sites that are not.
All options for the release of land outside of the Green Belt should be explored, including in higher tier settlements such as Sandbach.	The need for site allocations at all tiers of the settlement hierarchy is considered in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]

Question 5b: Safeguarded Land requirements

What approach do you think should be taken towards apportioning the remaining requirement for safeguarded land?

Summary of main issues raised:	How the main issues have been taken into account
The approach is haphazard and depends on where sites are put forward rather than being a strategic approach.	This has been considered through the development of a separate Local Service Centres Safeguarded land Distribution Report [ED 53].
LSCs Neighbourhood Plans should contribute to identifying areas of Safeguarded Land.	Whilst existing legislation and national policy makes no direct provision for neighbourhood plans to safeguard land for future development, NPPF ¶136 allows neighbourhood plans to alter the boundaries of the Green Belt, where a need to do so is identified by a strategic policy. LPS Policy PG 4 'Safeguarded Land' establishes the need to safeguard land in the Borough.

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<p>Suggested approaches include: weighting, including physical constraints and accessibility; taking account of a settlement's relative size, role and function within the settlement hierarchy, sustainability, and likely future development needs; directing to more sustainable locations; taking account of constraints, population figures and the conservation and enhancement of the historic environment; a similar approach to the LPS; taking account of a site's suitability and availability; following the method for disaggregating the overall housing need amongst LSCs</p>	<p>A variety of methods for distributing safeguarded land are considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53].</p>
<p>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.</p>	<p>The requirement for safeguarded land was considered thoroughly in the LPS examination and the LPS was found to be sound. The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the remaining amount of safeguarded land to be distributed to the LSCs inset within the North Cheshire Green Belt.</p>
<p>The apportionment of safeguarded land in the SADPD should be more heavily weighted to the northern areas of the Borough. A Borough-wide approach should be adopted to also consider safeguarded land for settlements in the south of the Borough.</p>	<p>As outlined in ¶8.54 of the LPS the main settlements in the south of the borough are located beyond the Green Belt and therefore there is no need to designate safeguarded land to ensure permanence of the South Cheshire Green Belt boundary.</p>
<p>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. 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. The 12.6ha should be a minimum identified to incorporate a buffer.</p>	<p>The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the amount and distribution of safeguarded land to be provided through the SADPD.</p>
<p>Land that 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. 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.</p>	<p>The requirement to designate additional safeguarded land and the exceptional circumstances required to alter the Green Belt boundary for this purpose are considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53].</p>
<p>The amount of safeguarded land is too high and is not required by</p>	<p>The requirement for safeguarded land was considered thoroughly in</p>

NPPF. There is no need for further safeguarded land as residual housing requirements can be met on windfall sites and by increased densities. The need for development does not constitute exceptional circumstances.	the LPS examination and the LPS was found to be sound. The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the remaining amount of safeguarded land to be distributed to the LSCs inset within the North Cheshire Green Belt.
Proposals for safeguarded land should consider the impact on KSCs and Principal Towns where strategic allocations have already been determined.	Safeguarded land is identified to meet potential long-term development requirements and to avoid the need for another review of the Green belt at the end of this plan period.
The total amount of safeguarded land should reflect the anticipated needs of individual LSCs beyond 2030. Concern that the area of safeguarded land will produce over-development in the future given the very optimistic forecasts in the plan.	The requirement for safeguarded land was considered thoroughly in the LPS examination and the LPS was found to be sound. The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the remaining amount of safeguarded land to be distributed to the LSCs inset within the North Cheshire Green Belt.
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.	Land is not safeguarded for a particular purpose; is identified to meet potential long-term development requirements and to avoid the need for another review of the Green belt at the end of this plan period.

Question 6a(i): Approach to inset and washed-over Green Belt villages

Do you agree with the proposed approach to determining whether villages should be 'inset' within or 'washed over' by the Green Belt?

Summary of main issues raised:	How the main issues have been taken into account
The role of Green Belt in protecting historic village areas should be considered as part of the analysis.	¶140 of the NPPF sets out the considerations for determining whether villages should be included within the Green Belt (washed-over) or excluded from it (inset). However, it is clear that this paragraph should not be read in isolation. ¶136 requires that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries...”
Settlements should be separate from Green Belt and settlements being inset is the preferred approach.	
The decision to inset or wash-over should be evidenced and consistent across the Borough.	
Exceptional circumstances require consideration of all other	

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<p>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.</p>	<p>The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering the existing Green Belt boundaries to create new inset boundaries and remove entire settlements from the Green Belt (or to include entire settlements within the Green Belt that are currently excluded).</p> <p>The Revised Publication Draft SADPD proposes Green Belt boundary alterations in a limited number of cases to identify safeguarded land but does not propose boundary alterations following an assessment of whether the open character of a village makes an important contribution to the openness of Green Belt.</p> <p>The approach to defining boundaries for settlements in the 'other settlements and rural areas' tier of the settlement hierarchy is set out in the Settlement and Infill Boundaries Review [ED 06].</p>
<p>Various site specific comments supporting the release of certain sites for development.</p>	
<p>The approach does not have regard to Neighbourhood Plans or local consultation.</p>	
<p>Various comments that specific settlements should either be washed-over or inset.</p>	
<p>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.</p>	
<p>There should be on the methodology to define a village.</p>	
<p>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.</p>	
<p>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.</p>	
<p>The SAPDD should give consideration as to whether allowing some development within these settlements through allocations would assist in achieving sustainable development.</p>	
<p>If villages are excluded from the Green Belt it would make it easier for community facilities such as small scale sport and physical activity</p>	

<p>facilities to be developed.</p>	
<p>The review must be based on evaluation of the land against the five Green Belt purposes.</p>	
<p>Under the Duty to Co-operate, CEC must evidence full co-operation with neighbouring planning authorities who share the Green Belt.</p>	
<p>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.</p>	
<p>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.</p>	
<p>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.</p>	
<p>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 "insetting" such settlements would be where there is a Neighbourhood Plan in place, which has identified sites for development.</p>	
<p>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.</p>	

The proposed approach should be informed by an understanding of Spirit of Place and landscape character).	
The current criteria are too narrow, not adequately drafted and could be problematic in their practical application.	
By definition a village comprises built form and is unlikely to make a contribution towards the openness of the Green Belt.	

Question 6a(ii): NPPF (2012) paragraphs 86 and 83 interpretation

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?

Summary of main issues raised:	How the main issues have been taken into account
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.	<p>¶140 of the NPPF sets out the considerations for determining whether villages should be included within the Green Belt (washed-over) or excluded from it (inset). However, it is clear that this paragraph should not be read in isolation. ¶136 requires that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries...”</p> <p>The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering the existing Green Belt boundaries to create new inset boundaries and remove entire settlements from the Green Belt (or to include entire settlements within the Green Belt that are currently excluded).</p> <p>The Revised Publication Draft SADPD proposes Green Belt boundary</p>
There is no requirement to alter Green Belt boundaries at Higher Poynton.	
In general terms, villages should be inset rather than washed-over.	
The approach must ensure that the inset boundary is firm and clear.	
Due to the subjective nature of openness, there must be consultation with Parish Councils and Neighbourhood Plan teams.	
It will still be necessary to demonstrate exceptional circumstances and a material change in circumstances since the Green Belt boundaries were previously adopted.	
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.	

The purpose of the SADPD is to identify land to meet a building quota and this is not an exceptional circumstance.	alterations in a limited number of cases to identify safeguarded land but does not propose boundary alterations following an assessment of whether the open character of a village makes an important contribution to the openness of Green Belt.
The interpretation does not take into account local views expressed through Neighbourhood Plans.	
The approach should be informed by an understanding of Spirit of Place and landscape character.	
Need to consider alternatives to developing Green Belt, such as using brownfield sites and developing beyond the Green Belt boundary.	
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.	
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.	
The approach to defining boundaries for settlements in the 'other settlements and rural areas' tier of the settlement hierarchy is set out in the Settlement and Infill Boundaries Review [ED 06].	

Question 6b: Other Green Belt matters

Are there any other Green Belt matters that need to be addressed in the SADPD?

Summary of main issues raised:	How the main issues have been taken into account
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.	LPS Policy PG 3 'Green Belt' sets the policy approach for development proposals within the Green Belt. The Revised Publication Draft SADPD Policy PG 10 'Infill villages' defines village infill boundaries, within which limited infilling is considered to be appropriate.
Need policies to identify additional housing land if housing is not being delivered in accordance with the identified need.	The NPPF requires the local plan to be reviewed every five years.

<p>Need to allocate more Green Belt land or designated AONB in the rural area surrounding Wrenbury.</p>	<p>There are no exceptional circumstances identified that would justify the designation of a new Green Belt around Wrenbury. Under the Countryside and Rights of Way Act 2000, Natural England can make orders to designate Areas of Outstanding Natural Beauty or vary the boundaries of existing ones. This is beyond the scope of a local plan.</p>
<p>The SADPD must consider whether further non-strategic Green Belt sites are required around Alsager.</p>	<p>The Alsager settlement report [ED 22] considers the need for further site allocations around Alsager.</p>
<p>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.</p>	<p>As required by the NPPF, Green Belt boundaries should only be altered in exceptional circumstances. The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements.</p>
<p>The 4ha of employment land required in Other Settlements and Rural Areas could involve the release of Green Belt land.</p>	<p>The need for site allocations in the other settlements and rural areas is considered in the Other Settlements and Rural Areas report [ED 46].</p>
<p>There are a number of farmsteads that could be allocated for employment use.</p>	<p>The need for site allocations in the other settlements and rural areas is considered in the Other Settlements and Rural Areas report [ED 46]. The Revised Publication Draft SADPD includes policies RUR 2 'Farm diversification' and RUR 10 'Employment development in the open countryside'.</p>
<p>Specific sites promoted for release from Green Belt and allocation.</p>	<p>All sites submitted for consideration through the Call for Sites (2017), the First Draft SADPD (2018), and the initial Publication Draft SADPD (2019) consultations have been considered in accordance with the site selection methodology for potential allocation in the SADPD.</p>
<p>The Wardle Employment Improvement Area will only deliver 46ha of employment land (not 61ha); therefore the rural requirement is actually 19ha (not 4ha).</p>	<p>The SADPD has been prepared in accordance with the strategic policies set out in the LPS, including policy LPS 60 'Wardle Employment Improvement Area'. The employment land requirements set out in LPS Policy PG 1 are set out as gross land requirements and the strategic employment sites in the LPS (including at Wardle) are expressed as a gross site areas (not net developable areas).</p>
<p>Many outdoor sports facilities require Green Belt land (especially sports pitches and equestrian uses). NPPF para 89 refers to outdoor</p>	<p>The consideration of whether a proposal preserves the openness of the Green Belt should be considered on a case by case basis, taking</p>

<p>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.</p>	<p>into account the particular circumstances.</p>
<p>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.</p>	<p>There are no identified exceptional circumstances that would justify the designation of new Green Belt.</p>
<p>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.</p>	<p>The policies in the Revised Publication Draft SADPD are considered to be in accordance with the latest version of the NPPF.</p>
<p>Utilisation of redundant agricultural and other buildings within the Green Belt for conversion to residential use should be considered.</p>	<p>The Revised Publication Draft SADPD includes Policy RUR 14 'Re-use of rural buildings for residential use'.</p>
<p>Need to consider the extent to which the setting of LSCs and villages contributes to their sense of place and unique selling points.</p>	<p>The Revised Publication Draft SADPD includes Policy ENV 3 'Landscape character'</p>
<p>If the SADPD is to propose Safeguarded Land it should clarify that such is removed from the Green Belt on SADPD adoption.</p>	<p>All policies and proposals in the SADPD will only become part of the statutory development plan upon adoption.</p>
<p>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.</p>	<p>Policy REC 1 'Green/open space protection' in the Revised Publication Draft SADPD sets out the policy context for protected open space.</p>
<p>A windfall allowance should be factored into the amount of Green Belt land to be released.</p>	<p>The consideration of sites to be removed from the Green Belt is set out in each of the respective settlement reports.</p>

Question 7: Strategic Green Gaps

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?

Summary of main issues raised:	How the main issues have been taken into account
The SADPD should refine and define the SGG policy	Policy PG 13 in the Revised Publication Draft SADPD states the following: <ol style="list-style-type: none"> 1. <i>The detailed boundaries of the areas defined as strategic green gaps in LPS Policy PG 5 are shown on the adopted policies map.</i> 2. <i>Proposals for development in the strategic green gaps will be determined in accordance with LPS Policy PG 5 'Strategic green gaps'.</i>
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:	The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].
existing and physical characteristics;	The proposed boundary has been defined using existing physical features on the ground that is likely to be permanent. Further details can be seen in the Strategic Green Gap Boundary Definition Review ED 08].
identifying logical and consistent boundaries that follow identifiable features and reflect adjoining development/land-uses;	The proposed boundary has been defined along logical, identifiable, physical features on the ground that are likely to be permanent, and reflects new built development and extant planning consents adjacent to existing settlements (as at 31.03.20). Further details can be seen in the Strategic Green Gap Boundary Definition Review [ED 08].
recognise sustainable development opportunities (e.g. previously developed land; limited infilling/rounding off; etc.);	The proposed boundary reflects sites adjoining the existing settlement boundary, which displays a high level of containment; high level of previously-developed land or high level of built form which has a strong functional relationship with the existing urban area. The boundary has also taken into account uses and development that has a clear social and / or economic relationship with the settlement.

	Further details can be seen in the Strategic Green Gap Boundary Definition Review [ED 08].
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.	The proposed boundary takes into account strategic allocations in the LPS, site allocations in the revised publication draft SADPD, and extant planning consents (as at 31.03.20). Further details can be seen in the Strategic Green Gap Boundary Definition Review [ED 08].
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	Where the broad extent of the Strategic Green Gap coincides with a settlement boundary (as identified through the SADPD Settlement Boundary Reviews) for Crewe [ED 28], Nantwich [ED 38], Shavington [ED 42], Haslington [ED 32], or the settlement boundary for Weston defined in the made Weston and Basford Neighbourhood Plan, the Strategic Green Gap boundary has been amended to follow the proposed settlement boundary.
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,	The green gap boundary has taken into account permissions at the base date of the 31.03.20.
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.	This was a strategic matter considered through the Local Plan Strategy.
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.	Noted. The strategic green gap detailed boundary definition has taken into account permissions at the base date of the 31.03.20.
The Green Gap boundary work should consider the role, function and performance of the land in terms of meeting the objectives of policy PG4a.	The general extent of the Strategic Green Gaps has been considered and settled through the LPS process. The extent of work required to define detailed boundaries should be proportionate to that task. It does not open up an opportunity to review the broad extent of the designated areas or necessitate a comprehensive review to determine whether the land shown generally falling within the Strategic Green Gaps should be re-assessed and rated against Strategic Green Gap purposes. However, in identifying an appropriate boundary, a check has been undertaken to determine whether it has enclosed land that does not contribute to Strategic Green Gap purposes. This is reflected

	in the Strategic Green Gap Boundary Definition Review [ED 08].
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.	As above.
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.	Noted. LPS Policy PG 5 states that within Strategic Green Gaps, Policy PG 6 'Open Countryside' will apply. LPS Policy PG 6 states <i>"within the Open Countryside only development that is essential for the purposes of agriculture, forestry, outdoor recreation, public infrastructure, essential works undertaken by public service authorities or statutory undertakers, or for other uses appropriate to a rural area will be permitted."</i> Policy PG 13 in the revised publication draft SADPD defines the detailed boundaries of the Strategic Green Gap in the Policies Map.
Neighbourhood Plans should not be provided an opportunity to revisit strategic matters	Noted.
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.	The general extent of the Strategic Green Gaps has been considered and settled through the LPS process. Some of those that were granted permission have since reached the detailed stage of "Reserved Matters", and were therefore reviewed to establish if further detailed adjustments needed to be made.
The Nantwich Bypass is a very strong permanent physical boundary	The settlement boundary of Crewe and Nantwich form readily recognisable and defensible boundaries that are likely to be permanent. There is no reason to remove the land between the settlement boundary of Nantwich and the Nantwich Bypass from the Strategic Green Gap which provides long-term protection against the coalescence of Crewe and Nantwich, protects the setting and separate identity of the existing settlements and retains the existing settlement pattern by maintaining the openness of land. The methodology for

	defining the detailed boundaries of the strategic green gap is contained in the Strategic Green Gap Boundary Definition Review [ED 08].
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).	The general extent of the Strategic Green Gaps has been considered and settled through the LPS process. The extent of work required to define detailed boundaries should be proportionate to that task. It does not open up an opportunity to review the broad extent of the designated areas or necessitate a comprehensive review to determine whether the land shown generally falling within the Strategic Green Gaps should be re-assessed and rated against Strategic Green Gap purposes. However, in identifying an appropriate boundary, a check has been undertaken to determine whether it has enclosed land that does not contribute to Strategic Green Gap purposes. This is reflected in the Strategic Green Gap Boundary Definition Review [ED 08].
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.	
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.	The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].
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	The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].
The boundaries should be considered in the same way that Planning	The proposed boundary has taken into account LPS allocations and

<p>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.</p>	<p>sites that have received planning permission before the 31.03.20. The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].</p>
<p>Needs to consider HS2</p>	<p>The guidance note for local planning authorities ‘HS2 Phase 2a West Midland to Crewe Safeguarding Directions’ (September 2017) states <i>“Local Plans should state that Safeguarding Directions have been made by the Secretary of State for Transport. They are not proposals of the LPA and the route in question will not be determined through the development plan process. The route will be considered in Parliament under hybrid bill procedures, which will provide appropriate opportunities for petitions to be made to Parliament by those directly affected by the scheme.”</i></p>
<p>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</p>	<p>The general extent of the Strategic Green Gaps has been considered and settled through the LPS process.</p>
<p>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.</p>	<p>Any infill in the SGG will be assessed against LPS Policy PG 5 (Strategic Green Gaps) and LPS Policy PG 6 (Open Countryside).</p>
<p>It is also recommended that the mistakes of the past are not repeated and the settlement is not ‘shrink wrapped’.</p>	<p>The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].</p>
<p>The proposed approach is potentially highly restrictive and the LPA has not demonstrated why this policy is necessary.</p>	<p>LPS Strategic Priority 3 highlights the importance of maintaining and enhancing the character and separate identities of the Borough’s towns and villages. LPS Policy PG 5 defines the areas between Crewe and Nantwich, and between Crewe and its surrounding villages situated to its south and east, as Strategic Green Gaps and details the three purposes. The purposes of Strategic Green Gaps are to: i. Provide long-term protection against coalescence; ii. Protect the</p>

	setting and separate identity of settlements; and iii. Retain the existing settlement pattern by maintaining the openness of land.
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	The provision of housing and employment land and the approach to spatial distribution document [ED 05] considers the need for further site allocations at settlements in all tiers of the settlement hierarchy (including Crewe). The definition of detailed Strategic Green Gap boundaries is not driven by the need to provide further development sites. The council is able to demonstrate a 5 year supply of deliverable housing sites.
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.	The settlement boundary of Crewe and Haslington form readily recognisable and defensible boundaries that are likely to be permanent. There is no reason to remove the land between the Crewe settlement boundary and the A534 from the Strategic Green Gap which provides long-term protection against the coalescence of Crewe and Haslington, protects the setting and separate identity of the existing settlements and retains the existing settlement pattern by maintaining the openness of land. The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].

Question 8: Identifying Local Green Gaps and other issues

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?

Summary of main issues raised:	How the main issues have been taken into account
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	Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD notes that in order to support the distinctiveness of settlements in the borough, the identification of localised separation policies in neighbourhood plans will be supported. Given the localised nature of the gaps envisaged under this policy, it is

<p>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.</p>	<p>considered most appropriate for these to be brought forward through neighbourhood plans where justified.</p>
<p>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.</p>	<p>Noted.</p>
<p>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.</p>	<p>In line with Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD the introduction of localised separation policies would have to be demonstrated by a neighbourhood plan, as appropriate.</p>
<p>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.</p>	<p>The intention set by Policy PG 14 'Local green gaps' in the Revised Publication draft SADPD is that localised separation policies are justified and evidenced through the preparation of neighbourhood plans, as appropriate.</p>
<p>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.</p>	<p>It is noted that local communities are often best placed to review and recommend the extent and boundaries of local green gaps. As such Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD is supportive of neighbourhood plans identifying localised separation policies, as appropriate and as justified by the relevant neighbourhood plan.</p>
<p>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.</p>	<p>The policy intention set out in Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD is that the introduction of local green gaps would be for neighbourhood plans to define and justify in line with appropriate evidence. The policy notes the considerations that may apply in local green gaps / a green wedge identified in neighbourhood plans once the Plan has been 'made'.</p>
<p>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.</p>	
<p>Sport England would like to ensure there are no unintended consequences of these designations on existing or proposed new outdoor sport and recreation facilities. Many outdoor sports facilities</p>	

<p>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.</p>	
<p>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.</p>	
<p>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.</p>	<p>No new Strategic Green Gaps have been proposed in the Revised Publication Draft SADPD. The policy intention set out in Policy PG 14 'Local green gaps' is that the introduction of local green gaps would be for neighbourhood plans to define and justify in line with appropriate evidence. The policy notes the considerations that may apply in local green gaps / green wedges identified in neighbourhood plans once the Plan has been 'made'.</p>
<p>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.</p>	<p>The policy intention set out in Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD is that the introduction of local green gaps would be for neighbourhood plans to define and justify in line with appropriate evidence.</p> <p>Any local green gaps designated through neighbourhood plans would be required to meet the basic conditions test.</p>
<p>No evidence as to why normal open countryside policies do not provide sufficient protection to justify a Local Green Gap policy</p>	<p>Local green gaps and green wedges, if justified and defined through neighbourhood plans, can help provide access to the countryside from urban areas, and protect the character and urban form of settlements, preventing coalescence in a settlement pattern and between nearby settlements.</p>

Question 9a. Neighbourhood Plans and Local Green Gaps

What role should Neighbourhood Plans play in defining Local Green Gaps?

Summary of main issues raised:	How the main issues have been taken into account
Neighbourhood plans should identify Local Green Gaps, and have a tool kit to guide the process based on a clear methodology.	The policy intention set out in Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD is that the introduction of local green gaps would be for neighbourhood plans to define and justify in line with appropriate evidence. The policy notes the considerations that may apply in local green gaps / green wedges identified in neighbourhood plans once the Plan has been 'made'. The council is currently considering the need and approach to the preparation of a tool kit on this matter.
The preservation of historic places should be supported when the local prerequisite is there.	Noted.
Definitions of settlement separation and Local Green Gap need further clarification.	Any term used would be described through the policies of the neighbourhood plan. The Revised Publication Draft SADPD includes a definition of local green gap within its glossary.
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.	Multi-parished neighbourhood areas can be designated. The policy intention set out in Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD is that the introduction of local green gaps would be for neighbourhood plans to define and justify in line with appropriate evidence.
Clearer definition of Local Green Gap is needed with a clear evidence base to ensure consistency between neighbourhood plans and SADPD.	Any local green gaps designated through neighbourhood plans would be required to meet the basic conditions test.
Neighbourhood Plans are well positioned to identify Local Green Gaps in consultation with parishes and towns.	Noted.
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.	Noted.

The LGG should be in accordance with the NPPF and a neighbourhood plan does not have enough scope to do this.	Any local green gaps designated through neighbourhood plans would be required to meet the basic conditions test.
Steering groups are well placed to be proactive in sharing evidence.	Noted.
There is a possibility of discord between strategic and local level.	A neighbourhood plan must be in general conformity with, and plan positively, to support the strategic policies of the development plan.
Local green gaps should not be designated through Neighbourhood Plans. This is not appropriate.	Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans as appropriate.
Local Green Gaps should be approved in non Green Belt areas.	It would be a matter for neighbourhood plans to consider the need and justification for Local Green Gaps.
Local Green Gaps should not be approved through the SADPD and should be approved by the Local Plan strategy.	The Local Plan Strategy was adopted in July 2017. Paragraph 8.64 of the LPS notes that the SADPD will consider whether there are further, more localised gaps that require additional policy protection through a local green gaps policy. The Revised Publication Draft SADPD, through Policy PG 14 'Local green gaps', notes how neighbourhood plans are best placed to identify local green gaps.
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.	
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.	Strategic Green Gaps were established through Policy PG 5 of the LPS and further information on detailed boundaries set out in Policy PG 13 'Strategic green gap boundaries' of the Revised Publication Draft SADPD. Policy PG 14 'Local green gaps' sets out the approach to local green gaps and notes that it would be for neighbourhood plans to identify and define localised separation policies, where relevant and justified to do so.
Local Green Gaps should be indicated in the SADPD to prevent inconsistency and reaffirm conformity.	Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans as appropriate.
Neighbourhood Plans should be the driving force to define LGG.	Noted.
Local Green Gaps left to Neighbourhood Planning leaves the scheme open to bias	Any local green gaps designated through neighbourhood plans would be required to meet the basic conditions test.

Question 9b. Toolkit for identifying Local Green Gaps

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?

Summary of main issues raised:	How the main issues have been taken into account
Parish councils are best place to decide green gaps through NP's.	Noted.
Concerned Cheshire East is being 'overly prescriptive and undermining localism'	Policy PG 14 'Local green gaps' of the Revised Publication Draft SADPD notes that localised separation policies should be set out in neighbourhood plans.
Neighbourhood plans are a big commitment for small parish councils and there may be barriers to creating NP's.	Government grants and support is available to complete a neighbourhood plan. The council offers certain services to support local communities in preparing neighbourhood plans and further information is available on the council's website.
Tool Kit policies should be left to Parish and Town councils.	Noted. The council is currently considering the need and approach to the preparation of a tool kit on this matter.
When Town Councils and Parishes have made a decision to make a neighbourhood plan, Cheshire East can support in GG and other issues.	Noted.
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.	Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans where justified.
Local green gaps overlap parish boundaries and NP's may not be prepared at the same time.	There are provisions for multi-parished neighbourhood areas to be created, as appropriate.
Cheshire East should provide a toolkit for Parish Councils that can be customised and tailored for their NP priorities.	Noted. The council is currently considering the need and approach to the preparation of a tool kit on this matter. The council offers certain services to support local communities in preparing neighbourhood plans and further information is available on the council's website.
Clear consistent methods of approach by CE are needed for across the borough, as this could undermine the process.	The council is currently considering its approach on the need and approach to a toolkit for neighbourhood planning groups who wish to

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	advance and justify Local Green Gaps.
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Question 9c. Local Green Gaps policy

Should the SADPD include any further policy to support the identification of Local Green Gaps in Neighbourhood Plans? If so, what should it say?

Summary of main issues raised:	How the main issues have been taken into account
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	The council is currently considering its approach as to the need and possible approach for preparing a toolkit for those groups who wish to advance and justify Local Green Gaps thorough the preparation of a neighbourhood plan.
The primary purpose of LGG should be clear in the SADPD Re: protection of vulnerable open spaces between adjacent settlements (vulnerable to development).	Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD sets out the purpose of local green gaps. It also notes how the identification of localised separation policies will be supported in neighbourhood plans, as appropriate and justified.
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.	Noted. The council is currently considering the need and possible approach for preparing a toolkit for those groups who wish to advance and justify Local Green Gaps thorough the preparation of a neighbourhood plan
Green Gaps should be preserved between settlements.	Policy PG 14 'Local green gaps' in the Revised Publication Draft SADPD sets out the purpose of local green gaps. It also notes how the identification of localised separation policies will be supported in neighbourhood plans, as appropriate and where justified.
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.	Policy PG 14'local green gaps' in the Revised Publication Draft SADPD sets out the purpose of local green gaps. It also notes how the identification of localised separation policies will be supported in "made" neighbourhood plans, as appropriate and justified. The council is currently considering the need and possible approach for a toolkit for local groups who wish to advance and justify Local Green Gaps thorough the preparation of a neighbourhood plan

Question 10: Settlement boundary issues

Have we identified the key settlement boundary issues that the SADPD should address?

Summary of main issues raised:	How the main issues have been taken into account
<p>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 settlements have important open areas within them. Need to take account of the setting of settlements, views into and out, and the historic development pattern.</p>	<p>The council has prepared a clear methodology to reviewing settlement boundaries for Principal Towns, Key and Local Service Centres [ED 06] in the Revised Publication Draft SADPD. Individual settlement reports have been prepared, which set out the implementation of the methodology for each relevant centre in the settlement hierarchy.</p>
<p>It is not clear whether existing open countryside could be considered for inclusion within settlement boundaries.</p>	<p>Policy PG 9 ‘Settlement boundaries’ of the Revised Publication Draft SADPD sets out the policy approach to development within settlement boundaries, adding detail to the existing policy context established by the LPS.</p>
<p>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.</p>	
<p>The SADPD should also consider settlement boundaries for smaller villages.</p>	<p>The Settlement and Infill Boundaries Review [ED 06] considers which settlements should have defined settlement boundaries and which should have defined infill boundaries. Settlement boundaries are proposed in the Revised Publication Draft SADPD for Principal Towns, KSCs and LSCs. In the other settlements and rural areas, a policy approach to the matter of ‘infill boundaries’ has been included in the Revised Publication Draft SADPD, as set out in policy PG 10 ‘Infill villages’.</p>
<p>Definition of the settlement boundaries should be part of a combined exercise to define the Strategic Green Gap boundaries.</p>	<p>The outcomes of the settlement boundary review have informed the approach to the definition of detailed Strategic Green Gap boundaries [ED 08], where relevant to do so.</p>
<p>Various sites promoted for inclusion within settlement boundaries.</p>	<p>Sites have been considered through the implementation of the site selection methodology [ED 07] as detailed through individual settlement reports.</p>

Proposals for settlement boundaries should be discussed with town and parish councils.	As evidenced through this consultation report (table 1), there has been engagement with town and parish councils during the development of the SADPD.
Safeguarded land should be included in settlement boundaries. Settlement boundaries should not follow the existing Green Belt boundary.	Safeguarded land is defined as land between the urban area and the Green Belt and LPS Policy PG 4 confirms that safeguarded land is within the open countryside. Green Belt boundaries should only be altered in exceptional circumstances and whilst exceptional circumstances have been identified to justify alteration of boundaries to accommodate development needs, these do not extend to a general review of Green Belt boundaries. Consequently, for those settlements inset within the Green Belt, the settlement boundary will continue to be the same as the Green Belt inset boundary, except for safeguarded land which will fall outside of both and be within open countryside.
This work should be completed as part of the neighbourhood planning process. Neighbourhood Plan settlement boundaries should be adopted in the SADPD	Footnote 2 of Policy PG 9 'Settlement boundaries' in the Revised Publication Draft SADPD notes that where neighbourhood plans define a settlement boundary, the council will apply the most recent settlement boundary, where relevant. The settlement and infill boundaries review [ED 06] takes account of the latest available information on completions and commitments as at 31 March 2020.
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.	The council has prepared a clear methodology for defining settlement boundaries in the Settlement and Infill Boundaries Review [ED 06].. Individual settlement reports have been prepared which set out the implementation of the methodology for each relevant centre in the settlement hierarchy.
The draft proposals map should be published for consultation.	The Draft Adopted Policies Map [ED 02] has been prepared and published alongside the Revised Publication Draft SADPD.
There should be consultation on the methodology for identifying settlement boundaries.	There was consultation on the First Draft SADPD in September / October 2018 and consultation on the initial Publication Draft SADPD in August / September 2019. Both of these documents were supported by a 'settlement and infill boundary review' document.
Settlement boundaries will need to be amended and reviewed to include further sites released from the Green Belt. Settlement	Settlement boundaries have been reviewed for Principal Towns, Key and Local Service Centres through individual settlement reports,

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boundaries should not be determined until other allocations have been identified.	alongside other topics including retail and site selection matters. The methodology for reviewing settlement boundaries includes provision for including allocated sites within the boundary.
Policies should be clear over what comprises or adjoins a settlement and how this will be interpreted to enable future sustainable development.	The supporting information to Policy PG 9 'Settlement boundaries' in the Revised Publication Draft SADPD notes that the open countryside is defined as the area outside of any settlement with a defined settlement boundary, where LPS Policy PG 6 'Open countryside' will apply.
Recognisable physical features should be used to prevent urban creep.	A methodology has been prepared and implemented for the review of settlement boundaries and this includes a consideration of physical features. This is set out in the Settlement and Infill Boundaries Review [ED 06].
Where Green Gap policies are in place, settlement boundaries should follow the same line irrespective of physical features.	A separate evidence based document has been prepared for defining the detailed Strategic Green Gap boundaries [ED 08]. This includes a consideration of the outcomes of the settlement boundary reviews for those relevant centres, alongside other considerations, where necessary.
Settlement boundaries should be drawn in a transparent and robust way with reference to the methodology.	The council has prepared a clear methodology to reviewing settlement boundaries for Principal Towns, KSCs and LSCs [ED 06] in the Revised Publication Draft SADPD. Individual settlement reports have been prepared which set out the implementation of the methodology for each relevant centre of the settlement hierarchy.
The wording for policy in the absence of a settlement boundary is too vague and open to interpretation.	Policy PG 9 'Settlement boundaries' builds on the strategic LPS policies and sets out how settlement boundaries for principal towns, key service centres and local service centres are defined on the adopted policies map. Where neighbourhood plans define a settlement boundary, the council will apply the most recent settlement boundary, where relevant.
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.	The Revised Publication Draft SADPD proposes Brereton Green as a infill village through Policy PG 10 'infill villages' informed by the settlement and infill boundaries review evidence document [ED 06]. The infill boundary is shown on the SADPD policies map [ED 02].

<p>The Civil Parish of Sandbach is covered by the SNDP and no changes to its boundaries are considered necessary.</p>	<p>A settlement report has been prepared for Sandbach [ED 41] that details the implementation of the settlement boundary review methodology for Sandbach (including the consideration of the Sandbach Neighbourhood Plan) which has informed the Revised Publication Draft SADPD.</p>
<p>The Sandbach Neighbourhood Plan does not represent a planned process of determining a logical settlement boundary and should be reviewed.</p>	
<p>The Alderley Edge settlement boundary should only be redrawn to accommodate changes in Green Belt.</p>	<p>A settlement report has been prepared for Alderley Edge [ED 21] that details the implementation of the settlement boundary review methodology for Alderley Edge which has informed the Revised Publication Draft SADPD.</p>
<p>The NPPF, paragraph 14, clearly outlines the need for plans to be flexible and the approach should ensure that settlements can grow appropriately.</p>	<p>‘The provision of housing and employment land and the approach to spatial distribution’ considers how the overall levels of development set out in the LPS will be facilitated; and considers the approach to flexibility. The plan is also supported by a clear monitoring framework [ED 54] to consider the overall performance of the plan.</p>
<p>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.</p>	<p>The council has prepared and implemented a clear methodology to reviewing settlement boundaries in the Revised Publication Draft SADPD. Individual settlement reports have been prepared which set out the implementation of the methodology for each relevant centre.</p>
<p>Local Service Centres should not have defined settlement boundaries – development limits should be flexible and able to respond to future uncertainties.</p>	<p>The council has prepared a clear methodology to reviewing settlement boundaries in the publication draft SADPD. The Settlement and Infill Boundaries Review [ED 06] gives consideration to the benefits of defining settlement boundaries or not. Individual settlement reports have been prepared which set out the implementation of the methodology for each relevant centre in the settlement hierarchy. The approach to flexibility is taken into account in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05].</p>
<p>The SADPD should review all villages that are ‘washed over’ by open countryside policy to determine whether they require a settlement boundary.</p>	<p>The settlement and infill boundary review [ED 06] has reviewed a large number of settlements in the other settlements and rural area tier of the settlement hierarchy to determine which should be designated as infill villages for the purposes of implementing policy PG 10 ‘infill villages’ in the Revised Publication Draft SADPD.</p>

The Middlewich settlement boundary should be reviewed.	A settlement report has been prepared for Middlewich [ED 36] that details the implementation of the settlement boundary review methodology for Middlewich.
Settlement boundaries should be reviewed on a regular basis to ensure housing needs continue to be met throughout the plan period.	National guidance notes that local plans and spatial development strategies, should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary.
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.	The policy approach established by the Local Plan Strategy is further supplemented by policy PG 9 'settlement boundaries' in the Revised Publication Draft SADPD. LPS Policy PG 6 'Open countryside' is clear that land outside of settlement boundaries is considered to be open countryside.
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.	Settlement boundaries are proposed for Principal Towns, Key and Local Service Centres in the Revised Publication Draft SADPD (Policy PG 9 'Settlement boundaries').
There must be a clear policy on what size of rural settlement becomes a village and merits a settlement boundary.	Settlement boundaries are proposed for principal towns, key service centres and local service centres in the settlement hierarchy, In the other settlements and rural areas tier, the settlement and infill boundaries review [ED 06] considers a number of factors to determine which smaller settlements should have an infill boundary.

Question 11: Jodrell Bank Observatory

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?

Summary of main issues raised:	How the main issues have been taken into account
Jodrell Bank should be fully protected within the SADPD. That protection should be drafted in close consultation with the relevant scientific bodies.	The council acknowledges that Jodrell Bank requires appropriate protection in line with LPS Policy SE 14 (Jodrell Bank). The council is working closely with the Observatory (Manchester University) to

	<p>prepare a specific Jodrell Bank supplementary planning document (SPD) to set out further guidance to support the implementation of LPS Policy SE 14. This will also reflect its recent inclusion on the world heritage List. Policy HER 9 (World heritage site) of the Revised Publication Draft SADPD identifies how the universal outstanding value of the world heritage site will be protected. The council is very conscious that the international scientific value of the Observatory is inextricably linked to its internationally important heritage value and this will be reflected in the SPD. Given the range of policy guidance that will need to be provided to support the implementation of LPS Policy SE 14 (and now SADPD policy HER 9), the use of a SPD route is considered more appropriate, rather than further policy within the SADPD.</p>
<p>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.</p>	<p>This will be addressed within the proposed SPD.</p>
<p>No permissions for development should be allowed if JBO object at any level, including “relatively minor” impact.</p>	<p>This is a matter for the planning application/appeal decision maker.</p>
<p>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.</p>	<p>The presence of Jodrell Bank and the application of LPS Policy SE 14 ‘Jodrell Bank’ does not prevent the overall housing requirements in the Plan being met. For example, the level of commitments and completions for the local service centre of Goostrey, which is situated close to Jodrell Bank, is 12 homes. The local service centre of Holmes Chapel, which lies about 4km to the south west of Jodrell Bank, has a commitments and completions figure of 871 homes. The housing figure for the Other Settlements and Rural Area tier of the Local Plan’s settlement hierarchy is now fully addressed through current completions and commitments. The provision of housing and employment land and the approach to spatial distribution report [ED 05] considers the need for any further housing allocations at each tier of the settlement hierarchy to enable the plan strategy to be delivered.</p>
<p>Guidance is needed on how development precisely impacts on the function of the Jodrell Bank Observatory.</p>	<p>This will be considered in developing the proposed SPD.</p>

<p>There is currently a lack of clarity within the development plan or supporting documentation regarding to show how a planning balance will be arrived at</p>	<p>This will be considered in developing the proposed SPD.</p>
<p>Any policy needs to be flexible and not be a blanket restriction but enable development to come forward providing appropriate mitigation is provided</p>	<p>This will be considered in developing the proposed SPD.</p>
<p>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.</p>	<p>An aim of having policy guidance within the proposed SPD is to assist prospective applicants as to the likelihood of obtaining planning permission and to assist decision makers in applying LPS Policy SE 14. No applications are identical and what may appear to be an inconsistent approach may be a reflection of the particular circumstances of individual applications.</p>
<p>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.</p>	<p>See response immediately above. The final balance of material considerations in determining whether or not planning permission should be granted is a matter for the decision maker.</p>
<p>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.</p>	<p>This will be considered in developing the proposed SPD.</p>
<p>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.</p>	<p>This will be considered in developing the proposed SPD.</p>
<p>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</p>	<p>This will be considered in developing the proposed SPD.</p>

<p>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.</p>	
<p>Areas within settlement boundaries should be removed from the Consultation Zone to enable the development/redevelopment of land which is normally considered appropriate.</p>	<p>The Consultation Zone is set through the Town & Country Planning (Jodrell Bank Radio Telescope) Direction 1973 and cannot be altered through development plan policies.</p>
<p>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.</p>	<p>This guidance is now proposed be provided within the proposed SPD.</p>
<p>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.</p>	<p>The Consultation Zone is set through the Town & Country Planning (Jodrell Bank Radio Telescope) Direction 1973 and cannot be altered through development plan policies.</p>
<p>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</p>	<p>The Consultation Zone is set through the Town & Country Planning (Jodrell Bank Radio Telescope) Direction 1973 and cannot be altered through development plan policies.</p>
<p>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</p>	<p>This will be considered in developing the proposed SPD which will also reflect Jodrell Bank's recent inclusion on the world heritage List.</p>

and free from man-made intrusions.	
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.	The extent of the consultation zone is already shown on the adopted policies map, linked to Policy SE 14. Additional policy guidance is now proposed to be provided within a proposed SPD.
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?	This will be considered in developing the proposed SPD.
Either the policy or an associated SPD should provide parameters which developers can rely 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.	This will be considered in developing the proposed SPD.
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.	Comment noted. The council similarly welcomes the opportunity to work closely with the University to develop appropriate policy guidance.
There is already a commitment in the LPS that the SADPD will provide this guidance.	Given the range of policy guidance that will need to be provided to support the implementation of LPS policy SE 14 (and now SADPD policy HER 9), the use of a SPD route is considered more appropriate, rather than further policy within the SADPD.
Historic England considers that there should be specific policy guidance regarding the Jodrell Bank Observatory. It should cover the	A specific policy is included in the Revised Publication Draft SADPD; Policy HER 9 (World heritage site) which addresses the heritage asset

heritage assets, guidance to inform development proposals and the potential outstanding universal value of the site.	point. Further planning guidance will be provided within the proposed SPD. The council will work closely with Historic England in drafting the SPD.
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Question 12: General requirements

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?

Summary of main issues raised:	How the main issues have been taken into account
A general requirements policy is required so that new development meets high environmental standards and for design to be in harmony with what already exists. It should avoid prescription and allow a level of flexibility to allow for design innovation and variation across the Borough. It could signpost to other policies in the plan.	The Revised Publication Draft SADPD [ED 01] contains a suite of general requirements policies
A general requirements policy/policies could include: the use of electric/hybrid vehicles, appropriate storage space for dwellings, minimum garage width, definition of over-development (in terms of safety, health and amenity), pedestrian priority, onsite car parking for employment sites, housing mix (reflecting an ageing population), local character, built form, ecology, historical context, environment of an area, business needs, Building for Life 12, Lifetime Homes Design Guide, broadband use, mobile phones, personal car reliance, principles of active design, nationally described space standards, viability, waterside development, protection of villages and Open Countryside, neighbouring land uses and compatibility, off- road parking provision, air quality, building height limits, energy exploration/capture, site design and layout, housing density, shop front design, biodiversity net gain.	The Revised Publication Draft SADPD [ED 01], along with the LPS, contains many policies that cover a wide range of issues, including a suite of general requirements policies. These include LPS Policy CO 2 'Enabling Business Growth Through Transport infrastructure', SADPD Policy INF 3 'Highway safety and access', SADPD Policy GEN 1 'Design principles', LPS Table C.4 'Size, Layout and Requirements for Bays and Garages', SAPD Policy HOU 1 'Housing mix', LPS Policy SC 4 'Residential Mix', LPS Policy SE 3 'Biodiversity and Geodiversity', SAPD Policy ENV 1 'Ecological network', SADPD Policy ENV 2 'Ecological implementation', LPS Policy SE 7 'The Historic Environment', SAPD Policy HER 1 'Heritage assets', SADPD Policy HER 2 'Heritage at risk', SADPD Policy HER 3 'Conservation areas', SADPD Policy HER 4 'Listed buildings', SADPD Policy HER 5 'Registered parks and gardens', SADPD Policy HER 6 'Historic battlefields', SADPD Policy HER 7 'Non-designated heritage assets', SADPD Policy HER 8 'Archaeology', SADPD Policy HER 9 'World heritage site', LPS Policy EG 1 'Economic Prosperity', LPS Policy EG 2 'Rural Economy', LPS Policy SE 1 'Design', SADPD Policy INF 8

	<p>‘Telecommunications infrastructure’, LPS Policy CO 3 ‘Digital Connections’, LPS Policy CO 1 ‘Sustainable Travel and Transport’, SADPD Policy HOU 6 ‘Accessibility and wheelchair housing standards’, SADPD Policy GEN 7 ‘Recovery of planning obligations reduced on viability grounds’, SADPD Policy ENV 4 ‘River corridors’, SADPD Policy PG 9 ‘Settlement boundaries’, SADPD Policy PG 10 ‘Infill villages’, LPS Policy PG 6 ‘Open Countryside’, SADPD Policy ENV 15 ‘New development and existing uses’, SADPD Policy HOU 10 ‘Amenity’, LPS Policy SE 12 ‘Pollution, Land Contamination and land Instability’, LPS Table C.1 ‘Car Parking Standards’, SADPD Policy INF 2 ‘Public car parks’, SADPD Policy ENV 12 ‘Air quality’, LPS Policy SD 2 ‘Sustainable Development Principles’ LPS Policy SE 9 ‘Energy Efficient Development’, SADPD Policy ENV 8 ‘District heating network priority areas’, SADPD Policy ENV 9 ‘Wind energy’, SADPD Policy ENV 10 ‘Solar energy’, SADPD Policy ENV 11 ‘Proposals for battery energy storage systems’, SADPD Policy HOU 11 ‘Housing density’, and SADPD Policy RET 4 ‘Shop fronts and security’.</p> <p>The promotion of health has been addressed in the LPS through Policy SC 3 ‘Health and well-being’. It has also been considered through the preparation of the SADPD and a number of policies in the Revised Publication Draft assist in the promotion of health including GEN 1 ‘Design principles’; ENV 6 ‘Trees, hedgerows and woodland implementation’; RET 5 ‘Restaurants, cafés, pubs and hot food takeaways’; INF 1 ‘Cycleways, bridleways and footpaths’; REC 1 ‘Green/open space protection’; REC 2 ‘Indoor sport and recreation implementation’; and REC 3 ‘Green space implementation’.</p> <p>Additionally, the Cheshire East Design Guide Supplementary planning Document has been prepared as a constructive means to engage in the design process with developers and communities, supplementing Building for Life 12, the industry design standard for new housing and helping to realise its aims within Cheshire East.</p>
<p>Policies should be developed that are appropriate to local areas and to address the range of settlement types in the LPS.</p>	<p>The Revised Publication Draft SADPD [ED 01], along with the LPS, contains many policies that cover a wide range of issues, some of</p>

	which are settlement specific.
There will be a need to include some specific policies relating to Manchester Airport, including the safe and efficient operation of the airport: Control of Development in Public Safety Zones; Aerodrome Safeguarding; Airport Operational Area; Off-Airport Car Parking; Noise Considerations	The Revised Publication Draft SADPD [ED 01] contains policies to address these issues.

Question 13: Natural environment, climate change and resources

Do you think that these are the issues that the SADPD should look to address regarding the natural environment, climate change and resources?

Summary of main issues raised:	How the main issues have been taken into account
Need to plan for fast broadband access across the whole of the Borough.	Policy CO 3 (Digital Connections) of the LPS supports the delivery of the necessary physical infrastructure for support digital communications networks in new developments. Proposed policy INF 8 of the revised publication draft SADPD supports fibre connections into new properties.
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.	<p>Building on the strategic policy context of the Local Plan Strategy, Public Rights of Way are recognised in policies RUR 6 (outdoor sport, leisure and recreation outside of settlement boundaries) and INF 1 (cycleways, bridleways and footpaths) of the revised publication draft SADPD.</p> <p>Open space policies in the revised publication draft SADPD include policy REC 1 (green/open space protection), REC 3 (green space implementation) amongst others.</p> <p>Landscape policies included in the revised publication draft SADPD include ENV 3 (landscape character) and ENV 5 (landscaping) amongst others. The policy context builds on existing strategic policies in the Local Plan Strategy including policy SE 4 'the landscape'. Local</p>

	landscape designation areas are shown on the proposed policies map that accompanies the revised publication draft SADPD.
It might be beneficial for these issues to be addressed in greater detail in, for example, a Sustainable Development SPD.	The revised publication draft SADPD is a 'daughter' document to the Local Plan Strategy and provides further detail on a number of matters relating to the natural environment.
Development policies that relate to 'Energy Efficient Developments' should not impact on the viability of development proposals.	<p>A report has been prepared 'site allocations and development policies viability assessment' [ED 52] that has considered the broad viability implications of policies contained in the SADPD, when read alongside the LPS and other material factors including the Community Infrastructure Levy. The report concludes that in the current market, the analysis in this report shows that the Council can be confident that the sites in the emerging SADPD are deliverable when taking into account the full cumulative impact of the policies in the SADPD and the adopted LPS. Further the additional policies in the revised publication draft SADPD are unlikely to prejudice the allocations in the adopted LPS.</p> <p>Whilst the non-residential uses are not viable, they are not rendered unviable by the cumulative impact of the Council's policies, rather by general market conditions.</p>
Consider meres and mosses landscape when identifying any stepping stones/ecological networks and areas of habitat creation.	Policy ENV 1 (ecological network) in the revised publication draft SADPD refers to the ecological network & core areas including Meres and Mosses catchments (buffer zones). This builds on the policy context set by LPS policy SE 3 (biodiversity and geodiversity).
Add water catchment areas for designated sites to the Policies Map (Issue 20) to help assess where there may be watery impacts.	A policies map has been prepared which shows the spatial extent of policies in the local plan. This has been produced to illustrate how the policies map would look if the revised publication draft SADPD were to be adopted in its current form. It shows the policies contained in the adopted LPS and the draft policies in this revised publication draft SADPD.
Give appropriate weight to the roles performed by the areas soils. These should be valued as a finite multi-functional resource which	LPS Policy SE 2 (efficient use of land) of the LPS (point 4) notes the importance of safeguarding natural resources including soil (amongst

underpins our wellbeing and prosperity.	other resources).
Safeguard the long term capability of best and most versatile agricultural land.	LPS Policy SE 2 (efficient use of land) of the LPS (point 4) notes the importance of safeguarding natural resources including high quality agricultural land (amongst other things). Policy RUR 5 (best and most versatile agricultural land) in the revised publication draft SADPD seeks to avoid the loss of best and most versatile agricultural land, where possible.
Policies should include safeguards regarding the environmental and visual impact of large solar voltaic and wind power schemes.	Policy ENV 10 (solar energy) in the revised publication draft SADPD sets out the relevant criteria that solar voltaic schemes in the borough will be considered against Policy ENV 9 (wind energy) in the revised publication draft SADPD refers to the relevant criteria that wind power proposals in the borough will be considered against
Local Landscape Designations should undergo a full review as part of the SADPD due to changes to the baseline, and a more detailed analysis.	The Council has reviewed Local Landscape Designations to inform the revised publication draft SADPD (local landscape designation review evidence document – ED 11).
The Bollin Valley and Parklands should not be co-joined as they have very different landscape characteristics.	Local landscape designations have been reviewed to inform the revised publication draft SADPD. It is now called Bollin Valley and amendments have been made to the boundary to the previous Bollin Valley and Parklands Area of Special County Value. This is set out in local landscape designation review evidence document [ED 11] and reflected on the SADPD Policies Map [ED 02].
Cheshire East Council should fund open spaces and habitat restoration.	Policy ENV 2 (Ecological Implementation) notes the importance of development proposals providing for an overall net gain for biodiversity in the borough.
Further policy required on restoration not just preservation of our natural environment.	Policy ENV 1 (Ecological Network) identifies restoration areas as part of the ecological network. The policy also identifies (in point 4) that new development should take proportionate opportunities to restore the ecological network for the borough. Policy ENV 4 (River Corridors) also notes the importance of restoring

	<p>and enhancing the natural environment around River Corridors.</p> <p>The policy context included in the revised publication draft SADPD should be read alongside the policy provisions of the Local Plan Strategy.</p>
<p>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.</p>	<p>A local landscape designation review [ED 11] and landscape character assessment [ED 10] has been prepared to support the relevant policies in the Revised Publication Draft SADPD and the existing landscape policy in the LPS (policy SE 4 – The Landscape).</p>
<p>Expand policies to include greater protection for areas registered as 'ancient woodlands'; buffer zones are insufficient, and wildlife corridors.</p>	<p>Policy ENV 6 (Trees, hedgerows and woodland implementation) notes that appropriate buffers must be provided adjacent/around ancient woodland to avoid any harm to the woodland arising from new development. Development proposals on any site adjacent to ancient woodland must be supported by evidence to justify the extent of the undeveloped buffer proposed. This builds upon LPS Policy SE 5 'Trees, hedgerows and woodland'</p>
<p>Protect mature and semi-mature woodland.</p>	<p>Policy ENV 6 (Trees, hedgerows and woodland implementation) builds upon LPS Policy SE 5 'Trees, hedgerows and woodland' and provides further guidance on the approach to woodland in the borough.</p>
<p>Air pollution is of increasing importance, requiring careful monitoring and control.</p>	<p>Policy ENV 12 (Air quality) notes how proposals that have an impact on local air quality will be required to provide an air quality assessment. This approach adds further detail to LPS policy SE 12 'Pollution, contamination and land instability' which seeks to make sure that all development is located and designed so as not to result in poor air quality.</p>
<p>Need a clear policy on fracking.</p>	<p>The Minerals and Waste Development Plan Document is in the process of being prepared. The Minerals and Waste Development Plan Document will provide more detail to the strategic LPS policy SE 10 'Sustainable Provision of Minerals'.</p>
<p>Landscape: Must be done on a borough-wide basis and not simply 'north' Cheshire East.</p>	<p>Landscape evidence has been prepared on a borough wide basis to support the revised publication draft SADPD (A local landscape designation review [ED 11] and landscape character assessment [ED</p>

	10]).
<p>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.</p> <p>Policy should refer to biomass & biodigestion schemes</p>	<p>LPS policy SE 8 'renewable and low carbon economy' sets out a number of principles relating to the consideration of renewable and low carbon energy proposals. This includes combined heat and power schemes and biomass boilers.</p>
<p>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.</p>	<p>The Minerals and Waste Development Plan Document is in the process of being prepared. The Minerals and Waste Development Plan Document will provide more detail to the strategic LPS policy SE 10 'Sustainable Provision of Minerals'.</p>
<p>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.</p>	<p>The assets referred to in policy NR4 are now referenced in LPS policy SE 3 'biodiversity and geodiversity'. A Policies Map [ED 02] has been prepared to show the spatial extent of policies included in the LPS and the revised publication draft SADPD. The map shows a number of other designations that are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position</p>
<p>Fabric first is the most effective method of energy reduction and the most visually appealing way of designing energy efficiency into homes.</p>	<p>Policy ENV 7 'Climate change' sets out a number of measures to adapt and / or demonstrate resilience to climate change and mitigate its impacts.</p>
<p>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.</p>	<p>LPS Policy SE 2 (efficient use of land) of the LPS (point 4) notes the importance of safeguarding natural resources including soil (amongst other resources).</p> <p>LPS policy SE 12 'pollution, land contamination and land instability' considers the matter of land instability and recognises that the issue can relate to ground stability issues also.</p>
<p>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.</p>	<p>Policy ENV 9 'wind energy' sets out the criteria for wind energy development proposals in the borough. This builds upon LPS policy SE 8 'renewable and low carbon energy'. Point 3 of the policy notes how applications for wind turbines should be supported by details of</p>

	consultation with statutory bodies and infrastructure providers, as appropriate.
Reference should also be made to the 14 Nature Improvement Areas in the Borough including the Mosses and Meres.	Nature improvement areas are referenced in policy ENV 2 (ecological implementation) of the revised publication draft SADPD.
Further policy detail is required on several matters like flood risk, contamination, and telecommunications masts.	Further policy has been provided in the revised publication draft SADPD, on matters including flood risk (policy ENV 16 'surface water management and flood risk' & ENV 17 'protecting water resources' as examples) and telecommunications infrastructure (policy INF 8). Contamination issues are considered in LPS policy SE 12 'pollution, land contamination and instability'.
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.	Policies ENV 9 'wind energy' and ENV 10 'solar energy' in the revised publication draft SADPD include the consideration of visual aspects alongside a number of other relevant factors. Both policies set out the requirement of a decommissioning statement.
Consider energy storage requirements as an equal partner in the climate change challenge.	Policy ENV 11 'proposals for battery energy storage systems' has been drafted in the revised publication version of the SADPD to consider the issue of proposals for battery energy storage systems and how they can be used to balance the electricity grid and renewable energy sources, alongside the consideration of other relevant criteria.
Reference could be made to the underlying importance of soil type for land capability.	LPS policy SE 12 'pollution, land contamination and land instability' considers the issue of soil and soil contamination. LPS Policy SE 2 (efficient use of land) of the LPS (point 4) notes the importance of safeguarding natural resources including soil (amongst other resources).
Recognise that impact of development on farm structure can be at least as significant as direct loss of farmland to development.	The revised publication draft SADPD includes a chapter on rural issues in the borough including a number of policies in relation to the approach to rural buildings (including for example, extensions and alterations to buildings outside of settlement boundaries – policy RUR 11).
More detailed guidance on Conserving Countryside Character” by	An update to the Landscape Character Assessment [ED 10] and Local

ensuring that development fully respects this “quality of place”, and giving special priority to maintaining the character and condition of locally distinctive landscapes	Landscape Designation Review [ED 11] has been prepared to support the landscape policies contained in the revised publication draft SADPD which supplement LPS policy SE 4 ‘ the Landscape’
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.	LPS policy IN 1 (infrastructure) and IN 2 (Developer Contributions) sets out the approach to developer contributions across the borough.
Develop a green infrastructure strategy, identifying shortfalls and opportunities, and a CIL charging regime that acknowledges the importance of green infrastructure.	The Council adopted its Community Infrastructure Levy Charging Schedule in February 2019 and it became operational in March 2019. This is supported by a regulation 123 list of items of infrastructure that CIL funds can contribute towards. At this time, the regulation 123 list includes a number of highways and education infrastructure items on the list. A Green Space Strategy Update has been prepared [ED 18] to support the revised publication draft SADPD.
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.	The revised publication draft SADPD, when read alongside the Local Plan Strategy, includes a number of relevant planning policies relating to matters including air & water quality, drainage and access.
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 (i.e. unable to be cultivated), solar farms should not compromise the wider rural economic 'offer'.	Policy ENV 10 ‘Solar Energy’ in the revised publication draft SADPD sets out relevant criteria for the consideration of solar farms / parks in the borough. This includes consideration of best and most versatile agricultural land (point 2). Point 7 of policy ENV 10 encourages roof based schemes where they do not conflict with other relevant local planning policies.
The issues should be linked to a collection of other policies e.g. sustainable transport.	The policies in the local plan should be read as a whole.
Policy for protecting long-distance and/ or strategic views of significance.	Policy ENV 3 ‘landscape character’ of the revised publication draft SADPD refers to the need for development proposals to respect the qualities, features and characteristics that contribute to the distinctiveness of the local area.

Ecological networks should be mapped and incorporated into the policies map.	Policy ENV 1 'ecological implementation' makes reference to ecological networks. They are included on the Policies Map for the revised publication draft SADPD.
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.	Policy ENV 8 'District heating network priority areas' identifies the areas within the settlement boundaries of Crewe and Macclesfield as district heating priority areas. This is based on the detailed feasibility study documents proposed for Crewe Town Centre (2015, AECOM) and Macclesfield Town Centre (2017, Arup). The supporting information notes that work may be extended to other areas of the borough during the life of the plan, which will be addressed in subsequent plan reviews.
There are a number of areas close to Holmes Chapel where wind power could be implemented without any significant adverse conditions being generated.	Policy ENV 9 'wind energy' sets out the criteria for how wind energy proposals will be considered in the borough.
Environmental capacity should be referenced.	The revised publication draft SADPD, alongside the Local Plan Strategy sets out a number of relevant policies to assist in the achievement of sustainable development in the borough. This includes the consideration of social, economic and environmental objectives.

Question 14: Historic environment

What policy detail regarding the historic environment do you think should be included in the SADPD?

Summary of main issues raised:	How the main issues have been taken into account
Clear guidance on the protection of historic assets should be given. The role of Green Belt in protecting these must be emphasized.	The revised publication draft SADPD stresses that the historic environment is very much linked with other policy areas in the Local Plan - "5.1 Cheshire East has one of the richest historic legacies in the north of England. Renowned for its numerous stately homes and extensive gardens and parkland, the borough has a magnificent heritage that the SADPD seeks to preserve and enhance. Heritage plays an important role in the quality and character of the borough, and so this section has strong linkages to other policy areas such as the

	<p><i>economy and environment.</i>” LPS Policy PG 3 ‘Green Belt’ sets out policy in relation the Green Belt. There is a suite of policies relating to the historic assets in the revised publication draft SADPD – policies HER 1 – HER 9. These build on the strategic context set by policy SE 7 ‘the Historic Environment’ in the LPS.</p>
<p>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.</p>	<p>Policy HER 4 ‘Listed Buildings’ in the revised publication draft SADPD (point 1) notes that development proposals affecting a listed building or its setting will be expected to preserve and enhance the asset and its setting, wherever possible. The policy then includes a list of policy requirements relevant to the consideration of proposals involving listed buildings. This builds on the strategic context set by policy SE 7 ‘the historic environment’ in the LPS. Locally listed assets are included in a ‘local list of historic buildings’ supplementary planning document. However it should be recognised that not all buildings, structures or landscapes that may be of local significance are currently documented or captured on a local list. Where these have local architectural or historic significance they will be treated as non-designated heritage assets under Policy HER 7 “non designated heritage assets”.</p>
<p>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.</p>	<p>Areas of archaeological potential and areas of special archaeological potential are shown on the policies map. It is noted that the designations are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.</p> <p>Policy HER 8 “archaeology” in the revised publication draft SADPD sets out the policy approach to this matter, building on LPS policy SE 7 ‘The Historic Environment’.</p>
<p>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.</p>	<p>Any specific site would be considered through existing policy provisions including national guidance, the LPS and saved policies until the SADPD is adopted. The revised publication draft SADPD includes a suite of policies relating to the historic environment which will look to supplement policy SE 7 ‘the historic environment’ in the</p>

	LPS.
Locally-listed buildings are expected to be listed in 5.3	Locally listed assets are included in the 'local list of historic buildings' supplementary planning document, however it should be recognised that not all buildings, structures or landscapes that may be of local significance are currently documented or captured on a local list. Where these have local architectural or historic significance they will be treated as non-designated heritage assets under Policy HER 7 "non designated heritage assets".
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 SADPD and how this may be extended to the whole of Cheshire East.	The revised publication draft SADPD is supported by updated evidence on landscape character [ED 10] and local landscape designation review [ED 11]. Policy ENV 3 'landscape character' sets out further guidance on landscape character and should be read alongside LPS policy SE 4 'The Landscape'.
Policies Map should show the location of designated and non - heritage assets.	The revised publication draft SADPD Policies Map includes Conservation Areas, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, Areas of Archaeological Potential and Areas of Special Archaeological Potential. These are designations that are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.
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.	The Canals and River Trust are statutory consultees on planning applications and therefore any heritage assets associated with the canals will be highlighted through the development management process. The revised publication draft SADPD includes a number of policies relating to the historic environment for designated and non-designated assets. This builds on the policy context included in the LPS (policy SE 7 'the historic environment').
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.	Public rights of way, public bridleways, restricted byways and byways are available to view on the definitive map and statement, which can be viewed interactively on the council's website.
More information on rural heritage walks should be provided. There	The revised publication Draft SADPD stresses that the historic

<p>must be some associated local trails related to farming and mills in the area.</p>	<p>environment is very much linked with other policy areas in the Local Plan. This includes rights of way and recreation. Policy SE 6 “Green Infrastructure” in the LPS lists a number of green infrastructure assets, many of which run through Cheshire’s towns. Policy INF 1 of the revised publication draft SADPD considers ‘cycleways, bridleways and footpaths’.</p>
<p>A more detailed guidance on what weight will be applied to different heritage assets should be included.</p>	<p>The revised publication draft SADPD includes a suite of policies relating to designated and non-designated assets. This information builds on the policy context established through policy SE 7 ‘the historic environment’ in the LPS.</p>
<p>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.</p>	<p>Policy HER 4 “Listed Buildings” in the revised publication draft SADPD contains detailed policy wording for the consideration of development proposals affecting a listed building.</p>
<p>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.</p>	<p>This is covered by policy GEN 3 “Advertisements” in the revised publication draft SADPD</p>
<p>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.</p>	<p>The Cheshire East Borough Design Borough Design Guide supplementary planning document is referenced under related documents in Policy HER 1 “Heritage Assets” in the revised publication draft SADPD.</p>

<p>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.</p>	<p>Appropriate references are included in Policy HER 5 ‘Registered parks and gardens’ in the revised publication draft SADPD.</p>
<p>Standards in conservation have dropped over the years due to a lack of enforcement. Policies to promote compliance/standards and upgrades would be welcomed.</p>	<p>This is not something policy can cover. Policy sets out the legal requirements of development and attempts to minimise damage or harm to listed buildings. If damage or harm is caused wilfully this would be a matter for enforcement and beyond the scope of the policy.</p>
<p>There is a need to include Sites of Special Scientific and Historic importance such as Lindow Common/Lindow Moss.</p>	<p>Sites of special scientific interest are included on the policies map. This is a designation that is referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position. Policy SE 3 ‘biodiversity and geodiversity’ of the LPS sets out the policy approach.</p>
<p>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.</p>	<p>A suite of heritage policies is included in the revised publication draft SADPD with an acknowledgement that heritage issues are very much linked to all other aspects of the plan: - “5.1 Cheshire East has one of the richest historic legacies in the north of England. Renowned for its numerous stately homes and extensive gardens and parkland, the borough has a magnificent heritage that the SADPD seeks to preserve and enhance. Heritage plays an important role in the quality and character of the borough, and so this section has strong linkages to other policy areas such as the economy and environment.”</p>
<p>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.</p>	<p>Every Local Planning Authority has a continuing duty to review its existing Conservation Areas or consider designating new Conservation Areas (Planning (Listed Buildings and Conservation Areas) Act 1990). This is a separate process to local plan making. As noted on the Cheshire East website, a rolling programme of Conservation Area appraisals for the designated Conservation Areas has commenced. Separately, the Bollington Neighbourhood Plan was made on the 10 May 2018.</p>
<p>A policy to ensure all conservation areas are reviewed at reasonable intervals, to ensure a consistent approach is adopted should be</p>	<p>As noted on the Cheshire East website, a rolling programme of Conservation Area appraisals for the designated Conservation Areas</p>

included. This is because Holmes Chapel has never been subject to appraisal.	has commenced.
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Question 15: Employment development

Do you think that these are the issues that the SADPD should look to address regarding employment development?

Summary of main issues raised:	How the main issues have been taken into account
Policies for employment development should take infrastructure impacts into account.	The Local Plan is intended to be read as a whole. There are existing policies in the Local Plan relating to infrastructure, for example policy IN 1 (infrastructure) in the LPS.
More detail is needed on employment related to the distribution of goods – policies should encourage yet control this type of development.	The employment related policies in the Local Plan apply to use classes B1, B2 or B8 unless otherwise specifically stated. Policy EMP 2 ‘Employment allocations’ includes allocations for B8 uses (alongside other employment uses), informed by the Employment Allocations Review [ED 05] that has been collated to inform the Revised Publication Draft SADPD.
Need policies specific to the North Cheshire Science Corridor.	Reference to the North Cheshire Science Corridor is included in the LPS in the descriptive text (for example paragraphs 11.7-11.8). Proposals brought forward in the North Cheshire Science Corridor can be considered through existing policy provisions established by the LPS and supplemented by policies in the Revised Publication Draft SADPD, as appropriate.
Policies should support the visitor economy and encourage facilities such as hotels, car parks, public toilets etc.	LPS Policy EG 4 ‘Tourism’ seeks to support tourism development but, where outside of principal towns, key service centres and local service centres, there must be evidence that the facilities are required in conjunction with a particular countryside location. Policy RUR 8 ‘Visitor accommodation outside of settlement boundaries’ of the Revised Publication Draft SADPD provides further policy guidance for visitor accommodation outside of settlement boundaries.
Inadequate recognition of the very high and growing level of home-	LPS Policy PG 1 ‘Overall development strategy’ sets out the overall

<p>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.</p> <p>The evidence base for employment land is flawed; the 0.7%/year jobs growth rate is too high.</p> <p>Not enough information on the cumulative impact of jobs growth in Cheshire East, Greater Manchester and elsewhere.</p>	<p>requirement of 380 hectares of land for employment uses to support an overall jobs growth of 31,400 (at a jobs growth rate of 0.7% per annum) over the Plan period. The Revised Publication Draft SADPD sets out non-strategic policies to supplement the strategic policies included in the LPS and does not in itself include further employment land calculations.</p>
<p>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.</p> <p>Long term protection of sites allocated for employment use should be avoided and land allocations must be regularly reviewed.</p>	<p>Existing allocated employment sites from legacy local plan documents have been assessed through document [ED 12] 'Employment allocations review' to support policy EMP 2 'employment allocations' of the Revised Publication Draft SADPD.</p> <p>LPS Policy EG3 'Existing and allocated employment sites' sets out the approach to existing and allocated employment sites.</p>
<p>The Bentley Strategic Employment Area as shown in the LPS should be extended to include all of Bentley's landholding.</p>	<p>The Revised Publication Draft SADPD includes a dedicated policy, reference CRE 1 'Land at Bentley Motors'. The site is also listed in policy EMP 1 'Strategic employment areas' with the extent of land shown on the Policies Map.</p>
<p>Policies should support the rural economy, encourage farm diversification and agricultural buildings where appropriate.</p>	<p>The Revised Publication Draft SADPD includes a dedicated chapter on rural issues including RUR 2 'Farm diversification' and RUR 10 'Employment development in the open countryside' amongst others.</p>
<p>Important to provide a range of employment opportunities in the right locations to meet anticipated needs, providing accommodation for small, medium and large enterprises.</p>	<p>Noted. Both the LPS and Revised Publication Draft SADPD include a range of employment allocations supported by appropriate evidence.</p>
<p>The plan should recognise that employment sites should be able to accommodate waste management facilities where appropriate.</p>	<p>The council is also preparing part 3 of its Local Plan, the Minerals and Waste DPD which will consider matters in relation to those topic areas.</p>
<p>Policies should take account of employment / local economy information identified in neighbourhood plans.</p>	<p>Neighbourhood Plans can provide a tool for providing for further localised guidance on employment / local economy matters. Once 'made', Neighbourhood Plans form part of the Development Plan in the borough.</p>

More detail is required on the site selection process, including residential amenity, infrastructure, access to the major road network etc.	The Revised Publication Draft SADPD is supported by detailed evidence on site selection – [ED 07] ‘Site Selection Methodology Report’ and [ED 12] ‘Employment Allocations Review’.
Policy should refer to sustainable transport modes as facilitating commuting.	The Revised Publication Draft SADPD is supported by a detailed policy on cycleways, bridleways and footpaths (policy reference INF 1) alongside strategic policies in the LPS, for example policies CO 1 ‘Sustainable travel and transport’ and CO 2 ‘ Enabling business growth through transport infrastructure’.
Crewe Town Council would, in principle, welcome further employment allocations.	The Revised Publication Draft SADPD includes two further employment sites in Crewe (CRE 1 & CRE 2). Whilst these are not strictly required to meet the employment land requirements for Crewe, they are well-related to the urban area and are needed to support the continued economic growth of the town by providing land for some of the town's key employers.
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.	Noted.
Employment development in open countryside must not undermine the ‘quality of place’ which contributes to the borough’s economy.	The revised publication draft SADPD includes a detailed policy on employment development in the open countryside (policy reference RUR 10).
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).	Employment development in the Local Plan refers to development in classes B1, B2 and B8 of the use class order.
A policy is required to reflect existing employment areas within settlement boundaries.	LPS Policy EG 3 considers existing and allocated employment sites.
The plan must ensure that emerging technologies (such as energy storage and other battery) are not restricted but should be encouraged.	The Revised Publication Draft SADPD includes Policy ENV 11 ‘Battery energy storage systems’.
Alsager has fulfilled its employment land obligations and should not provide additional employment land.	A settlement report has been prepared for Alsager [ED 23] which sets out the approach to employment land requirements in the town.

Policy should support major inward investment in key sectors of the knowledge economy and support expansion of major employers in the borough.	Revised Publication Draft SADPD Policy EMP 1 'Strategic employment areas defines strategic employment areas and notes that proposals for further investment for employment uses in these areas will be supported..
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.	A settlement report has been prepared for Handforth [ED 31] which sets out the approach to employment land requirements in the town.
The Council should apply flexibility to the employment land requirement in Crewe of 65 hectares and seek to identify more land.	The employment land requirement identified in LPS Policy PG 1 'Overall development strategy' already includes a 20% flexibility factor, as set out in the Alignment of Economic, Employment and Housing Strategy (¶¶3.55 to 3.58). There is no need to add a further flexibility factor for employment land at the settlement level.

Question 16: Housing

Do you think these are the relevant housing issues for the SADPD to address?

Summary of main issues raised:	How the main issues have been taken into account
Delivery of 36,000 homes is a challenge – the SADPD should encourage smaller housebuilders through the allocation of smaller sites;	<p>Policy HOU 13 'housing delivery' of the revised publication draft SADPD includes steps to support the delivery of housing sites in the borough. This includes policy support for the sub-division of large sites where this could help to speed up the delivery of homes and does not conflict with the sites comprehensive planning and delivery.</p> <p>Policy HOU 14 'small and medium sized sites' of the revised publication draft of the SADPD notes the particular benefits of providing well-designed new homes on small and medium-sized sites, up to 30 homes, which will be given positive weight in determining planning applications.</p>
Due consideration should be given through the planning application process to ensure a housing mix and to promote good design;	Policy HOU 1 'housing mix' of the revised publication draft of the SADPD sets out the proposed policy approach to ensure detailed planning applications / applications at reserved matters stage consider

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	the approach to the mix of house types, through the preparation of a housing mix statement using evidence included in the Cheshire East Residential Mix Assessment report [ED 49] as a starting point.
SADPD Issues Paper fails to recognise and include other types of market housing such as care homes, assisted living or elderly persons accommodation;	Policy HOU 2 'specialist housing provision' of the revised publication draft of the SADPD includes the proposed policy approach to specialist housing, including housing for older people, in the borough.
Goostrey needs be closely considered in relation to its proximity to Jodrell Bank, recent planning application refusals, sustainability and subsequent LSC categorisation;	The provision of housing land and employment land and the approach to spatial distribution [ED 05] report has considered the need for additional allocations in the revised publication draft SADPD. Policy PG 8 sets out that local service centres are indicatively to provide in the order of 7ha of employment land and 3,500 new homes. It is expected that the housing element will be addressed by windfall going forward, in line with other policies in the Local Plan, and the employment element will include an allocation at Homes Chapel (Site HCH 1 'Land east of London Road') as well as windfall in line with other policies in the Local Plan.
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;	The issue of housing land supply flexibility has been considered in the 'provision of housing and employment land and the approach to spatial distribution' [ED 05] report.
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; Whilst the Inspector has concluded that a 5 year supply can be achieved (as at 31 st March 2016) this will need to updated annually in line with the NPPF; 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	The Council has separately produced its housing land monitor. The most recent Cheshire East Housing Monitoring Update (HMU) provides a comprehensive review of housing delivery and supply across Cheshire East to a base date of the 31 March 2019. The 2019 HMU indicates a housing land supply figure of 7.5 years. The findings of the HMU have been subject to recent consideration in the recovered appeal 'Land off Audlem Road/ Broad Lane, Stapeley, Nantwich'5. In his decision letter dated the 15th July 2020, the Secretary of State confirmed that the council can demonstrate a deliverable housing land supply in excess of 5 years. The annual five year housing land supply assessment will be updated to a 31 March

<p>it was stated that applications should now have been received) have not taken place;</p>	<p>2020 base date in due course.</p> <p>Confirmation of the existence of 5 year housing land supply is not sought through the examination of the SADPD.</p> <p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the 'provision of housing and employment land and the approach to spatial distribution' [ED 05] report.</p>
<p>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;</p>	<p>The Council has set out its approach to small sites in evidence document [ED 58] alongside the revised publication draft SADPD.</p>
<p>Request that Land East of Hilbre Bank, Alraham is considered for an allocation and Land off Nantwich Road, Alraham is included as a residential / community facility allocation;</p>	<p>The Council has produced a report that details its approach to sites in the other settlements and rural areas tier of the settlement hierarchy [ED 46]. No allocations in the other settlements and rural areas tier of the settlement hierarchy are proposed in the revised publication draft SADPD.</p>
<p>Housing density must be robustly evidenced, respond to local circumstances, and must include a degree of flexibility to respond to the needs of the market;</p>	<p>Policy HOU 12 'housing density' of the revised publication draft SADPD sets out that residential development proposals will be expected to achieve a net density of 30 dwellings per hectare. The policy includes a number of factors that will be considered in determining an appropriate density.</p>
<p>Approach to optional technical standards including space standards needs to be justified and flexible to future changes</p>	<p>The Council has set out its approach to optional technical standards including space standards in policy HOU 6 'accessibility, space and wheelchair housing standards'. Related evidence documents include the Residential Mix Assessment [ED 49] and Nationally Described Space Standards [ED 57] evidence based reports.</p>
<p>Support self build and custom build but should be encouraged on smaller sites and should not be imposed on larger housebuilders;</p>	<p>Policy HOU 3 'self and custom build dwellings' in the revised publication draft SADPD supports self build and custom build housing in suitable locations.</p>
<p>The SADPD should focus on sites between 10 and 50 units to help rebalance the size of housebuilders active in Cheshire East;</p>	<p>Policy HOU 14 'small and medium-sized sites' in the revised publication draft SADPD notes the particular benefits of homes on</p>

	small and medium sized sites of up to 30 homes.
Significant fines should be imposed where start and completion dates (as agreed with the LPA) are not met;	Policy HOU 13 'housing delivery' in the revised publication draft SADPD notes how the Council will work closely with key partners, developers and landowners to expedite the delivery of housing and maintain at least a five year supply of housing. Policy HOU 13 'housing delivery' includes a number of measures, including the sub-division of sites where appropriate and modern methods of construction to support this overall aim. It is not considered appropriate nor justified for the SADPD to consider fines when start and completion dates are not met.
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; Representations for a site at Macclesfield Road (Eaton Cottage) for 55 dwellings;	The revised publication draft SADPD is supported by a specific settlement report for Congleton (ref ED 27) which notes that taking into account existing completions, commitments and strategic allocations in the Local Plan Strategy that no housing allocations are proposed for Congleton in the revised publication draft SADPD.
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	The revised publication draft SADPD is supported by a detailed site selection methodology including the appropriate consideration of Green Belt matters [ED 07]
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;	The revised publication draft SADPD includes policy HOU 13 'housing delivery'. This policy supports the use of initiatives including masterplans, the sub-division of large sites (where appropriate), modern methods of construction, alongside other initiatives, to support the delivery of housing in the borough.
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;	The revised publication draft SADPD is supported by a detailed site selection methodology [ED 07]. The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report.
Clear need for future allocations to be made in Holmes Chapel;	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05]

	report. A settlement report has also been produced for Holmes Chapel [ED 33].
Due regard must be given to viability issues when preparing the evidence base to support Policy SC4 (Residential Mix);	The revised publication draft SADPD is supported by a viability assessment (ref ED 52 'Local Plan SADPD Viability Assessment').
Policy should be included in the SADPD that better manages the issue of 'Garden Grabbing';	The revised publication draft SADPD includes policy HOU 8 'Backland Development' to consider the issue of tandem or backland housing development in the borough.
Former local plan policies (Crewe & Nantwich) policies should continue to be utilised, strengthening the preservation of open countryside and settlement boundaries;	Once adopted, the policy provisions included in the SADPD (alongside the LPS) will replace policies in the Crewe and Nantwich Local Plan
Gypsy and Traveller accommodation should be identified in line with the Government guidance from 2015;	The Gypsy and Traveller Accommodation Assessment has been updated to take account of changes in national planning guidance issued in 2015. The 2018 Gypsy and Traveller Accommodation Assessment [ED 13] has informed the revised publication draft SADPD.
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;	Additional evidence has been collected on residential mix (ref ED 49) and has informed policy HOU 1 'Housing Mix' in the revised publication draft SADPD.
Higher densities on urban land should be promoted to ensure more houses but on less land;	Policy HOU 12 'housing density' in the revised publication draft SADPD notes how development proposals will be expected to achieve a higher density in the settlement boundaries of Principal Towns, Key and Local Service Centres, subject a number of other considerations set out in the policy.
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;	The LPS includes policy SC 6 'rural exceptions housing for local needs' that considers the matter of rural exception sites for affordable housing in the rural areas.
Allocations in LSCs need to have due regard to commitments and completions as well wider size and function during this process;	Individual settlement reports have been prepared for each LSC. The settlement reports have considered the position of commitments / completions as at the 31 March 2020. The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the 'provision of housing and employment land and the approach to

	spatial distribution' [ED 05] report.
Policy detail in relation to HMOs needs to be clarified;	Policy HOU 4 'houses in multiple occupation' has been included in the revised publication draft SADPD to provide more detail on this matter.
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	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the 'provision of housing and employment land and the approach to spatial distribution' [ED 05] report. The application of the Council's site selection methodology [ED 07] through individual settlement reports has considered the suitability, achievability and availability of sites (where necessary) in line with national planning guidance.
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;	The revised publication draft SADPD including policy HOU 13 'housing delivery' considers an approach to expedite the delivery of housing in the borough.
Prestbury's Village Design Statement sets the format for an appropriate approach to density.	The revised publication draft SADPD includes policy HOU 12 'housing density' that considers the approach to achieving appropriate housing densities across the borough taking account of a number of appropriate factors..

Question 17: Town centres and retail development

Do you think that these are the issues that the SADPD should look to address regarding town centres and retail development?

Summary of main issues raised:	How the main issues have been taken into account
Should be looking to consolidate central parts of retail areas but should be giving serious consideration to turning over failing peripheral retail areas	For Principal Towns and Key Service Centres, the revised publication draft SADPD has included the identification of Primary Shopping Areas, where retail development is concentrated. Policies including RET 7 'supporting the vitality of town and retail centres' sets out a clear policy approach to the primary shopping areas, whilst also supporting main town centre uses to support the long term vitality and

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	viability of town centre locations.
Need to take account of changing nature of retail (internet shopping)	The policy approach set out the revised publication draft SADPD has taken account of the changing nature of retail and town centres across the borough. It has been informed by various studies including the Retail Study and associated update documents (2016 & 2018 & 2020 respectively).
Car parking is an issue	Revised publication draft policy INF 2 'public car parks' seeks to retain existing public car parks and sets out the circumstances whereby development proposals involving the loss of public car parking spaces will be justified.
Good mix of day / night time economy required	LPS policy EG 5 'promoting a town centre first approach to retail and commerce' (point 6) supports proposals for the evening and night time economy in Principal Towns and Key Service Centres, where the negative impacts on amenity are addressed.
<p>No current need for out of town shopping.</p> <p>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.</p>	<p>Policy RET 2 'planning for retail needs' in the revised publication draft SADPD notes that retail convenience and comparison floorspace needs arising in the borough over the period 2018-2030 will be met principally through the delivery of sites allocated in the LPS that include an element of retailing to meet local needs, further retail development in Crewe and Macclesfield, on sites in town centre location and the delivery of allocated site LPS 47 'Snow Hill, Nantwich'.</p> <p>In addition, the revised publication draft SADPD has set out further policy guidance on the approach to the sequential and impact retail tests (RET 3 'sequential and impact tests').</p>
Pedestrianised / shared spaces and highways infrastructure provision are important	Policy RET 9 'environmental improvements, public realm and design in town centres' builds on LPS policy SE 1 'design' and sets out a number of considerations for development proposals in town centres – including high quality public realm and supporting ease of movement in town centre environments.
Need policies to control the effect of entertainment services on town	Policy ENV 15 'New development and existing uses' in the revised

centre living	publication draft SADPD notes how proposals for new residential uses in town centre environments should be effectively integrated with existing business and community facilities in line with the agent of change principle.
Need to protect the vitality and viability of Crewe Town Centre 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	Policy RET 10 'Crewe Town Centre' in the revised publication draft SADPD includes a number of development areas to support the viability and vitality of the town centre. Point 6 (iii) provides an appropriate cross reference to RET 8 'residential accommodation in the town centre'.
Local shopping centres perform an important function, and where viable should be protected from inappropriate development	The revised publication draft SADPD has identified a number of local centres, local urban centres and neighbourhood parades of shops (in policy RET 1) and set out an appropriate policy approach in the SADPD.
Need to clearly identify town centre boundaries, primary shopping areas and retail frontages	The revised publication draft SADPD has identified town centre and primary shopping area boundaries for principal town centres and town centres. Primary and secondary retail frontages have been used in settlement reports (for principal towns and key service centres) as evidence to support the identification of town centre and primary shopping area boundaries. Primary and secondary retail frontages are not identified on the SADPD policies map nor in retail policies included in the SADPD.
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	The Macclesfield Settlement Report [ED 35] sets out the approach and evidence for defining an appropriate town centre and primary shopping area boundary. In addition, policy RET 11 'Macclesfield Town Centre and environs' sets out a policy approach to identified character areas in the town centre and its immediate environs.
Encourage 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.	The revised publication draft SADPD includes policies GEN 3 'advertisements' and RET 4 'shop fronts and security' in relation to advertisements. Policy RET 9 'environmental improvements, public

	realm and design in town centres' supports the use of a consistent style of signage and avoiding clutter in the town centre.
National planning policy, through paragraph 26 of the NPPF, notes that an impact assessment 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.	Policy RET 3 'sequential and impact tests' in the revised publication draft SADPD sets out the approach and impact test thresholds for principal town centres, town centres and local centres.
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.	Main town centre uses as defined in the revised publication draft SADPD includes certain sport, leisure and recreation uses.
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.	The revised publication draft SADPD includes policy HER 3 'conservation areas'. This sets out the factors that proposals within or affecting the setting of a conservation area should address. Policies RET 5 'restaurants, cafes, pubs and hot food takeaways' considers the factors that such proposals will be considered against. This includes specific planning policy requirements for hot foot takeaways within 400 metres of a secondary school.
Provision of retail in villages should be market-driven not developer-driven	The revised publication draft SADPD has, following a review of the relevant factors, identified local centres and neighbourhood parades of shops and provided an appropriate policy approach to those areas to support important local community retail facilities (read alongside policy REC 5 'community facilities') in the revised publication draft SADPD.
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.	Policies RET 5 'restaurants, cafés, pubs and hot food takeaways' considers the factors that such proposals will be considered against. This includes specific policy requirements for hot foot takeaways within 400 metres of a secondary school.
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	The revised publication draft SADPD is supported by a proposed monitoring framework [ED 54] which monitors the effectiveness of policies included in the revised publication draft SADPD.

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.	Individual settlement reports prepared to support the revised publication draft SADPD include a section on retail matters. This assessment has included the consideration of qualitative & quantitative factors and has been informed by proportionate retail evidence.
Specific consideration should be given to how best to accommodate main town centre uses proximate to such areas of planned residential expansion.	Policy ENV 15 of the revised publication draft SADPD 'New development and existing uses' considers the 'agent of change' principle.
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	LPS policy EG 5 'promoting a town centre first approach to retail and commerce in point 2 notes how town centres will be promoted as the primary location for main town centre uses including leisure development.
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	Policy RET 7 'supporting the vitality of town and retail centres' supports the primary shopping area locations as the focus for where retail uses are concentrated.
Policies relating to matters including advertisements, amusement centres, shop fronts and security, living above shops	The retail section of the revised publication draft SADPD includes a number of policies in relation to such matters, including RET 8 'residential accommodation in the town centre', RET 5 'restaurants, cafes, pubs and hot food takeaways' and RET 4 'shop fronts and security' amongst other policies
Whether policies are required on town centre environmental improvements	Policy RET 9 'environmental improvements, public realm and design in town centres' considers a number of design principles for town centre based proposals to consider.
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.	The 2016 retail study is just one of a number of related evidenced based documents which have informed the approach set out in the SADPD. These are set out in Appendix A of the revised publication draft SADPD. Updates to the Council's retail evidence has been undertaken in 2018, 2020 and in settlement reports to support the proposed policy approach in the revised publication draft SADPD.
The 'Cheshire Retail Study' demonstrates a significant need for	Policy RET 2 'planning for retail needs' in the revised publication draft

<p>additional retail floorspace is in Knutsford given the level of growth in available expenditure and evidence of significant overtrading in existing facilities.</p>	<p>SADPD notes that retail convenience and comparison floorspace need arising in the borough over the period 2018-2030 will be met principally through the delivery of sites allocated in the LPS that include an element of retailing to meet local needs, further retail development in Crewe and Macclesfield, on sites in town centre location and the delivery of allocated site LPS 47 'Snow Hill, Nantwich'.</p>
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Question 18: Transport and infrastructure

Are these the transport and infrastructure issues that the SADPD should address?

Summary of main issues raised:	How the main issues have been taken into account
<p>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.</p>	<p>The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. A vision and set of policies addressing HS2 cannot be included in the SADPD. They would be strategic policies that departed from the LPS and fall outside the scope of the SADPD. The council is preparing a separate Crewe Hub Area Action Plan which is setting a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This is subject to its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.</p>
<p>Secure cycle parking should be installed at all railway stations to encourage people to cycle to stations and use public transport.</p>	<p>This is encouraged already through LPS policy CO 1 (Sustainable Transport and Travel). Its clause 3 ii. expects the provision of secure parking facilities at new developments, at transport hubs, at town centres and at community facilities. The priority that should be given to cycling in designing new development is also picked up in a number of policies in the SADPD including policy GEN 1 (Design principles) and policy INF 1 (Cycleways, bridleways and footpaths).</p>
<p>More investment is required in improving the public realm to</p>	<p>This objective is reflected in policy GEN 1 (Design principles) and</p>

encourage walking particularly over short distances.	policy INF 1 (Cycleways, bridleways and footpaths).
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.	This is addressed in SADPD policy INF 8 (Telecommunications infrastructure) states that all new properties (residential and non-residential) should be developed with fibre to the premises enabling them to have a superfast broadband network connection.
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.	These are general points about the maintenance and management of roads and the road system which, although there are some linkages, do not directly fall within the scope of Local Plan policies.
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.	A by-pass for Holmes Chapel would be a new, strategic piece of infrastructure and is not included in the Local Plan Strategy or the Infrastructure Delivery Plan that accompanies the Local Plan. As such it falls outside the scope of the SADPD. A single allocation is proposed at Holmes Chapel in the SADPD - site HCH 1 Land east of London Road, for employment development. The site policy includes a number of requirements including the provision of new infrastructure. No housing site allocations are proposed at the village in the SADPD and the sites that have been completed and committed will have had to address their own infrastructure impacts, including appropriate contributions towards providing additional school places.
Detailed assessment of future rather than current infrastructure needs is required otherwise transport networks will become quickly overwhelmed after development has taken place.	This is addressed through the LPS. The LPS process included an assessment of the need for infrastructure investment (including roads) throughout the Plan period related to the overall scale, type and location of development promoted in the Plan. These infrastructure requirements are set out in a published Infrastructure Delivery Plan Update July 2016, available in the Local Plan Strategy library [reference PC B033]
Infrastructure should include local access to community hub facilities for the older population and access to health services for an increasing population.	This is addressed through the LPS, namely policies IN 1 (Infrastructure) and IN 2 (Developer Contributions). Together these require the provision of necessary infrastructure arising from development schemes, including improved social and community

	<p>facilities, as appropriate. SADPD policy REC 5 (Community Facilities) supports the retention, provision and improvement of community facilities.</p>
<p>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.</p>	<p>This is addressed through the LPS. The LPS process included an assessment of the need for infrastructure investment (including roads) throughout the Plan period related to the overall scale, type and location of development promoted in the Plan. These infrastructure requirements are set out in a published Infrastructure Delivery Plan Update July 2016, available in the Local Plan Strategy library [reference PC B033]</p> <p>Where additional sites have been allocated, when development proposals are considered for them, they will be subject to a number of policies in the LPS and SADPD that require contributions towards a range of different infrastructure e.g. transport, education, health, etc. Where necessary these are reflected in the policies that allocate individual sites. These are intended to ensure that developers fully address the impact of their development schemes in terms of its infrastructure demands.</p>
<p>There should be an infrastructure investment plan to remedy existing capacity problems and provide for any further development.</p>	<p>Please see response above.</p>
<p>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.</p>	<p>No new development is proposed at Goostrey through the SADPD. Any planning application proposals will be subject to a number of policies in the LPS and SADPD that require contributions towards a range of different infrastructure e.g. transport, education, health, etc.</p>
<p>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.</p>	<p>No new development is proposed at Knutsford through the SADPD. Any planning application proposals will be subject to a number of policies in the LPS and SADPD that require contributions towards a range of different infrastructure e.g. transport, education, health, etc.</p>

<p>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.</p>	<p>The promotion of walking and cycling including the provision of appropriate routes and facilities are set out in the LPS through a number of its policies including policy CO 1 (Sustainable Travel and Transport), CO 2 Enabling Business Growth Through Transport Infrastructure) and CO 4 (Travel Plans and Transport Assessments). The importance and priority that should be given to cycling in designing new development is also picked up in a number of policies in the SADPD including policy GEN 1 (Design principles) and policy INF 1 (Cycleways, bridleways and footpaths).</p>
<p>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 be recognition of the importance of Assets of Community Value, how they are identified, registered and maintained.</p>	<p>The Revised Publication Draft SADPD does not allocate any sites for housing in LSCs. The inclusion of a nominated asset on the list of Assets of Community Value (ACV) by a local authority is separate the local plan process. The ACV listing process is subject to its own statutory set of rules and is noted in paragraph 11.17 of the SADPD as part of the supporting information accompanying policy REC 5 (Community facilities).</p>
<p>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.</p>	<p>In terms of the first sentence, this general objective is supported already through LPS policy SE 6 (Green Infrastructure), clause 4 viii of which promotes linkages between new development and surrounding recreational networks, communities and facilities. SADPD policy INF 10 (Cycleways, bridleways and footpaths) directly supports this objective. In addition, Clause 10 of SADPD policy GEN 1 (Design principles) says that development should maintain or improve access, connectivity and permeability in and through developments sites and the wider area including to local services and facilities, particularly for walking and cycling routes. The matter of speed limits falls outside the scope of local plan policy.</p>
<p>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.</p>	<p>This is addressed in SADPD policy RET 10 (Crewe town centre). Clause 4, Southern Gateway Development Area, highlights the need for development proposals to provide for new and improved pedestrian and cycle connectivity through this important area situated between</p>

	the rail station and town centre.
Infrastructure provision should include appropriate facilities for Higher Education in Crewe whether on the MMU campus or elsewhere.	There are no additional housing development sites proposed at Crewe in the SADPD so no additional education infrastructure issues arise in relation to it.
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.	<p>The general point about the timing of infrastructure is agreed although this may not always be practically possible. Timing will depend upon the particular circumstances of the development and the infrastructure involved. The issue is addressed, although only in part, through Revised Publication Draft SADPD policy GEN 4 (Recovery of forward-funded infrastructure costs). This policy seeks to enable infrastructure to be forward funded and delivered by the council or other provider ahead of new development with the confidence that subsequent developer contributions will be made towards it where their schemes rely on it.</p> <p>The priority to be given to pedestrians and cyclists in the design of new development is already addressed in clause 1ii of LPS policy CO 1 (Sustainable Travel and Transport). The SADPD adds further detail. Policy INF 10 (Cycleways, bridleways and footpaths) directly supports this prioritisation. In addition, Clause 10 of SADPD policy GEN 1 (Design principles) says that development should maintain or improve access, connectivity and permeability in and through developments sites and the wider area including to local services and facilities, particularly for walking and cycling routes. Car parking standards have already been set through the LPS – see its Appendix C.</p>
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.	Planning policies cannot address all existing problems associated with car parking around schools. LPS Policy CO 1 (Sustainable Transport and Travel) already seek to prioritise pedestrians and cyclists in the design of new development and seek measures that introduce safe routes to schools.
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	The improvement of sports facilities achieved through the implementation of Local Plan policies may support this. SADPD Policies REC 1, REC 2 and REC 3 provide further policy detail to

increasingly towards prevention, we need the right infrastructure to support future health spending.	protect and enhance green space and sports provision.
Consideration should be given to roadside services (including Motorway Service Areas) and associated commercial development.	No specific need has been identified for additional roadside services including Motorway Service Areas warranting additional planning policies.
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.	This has been addressed through ongoing discussions with Sport England in the development of the SADPD. Where particular allocations involve the use of playing field land, the compensatory measures by way of re-provision or other investment has been identified and agreed with Sport England.
It is essential that existing roads and drainage are adequately maintained.	The maintenance of existing roads and drainage falls outside the scope of planning policy.
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.	This is already addressed, in part, in clause 2 v in LPS policy CO 1 (Sustainable Transport and Travel) which expects development to support work to improve canal towpaths where they can provide key linkages between development and local facilities. Further detailed policy protection to public rights of ways and permissive paths (such as canal towpaths) is identified in SADPD policy INF 1 (Cycleways, bridleways and footpaths). In addition SADPD policy INF 10 deals with development proposals adjacent to the borough's canals and requires proposals to safeguard and, where possible, enhance public access to, and the recreational use of, the canal corridor.
Car parking areas should be identified in a pro-active way to meet car parking needs in line with expected growth.	This is addressed through the Local Plan Strategy, specifically its Appendix C sets out the car parking requirements for new development. SADPD policy INF 2 (Public car parks) seeks to retain public car parks unless they are replaced nearby, are surplus to needs or their loss can be adequately mitigated through other measures. SADPD policy RET 10 (Crewe town centre) requires the provision of a new multi-storey car park available to all town centre visitors as part of the proposed leisure-led, mixed use Royal Arcade scheme
Greater emphasis should be afforded to the known health problems associated with air pollution caused by an ever-increasing number of	LPS policy SE 12 (Pollution, Land Contamination and Land Instability) already addresses this issue. It seeks to prevent development where it

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vehicles on local roads and on the M6 motorway.	would be subject to unacceptable levels of air pollution.
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	These wide ranging list of points are addressed in various policies within the LPS and also the SADPD. Consideration has also been given to most of these issues in assessing the suitability of candidate sites for allocation in the SADPD, as evidenced in the various settlement reports. No further site allocations are proposed at Wrenbury in the SADPD.
The rail station at Radway Green and Barthomley should be re-opened for commuters.	This does not feature in the LPS or the Infrastructure Delivery Plan Update (2016) that was published alongside the LPS. It also doesn't feature as a proposal in the council's Local Transport Plan or the Cheshire and Warrington LEP Transport Strategy. As such a planning policy seeking its re-opening would not be justified.
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.	This would be a strategic matter falling outside the scope of the SADPD.
The importance of transport and infrastructure for the Poynton area should be recognised and given priority.	The Local Plan recognises the importance of transport and infrastructure across all parts of the borough. It is not considered necessary to protect the land required to deliver the Poynton Relief Road in SADPD policy INF 6 (Protection of existing and proposed infrastructure) due to the advanced stage of the scheme towards construction.
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.	This is reflected in policy INF 6 (Protection of existing and proposed infrastructure) which seeks to safeguarded land considered necessary to deliver this scheme.
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.	These matters relate to the strategic policies of the LPS and fall outside the scope of the SADPD.

Population figures support the need for increased cremation and burial sites and increased provision at cemeteries and crematoria.	Proposals for new or expanded crematoria or cemeteries would be assessed in the usual manner, considering all relevant policies in the development plan.
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Question 19: Recreation and community facilities

Do you agree that these are the issues that the SADPD should address regarding recreation and community facilities?

Summary of main issues raised:	How the main issues have been taken into account
Development management policy needed to support Policy SC3 in relation to community facilities and their provision and protection.	Policy REC 2 in the revised publication draft SADPD [ED 01] will assist this in requiring contributions towards community and recreation facilities. Policy REC 5 'community facilities' looks to support community facilities that make a positive contribution to the social or cultural life of a community.
Need for community facilities to meet the needs of elderly people.	As above
Policies required covering the full range of infrastructure – community facilities, convalescent homes, medical facilities, allotments, parks etc.	LPS policies require the provision of infrastructure and policies in the revised publication draft SADPD build upon them e.g. REC 3 Green Space Implementation and REC 5 'community facilities'.
Agree with issues raised in consultation paper.	Support noted
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.	Paragraph 99 of the NPPF (February 2019) discusses the designation of land as local green space through local and neighbourhood plans. The Green Space Strategy [ED 18] provides background information regarding green spaces. Green spaces are shown on the policies map [ED 02]. See also Paragraph 11.3 to policy REC 1 'green/open space protection' in the revised publication draft SADPD [ED 01].
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.	Policies REC 1 Green/open space protection and REC 3 'Green Space Implementation' in the revised publication draft SADPD [ED 01] assist green space protection and maintenance.

<p>Local Green Space and Open Space designations should be done by Neighbourhood Plans rather than CEC but should be shown in the SADPD.</p>	<p>Paragraph 99 of the NPPF (February 2019) discusses the designation of land as local green space through local and neighbourhood plans. The Green Space Strategy [ED 18] provides background information regarding green spaces. Green spaces are shown on the policies map [ED 02]. See also Paragraph 11.3 to policy REC 1 'green/open space protection' in the revised publication draft SADPD [ED 01].</p>
<p>Important to take account of Neighbourhood Plans.</p>	<p>Made Neighbourhood Plans are part of the Development Plan. In relation to green space they are referenced in the Green Space Strategy [ED 18].</p>
<p>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.</p>	<p>LPS policies address some of these issues and environment and recreation policies in the revised publication draft SADPD [ED 01] build upon the strategic policies. Green spaces are shown on the policies map [ED 02]. ENV 1 and ENV 2 deal with ecology in the revised publication draft SADPD [ED 01] and build on the strategic context set by policies included in the LPS.</p>
<p>Clarification required regarding outdoor sports provision and developer contributions.</p>	<p>Policy REC 3 'green space implementation' in the revised publication draft SADPD [ED 01] builds upon LPS Policy SC2 'indoor and outdoor sports facilities' by providing clarification around contributions for outdoor sport.</p>
<p>More detail regarding open space calculations for play areas etc. so that developers can proactively plan for their inclusion within development proposals.</p>	<p>Policy REC 3 'green space implementation' in the revised publication draft SADPD [ED 01] builds upon LPS Policy SE 6 'green infrastructure' in terms of green space provision. Additional information is provided in the Green Space Strategy [ED 18].</p>
<p>Shared use of school sites should be encouraged and facilities improved through contributions.</p>	<p>Noted</p>
<p>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.</p>	<p>School playing fields are part of the green spaces network – protection under policy REC 1 'green/open space protection' in the revised publication draft SADPD [ED 01]. Background information is included in the Green Space Strategy [ED 18].</p>
<p>The Local Plan must ensure that adequate informal and formal green spaces are provided in the future to enable recreation and community</p>	<p>LPS policies address some of these issues and environment and recreation policies in the revised publication draft SADPD [ED 01] build</p>

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.	upon the strategic policies established in the LPS. Green spaces are shown on the Policies Map [ED 02].
Need for liaison with other bodies such as Canals and River Trust, National Trust etc. to ensure consistent policies.	Liaison carried out as part of consultation process. Comments have been taken on board in the development of the revised publication draft SADPD.
Canal infrastructure important green infrastructure asset for health and recreation	Policy INF 10 'canals and mooring facilities' in the revised publication draft SADPD [ED 01] addresses a number of these points.
Protection of urban green space important – need for local bodies (e.g. Crewe TC) to be involved in the designation process.	Town and parish councils have been involved in Development Plan process as evidenced in table 1 of this consultation report.
Importance of protection and enhancement of green space for health and recreation.	This aspect is discussed in the Green Space Strategy [ED 18].
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.	On-site recreational facilities are encouraged on site as part of the Development Management process. This aspect is also discussed in the Green Space Strategy [ED 18].
Issue of public access to private land through development allocations (Bollin Valley site given as an example).	Noted – provision of publically accessible open space can be obtained through development allocations. Examples of this can be found in the revised publication draft SADPD [ED 01].
Use of open space designation in association with development to protect important areas/approaches to settlements.	Noted – all aspects of green space are discussed in the Green Space Strategy [ED 18].
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).	Support noted. New and updated Playing Pitch Strategy [ED 19 & 19a]
Highlight the need to consider green infrastructure in the wider sense, and the important recreational/community function it performs.	LPS Policy SE 6 Green Infrastructure is the broad ranging strategic policy. Environment and Recreation policies in the revised publication draft SADPD [ED 01] build upon SE6 in the LPS.
Green infrastructure network should be looked at the SADPD level with input from Neighbourhood Plans. The green infrastructure	As above. Green spaces and ecological network shown on policies map [ED 02].

network should look at a range of functions and be designed to deliver these functions. (Natural England)	
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).	Site discussed in Playing Pitch Strategy document [ED 19 & 19a]
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.	Range of evidence base: Green Space Strategy [ED 18], Playing Pitch Strategy [ED 19 & 19a] and Indoor Built Facilities Strategy [ED 20 & 20a] has been prepared to support the revised publication draft SADPD.
It is important that community facilities for recreation etc. grow commensurate with development to accommodate increasing populations.	Policy REC 2 in the revised publication draft SADPD [ED 01] will assist this in requiring contributions towards community and recreation facilities.
Alternative use of facilities should be considered if no longer required.	Noted – LPS Policy SC 2 ‘indoor and outdoor sport facilities’ and REC 1 ‘green/open space protection’ consider this issue and provide guidance in line with the NPPF
Policies required to protect Nantwich’s existing strategic green spaces, new open space and promote development of cycleway and footpath network.	LPS Policy SE 6 ‘green infrastructure’ is the strategic policy for this issue. Further environment, infrastructure and recreation related policies are included in the revised publication draft SADPD [ED 01] to build upon LPS policy SE 6 ‘green infrastructure’.
Details provided regarding Sandbach’s requirements - e.g. extra swimming capacity needed. Support joint working – PCs/TCs and CEC.	Information noted and used in evidence base updates. The publication draft SADPD [ED 01] has been informed by engagement with Town and Parish Council’s, as set out in table 1 of this consultation report.
Existing areas of open space should not be sold for housing.	Policy REC 1 ‘green/open space protection’ in the revised publication draft SADPD [ED 01] assists green space protection.
Open space assessments important and protection of urban space – important shown on proposal’s map. (Poynton PC – detail regarding various sites)	Policy REC 1 Green/open space protection in the revised publication draft SADPD [ED 01] assists green space protection. Green spaces are shown on the policies map [ED 02].
Cheshire East Local Access forum request involvement in the further development of policies in relation to SC2 and SE6.	Consultation with relevant bodies carried out in policy development including consultation on the first draft SADPD in September / October 2018 and on the initial publication draft 2019. Policy INF 1 cycleways,

	bridleways and footpaths is one policy of relevance to the Forum (consultation draft SADPD mentioned in Forum's 2018-2019 Annual Report).(Organisation now Cheshire East Countryside Access Forum – Local Plan not mentioned in Summary 2019/2020 report)
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.	Green spaces are shown on the policies map [ED 02]. This shows the distribution of green space facilities across the Borough. There are a variety of policies in LPS and the revised publication draft SADPD which aim to protect, improve and provide new facilities. Some of the main facilities across the Borough are discussed in the Green Space Strategy [ED 18].
Cross boundary issues – CEC and CWAC and shared facilities (example of proposed housing site in Middlewich given).	Cross boundary issues discussed in SADPD Duty to Co-operate Statement of Common Ground [ED 51]
Consider the release of green belt to meet the needs of the community in terms of community infrastructure.	LPS Policy SD 1 'Sustainable development in Cheshire East' requires development to, wherever possible, provide appropriate infrastructure to meet the needs of the local community, including community facilities. LPS Policy EG 2 'Rural economy' seeks to support the rural economy and promotes the retention and delivery of community services such as shops, public houses and village halls. Policy REC 5 'community facilities' sets out further policy considerations relating to 'community facilities', requiring accordance with other policies in the development plan.

Question 20: Policies map

Do you agree with the proposed approach to the Local Plan Policies Map?

Summary of main issues raised:	How the main issues have been taken into account
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.	A Policies Map [ED 02] has been prepared to support the revised publication draft SADPD. Paragraph(s) 1.17–1.21 of the revised publication draft SADPD sets out the approach to the Policies Map.
Policies Map should include the Inner and Outer Consultation zones	The Policies Map [ED 02] includes the Jodrell Bank Consultation Zone.

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from the Town and Country Planning (Jodrell Bank Direction) 1973	Paragraph 1.20 notes that this item is referred to, but not defined by the development plan; and it is shown on the map for information.
Listed Buildings and their settings	Listed buildings are recorded on the national heritage list for England maintained by Historic England.
Flood Zone 3 (High Risk), Footpaths and Bridleways	Environment agency flood zones are shown on the policies map. These are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position. Information on public rights of way and bridleways including their spatial extent can be found on the Council's website ³²
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.	The Policies Map shows neighbourhood areas with plans that have been passed at referendum, but it does not show the spatial extent of policies contained in neighbourhood plans.
Local and Strategic Green Gaps	Detailed boundaries of Strategic Green Gaps are shown on the Policies Map. Local Green Gaps are proposed to be defined by neighbourhood plans, in line with policy PG 14 'Local green gaps' where justified and necessary to do so.
'Blue corridors' to enable rivers to restore, re-naturalise and have space to meander	The Policies Map [ED 02] shows the policies contained in the adopted LPS and the draft policies in this publication draft SADPD. There is no spatial definition of a 'blue corridor' to show on the map.
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	Allocations proposed in the SADPD (alongside allocations in the LPS) are included on the Policies Map. Commitments and completions are not shown on the policies map but individual settlement reports have been prepared that provide detail on how commitments, as at the 31 March 2020, have informed the proposals in the revised publication draft SADPD, for example through the definition of settlement boundaries.

³² https://www.cheshireeast.gov.uk/leisure_culture_and_tourism/public_rights_of_way/the_definitive_map.aspx

local landscape designations following their review	Local landscape designations are shown on the Policies Map [ED 02].
Open countryside designation	Open countryside is shown on the Policies Map [ED 02]. The open countryside is defined as the area outside of any settlement with a defined settlement boundary, where LPS Policy PG 6 'Open countryside' will apply.
the Manchester Airport safeguarding zone	The Manchester Airport Operational Area is shown on the Policies Map [ED 02].
air quality management zones	Air quality management area maps can be viewed on the council's website ³³
infrastructure schemes (national and local)	Land required for proposed infrastructure associated with policy INF 6 of the revised publication draft SADPD is shown on the policies map.
sites from the Brownfield Register and Small Sites Register that have Permission in Principle	Information on the brownfield register can be found on the council's website ³⁴
waterways green/blue infrastructure (Canal and River Trust)	Canals and other assets are shown on the OS base of the policies map.
town centre boundaries, Primary Shopping Areas, primary and secondary shopping frontages	Town centre boundaries and primary shopping areas are shown on the Policies Map [ED 02]. Following changes to the NPPF, primary and secondary frontages are not included in the revised publication draft SADPD.
Sites of Biological Importance	Sites of biological importance / local wildlife sites are shown on the policies map. These are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.
Historic Landscapes, Parklands & Gardens	Registered parks and gardens are shown on the policies map. These are referred to, but not defined by the development plan. The spatial

³³ https://www.cheshireeast.gov.uk/environment/environmental_health/local_air_quality/aqma_area_maps.aspx

³⁴ https://www.cheshireeast.gov.uk/planning/spatial_planning/brownfield-register.aspx

	extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.
Manchester Airport noise contours	Manchester Airport average summer day (16 hour, 07:00-23:00) and night (8 hour, 23:00-07:00) noise contours are shown on the policies map. These are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.
Safeguarded Land	LPS and SADPD safeguarded land is included on the policies map [ED 02]
Settlement boundaries, allocations and designations are reasoned and justified and, appropriate when considered in the context of their wider surroundings.	Settlement boundaries are included on the policies map [ED 02].
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)	Impact Risk Zones are included on the Magic Map facility managed by Natural England. Ramsar sites, special protection areas, special areas of conservation and sites of special scientific interest are shown on the policies map. These are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.
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 brought 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	The Policies Map [ED 02] is prepared as a booklet to highlight the policy proposals of the revised publication draft SADPD. An interactive online version of the Policies Map has also been made available.

provide more detail for the certain settlements or areas where a number of different policies or site allocations are located close together.	
There should be a series of maps in order that all the parameters can be seen clearly. One map could become jumbled and confusing	
A draft policies map is prepared at the same time as the next consultation version of the SADPD.	Noted. The revised publication draft SADPD is supported by a Policies Map [ED 02]
Sport England particularly welcomes the inclusion of playing pitches.	Noted. Protected open space is included on the Policies Map [ED 02].
Any map(s) need to be clear and understandable	Noted.

Question 21: Monitoring indicators

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?

Summary of main issues raised:	How the main issues have been taken into account
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.	This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council's yearly Authority Monitoring Report (AMR). The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.
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. 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.	This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council's yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.

	A local plan review is a requirement of Regulation 10A of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017.
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.	This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54] and includes significant environmental effects of the plan. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council’s yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.
Suggested indicators: significant environmental effects of implementing the DPD ; Amount of new development in AONB/National Park/Heritage Coast and likely impact; Number of planning approvals generating 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; 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; Loss of Green Belt (settlement and Borough wide); Number of applications approved against PC recommendations; Number of applications approved against CEC planners or Committee recommendations (i.e. at Appeal); Air pollution and an on-going review of designated sites for air quality with published results; Complaints received; proportion and quantity of the full range of affordable housing tenures; Green Gap encroachment; active design principles; loss of greenspace; whether new development has conserved/enhanced key landscape characteristics or local vernacular building design; Quality of life; impacts of the plan on the historic environment.	This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council’s yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.
Annual if not half yearly housing completion figures are produced and	The Council publishes a yearly AMR to comply with Section 35 of the

<p>published on the 31st March and 31st September. Helpful if housing and other statistics were available on a 3 monthly and/or six monthly basis, particularly when fighting planning appeals.</p>	<p>Planning and Compulsory Purchase Act 2004 and Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In addition, National Planning Policy requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The Cheshire East Housing Monitoring Update provides a comprehensive review of housing delivery and supply across Cheshire East, and is published yearly.</p>
<p>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.</p>	<p>This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council's yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.</p>
<p>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.</p>	<p>This is considered through the publication of the yearly AMR.</p>
<p>Maintain a Brownfield Register and a record of annual completions on previously developed land.</p>	<p>A brownfield land register is published every year. The percentage of new and converted dwellings on PDL and the total amount of employment floorspace on PDL is monitored very year through AMR indicators SE1 and SE2 respectively.</p>
<p>A framework including an assessment of the sites suitability to deliver sustainable development, particularly those adjacent to LSC's.</p>	<p>The sites have been assessed through the individual settlement reports and have been subjected to Sustainability Appraisal [ED 03].</p>
<p>A clearer picture on timescales for monitoring and implementation in the SADPD.</p>	<p>This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council's yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.</p>

Question 22: Other issues

Are there any other issues that the SADPD should address?

Summary of main issues raised:	How the main issues have been taken into account
Submission of a number of sites for inclusion as allocations in the SADPD.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] and documented in the various settlement reports and the 'Other Settlements and Rural Areas Report' [ED 46].
Critical of the time taken to produce the local plan and consequential number of houses being built on greenfield rather than brownfield land.	As detailed in the Site Selection Methodology [ED 07], brownfield and non-Green Belt sites are prioritised under the iterative approach.
CEC Spatial Distribution Report (ref PS E035) is incorrect regarding the population of Goostrey which states it is much more than it is.	The Goostrey Settlement Report [ED 30] takes the latest 2018 mid-year population estimates into account.
SADPD should stress the need for development to meet the Building for Life Standards.	The supporting information to Revised Publication Draft SADPD Policy GEN 1 'Design principles' confirms that the council will use design assessment frameworks including Building for Life 12 (or as updated).
SADPD must support and where necessary flesh out the aspirations and principles for Central Crewe (Policy SL 1 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. A clear vision is needed for Crewe Station and surrounding area to capitalise on the benefit of the HS2 Hub.	The Revised Publication Draft SADPD includes policy RET 10 'Crewe town centre' which supports new residential development in the town centre. A separate Area Action Plan for Crewe Hub Station (and its surrounding areas) is in preparation.
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.	The Revised Publication Draft SADPD includes a number of criteria-based policies to guide development in rural areas, including Policy PG 10 'Infill villages' which defines boundaries within which limited infill development will be appropriate in a number of villages in the open countryside.
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.	Highways impacts are considered in accordance with the Site Selection Methodology [ED 07] and documented through the suite of settlement reports.

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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.	The Revised Publication Draft SADPD policies are written in a positive manner wherever possible, whilst being clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
SADPD should contain a robust policy dealing specifically with waterside development which maximises the potential that fronting a waterway can provide.	The Revised Publication Draft SADPD includes Policy INF 10 'Canals and mooring facilities' and ENV 4 'River corridors'.
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.	Upon adoption of the SADPD, all remaining saved policies in the Congleton Borough Local Plan; Borough of Crewe and Nantwich Local Plan; and the Macclesfield Local Plan will be deleted.
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 LPS Policy PG 7 expects the Other Settlements and Rural Areas to accommodate in the order of 2,950 new homes over the plan period. As set out in the Other Settlements and Rural Areas Report [ED 46], it is not proposed to make further site allocations in this tier of the settlement hierarchy.
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.	The LPS acknowledges (at ¶16.10) that the council will actively engage with the National Trust and other key partners, including neighbouring authorities.
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.	The Revised Publication Draft SADPD includes a number of policies that would be relevant to any proposals for roadside facilities. Highways England has not identified a need for any additional roadside facilities on the strategic road network during the plan period.
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.	The Revised Publication Draft SADPD includes Policy ENV 11 'Proposals for battery energy storage systems' which is a criteria based policy that adds detail to the LPS Policy SE 8 'Renewable and low carbon energy'.
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.	The SADPD has been prepared in accordance with the strategic policies of the LPS, including policy PG 1 'Overall development strategy' and the plan as a whole provides sufficient land to enable 36,000 net additional dwellings to be delivered during the plan period.

The southern parts of the borough are subject to most development pressure, 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.	The Community Infrastructure Levy Charging Schedule was considered through examination and adopted by the council from the 01 March 2019.
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.	The Revised Publication Draft SADPD takes into account the role that neighbourhood plans can play and their status as part of the statutory development plan. The introduction section confirms the council's support for neighbourhood planning.
Joint working with Cheshire West and Chester Council over development requirements of Middlewich and ongoing need to fulfil the Duty to Cooperate (Issue 10).	The SADPD Duty to Co-operate Statement of Common Ground [ED 51] documents joint working and Duty to Co-operate discussions.

Question 23: Gypsy and Traveller and Travelling Showpeople's accommodation

Do you agree with the approach set out towards identifying sites for Gypsy and Traveller and Travelling Showpeople's accommodation?

Summary of main issues raised:	How the main issues have been taken into account
Reference should be added to Jodrell Bank to the suitability matrix Priority given to brownfield sites	The site selection methodology & approach [ED 14] has been further refined since the consultation on the issues paper, so its approach is consistent with the site selection methodology for employment and other types of housing, in the revised publication draft SADPD [ED 07]. The assessment regarding Jodrell Bank is included as part of the assessment of landscape impact in the traffic light criteria. Brownfield sites are included as part of the traffic light assessment regarding a sites suitability.
Sports England should like to see Sport and Recreation sites included	'Protected open space' has been used as part of the approach to the

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within the Stage 2 suitability matrix	sifting and screening and sites – stage 2 ‘first site sift’ in the Gypsy and Traveller and Travelling Showpeople site selection report [ED 14]
The Gypsy and Traveller Accommodation Assessment should be updated in line with national policy requirements which have emerged since the assessment was prepared.	The Gypsy and Traveller Accommodation Assessment has been updated in line with national planning policy requirements (document reference ED 13).
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.	The site selection methodology & approach [ED 14] includes a clear consideration of Green Belt matters.
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	The site selection methodology & approach [ED 14] has been further refined since the consultation on the issues paper, so its approach is consistent with the site selection methodology for employment and other types of housing, in the revised publication draft SADPD [ED 07].

Call for sites consultation

The table below includes a summary of the main issues raised through the Call for Sites consultation and how these have been taken into account.

Summary of main issues raised:	How the main issues have been taken into account
<p>The council invited local residents, landowners, developments and other parties to put forward sites they consider to be suitable and available for future development for housing, commercial, employment or other types of development (excluding minerals and waste sites) between 27 February 2017 and 10 April 2017. This was subsequently extended, and all sites submitted up to the end of June 2017 have been considered in the pool of sites for inclusion in the first draft SADPD.</p> <p>Approximately 600 sites were submitted to the council over the consultation period on the SADPD Issues Paper. In order to inform</p>	<p>A call for sites report has been produced which sets out by town / parish the sites submitted either during the call for sites consultation or during consultation stages in the development of the SADPD [ED 45].</p> <p>The Council’s site selection process [ED 07] includes a number of stages, broadly outlined as:</p> <p>Stage 1: Establishing a pool of sites Stage 2: First site sift Stage 3: Decision point Stage 4: Site assessment, Sustainability Appraisal and Habitats Regulations Assessment</p>

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<p>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.</p>	<p>Stage 5: Evaluation and initial recommendations Stage 6: Input from infrastructure providers/statutory consultees Stage 7: Final site selection Sites submitted during the call for sites process formed part of the 'pool of sites' considered through stage 1 onwards for the site selection process for settlements in the settlement hierarchy. The approach and implementation of the site selection methodology is clearly set out in individual settlement reports prepared to support the revised publication draft SADPD.</p>
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Draft Sustainability Appraisal Scoping Report consultation

The table below includes a summary of the main issues raised through the Draft Sustainability Appraisal Scoping Report consultation and how these have been taken into account. These are also included in the final version of the Sustainability Appraisal Scoping report consultation statement (June 2017).

Summary of main issues raised:	How the main issues have been taken into account
<p>Whilst there is an overall objective in Figure 6.1 relating to tackling all forms of pollution, there is no specific reference to mediation of poor air quality.</p>	<p>Objective 10 requires all forms of pollution (which includes air) to be positively addressed.</p>
<p>Table 4.1 is incorrect as it only refers to species and habitats on the LBAP, whereas it should primarily reference or list the local species and habitats that are on the UK S41 Priority list. The small number of LBAP only (i.e. local priority only) species and habitats can be provided as an addition.</p>	<p>Amend Table 4.1 title: 'Biodiversity Action Plan species <u>Priority Species and Habitats</u> in Cheshire (Cheshire East, Cheshire West and Chester, Halton, Wirral and Warrington'.</p>
<p>In 2016 the number of LWS/SBIs in CE was 352 with an additional 30 in the Cheshire section of the PDNP.</p>	<p>Amend ¶4.9, bullet 1: '414 383 Local Wildlife Sites (20132015) – Locally valued sites of biodiversity.'</p>
<p>Figure 4.2 does not show the most up to date data for the location of Local Wildlife Sites.</p>	<p>Figure 4.2 was replaced with an updated version showing more up to date locations of LWSs.</p>

<p>The biodiversity networks referred to in this section have not yet been mapped.</p>	<p>The ecological network has been mapped and is considered under Revised Publication Draft SADPD Policy ENV 1 ‘Ecological network’.</p>
<p>For clarity the data relating to levels of pollution that are considered harmful to 1) human health and 2) ecosystems should be provided. Areas that currently meet or exceed these harmful levels should be clearly mapped.</p>	<p>The Council has taken a proportionate approach to the baseline data and consider that sufficient information has been provided with regards to pollution.</p>
<p>Undesignated assets and archaeology should be referred to within the baseline information. Baseline information should describe the current and future state of the historic environment.</p>	<p>New paragraphs inserted between ¶¶4.56 and 4.57: <u>‘There is also the potential for non-designated (or local heritage) assets, and unrecorded archaeology on some sites’.</u> <u>‘Cheshire contains 12 historic land classifications, based on the presence or absence of features in the landscape in 2007:</u> <input type="checkbox"/> <u>Settlement: about 12% (about 31,405ha)</u> <input type="checkbox"/> <u>Woodland: about 3.4% (about 8,997ha)</u> <input type="checkbox"/> <u>Non-improved: about 4.2% (about 11,116ha)</u> <input type="checkbox"/> <u>Ornamental Landscape: about 2.6% (about 6,797ha)</u> <input type="checkbox"/> <u>Ancient Landscapes: about 18.0% (about 46,586ha)</u> <input type="checkbox"/> <u>Post Medieval Landscape: about 27.8% (about 73,049ha)</u> <input type="checkbox"/> <u>Military: about 0.3% (about 829ha)</u> <input type="checkbox"/> <u>C20th Landscapes: about 16.0% (about 41,698ha)</u> <input type="checkbox"/> <u>Communications: about 1.9% (about 4,889ha)</u> <input type="checkbox"/> <u>Water Bodies: about 0.5% (about 1,414ha)</u> <input type="checkbox"/> <u>Industry: about 5.0% (about 123,991ha)</u> <input type="checkbox"/> <u>Recreation: about 2.6% (about 6,943ha)</u></p> <p>Add to ¶4.60 <u>‘There may also be opportunities to enhance non-designated heritage assets.’</u></p>
<p>The scoping report should recognise the importance of local character and identity including the landscape and townscape of an area is an important consideration.</p>	<p>The Council has adopted a design guide supplementary planning document, which focuses on local character and identity and an understanding of character to underpin decision making. Volume 1 is principally dedicated to setting this character out for various parts of the Borough. This is being carried through in some of the Neighbourhood Plans, both in terms of landscape setting and character and townscape.</p>

	<p>Add to ¶4.57: <u>‘Cheshire contained 20 landscape character types in 20082: Sandy Woods, Sandstone Ridge, Sandstone Fringe, Drained Marsh, Rolling Farmland, West Lowland Plain, East Lowland Plain, Lowland Estate, Estate Woods and Meres, Lower Farms and Woods, Salt Flashes, Mosslands, River Valleys, Shallow River Basin, Mudflats and Saltmarsh, Higher Farms and Woods, Upland Estate, Upland Foothills, Upland Fringe, Moorland Plateau.’</u></p> <p>Amend Table 5.1, Issue 16: ‘There is a need to conserve and enhance the Borough’s heritage assets, <u>landscapes and townscapes</u>; particularly those that are designated.’</p>
<p>The plans and policies identified need to cover all those relevant at an international, national and local level that would have a direct bearing for the historic environment.</p>	<p>Chapter 3 and Appendix A of the Scoping Report provide a list of policies, plans and programmes identified, including those that have a direct bearing for the historic environment.</p> <p>Add to Table 3.1 and Table A.3: Conservation Area Appraisals, Local List of Historic Buildings Supplementary Planning Document, Conservation Area Guides. With further details in Table A.3.</p>
<p>The objectives included under SA Objective 12 (Table 6.1) needs to be amended to closely reflect the approach and terminology of the NPPF in terms of heritage assets and the historic environment and the need to conserve and enhance in line with the requirements of the NPPF rather than quality, integrity and distinctiveness.</p>	<p>Amend Table 6.1, Objective 12: Protect <u>Conserve and enhance the quality, integrity and distinctiveness of the area’s heritage (including its setting), landscapes landscape character and townscapes</u>; particularly those that are designated. This amendment will also need to be made to Table 7.1 and Table B.1.</p>
<p>The criteria, contained within the framework needs to be amended to ensure that key heritage issues are included and that likely effects on the historic environment are properly assessed.</p>	<p>Amend Table 7.1, criteria for Objective 12: Will it protect or enhance the area’s designated heritage assets and their settings? Will it <u>conserve and/or enhance heritage assets (both designated and non-designated), their setting and the wider historic environment? Will it contribute to the better management of heritage assets and tackle heritage at risk?</u></p>
<p>The key sustainability issues should be amended to include reference to the historic environment as well as heritage assets. Setting can make an important contribution to a heritage asset, and therefore this</p>	<p>Amend Table 5.1, Issue 16: ‘There is a need to conserve and enhance the Borough’s heritage assets <u>and their setting, landscapes and townscapes</u>, particularly those that are designated, <u>and the historic</u></p>

should also be included here (Bullet 16).	<u>environment</u> .
The SA is insufficiently comprehensive and robust to address the impacts of the Local Plan. The sustainability objectives are insufficiently sensitive to the needs of local communities. There is insufficient detail provided as to how detailed impacts would be assessed. Insufficient regard is paid to the significance of a diverse range of impacts.	The Scoping Report has been prepared in accordance with extant guidance and is considered to be comprehensive and robust to address the impacts of the Local Plan.
There is insufficient detail provided as to show how changes to baseline data would be assessed, incorporated into the Borough Council Plan monitoring work and adverse impacts addressed.	A Local Plan Monitoring Framework has been produced [ED 54]. It is not the role of the Scoping Report to say how adverse impacts will be addressed.
Confirmation of what baseline information on brownfield land/sites is available and will be taken into account to influence the SADPD and related policies.	The Council publish a Brownfield Land Register each year.
The benefits of promoting brownfield development resources first when they are in competition with greenfield sites should be considered, along with a relevant objective.	Objective 16 of the Sustainability Appraisal Framework (p31) refers to optimising the re-use of previously developed land, buildings and infrastructure. The criteria include 'Will it encourage the re-use of previously developed land, buildings and infrastructure.'
Table 4.1 does not mention rivers as a priority habitat.	Amend Table 4.1: add ' <u>Rivers</u> ' to the Habitats category.
There is no mention of the Water Frame Directive North West River Basin Management Plan.	For clarity, additional text has been added to the start of ¶4.28: The North West River Basin District River Basin Management Plan ³ sets out: the current state of the water environment; pressures affecting the water environment; environmental objectives for protecting and improving the waters; a programme of measures, and actions needed to achieve the objectives; and progress since the 2009 plan.
Green Belt is not sufficiently addressed.	Green Belt is sufficiently addressed in Objective 12 of the Sustainability Appraisal Framework. Objective 12 seeks to 'protect and enhance...the area's ... landscapes...' The criteria include 'Will it impact on the Green Belt.'
The Objectives should be broadened to include maintain habitats and biodiversity and make reference to soils and species.	Amend Table 6.1, Objective 11: 'Protect, <u>maintain</u> and enhance biodiversity, habitats, <u>soils</u> , <u>species</u> , geodiversity and important geological features; particularly those that are designated.' This

	amendment will also need to be made to Table 7.1 and Table B.1.
The importance of geodiversity should be reflected.	Reference is made to geodiversity in objective 11.
A specific green infrastructure objective should be included.	Green infrastructure is referenced under the second criteria of Objective 16. The Local Plan will be assessed against the whole of the Sustainability Appraisal Framework, and therefore one reference under the most relevant objective is sufficient.

Appendix C: First Draft SADPD consultation main issues

The First Draft SADPD consultation took place between 11 September and 22 October 2018. This included consultations on the Interim Sustainability Appraisal, the First Draft SADPD Habitats Regulations Assessment, and the Gypsy and Traveller and Travelling Showpeople Call for Sites. This Appendix sets out the key issues raised in each of these consultations, and how these have been taken into account.

First Draft SADPD consultation

Chapter 1: Introduction / general issues

Summary of main issues raised:	How the main issues have been taken into account
The SADPD must reflect the LPS and meet the tests of soundness; reflect the most appropriate approach when considered against the alternatives.	Reasonable alternatives have been considered through the Sustainability Appraisal [ED 03]. The policies and proposals in the Revised Publication Draft SADPD are consistent with the strategic policies of the LPS.
Development plans should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.	The Revised Publication Draft SADPD has been informed by an extensive evidence base, which is considered adequate, up to date and relevant.
The allocation of non-strategic sites is of critical importance in ensuring that the future growth needs and spatial strategy outlined in LPS are deliverable; and to help diversify the land supply.	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers this issue and the Revised Publication Draft SADPD proposes to allocate a number of non-strategic sites to make sure that the overall strategy set out in the LPS can be delivered over the plan period.
There was no advanced notice of the publication date of the First Draft SADPD. The consultation portal is inaccessible and difficult to use.	The 6 week consultation period ran from 11 September 2018 to 22 October 2018. The first press release informing people about the forthcoming consultation was issued on 20 August 2018; all documents were available in the deposit locations and on the website from 05 September; and notification letters / emails were sent out on 10 and 11 September. The consultation portal was set-up to be as

	easy to use as possible given the complex nature of the document and the requirements of the Regulations. Representations were also accepted by email and post.
There is a lack of value placed on productive agricultural land.	The importance of agricultural land has been considered and reflected in Policy RUR 5 'Best and most versatile agricultural land' of the Revised Publication Draft SADPD.
There is a lack of value placed on nature conservation.	The importance on nature conservation has been considered and additional detail is included in the Publication Draft SADPD to supplement LPS Policy SE 3 'Biodiversity and geodiversity'. The Revised Publication Draft SADPD addresses the issue of nature conservation through Policy ENV 1 'Ecological network' (evidenced through the 'Ecological network for Cheshire East' report [ED 09]) and Policy ENV 2 'Ecological implementation' which requires development to deliver an overall net gain for biodiversity.
The SADPD does not reflect the lower housing targets set by government it disregards local community opinion regarding the actual housing needs in the area.	As required by the NPPF, the non-strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy'.
The SADPD is limited with regards to the promotion of health.	The promotion of health has been addressed in the LPS through Policy SC 3 'Health and well-being'. It has also been considered through the preparation of the SADPD and a number of policies in the Revised Publication Draft assist in the promotion of health including GEN 1 'Design principles'; ENV 6 'Trees, hedgerows and woodland implementation'; RET 5 'Restaurants, cafés, pubs and hot food takeaways'; INF 1 'Cycleways, bridleways and footpaths'; REC 1 'Green/open space protection'; REC 2 'Indoor sport and recreation implementation'; and REC 3 'Green space implementation'.
Cheshire East and Cheshire West and Chester councils do not appear to have fully exploited the Duty to Cooperate to date.	There has been ongoing engagement with Cheshire West and Chester Council throughout the preparation of the SADPD which is documented in the SADPD Duty to Cooperate Statement of Common Ground [ED 51].
The SADPD does not comply with LPS Policy SE 10 Sustainable	A separate Minerals and Waste Development Plan Document is

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<p>Provision of Minerals'. Minerals can only be worked where they exist and without a clear strategy for minerals to 2030, other types of development may be allocated and thereby compromise future mineral development. Mineral safeguarding, mineral consultation zones (as applicable), Areas of Search, Preferred Areas and Specific Sites for minerals should all be established first to inform where other types of development (non-mineral development) can potentially be located. Non-mineral development should have no higher status in a Local Plan than mineral development, not least because non-minerals development will ultimately rely to a large extent on the availability of minerals for construction. Cheshire East is still relying on saved policies from the 1999 Cheshire Replacement Minerals Local Plan. This does not allow mineral companies to plan properly for future areas, meaning proposals are having to come forward to seek to ensure continuity of supply that are necessarily not in compliance with the adopted plan.</p>	<p>currently in preparation that, once adopted, will replace the existing saved policies in the Cheshire Replacement Minerals Plan. Consequently, it is considered that the SADPD should not seek to add detail to the LPS Policy SE 10 'Sustainable provision of minerals' as this is best addressed through the Minerals and Waste DPD. Minerals issues have been considered in the selection of sites, in accordance with the Site Selection Methodology Report [ED 07].</p>
<p>The SADPD should include a commitment to review the need and extent of new build required at least every five years in order to fine tune the strategy to the development on the ground.</p>	<p>Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the NPPF (¶33) require local plan policies to be reviewed to assess whether they need updating at least once every five years.</p>
<p>The removal of further Green Belt land for development or safeguarding should be withdrawn from the SADPD.</p>	<p>'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers the need to further Green Belt allocations in SADPD, concluding that no further Green Belt boundary alterations are required to accommodate development in this plan period. However, as set out in the 'Local service centres safeguarded land distribution report' [ED 53], there is a need to identify additional safeguarded land through the SADPD.</p>
<p>The SADPD should set out in a table format how the content of each existing saved policy is to be saved, deleted or incorporated into a new SADPD policy.</p>	<p>The introduction section of the Revised Publication Draft SADPD confirms that all existing saved policies from the Congleton Borough Local Plan (2005), the Borough of Crewe and Nantwich Local Plan (2005) and the Macclesfield Borough Local Plan (2004) will be deleted upon adoption of the SADPD, whilst all existing saved policies from the Cheshire Minerals Local Plan (1999) and the Cheshire Waste</p>

	Local Plan (2007) will continue to be saved until replaced by policies in the Minerals and Waste DPD.
The SADPD fails to take proper account of the Bollington Neighbourhood Plan; there are some inconsistencies between the First Draft SADPD and the second stage pre-submission 2018 version of the Poynton Neighbourhood Plan; the consideration of sites in High Legh should have full regard to the High Legh Neighbourhood Plan. References to neighbourhood planning in the First Draft SADPD are unbalanced in focussing too much on development, without referring to the other useful potential of Neighbourhood Plans. Neighbourhood plans should be listed.	The Bollington and Poynton Neighbourhood Plans have been considered through the Bollington and Poynton Settlement Reports [ED 24] and [ED 39]. High Legh is within the 'Other Settlements and Rural Areas' tier of the settlement hierarchy under LPS Policy PG 2. The need for site allocations in the other settlements and rural areas is considered in the 'Other settlements and rural areas report' [ED 46] which concludes that no SADPD site allocations are required in the other settlements and rural area. This does not preclude neighbourhood plans from making site allocations in these areas. The Revised Publication Draft SADPD includes a section describing the role of neighbourhood planning in its introduction section. The draft SADPD makes numerous references to neighbourhood plans, including specific made plans where directly relevant to the policy concerned (for example, the footnotes to draft policy PG 9). It does not list all made neighbourhood plans as there are a large number of plans either made or in preparation. Any list of made neighbourhood plans would inevitably become out of date very quickly.
Local residents, Bollington Town Council, Bollington Civic Society and other representative bodies have not been asked to suggest where land should be allocated for housing, only local developers and land owners; this is a biased sample.	The submission of sites through the call for sites exercise (2017); the First Draft SADPD consultation (2018); and the initial Publication Draft SADPD consultation (2019) was open to any interested party and not restricted to developers and landowners. Additionally, there have been a number of series of meetings open to all town and parish councils, as detailed in chapter 2 of this consultation statement.
The impacts of the proposed increase in housing numbers and, hence, population, car numbers, car journeys have not been given any weight in the final calculation. There does not appear to be any evidence to support the population increase and demographics that justify the delivery of increase in demand for housing in the area.	The Revised Publication Draft SADPD has been prepared to be consistent with the strategic policies set out in the LPS, including the overall level of development set out in Policy PG 1 'Overall development strategy'. The SADPD does not propose an increase in housing numbers above that set out in the LPS.
There are no plans for the enhancement of infrastructure.	Infrastructure improvements and enhancements are set out in the Infrastructure Delivery Plan. The issue has also been taken into account in the Revised Publication Draft SADPD, which seeks to

	recover costs of forward-funded infrastructure under Policy GEN 4 'Recovery of forward funded infrastructure costs'. It also makes provision for the protection of existing and proposed infrastructure under Policy INF 6.
There needs to be a commentary as to how the amendments to the NPPF have been considered.	The requirements of the current NPPF have been taken into account in the preparation of the plan.
The council may wish to consider the allocation of land in rural areas solely for 100% rural exception sites, developing affordable homes for rural needs on small sites large enough for a small number of dwellings.	LPS Policy SC 6 'Rural exceptions housing for local needs' allows for a criteria-based approach to proposals for affordable homes in rural areas. It is not considered necessary to allocate specific sites for such schemes.
The council has not published a whole plan viability assessment.	A viability assessment [ED 52] has been produced to inform the preparation of the SADPD.

Chapter 2: Planning for growth (general issues)

Summary of main issues raised:	How the main issues have been taken into account
The council has experienced issues with under-delivery of housing and it is necessary to ensure that a range of sites are allocated in the plan to ensure that the housing requirement can be met.	Housing delivery has accelerated rapidly in recent years and particularly following the adoption of the LPS in 2017. The SADPD seeks to allocate additional sites for development to assist in meeting the overall development requirements set out in the LPS.
Small, available sites can make a significant contribution to housing land supply and choice.	The Revised Publication Draft SADPD includes policy HOU 14 'Small and medium-sized sites' which is supportive of housing delivery on small sites.
Sites in the OSRA should be allocated and the flexibility for this tier retained. Over reliance on windfall to meet the OSRA requirement. No evidence is provided of historic delivery rates for windfall sites.	The 'Other settlements and rural areas report' [ED 46] considers whether it is necessary to allocate further sites within this tier of the settlement hierarchy. The employment land requirement set out in LPS Policy PG 1 already includes 20% flexibility. Flexibility in housing supply has been considered in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].

Over optimistic assessment of housing need, based on assumptions of growth that are unlikely to be achieved. The Site Allocations and Development Policies Document compounds provision for over-development of Cheshire East.	Policies and proposals in the SADPD have been prepared to be in accordance with the strategic policies in the LPS, including the overall level of development set out in Policy PG 1 'Overall development strategy'.
The methodology used to assess sites is flawed.	The approach to site selection is considered through the Site Selection Methodology [ED 07] and is based on the approach to site selection in the LPS, which was found to be sound at examination..
The focus of the plan is reaching a target number of homes rather than an assessment of housing need in each area. The model is dependent on landowners offering sites, not necessarily in the right place, in order to fit the numbers. Allocation of safeguarded land in Chelford demonstrates this approach.	Policies and proposals in the SADPD have been prepared to be in accordance with the strategic policies in the LPS, including the spatial distribution of development set out in Policy PG 7 'Spatial distribution of development'. The 'Local service centres safeguarded land distribution report [ED 53] takes the relevant planning factors into account in determining the spatial distribution of safeguarded land to the LSCs.
Social and economic objectives are not weighed against environmental considerations.	Environmental considerations are taken into account through a number of the evidence base documents (including the Sustainability Appraisal [ED 02]) and are promoted by a number of proposed policies in the Revised Publication Draft SADPD, including those on biodiversity, landscape, trees, climate change, renewable energy, pollution, water management and the historic environment.
Achieving the right balance is relevant to both urban and rural areas. 'Development proportionate to the scale of settlements' should also consider potential, existing and planned infrastructure.	'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] considers the need for allocations at each tier of the settlement hierarchy.

Policy PG 8 'Spatial distribution of development: local service centres'

This First Draft SADPD Policy is titled PG 8 'Development at local service centres' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The purpose of the "Flexibility Factor" was to ensure that the agreed and adopted housing "targets" for each of the settlement hierarchies is	The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial

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Summary of main issues raised:	How the main issues have been taken into account
delivered rather than the overall plan target. While targets may be exceeded elsewhere, there is a need to ensure that the housing target for the LSCs is met. The flexibility factor should be retained, this would result in a need for an additional 245 dwellings in the LSC's (with 7% flexibility factor). There is no evidence that development in higher order settlements will support lower tier settlements.	distribution' report [ED 05].
A total of 3,501 dwellings are proposed in the LSC tier, this is 1 dwelling more than the requirement for the tier. There is a risk that insufficient development will take place to provide for a sustainable pattern of development.	The overall development figures that the LSC area is expected to accommodate are set out in Policy PG 7 'Spatial Distribution of Development' of the LPS and are expressed as 'in the order of'. As stated in ¶8.73 of the LPS, 'these figures are intended as a guide and are neither a ceiling nor a target.'
The hybrid option results in a disproportionate level of growth being allocated to southern LSC's (63.4%). The proposals will not support northern communities or deliver sufficient homes to meet local needs. The plan fails to identify sufficient housing sites in the right locations, will result in unsustainable patterns of development and will not 'boost significantly' housing land supply. A balanced geographical approach is required to ensure that there is sufficient growth to maintain and support the vitality of all LSC's. There is an over-reliance on 'off plan' planning permissions, all of which are in the south of the borough, setting these against the housing figures.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Providing flexibility at the LSC tier would provide choice of sites and increased certainty that sufficient homes will be delivered to meet the LPS requirement, particularly if LPS sites slip.	The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The policy should be reworded to clarify that any target is not a maximum figure and additional housing may be permitted where it is consistent with development plan policies.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.. As stated in ¶8.73 of the

Summary of main issues raised:	How the main issues have been taken into account
	LPS, 'these figures are intended as a guide and are neither a ceiling nor a target.'
There is an over-allocation of housing numbers within the Green Belt, including Alderley Edge, Chelford, Disley, Prestbury, Bollington and Holmes Chapel.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs. To clarify, Holmes Chapel is not located in the Green Belt.
The six approaches to disaggregating the housing requirement are flawed. The spatial distribution disaggregate report contains errors and no evidence is provided to show how the level of commitments and completions has been derived. Sites counted as commitments include allocated sites and sites with outline planning permission – these may not be 'deliverable' without sufficient evidence. Methodology is flawed, the variables used to assess the options and site assessments are not weighted - they are not of equal importance.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
All sites submitted in LSCs should be fully assessed to ensure that the proposed strategy is the most appropriate and that all reasonable alternatives have been considered.	All reasonable alternatives are considered through the Sustainability Appraisal [ED 03]. According to NPPF ¶35, plans are sound if they are positively prepared, justified, effective and consistent with national policy. Whereby justified is seen to be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
Standard methodology for calculating housing need is likely to result in a lower housing need figure for the borough. The Part 2 should take account of the updated projections.	It is not the role of the SADPD to revisit strategic policy. The overall development strategy for the borough is set out in Policy PG 1 'Overall Development Strategy' of the LPS. This has been considered at length through the LPS examination process and was found to be sound.
The spatial distribution should take account of: constraints, brownfield land availability, housing density, housing need	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial

Summary of main issues raised:	How the main issues have been taken into account
	distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Shavington <ul style="list-style-type: none"> • The dwelling figure for Shavington is too low, additional land should be allocated to accommodate the housing requirement of other southern settlements. • Shavington performs more strongly as an LSC than other southern settlements, for example Bunbury. 	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Haslington <ul style="list-style-type: none"> • The evidence base does not justify why further development would be limited in locations such as Haslington. • The allocation for Haslington should be increased from 490 dwellings to 700 dwellings. 	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Bunbury <ul style="list-style-type: none"> • Bunbury is a less sustainable location for development, the housing requirement should be reduced and any residual requirement allocated to Shavington. 	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Holmes Chapel <ul style="list-style-type: none"> • Further allocations should be made around Holmes Chapel, including housing. • The plan should be clarify that Holmes Chapel is not expected to accommodate any unmet housing needs of Goostrey. 	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is

Summary of main issues raised:	How the main issues have been taken into account
	not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.. ED 05 also considers the need to allocate a further employment site in Holmes Chapel and the Holmes Chapel Settlement Report applies the Site Selection Methodology [ED 07] to recommend the most suitable site for inclusion in the SADPD.
<p>Prestbury</p> <ul style="list-style-type: none"> • The proposed housing requirement for Prestbury is too low and it should be increased to align with other Green Belt settlements. • There has been very little housing development in Prestbury; there is a limited stock of different housing types and the amount of housing proposed will not sustain the local community. • It is unclear how the figure of 130 dwellings has been derived. • No employment sites are proposed and this undermines the future sustainability of the village. 	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
<p>Bollington</p> <ul style="list-style-type: none"> • The level of housing proposed is too low and should be increased to at least 500 dwellings, based on existing population and number of households. • Unclear how 400 figure derived. • Lack of family housing in Bollington, a high proportion of housing stock is terraced. • Level of housing proposed in Bollington is disproportionately high in relation to the population of the village and in comparison with other LSCs. Insufficient account is taken of the constraints and the impact of additional housing development upon infrastructure and congestion is not considered. • There is no assessment of housing need within the village. • The SADPD evidence is flawed and contains errors. 	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.

Summary of main issues raised:	How the main issues have been taken into account
<ul style="list-style-type: none"> • The residual requirement for Bollington should be redirected to Alderley Edge. • There is no residual requirement for Bollington, any future housing needs can be met from brownfield sites as indicated in the Neighbourhood Plan. • No account is taken of density of housing. Bollington is already over-developed compared to other settlements. • Other sites have been submitted through the call for sites, in other settlements which are less constrained than Bollington. Any housing requirement could be met elsewhere. • Only sites submitted by owners/ developers have only been considered. There are brownfield sites in the village. • Allocation is based on ONS figure which has now been revised down to 350, reducing any residual requirement to 32 dwellings rather than 82. • The flexibility factor has been removed and there is now no need for the number of houses proposed. • Conflict with the Bollington Neighbourhood Plan. • Test of exceptional circumstances has not been met for Green Belt release. 	
<p>Mobberley</p> <ul style="list-style-type: none"> • Mobberley is one of the largest LSCs, the housing figures are too low in comparison to other LSCs and having regard to the size of the settlement and its range of services. • The housing needs of Mobberley will not be met by the policy. There is little opportunity for open market or affordable housing within the village. Sites should be allocated to meet local housing need. • There are existing commitments for housing within the village, suggesting that aircraft noise is not the constraint suggested by the council. Aircraft noise does not affect all areas of the settlement. 	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>

Summary of main issues raised:	How the main issues have been taken into account
<ul style="list-style-type: none"> • Other LSCs are also affected by aircraft noise but attract a higher level of allocations. • The influence of constraints upon housing development in Mobberley is questioned. Constraints are similar to other LSCs. • Aircraft noise does not preclude the allocation of sites for employment uses. • If land is not allocated within Mobberley, it should be allocated within the same market area such as Ashley or Knutsford. 	
<p>Alderley Edge</p> <ul style="list-style-type: none"> • The housing requirement figure is too low and should be increased to at least 300 dwellings to meet the housing needs of the local population. • Additional safeguarded land should be identified. • Affordability is a significant issue in Alderley Edge and this is compounded by the low level of completions. • Alderley Edge performs better than other LSCs such as Bollington, which is allocated a higher housing figure. • Alderley Edge is identified by the council as a 'borderline' KSC. It is a sustainable settlement with a range of shops, services and facilities. • The town is not so constrained that it could not deliver further development. • Sufficient new housing is required to support economic growth - Alderley Park is capable of meeting the employment needs of Alderley Edge. Support for identifying the level of housing for the village and the sites to meet the requirement. • Housing requirement could result in overdevelopment of green spaces and gardens within the village to the detriment of the character and appearance of the local area. • Unclear where the employment land will be provided. 	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>

Summary of main issues raised:	How the main issues have been taken into account
<p>Wybunbury</p> <ul style="list-style-type: none"> Wybunbury should be identified as an LSC as it displays many of the characteristics of other LSCs. 	<p>It is not the role of the SADPD to revisit strategic policy. The settlement hierarchy for the borough is set out in Policy PG 2 'Settlement Hierarchy' of the LPS. This has been considered at length through the LPS examination process and was found to be sound.</p>
<p>Goostrey</p> <ul style="list-style-type: none"> Lack of evidence to justify the low housing figure for Goostrey. There is no supporting information in the evidence base that relate to Jodrell Bank Observatory (JBO) that justifies the low numbers proposed in Goostrey or the impact of JBO on housing delivery 	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Disley</p> <ul style="list-style-type: none"> Insufficient land is allocated for new homes in Disley and it does not reflect the existing population and number of households. It should be increased to at least 300. It is unclear how the figure of 225 dwellings and 0.35 hectares of employment land has been derived. The principle of releasing land from the Green Belt was established through the LPS. Further development in Disley should not be discounted on the basis that the settlement is constrained by the Green Belt. 	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Chelford</p> <ul style="list-style-type: none"> Illogical that Chelford has a similar level of housing allocation to Alderley Edge, and considerably more safeguarded land given the respective sizes of the settlements. Lack of suitable sites in Mobberley should not result in the allocation of additional sites in Chelford. Chelford does not have a high rate of housing need, there are a significantly lower number of people on the housing register than the median figure for LSC's. Need is skewed by the inclusion of Chelford in a sub group with Mobberley and 	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>

Summary of main issues raised:	How the main issues have been taken into account
<p>Alderley Edge.</p> <ul style="list-style-type: none"> The amount of safeguarded land at Chelford is not proportionate to the future needs of the settlement. 	
<p>Other settlements and rural areas (OSRA)</p> <ul style="list-style-type: none"> Sites should be allocated within the OSRA. The case that it would be 'time consuming' to allocate sites in the OSRA is not a sufficient justification for not doing so. Development in OSRA would contribute to the vitality of rural communities. There is a shortfall of 390 dwellings in the OSRA. There is no up to date evidence to suggest that any residual requirement will be met. Windfall should not be relied upon to meet the housing needs. The SADPD should consider which settlements could be subject to additional growth, some are more constrained than others and the settlements should be assessed to ascertain where the OSRA requirement could be accommodated. 	<p>The approach to OSRA has been considered through the development of the Other Settlements and Rural Areas Report [ED 46] and 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>

Policy PG 9 'Settlement boundaries'

Summary of main issues raised:	How the main issues have been taken into account
<p>Several potential development sites put forward for inclusion in settlements boundaries.</p>	<p>The need (or otherwise) for allocations for employment / housing uses has been considered through the 'Provision of Housing and Employment Land and the Approach to Spatial Distribution' [ED 05] report.</p> <p>Sites have been considered for allocation in accordance with the implementation of the Council's site selection methodology [ED 07] and the approach documented through individual settlement reports for each Principal Town, Key or Local Service Centre.</p> <p>The settlement and infill boundaries review [ED 06] sets out the methodology for the consideration of settlement boundaries. The</p>

	methodology for settlement boundaries has been implemented through work on individual settlement reports for Principal Towns, Key and Local Service Centres.
The settlement boundaries are too restrictive; the policy should be flexible to be able to accommodate new development outside of settlement boundaries.	The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries.
<p>The settlement boundary should be amended / extended in:</p> <ul style="list-style-type: none"> • Alderley Edge • Prestbury • Sandbach • Knutsford • Wilmslow • Shavington • Bunbury • Crewe • Holmes Chapel • Congleton • Alsager • Bollington 	<p>The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries. This methodology has been applied in individual settlement report(s):</p> <ul style="list-style-type: none"> • Alsager [ED 22] • Alderley Edge [ED 21] • Bollington [ED 24] • Bunbury [ED 25] • Congleton [ED 27] • Crewe [ED 28] • Holmes Chapel [ED 33] • Knutsford [ED 34] • Prestbury [ED 40] • Sandbach [ED 41] • Shavington [ED 42] • Wilmslow [ED 43]
Albion Works should be included in the defined settlement boundary for Sandbach, similar to the current Congleton Local Plan 2005.	The settlement and infill boundaries review [ED 06] sets out the methodology for the consideration of settlement boundaries. This methodology has been applied for Sandbach, in an individual settlement report [ED 41].
The policy should state that the settlement boundaries of other settlements such as Wybunbury should be amended.	Wybunbury falls within the other settlements and rural areas tier of the settlement hierarchy. As set out in the settlement and infill boundaries review document [ED 06], settlements in the 'other settlements and rural areas' tier of the settlement hierarchy are not proposed to have a defined settlement boundary (unless determined through a neighbourhood plan) and would therefore remain in the open

	<p>countryside. The LPS Open Countryside (PG 6) and Green Belt (PG 3) both allow for 'limited infilling in villages', as does the NPPF ¶145. The evidence contained in the settlement and infill boundaries review document has defined villages where infill boundaries and limited infilling would apply (as set out in policy PG 10 (infill villages) in the revised publication draft SADPD). This includes Wybunbury, which is considered a village for the purposes of PG 10 (infill villages) of the revised publication draft SADPD.</p>
<p>Safeguarded land should be included in Prestbury's settlement boundary.</p>	<p>Safeguarded land is defined as land between the existing urban area and the inner boundary of the Green Belt that may be required to meet longer-term development needs stretching well beyond the period of the plan. Policy PG 4 (Safeguarded Land) of the LPS clarifies that "safeguarded land is outside of the urban area and therefore policies relating to development in the open countryside will apply". This means that safeguarded land is considered to be outside of any settlement boundary.</p>
<p>Hankelow, Bucklow Hill, Pickmere, Brereton Green should have settlement boundaries.</p>	<p>These settlements fall within the other settlements and rural areas tier of the settlement hierarchy established through the LPS. The extent to which they are considered a village for the purposes of policy PG 10 (infill villages) has been set out in the settlement and infill boundaries review [ED 06] with Hankelow and Pickmere identified as suitable for infill boundaries. As set out in the footnote to policy PG 9 (settlement boundaries), at July 2020, in consultation with Brereton Parish Council, the settlement boundaries for Brereton Green and Brereton Heath defined in the Brereton Neighbourhood Plan are not brought forwards to be covered by this policy and under the SADPD, once adopted, Brereton Green and Brereton Heath do not have defined settlement boundaries. Brereton Green has been identified as suitable for an infill boundary in policy PG 10 (infill villages).</p>
<p>Without the designation of development boundaries in 'infill village' settlements, the SADPD is neither justified nor consistent with national policy, and is therefore unsound, as it fails to accord with the aims and objectives of the adopted LPS and the NPPF.</p>	<p>The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries and infill boundaries in the revised publication draft SADPD.</p>

Several permissions and applications do not appear to have been fully taken into account when redrawing the settlement boundary	The base date for the revised publication draft SADPD is the 31 March 2020. This has been used as the base date for the individual settlement reports prepared.
The settlement boundary for Bollington should include all parts of the administrative town of Bollington, including the parts at East Tytherington that lie in Bollington, and adjacent parts that can only be accessed from Bollington, including parts of Ingersley Vale.	The boundaries for settlements as they relate to the settlement hierarchy in the LPS are taken from lower super output areas used in the 'determining the settlement hierarchy paper' prepared in 2010 which informed policy PG 2 (Settlement Hierarchy) in the LPS.

Policy PG 10 'Infill villages in the open countryside'

This First Draft SADPD policy is titled PG 10 'Infill villages' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
It adds a new definition of infill villages in the open countryside, creating ambiguity with the settlement hierarchy. The policy should refer to OSRA to be consistent with the LPS and para 16 (d) of the NPPF.	The definition of village infill boundaries for settlements in the other settlements and rural areas is considered to be consistent with the settlement hierarchy. Reference has been added to the 'other settlements and rural areas' in criterion 1 of the policy for clarity.
The approach in bullet 2 to identify OSRAs as 'Open Countryside' or Green Belt is contrary to LPS Policy PG 2 as it would not allow them to grow. Achieving the housing requirement for OSRA is restricted by this policy.	The draft policy has been reviewed against the requirements of LPS PG 2. It allows for small scale growth where appropriate within the existing built envelope of settlements and is considered to be in accordance with LPS PG 2. The 'Provision of Housing and Employment Land and the Approach to Spatial Distribution' report [ED 05] and the 'Other Settlements and Rural Areas' report [ED 46] consider how to meet the housing requirement in this tier of the settlement hierarchy.
Bullet 3 is contrary to Paras 78 and 84 of the NPPF as it does not promote sustainable development in rural areas or allow appropriate development to come forward on sites that are physically well related to existing settlements.	The draft policy is considered to be in accordance with the NPPF. It allows for small scale growth where appropriate within the existing built envelope of settlements. It defines where 'limited infilling in villages' will be allowed under the strategic LPS Policy PG 6 'Open countryside' but does not prevent other types of development allowed under PG 6 from occurring outside of the infill boundaries – including the infill of a small gap with one or two dwellings; re-use of existing

	rural buildings; replacement buildings; extensions; development essential for an existing business; or development essential for the conservation of a heritage asset.
Bullet 3. i. is too restrictive as not all local areas will contain buildings of similar appearance. The policy should be flexible and allow schemes to be considered on their individual merits and on a site by site basis.	The policy wording requires proposals to be in keeping with the scale, character and appearance of the local area. If a mix of properties from different periods exists, then proposals would have greater flexibility.
Bullet 3. ii. is unnecessary as whether a development creates an impact will be determined as part of any planning application.	The wording has been considered and is required for clarity.
Bullet 3. iii. is too restrictive and unlikely to allow 2,950 homes to come forward.	This policy seeks to allow appropriate development within infill boundaries. As demonstrated in the Other Settlements and Rural Areas report [ED 46], the number of dwellings already completed or committed in OSRA significantly exceeds the 2,950 requirement for new dwellings over the plan period.
Part 4 of the Policy should be removed as it reiterates LPS Policies PG 3 and PG 6.	The wording is required for clarity.
Objection to the non-allocation of sites in OSRA. Meeting the OSRA requirements should not be deferred to Neighbourhood Plans.	The Other Settlements and Rural Areas report [ED 46] considers whether it is necessary to allocate further sites within this tier of the settlement hierarchy.
Detailed issues related to the assessments of individual settlements and proposed boundaries.	These issues have been considered and taken into account through the Settlement and Infill Boundaries Review [ED 06].
The policy is contrary to paragraph 50-001 of the PPG.	This paragraph has been replaced by Paragraph: 009 Reference ID: 67-009-20190722. The policy is considered to be in accordance with the guidance.
The policy seeks to “downgrade” established settlement boundaries around certain settlements to allow infill only.	The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06].
The infill boundaries have been drawn so tightly around the settlements that they would only allow very few (if any) opportunities for any infill development to take place at all.	The methodology for defining boundaries is set out in the Settlement and Infill Boundaries Review [ED 06].

<p>The policy is contrary to LPS Policy PG 6 and is more restrictive than national Green Belt policy. The identification of infill villages should not be arbitrarily prescribed through the local plan and such an approach is contrary to established case law. An assessment as to whether a development constitutes 'infill development' should not be prescribed through the local plan process; it can only be made 'on the ground' with due regard for the site-specific circumstances.</p>	<p>The NPPF advises that plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”; and that “non-strategic policies should be used... to set out more detailed policies for specific areas, neighbourhoods or types of development” (¶28). Defining villages and infill development within the SADPD is consistent with these principles.</p>
<p>The flexibility for OSRA has been lost through the SADPD.</p>	<p>Flexibility in housing supply has been taken into account through The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].</p>
<p>The 2,950 housing requirement for OSRA should be disaggregated.</p>	<p>The need to disaggregate development requirements in the other settlement and rural areas is considered in the Other Settlements and Rural Areas report [ED 46].</p>
<p>The policy will worsen the currently adopted policy situation (Saved Policy GC 4) with regards to infilling and the redevelopment of entire sites. Saved policy GC 4 should be carried forward or PG 10 amended to reflect it.</p>	<p>Saved policy GC4 in the Macclesfield Borough Local Plan allows for limited infilling or redevelopment on major developed sites in the Green Belt subject to a number of criteria. LPS Policy PG 3 and the NPPF already allow for limited infilling or the partial or complete redevelopment of previously developed land in the Green Belt, regardless of whether it is located within a village infill boundary or not..</p>
<p>Greater clarity is needed regarding the definition of a 'relatively small gap'.</p>	<p>The glossary includes a definition of infill development and the scale of development appropriate will depend on the location of the site.</p>
<p>The policy should provide the flexibility to enable 'made' neighbourhood plans to provide clearly defined infill boundaries for villages additional to those in the list set out in the policy PG 10. There is no explanation or justification for the statement in footnote 4.</p>	<p>Neighbourhood plans are able to define settlement or infill boundaries.</p>

Policy PG 11 'Green Belt boundaries'

This First Draft SADPD policy has been merged with Policy PG 12 'Safeguarded land boundaries' and titled PG 12 'Green Belt and safeguarded land boundaries' in the Revised Publication Draft SADPD.

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Summary of main issues raised:	How the main issues have been taken into account
Concerns about the whether exceptional circumstances exist to justify the alteration of Green Belt boundaries.	Green Belt issues and exceptional circumstances have been taken into account in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Local Service Centres Safeguarded Land Distribution Report [ED 53].
Various representations that particular sites should be removed from the Green Belt and allocated for development.	Sites are selected in accordance with the Site Selection Methodology [ED 07] and the assessments of individual sites are included in the relevant settlement report.
Whilst the settlement character of the infill villages has been assessed in the Settlement and Infill Boundaries Review document, an assessment has not been carried out as to whether or not these settlements should be washed over by the Green Belt or inset in the Green Belt as required by NPPF paragraph 140. To do this, a character assessment of each village located within the Green Belt should be prepared to determine the contribution each village makes towards the key characteristic of Green Belt.	The NPPF (¶136) requires that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries...” The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering existing Green Belt boundaries to create new inset boundaries and remove entire settlements from the Green Belt (or to include entire settlements that are currently excluded)..
The Kings School new and existing sites at Derby Fields (including Fallibroome Farm Site) should be removed from the Green Belt and included on the list in Policy PG 11.This would reflect what was envisaged in the LPS.	The identified exceptional circumstances were identified through the strategic policies of the LPS and justify boundary alterations to accommodate the need for housing and employment development. The removal of a school from the Green Belt would not fall within the identified exceptional circumstances.
The council has not given due weight to other potential development opportunities offered by non-Green Belt sites/land.	As detailed in the Site Selection Methodology [ED 07], brownfield and non-Green Belt sites are prioritised under the iterative approach.
The policy should acknowledge that brownfield sites within the Green Belt are suitable for development.	LPS Policy PG 3 allows for limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt.
The policy should account for Paragraph 145 in the NPPF (2018) which contains an additional line which allows for the development of brownfield land in the Green Bet which does not have a ‘significant’	The SADPD seeks to add non-strategic detail to the strategic policies set out in the LPS. Although it is recognised that the NPPF wording has changed since the adoption of the LPS, it is beyond the scope of

impact on the openness when there is provision of affordable housing to meet local housing need.	the SADPD to amend strategic policies in the LPS.
Without the release of additional non-strategic sites from the Green Belt to enable development in infill villages, it is considered that the SADPD is neither justified nor consistent with national policy, and is therefore unsound.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas report [ED 46] consider whether it is necessary to allocate further sites within this tier of the settlement hierarchy.
There are likely to be other brownfield sites becoming available in to next 13 years and therefore there is no need to allocate Green Belt to meet future housing needs	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the Revised Publication Draft SADPD and there are no Green Belt sites proposed to meet housing needs. However there is a requirement for safeguarded land. Brownfield and non-Green Belt sites are prioritised under the iterative approach set out in the Site Selection Methodology [ED 07].
The scale of proposed development in the SADPD is not justified, nor needed. The SADPD is not positively prepared, and not consistent with national policy requiring development to be sustainable. According to the MHCLG's own housing needs methodology, the housing requirement for Cheshire East is 1,142 p.a. which would provide 22,840 homes over the 20 year period of the Local Plan.	Policies and proposals in the SADPD have been prepared to be in accordance with the strategic policies in the LPS, including the overall level of development set out in Policy PG 1 'Overall development strategy'.

Policy PG 12 'Safeguarded land boundaries'

This First Draft SADPD policy has been merged with Policy PG 11 'Green Belt boundaries' and titled PG 12 'Green Belt and safeguarded land boundaries' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Several potential development sites put forward to be included as safeguarded land.	Sites have been selected in accordance with the Site Selection Methodology [ED 07].
Safeguarded land and more is needed for development now.	Strategic policy PG 4 in the LPS states that "safeguarded land is not allocated for development at the present time". The Provision of Housing and Employment Land and the Approach to Spatial

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	Distribution report [ED 05] has considered the need for additional site allocations in the Revised Publication Draft SADPD.
A re-review of the Green Belt boundaries around Knutsford must be undertaken to explore suitable sites for Green Belt release to meet emerging development requirements.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Knutsford Settlement Report [ED 34] consider whether Knutsford requires further site allocations.
The safeguarded land allocated to Chelford should be redistributed to Alderley Edge. Safeguarded land should be identified in Poynton.	The distribution of safeguarded land is considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53]
For any site allocations in this policy it will need to be demonstrated that an appropriate heritage assessment has been undertaken of the impact they may have on the historic environment.	Heritage Impact Assessments of Sites [ED 48] have been carried out where necessary.
The revised population/housing figures render the safeguarded land provision unnecessary.	Policies and proposals in the SADPD have been prepared to be in accordance with the strategic policies in the LPS, including Policy PG 4 'Safeguarded land'.
The policy would result in the over development of Cheshire East.	Strategic policy PG 4 in the LPS states that "safeguarded land is not allocated for development at the present time".

Policy PG 13 'Strategic green gaps boundaries'

Summary of main issues raised:	How the main issues have been taken into account
Reps received for the release of land off Land off Gresty Lane as it does not function as Green Gap	The Gresty Road Site does not have planning permission as of 31.03.20 and the Council can demonstrate a 7.5 year supply of housing as shown in the latest Housing Monitoring Update, as at 31.3.19. There is no reason to remove this site from the green gap which provides long-term protection against the coalescence of Crewe and Shavington, protects the setting and separate identity of the existing settlements, and retains the existing settlement pattern by maintaining the openness of land.
This policy to be an unnecessary duplication of LPS Policy PG 5, as it does not provide any new criteria.	LPS Policy PG 5 states " <i>the detailed boundaries of the Strategic Green Gaps will be defined through the Site Allocations and</i>

	<i>Development Policies Document and shown on the Adopted Policies Map</i> ". The SADPD Policy is therefore required to set out that the detailed boundaries of the areas defined as strategic green gaps in LPS Policy PG 5 are now shown on the adopted policies map.
This is contrary to the Revised NPPF: Local Planning Authorities should ensure plans 'serve a clear purpose, avoiding unnecessary duplication	As above.
The proposed policy should be amended to allow for the alteration of the green gap when needed, for example when the supply of houses falls below 5 years	The Council can demonstrate a 7.5 year supply of housing as at 31.03.19 as shown in the latest Housing Monitoring Update. In the event that the housing land supply falls below 5 years, Para 11(d) of the National Planning Policy Framework (2019) would be relevant.
Support LPS Policy PG 5 and the retention of the Strategic Green Gaps	Support noted.
This policy should be expanded to allow a review of the existing strategic green gaps in light of the strategic site allocations in the LPS and particularly where those strategic green gaps have been eroded by planning consents granted at appeal.	The strategic green gap boundary has taken into account allocations in the LPS and sites that have received planning permission as at 31.03.20. Further details for defining the detailed boundaries of the strategic green gap can be seen in the Strategic Green Gap Boundary Definition Review [ED 08].
Land West of Crewe Road, Shavington should not be in the Strategic Green Gap	Land West of Crewe Road, Shavington does not have planning permission as of 31.03.20 and the Council can demonstrate a 7.5 year supply of housing as shown in the latest Housing Monitoring Update. There is no reason to remove this site from the Strategic Green Gap which provides long-term protection against the coalescence of Crewe and Shavington, protects the setting and separate identity of the existing settlements, and retains the existing settlement pattern by maintaining the openness of land.
The Settlement and Infill Boundaries Review [FD06] and Strategic Green Gap Boundary definition Review [FD08] which have been prepared as part of the Council evidence base to justify alteration to boundaries appear to fail to assess reasonable alternative sites other than those that have been allocated or committed. Therefore no consideration has been made to existing sites and the relationship to	The proposed boundary reflects sites adjoining the existing settlement boundary, which displays a high level of containment; high level of previously-developed land or high level of built form which has a strong functional relationship with the existing urban area. The boundary has also taken into account uses and development that has a clear social and / or economic relationship with the settlement.

the physical form of the built environment.	Further details can be seen in the Strategic Green Gap Boundary Definition Review [ED 08].
Land to the north of Shavington should be excluded from the Strategic Green Gap. The detailed settlement and Strategic Green Gap boundary should be re-drawn with the A500 forming the long term defensible boundary to the north of Shavington.	Land to the north of Shavington does not have planning permission as of 31.03.20 and the Council can demonstrate a 7.5 year supply of housing as shown in the latest Housing Monitoring Update. There is no reason to remove this site from the Strategic Green Gap which provides long-term protection against the coalescence of Crewe and Shavington, protects the setting and separate identity of the existing settlements, and retains the existing settlement pattern by maintaining the openness of land.
Land south of Newcastle Road, Willaston should be entirely excluded from the SGG and the boundary should be altered to follow the A500 rather than Cheer Brook	Cheer Brook already forms a readily recognisable and permanent settlement boundary and therefore there is no reason to alter the Strategic Green Gap boundary.
The site known as Land at Rope Lane, Shavington represents a suitable and sustainable location for development now and should be allocated for housing in the SADPD. The site should also be removed from the Green Gap and Open Countryside as defined on the draft allocations policies map.	The development of 29 dwellings on land at Rope Lane (17/0295N) was allowed at appeal on 30.01.18 (after the original base date in the First Draft SADPD of the 31.03.17). As the Revised Publication Draft SADPD has a base date of 31.03.20 , this site has now been included within the settlement boundary of Shavington (as detailed in the Shavington Settlement Report [ED 42]). The site has therefore been removed from the Strategic Green Gap, as it no longer performs any of the functions identified in LPS Policy PG 5.
Hough and Chorlton Parish Council strongly support these Policies. The Parish would like to see the Strategic Green Gap extended further to the South of Crewe to protect the villages within the Parish. In addition, as part of Wybunbury Combined Parishes Neighbourhood Plan we would wish to see this supplemented by Local Green Gaps. This will ensure effective planning control to prevent the coalescence of development between settlements within the Parishes and Crewe.	Support noted. The general extent of the Strategic Green Gaps has been considered and settled through the LPS process. The extent of work required to define detailed boundaries should be proportionate to that task. It does not open up an opportunity to review the broad extent of the designated areas or necessitate a comprehensive review to determine whether the land shown generally falling within the Strategic Green Gaps should be re-assessed and rated against Strategic Green Gap purposes.
The SGG should include no more land than is necessary to prevent the coalescence of Crewe and Haslington having regard to	Noted. The methodology for defining the detailed boundaries of the strategic

<p>maintaining their physical and visual separation.</p>	<p>green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].</p>
<p>Land north of Sydney Road and land east of Nantwich Road should be excluded from the proposed SGG as it does not maintain the sense of separation.</p>	<p>Land north of Sydney Road and east of Nantwich Road provides long-term protection against the coalescence of Crewe and Nantwich, protects the setting and separate identity of the existing settlements, and retains the existing settlement pattern by maintaining the openness of land.</p>
<p>Recommended change to the SGG detailed boundary: To be realigned to follow the north side of A500, to the immediate west of the Basford West Site, as far as Crewe Road, and then follow Crewe Road northwards to join up with the proposed detailed boundary west of Crewe Road the exclusion of the Crewe Road site from the Green Gap would not conflict with the purposes relating to boundary definition of the Strategic Green Gap, and would not set a precedent for making changes to the west of the Crewe Road and elsewhere.</p>	<p>Land west of the Basford West Site does not have planning permission as of 31.03.20 and the Council can demonstrate a 7.5 year supply of housing as shown in the latest Housing Monitoring Update. There is no reason to remove this site from the Strategic Green Gap which provides long-term protection against the coalescence of Crewe and Shavington, protects the setting and separate identity of the existing settlements and retains the existing settlement pattern by maintaining the openness of land.</p>
<p>The Nantwich/Willaston/Crewe Green Gap boundary should follow the A51 Nantwich bypass rather than the proposed boundary as the road is a stronger boundary.</p>	<p>The strategic green gap boundary follows the settlement boundary of Crewe and Nantwich which are readily recognisable and defensible boundaries that are likely to be permanent. The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition Review [ED 08].</p>
<p>Development of Land at Park Road would have very minimal impact on the function of the Willaston/Wistaston/Nantwich/Crewe Strategic Green Gap.</p>	<p>Land at Park Road has been subject to two dismissed appeals in 2016 and 2017, citing the importance of maintaining the Strategic Green Gap It does not have planning permission as of 31.03.20 and the Council can demonstrate a 7.5 year supply of housing as shown in the latest Housing Monitoring Update. There is no reason to remove this site from the Strategic Green Gap which provides long-term protection against the coalescence of Crewe and Nantwich, protects the setting and separate identity of the existing settlements and retains the existing settlement pattern by maintaining the openness of land.</p>
<p>In the Weston and Basford area a key strategic green gap is field D1 between Basford East and the South Cheshire Growth Village. This strategic green gap must be maintained in its entirety between these</p>	<p>Noted. The methodology for defining the detailed boundaries of the strategic green gap is detailed in the Strategic Green Gap Boundary Definition</p>

<p>two strategic allocations, the Crewe to Stoke railway line to the north and the A500 Shavington Bypass to the south. Any erosion of this key green gap will be totally unacceptable to the Parish Council and will undermine the strategic principle of the green gap boundaries and Strategic Policy PG 5 and SADPD Policy PG 13. The same principle applies to the Strategic Green Gap separating Weston Village from the A500 Shavington bypass which is extremely narrow and must be retained in its entirety.</p>	<p>Review [ED 08].</p>
<p>Object to Policy PG 13 which is considered not to be effective, positively prepared, justified or consistent with national policy.</p>	<p>LPS Policy PG 5 states “<i>the detailed boundaries of the Strategic Green Gaps will be defined through the Site Allocations and Development Policies Document and shown on the Adopted Policies Map</i>”. The SADPD Policy is therefore required to set out that the detailed boundaries of the areas defined as strategic green gaps in LPS Policy PG 5 are now shown on the adopted policies map.</p>
<p>The boundary of the SGG south of the SCGV (LPS 8) should be revised and informed either by master planning of the village or alternatively should be aligned to the A500 consistent with land at Basford East.</p>	<p>At the base date (31.03.20) no detailed plans for LPS 8 have been submitted or approved to see if any additional adjustments would be required to the strategic green gap boundary. The boundary has therefore remained the same as that shown within the LPS.</p>
<p>The map of the Strategic Green Gap south of Crewe, should be extended to the east to provide additional protection to Weston Village, Wychwood Village and Wychwood Park - all of which will be significantly impacted upon by HS2a construction work over the next 10 years and by the HS2a operations in perpetuity.</p>	<p>The general extent of the Strategic Green Gaps has been considered and settled through the LPS process. The extent of work required to define detailed boundaries should be proportionate to that task. It does not open up an opportunity to review the broad extent of the designated areas or necessitate a comprehensive review to determine whether the land shown generally falling within the Strategic Green Gaps should be re-assessed and rated against Strategic Green Gap purposes.</p>
<p>The current document does not completely protect the individual villages within the Haslington Parish boundary. We are keen to ensure that no development takes place at the Winterley to Wheelock boundary, the Winterley to Haslington gap and Haslington to Crewe Green Gap. It is imperative that these villages retain their individuality and the protection of the countryside is maintained. Any development be it small or large house dwellings will have detrimental impact on</p>	<p>As above.</p>

environment, highways and transport network along with health and wellbeing of the communities.	
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Policy PG 14 'Local green gaps'

Summary of main issues raised:	How the main issues have been taken into account
<p>Local Green Gaps suggested:</p> <ul style="list-style-type: none"> • between Haslington and Winterley; • between Winterley and Wheelock; • to the south and east of the village of Weston separating Weston Village from Wychwood Park and Wychwood Village; • land within the following roads: Stock Lane, Main Road, Wrinehill Road Wybunbury, Cobs Lane, Pit Lane, Hough and the Newcastle Road; • between Hankelow and Audlem 	<p>Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans as appropriate.</p>
<p>The Local Green Gaps referred to within this policy would appear to be Local Green Space (LGS) by another name. Reference should be made within Policy PG 14 to paragraph 100 of NPPF18 which sets out the tests which must be applied when seeking to designate LGS.</p>	<p>Any local green gaps designated through neighbourhood plans would be required to meet the basic conditions test. The purpose of designating gaps to support the distinctiveness of settlement is different to the designation of Local Green Space.</p>
<p>The policy should be specific to distinct settlements of compact form, with or without an infill or settlement boundary, which are surrounded by open countryside.</p>	<p>Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans as appropriate.</p>
<p>"Green wedge" should be defined.</p>	<p>Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans as appropriate. Any term used would be described through the policies of the neighbourhood plan.</p>
<p>Whilst it is not appropriate for the NP to oppose major national infrastructure projects, Local Green Gaps may help reduce the cumulative impact of other development in close proximity to HS2a.</p>	<p>Given the localised nature of the gaps envisaged under this policy, it is considered most appropriate for these to be brought forwards through neighbourhood plans as appropriate.</p>
<p>The policy does not completely protect the individual villages. No</p>	<p>It would not be a sound approach to impose a blanket ban on all</p>

development should take place at the Winterley to Wheelock boundary, the Winterley to Haslington gap and Haslington to Crewe Green Gap. It is imperative that these villages retain their individuality and the protection of the countryside is maintained. Any development will have a detrimental impact on environment, highways and transport network along with health and wellbeing of the communities.	development.
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Chapter 3: General requirements (general issues)

Summary of main issues raised:	How the main issues have been taken into account
The policies in this Chapter seek to provide guidance on a number of issues that are universal to nearly all developments.	Noted.

Policy GEN 1 ‘Design principles’

Summary of main issues raised:	How the main issues have been taken into account
The wording of the policy is weak in relation to ‘should’.	The word ‘should’ is considered sufficiently robust in relation to the future application of this policy.
Bullet 1 is vague and does not make it clear how the policy can be complied with, or otherwise.	It is considered that bullet 1 is consistent with paragraph 127 of the NPPF which talks about establishing and maintaining a strong sense of place and developments being sympathetic to local character and history.
The policy does not adequately consider the step change in the NPPF 2018 to how appropriate densities for new development should be determined.	The revised publication draft SADPD should be read as a whole, alongside the policy requirements of the LPS. Policy HOU 12 ‘housing density’ sets out that residential developments will generally be expected to achieve a net density of at least 30 dwellings per hectare and includes a number of other factors that are expected to be considered in determining an appropriate density.
The policy should reference water efficiency measures and sustainable drainage.	Point 11 of policy GEN 1 ‘Design Principles’ in the revised publication draft SADPD makes reference to showing resilience to climate change

	<p>and its impacts within the development layout. The supporting information to policy GEN 1 makes reference to policy ENV 7 'Climate Change' (point 6 of policy ENV 7 makes reference to water efficiency measures).</p> <p>Additional text has been added to the supporting information of policy GEN 1 to emphasise the importance of taking opportunities to incorporate sustainable drainage and water efficiency measures within the development layout in line with policy ENV 16 'surface water management and flood risk'.</p>
More should be made of the need for new developments to reinforce or reflect the local built character, especially of historic places and towns.	Policy GEN 1 'Design Principles' of the revised publication draft SADPD appropriately refers to development proposals supporting the quality of place and local identity throughout the policy.
It is unclear how the policy relates to the Cheshire East Design Guide SPD.	The supporting information to policy GEN 1 of the revised publication draft SADPD states that in order to provide clarity about design expectations at an early stage, proposals should take account of any formally adopted supplementary planning documents (including the Cheshire East Borough Design Guide).
Regarding bullet 10, access should be defined further as to local facilities; there must be safe pavements and pathways to local facilities.	Bullet 10 of policy GEN 1 'Design Principles' in the revised publication draft SADPD includes reference to access, connectivity and permeability in and through the development site and wider area including to local services and facilities, particularly for walking and cycling routes.
The general design requirements should also include those incorporated into Neighbourhood Plans.	The supporting information to the policy makes reference to neighbourhood plans having the potential to help identify the special and distinctive qualities of the local area.
The policy could be used to justify pastiche design leaving little scope for modern innovative architecture.	Each application would be considered on its own merits. The policy, when read alongside LPS policy SE 1 'design' should support good design in the borough.
Developers should engage with the council and relevant statutory consultees, at the earliest opportunity.	The supporting information to policy GEN 1 (para 3.4) in the revised publication draft SADPD states that developers should engage with the council, the local community and relevant statutory consultees at the earliest opportunity in order to make sure that new development

	responds appropriately to the unique character and quality of place in the borough.
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Policy GEN 2 ‘Security at crowded places’

Summary of main issues raised:	How the main issues have been taken into account
No comments made.	No issues were raised.

Policy GEN 3 ‘Advertisements’

Summary of main issues raised:	How the main issues have been taken into account
The strong wording of this policy: ‘Proposals.... will be supported by the following ‘criteria’ could be adopted with benefit in a number of other policies where the present text read ‘should’ and thereby lacks teeth.	The word ‘should’ is considered sufficiently robust in relation to the future application of other policy in the Revised Publication Draft SADPD.
The statement “internally illuminated signs will not be approved on listed buildings or in conservation area” is inconsistent with government policy and guidance, and therefore unsound. Para 132 of NPPF is clear that advertisements should be subject to control only in the interest of amenity and public safety, taking account of cumulative impacts.	¶132 of NPPF states: “Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts”. Point 9 has been removed and under the subheading ‘Supporting Information’ in the Revised Publication Draft SADPD additional wording has been inserted: “Any applications affecting a designated heritage asset will also be considered against the policies contained in Chapter 5”.
The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 does not explicitly preclude the display of internally illuminated signs on listed buildings or in conservation areas.	¶132 of NPPF states: “Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts”. Point 7 has been removed and under the subheading ‘Supporting Information’ in the Revised Publication Draft SADPD additional wording has been inserted: “Any applications affecting a designated heritage asset will also be
Applications for advertisement on listed buildings are subject to listed building consent and separate requirements in terms of safeguarding the significance of the heritage asset and minimising any harm. Therefore to ensure certainty for those submitting applications, the	

policy would benefit from removal of Point 7.	<i>considered against the policies contained in Chapter 5”.</i>
Point 9 would benefit from being deleted and being replaced with a criterion which states that any applications affecting a designated heritage asset will be dealt with using the policies contained in Chapter 5 of the Plan.	
Should Point 8 be retained, reference should be made to setting as the criterion specifically mentions areas adjacent to the conservation area (which may contribute to its setting).	Point 8 has been removed and under the subheading ‘Supporting Information’ in the Revised Publication Draft SADPD additional wording has been inserted: <i>“Any applications affecting a designated heritage asset will also be considered against the policies contained in Chapter 5”.</i>

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

This First Draft SADPD policy has been split into two separate policies in the Revised Publication Draft SADPD: GEN 4 ‘Recovery of forward funded infrastructure costs’ and GEN 7 ‘Recovery of planning obligations reduced on viability grounds’.

Summary of main issues raised:	How the main issues have been taken into account
<p>The main issues raised include:</p> <ul style="list-style-type: none"> the need for more detail within the policy on how it is to be implemented rather than leaving this to be identified in other guidance; the need for the policy to identify relevant infrastructure projects and their likely costs; the need for greater clarity on how grant funded costs will be treated when calculating repayments; the need for more clarity on the policy’s interrelationship with the Council’s CIL charging schedule. the appropriateness of attempting obligation recovery after planning permission has been granted; whether the policy conforms with the CIL tests set out in planning guidance and regulation; the need to ensure that recovery is not based on profit being 	<ul style="list-style-type: none"> The revised Policy GEN 4 outlines the general framework within which the policy will operate and indicates that further details will be provided in a scheme specific SPD. The Council does not consider it is necessary, appropriate or practical for the policy to give a detailed explanation of how it will operate so that all eventualities and circumstances are covered. As the number of cases where forward funded infrastructure is provided by the Council within the remit of this policy is expected to be limited, it is more appropriate that these details are scheme specific and agreed prior to any planning approvals so developers are aware at an early stage of the obligation costs that will apply. The Council is satisfied that the policy and supporting information has been written to meet the requirements of the CIL tests and this requirement has been added as a specific

<p>demonstrated; and</p> <ul style="list-style-type: none"> ensuring the policy is not used to support failing developers, unviable applications or allow developers the ability to avoid meeting their obligations. 	<p>policy criteria.</p> <ul style="list-style-type: none"> Additional text has been added to the supporting text to clarify how grant funded costs will be treated when calculating repayments. The Council has revised this policy to take account of the updated (September 2019) planning practice guidance on planning obligations and viability. This is considered to provide sufficient information on the interrelationship between infrastructure funding raised through CIL and planning obligations for this to not require repeating within the policy and / or its supporting text. Further text has been added to clarify that the expectation, in line with NPPF para 57, is that developers will provide for the planning obligation requirements detailed in the approved Local Plan as these have been tested at examination and are assumed to be viable. Reducing these obligations should only occur in exceptional circumstances and so it is considered appropriate for the Council to seek their recovery should viability improve. Further text has also been added to refer to the need for viability tests to conform with national planning guidance on standardised inputs, including the need for achieving normal profit returns, as well as their need to be made publically available.
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Policy GEN 5 ‘Adopted policies map’

This First Draft policy has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
A detailed policy approach for proposals located in the Jodrell Bank Consultation Zone is not included.	The council is exploring the potential to provide detailed guidance to support the existing LPS Policy SE 14 ‘Jodrell Bank’ through a Supplementary Planning Document.

<p>The Policies Map should be amended to include the land known as Albion Works in the defined settlement boundary for Sandbach, similar to the current Congleton Local Plan 2005.</p>	<p>The settlement boundary for Sandbach is considered in the Sandbach Settlement Report [ED 41] in accordance with the methodology in the Settlement and Infill Boundaries Review [ED 06].</p>
<p>Some of the policy designations listed in the policy are not clearly shown on the policies map, e.g. the ecological networks and the route of the proposed Poynton Relief Road are not shown.</p>	<p>Ecological Networks are shown on the policies map but given their extensive coverage and the large number of features shown on the map, they are not shown prominently to avoid obscuring other features on the map. The online map highlights the selected features at any given point by clicking with the mouse. Land safeguarded for particular schemes under Revised Publication Draft SADPD Policy INF 6 'Protection of existing and proposed infrastructure' is now shown on the policies map, however it is not considered necessary to show the route of the Poynton Relief Road given its advanced stage towards construction..</p>
<p>The 'Land Reserved for Future Railway Station' should be removed or relocated to the norther section of the site in line with the draft Masterplan.</p>	<p>The 'Land reserved for future railway station' is defined through the strategic policies of the LPS. The Revised Publication Draft SADPD has not deleted this designation but has added a further, more defined area under Policy INF 6 'Protection of existing and proposed infrastructure'.</p>
<p>Local Landscape Designations are subject to amendment and it may be useful to discuss these further once the outcome of the Part Two examination is known in relation to Cheshire West's Areas of Special County Value.</p>	<p>Local Landscape Designations are considered in the 'Cheshire East Local Landscape Designations Review' [ED 11].</p>
<p>Land for a full parallel taxiway for Runway 2 at Manchester Airport should be safeguarded or at least recognised.</p>	<p>Within the Manchester Airport operational area, development and uses that are necessary for the operational efficiency and amenity of the airport will usually be permitted, under Revised Publication Draft SADPD Policy INF 4 'Manchester Airport'.</p>
<p>The London Road site should be excluded from the Homes Chapel settlement boundary.</p>	<p>The settlement boundary for Holmes Chapel is considered in the Holmes Chapel Settlement Report [ED 33] in accordance with the methodology in the Settlement and Infill Boundaries Review [ED 06].</p>
<p>There is a lack of mapping of heritage assets.</p>	<p>The policies map shows the spatial extent of all policies in the SADPD and LPS. It also shows a number of other designations that are referred to, but not defined by, the local plan. For heritage assets,</p>

	these include conservation areas, scheduled monuments, registered parks and gardens, registered battlefields, areas of archaeological potential and areas of special archaeological potential. Due to the large number of features shown on the policies map, it is not possible to show other heritage assets such as listed buildings and locally listed buildings, however this does not diminish the policy protection afforded to them.
The policy is not necessary as it just lists what is contained on the policies map.	The First Draft SADPD Policy GEN 5 'Adopted policies map' has been deleted from the Revised Publication Draft SADPD and the information from it moved to the introduction section.
It fails to identify settlement development boundaries and associated land allocations for 'infill villages'.	Infill villages have infill boundaries (rather than settlement boundaries) and these are shown on the policies map. All allocated sites are shown on the policies map.
Disagreement with primary and secondary shopping frontages.	Primary and secondary shopping frontages have been removed from Policy RET 7 'Ensuring the vitality of town and retail centres' and also removed from the policies map following changes to the NPPF

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

Summary of main issues raised:	How the main issues have been taken into account
<p>A number of policies overlap with adopted policies in the Local Plan Strategy, including:</p> <ul style="list-style-type: none"> • Draft Policy GEN 1 'Design Principles' would overlap with adopted LPS Policy SD 1 'Sustainable Development in Cheshire East'; • Draft Policy ENV 1 'Ecological Network would overlap with adopted LPS Policy SE 3 'Biodiversity and Geodiversity'; • Draft Policy ENV 3 'Landscape Character' and draft Policy ENV 5 'Landscaping' would overlap with adopted LPS Policy SE 4 'The Landscape'; • Draft Policy ENV 6 'Trees, Hedgerows and Woodland 	<p>The Site Allocations and Development Policies Document (SADPD) is the second part of the Local Plan. It follows the strategic lead of the LPS and provides additional guidance on a number of policy areas where the strategic context has already been set by the LPS.</p>

Summary of main issues raised:	How the main issues have been taken into account
<p>Implementation' would overlap with adopted LPS Policy SE 5 'Trees, Hedgerows and Woodland';</p> <ul style="list-style-type: none"> • Draft Policy ENV 12 'Air Quality' would overlap with adopted LPS Policy SE 12 'Pollution, Land Contamination and Land Instability'; and • Draft Policy ENV 15 'Surface Water Management and Flood Risk' would overlap with adopted LPS Policy SE 13 'Flood Risk and Water Management' 	
Full account must be taken of Neighbourhood Plan policies	Neighbourhood Development Plans, when made, form part of the development plan in Cheshire East.
Cheshire East should actively support and find ways to develop sustainable energy.	There are a number of policies contained within the Revised Publication Draft SADPD that consider the issues of energy generation including policies ENV 8 (District heating network priority areas), ENV 9 (Wind energy), ENV 10 (Solar energy) and ENV 11 (Proposals for battery energy storage systems).

Policy ENV 1 'Ecological network'

Summary of main issues raised:	How the main issues have been taken into account
The wording of the policy should include all the categories that merit protection	LPS Policy SE 3 'Biodiversity and Geodiversity' includes all the relevant categories.
Object to policy as it is onerous; consider that reference to new development protecting or conserving the ecological network and the particular role that the site has to the network is given greater importance in this emerging policy than that required by the NPPF (Chapter 15, Paragraph 175); delivery of enhancements not always practical; should be determined on a case by case basis. The policy is inconsistent with national policy and is not justified and is therefore unsound. The draft policy should be reviewed in full.	Policy ENV 1 'ecological network' is consistent with the NPPF and NPPG regarding seeking enhancement and net gain for biodiversity. However, the policy has been amended to "seek proportionate opportunities to protect, conserve, restore, enhance" etc.
Concerns that the policy is not defined enough. The map contained in	The Ecological Network is shown on the draft adopted policies map

Summary of main issues raised:	How the main issues have been taken into account
Figure 4.1 is not produced at a scale that enables the reader to determine within which 'area' a site may be located in the ecological network. The sub-criteria to part i. of criterion 4 is not clearly defined. The policy should be reworded to ensure that it is clear that any changes to the ecological network are appropriate and proportionate to individual development proposed.	(online interactive version) [ED 02]. Policy wording has been amended to seek a proportionate approach (point 4).
Boundaries need to be more accurately drawn; concerns regarding boundaries in the Wheelock area; new boundaries suggested in relation to settlement boundary and wildlife corridor.	The ecological network for the Borough and the methodology used to identify it are set out in 'Ecological Network for Cheshire East' (November 2017) [ED 09]. The Ecological Network is shown on the draft adopted policies map (online interactive version) [ED 02].
Land west of Eaton Bank, Congleton should not be included in the scope of policy ENV 1 and associated ecological network/corridor.	
The policy is unsound as it is not justified or effective. It is not clear in the Policy or explanatory text how the parts of the borough covered by each of the ecological areas identified in the Policy have been defined. It is not therefore possible to assess whether the areas defined are justified. The SADPD should be amended to include this information.	The policy is consistent with the NPPF and NPPG regarding seeking enhancement and net gain for biodiversity. The Ecological Network for Cheshire East report [ED 09] includes a clear methodology and justification for the approach taken.
More clarity and explanation needs to be provided in the Policy and explanatory text to make it possible to assess the impact these Policy requirements will have on the development of sites, and to assess the level of provision that is required on sites. Clarification is needed in the Policy that the intention is not to stifle or preclude development on these sites. It would be beneficial if an 'example site' diagram could be provided in the SADPD, showing how the Council anticipates that these measures could be incorporated into a typical development site.	The policy wording for point 3 of Policy 'ENV 1' Ecological Network has been amended to seek a proportionate approach.
The policy wording should have more clarity as to how ecology on the identified network component areas should be retained/improved and how development proposals will be considered on such areas.	The Ecological Network for Cheshire East report [ED 09] includes a clear methodology and justification for the approach taken. Policy ENV 2 'Ecological implementation' in the revised Publication Draft SADPD [ED 01] describes how development proposals can contribute positively to biodiversity.
Neighbourhood Planning Steering Groups have invested in detailed	Made Neighbourhood Plans form part of the Development Plan for

Summary of main issues raised:	How the main issues have been taken into account
ecological research and reports that must each be incorporated into the ecological policies of the SADPD.	Cheshire East.
No account taken of the impact of HS2 (line of route, mitigation, wildlife trust reports etc.)	As the Ecological Network is shown on the draft adopted policies map (online interactive version) [ED 02] any future projects can be taken into account. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the Local Plan Strategy (LPS). The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.
Needs reference to major development projects such as HS2 and fracking.	As the Ecological Network is shown on the draft adopted policies map (online interactive version) [ED 02] any future projects can be assessed accordingly. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS. A separate Minerals and Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.
Welcome the addition of Figure 4.1 illustrating the ecological network within Cheshire East; but certain meres and meres appear to be omitted - recommend that the figure is updated to include all meres and mosses within the ecological network.	The catchment data obtained from the relevant bodies does not provide this greater detail.

Summary of main issues raised:	How the main issues have been taken into account
Consideration should be given to local wildlife corridors that have been identified through an evidence based methodology via the Neighbourhood Planning process. These wildlife corridors compliment the wider ecological networks and provide a greater level of refinement at the parish/neighbourhood level.	Made Neighbourhood Plans form part of the Development Plan for Cheshire East.
The policy does not include reference to the following protected sites: Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI). The sites are listed in the explanatory policy text as being contained in the core areas. A possible suggestion would be to include additional wording, reference or a footnote to ENV 1 policy wording to ensure the above sites are captured in the Ecological Network for clarity.	Overarching LPS Policy SE 3 'Biodiversity and geodiversity' includes and lists all the statutory designated sites. SAC, SPA, Ramsars and SSSI are shown on the draft adopted policies map [ED 02]. These are designations that are referred to, but not defined by, the development plan. The spatial extent of these designations may alter over time and the online adopted policies map updated accordingly.
Full account must be taken of environment policies in Bollington Neighbourhood Plan.	Made Neighbourhood Plans form part of the Development Plan for Cheshire East.
Add potential local wildlife sites to paragraph 4.5.	Potential Local Wildlife Sites are covered by LPS Policy SE 3 'Biodiversity and Geodiversity' (justification paragraph 13.26).

Policy ENV 2 'Ecological implementation'

Summary of main issues raised:	How the main issues have been taken into account
Criterion 1 - Concerns that the metric calculation will be used instead of a reasonable, objective approach to assessing the landscaping, planting plans and variety of habitats to be created, as found in ecological and landscaping reports. Expect that the metric calculation will be used side by side with the desk assessment by Planning Officers and if the metric calculation is found to be too subjective, then a 'common sense' approach is taken to assessing the mitigation proposed.	Policy ENV 2 'Ecological implementation' has been amended to clarify that the biodiversity measureable net gain metric calculation only applies to major developments and developments affecting semi-natural habitats. The metric calculation is an objective tool that can be used to measure biodiversity losses and gains in an objective, consistent and transparent manner (see NPPG).
Criterion 2 - Often compensation is required on development sites and the wording 'as a last resort' is too strong.	The wording included in this element of the policy is taken from the NPPF.

Summary of main issues raised:	How the main issues have been taken into account
<p>Criterion 3 iv - re-word – add “and/or assessment of the ecological mitigation/landscaping plans by the Nature Conservation Officer, using their knowledge of the site and the locality”.</p>	<p>A “reality checking” of the assessment by the nature conservation officer is a normal part of the development management process.</p>
<p>Criterion 4 – concerns regarding long-term maintenance and management (onward sale of sites) – add as planning condition e.g. production of a 10 year management plan.</p>	<p>Accords with NPPF and NPPG to ensure that biodiversity net gain is of lasting value. Point 4 of Policy ENV 2 ‘Ecological implementation’ notes the importance of management and ongoing maintenance.</p>
<p>The requirement for all development proposals to deliver an overall measurable net gain for biodiversity and for net losses and gains for biodiversity/geodiversity to be identified using a biodiversity metric calculation is not justified and is not consistent with national planning policy. Part 1 and Part 3(iv) of Policy ENV 2 should be deleted.</p>	<p>Policy amended to clarify that the metric calculation only applies to major developments and developments affecting semi- natural habitats.</p>
<p>The Framework does not set a blanket requirement for all developments to pursue opportunities for securing net gains in biodiversity. It also does not establish a requirement for net losses and gains for biodiversity/geodiversity to be assessed using a biodiversity metric calculation. This position is supported by information produced by the Government (www.gov.uk/government/collections/biodiversity-offsetting), which makes clear that biodiversity offsetting is an option available to developers to fulfil their obligations under the planning system’s mitigation hierarchy, rather than a requirement.</p>	<p>Policy ENV 2 ‘Ecological implementation’ has been amended to clarify that the biodiversity measureable net gain metric calculation only applies to major developments and developments affecting semi-natural habitats.</p>
<p>Unsound for a policy to seek the application of such a biodiversity requirement to all development proposals, given that many development proposals will simply have (an appropriate) neutral effect. The policy should be drafted so that it relates only to development that has the potential to result in an impact on biodiversity and that the biodiversity impact of development is a material consideration in the determination of such planning applications.</p>	<p>Policy ENV 2 ‘ ecological implementation’ have been amended to clarify that the biodiversity measureable net gain metric calculation only applies to major developments and developments affecting semi-natural habitats.</p>
<p>The policy could be strengthened by reference to major development projects such as HS2a and fracking, and the impact these proposals could have on the very important ecological networks in Cheshire.</p>	<p>The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue</p>

Summary of main issues raised:	How the main issues have been taken into account
	falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS. A separate Minerals and Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.
As net gains may not be achievable within the constraints of each individual development suggest that a caveat is added to point 1, i.e.: “1. Net gain: all development proposals must deliver an overall measurable net gain for biodiversity using a biodiversity metric calculation. Where this cannot be delivered on site, off site compensation should be secured through a process agreed with the Local Authority”.	Policy ENV 2 ‘ecological implementation’ has been amended to refer to off-site provision in criterion 2 iii.
Requirements of policy are onerous for small-scale developments – clarification required.	Policy amended to clarify that the metric calculation only applies to major developments and developments affecting semi- natural habitats.
Suggest that the policy be better balanced/re-worded so that an overall net gain is sought unless it can be demonstrated that this is not economically or technically feasible and that the wider benefits of the scheme outweigh any overall net loss in biodiversity.	All development proposals can deliver net gains for biodiversity (see NPPG).
May wish to consider specifying the Defra metric as an approved approach to ensure consistency between developers and to simplify the process of assessing planning applications. Reference to the NPPF (para 174) could be made to strengthen this policy further.	Reference to Defra metric added to the supporting information for policy ENV 2 ‘Ecological implementation’ (paragraph 4.13).
Would like to see some wording in this policy about avoiding development on peat, as it is a precious resource that can take thousands of years to form and should be protected.	Local Wildlife Sites often relate to important areas of peat – there is protection under LPS Policy SE3 ‘Biodiversity and Geodiversity’.

Summary of main issues raised:	How the main issues have been taken into account
Query whether the Council have a means to quantify impact in order to effectively implement criteria 2ii) and 2iii) of the policy.	The application of this policy will be on a case-by-case basis informed by pre-application consultation period and determination of a planning application.
Policy should allow for the ability to balance the effects of net gain against other sustainable objectives. Criteria 1 could be amended to say; "wherever possible" or "unless it can be clearly demonstrated that the provision of net biodiversity gain would be outweighed by other benefits...."	All development proposals can deliver net gains for biodiversity (see NPPG).
This policy would benefit from the Planning Authority commissioning the assessments at the applicant's expense to ensure independence of the process.	This is not how the system currently works. ¶4.13 of the supporting information to Policy ENV 2 'Ecological implementation' provides further information on the process of undertaking the DEFRA biodiversity metric.
The requirements of Neighbourhood Plans on this topic must also be implemented. Detailed ecological reports produced for Neighbourhood Plans should be incorporated into the ecological policies.	Made Neighbourhood Plans form part of Development Plan for Cheshire East.
Policy does not take into account of Meres and Mosses Area, impact of HS2 and mitigation proposed.	Meres and Mosses Areas are referenced in Revised Publication Draft SADPD Policy ENV 1 'ecological network'. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.

Policy ENV 3 'Landscape character'

Summary of main issues raised:	How the main issues have been taken into account
The policy should include all categories that merit protection; developers do not always take into account supporting paragraphs	This policy builds on the detailed strategic policy of LPS Policy SE 4 'The landscape'.
The report has failed to pick up on the area around Yarwood Heath Farm, which due to the A556 and M56 works, is now distinctly separate from the river valley and provides no landscape contributions to the LLD. The SADPD should review this and remove the land parcel from the Bollin Valley LLD. Urge that more detailed analysis is undertaken to take account of the future HS2 route, which is planned to the north of the Rostherne/Tatton Park LLD. This will undoubtedly have a significant impact on the landscape character of the area, and is likely to occur during the Local Plan period (by 2030).	All the areas are evidenced in the LUC Reports; 'Cheshire East Landscape Character Assessment' [ED10] and 'Cheshire East Local Landscape Designation Review' [ED11]. All areas worthy of retention are documented. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.
Areas to the north of the River Bollin lie within Trafford Councils Policy ENV 17 Protection of Landscape Character; this is a general policy that does not specifically provide context to the River Bollin Corridor. Therefore, the Bollin Valley LLD is an incomplete designation with limited meaning as it only covers the southern side of the valley, doesn't traverse the tow local planning authority boundaries and should be removed in its entirety.	All the areas are evidenced in the LUC Reports; 'Cheshire East Landscape Character Assessment' [ED10] and 'Cheshire East Local Landscape Designation Review' [ED11]. All areas worthy of retention are documented. For example: Bollin Valley – page 13 of [ED11]: "Extend western-most extent of ASCV southward to cover more undeveloped, rural floodplain, also resulting in extended coverage of the wider setting of Dunham Massey to the north."
Consider that the landscape-led approach to the LLD designations is inconsistent with the provisions of the NPPF (paragraph 170 of the NPPF does not take just a landscape led approach to conserving the natural environment).	All the areas are evidenced in the LUC Reports; 'Cheshire East Landscape Character Assessment' [ED10] and 'Cheshire East Local Landscape Designation Review' [ED11]. It is considered that the approach undertaken for Local Landscape Designations is consistent with the requirements of the NPPF: Paragraph 127 c Planning policies and decisions should ensure that developments:

Summary of main issues raised:	How the main issues have been taken into account
	<p>c) are sympathetic to local character and history, including the surrounding built environment and landscape setting,</p> <p>Paragraph 170: Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes,</p>
<p>Support the decision to assess and designate the Bollin Valley LLD in its own right but question evidence to support detailed boundaries – should be more detail (evidence base must go into more detail at the localised level, to ensure that the detailed boundaries of the Bollin Valley LLD can be fully justified as part of the emerging SADPD process)³</p>	<p>All the areas are evidenced in the LUC Reports; ‘Cheshire East Landscape Character Assessment’ [ED10] and ‘Cheshire East Local Landscape Designation Review’ [ED11]. All areas worthy of retention documented. For example: Bollin Valley – page 13 of [ED11]: “Extend western-most extent of ASCV southward to cover more undeveloped, rural floodplain, also resulting in extended coverage of the wider setting of Dunham Massey to the north”.</p>
<p>Feel that the language used is aspirational rather than conclusive. Neighbourhood Plans should have more prominence; paragraph 4.19 would read better as “Where Neighbourhood Plans provide further detail at the local level regarding landscape character, these must be respected in any development proposals.”</p>	<p>The paragraph provides adequate cross-reference to Neighbourhood Plans. Made Neighbourhood Plans form part of the Development Plan for Cheshire East.</p>
<p>Consider that policy ENV 3 is weak and fails to present criteria as to when permission will not be granted. ENV 3 should be amended to state “must” in place of “should”.</p>	<p>The policy is consistent with NPPF, which uses the word “should”.</p>
<p>Refer to major development projects such as HS2a and fracking</p>	<p>The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be</p>

Summary of main issues raised:	How the main issues have been taken into account
	addressed through a review of the LPS. A separate Minerals and Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.
Policy should not restrict quest to build unique designs on self-build plots.	Any application is looked at carefully and taken on its merits.
Support for policy - the requirements of Neighbourhood Plans on this topic must also be implemented	Made Neighbourhood Plans form part of the Development Plan for Cheshire East.
The draft SADPD does not include policy on the protection of long-distance and/ or strategic views of significance. That should be rectified, especially with the quality of much of Cheshire East's built and natural environment and with the scale of development proposed to 2030.	Long-distance views are taken into account in the Cheshire East Landscape Character Assessment [ED10]. Views and perceptual qualities are considered under Key Characteristics for each Landscape Type. These are then looked at as part of the development proposal assessment process. Views are included in the description of Character Areas e.g. see LCA 5b Capesthorpe Character Area – paragraphs 3 and 4. A number of Neighbourhood Plans consider important local views.
The policy has weak phrasing and may not carry any weight in the planning process. The requirement ought to be compulsory as in “must respect the qualities” and it ought to refer to “demonstrably respect” instead of simply “respect”, and state “Planning permission will not be granted for development proposals which fail to do so”.	In relation to development respecting landscape qualities etc., this is covered by criteria 3 and 4 of LPS Policy SE4 ‘The Landscape’. Criterion 1 says “should”, which reflects NPPF wording.
It does not appear that the assessments will carry any real weight. If this is the case, then this is no more than window dressing. There needs to be a statement to the effect that if development proposals fail to recognise landscape character, they will be refused.	Policy ENV 3 of the Revised Publication Draft SADPD will provide adequate protection in conjunction with LPS Policy SE 4 ‘The Landscape’.

Policy ENV 4 ‘River corridors’

Summary of main issues raised:	How the main issues have been taken into account
<p>There needs addition of incorporation of ecological reports from neighbourhood plan; impact of HS2 on River Corridors etc.; mitigation measures in relation to HS2 etc.</p>	<p>Made Neighbourhood Plans form part of the Development Plan; policy would apply to projects mentioned. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.</p>
<p>Policy ENV 4 should be amended to include reference to the Water Framework Directive (WFD), as this outlines the important link between protecting river corridors/hydromorphology and watercourses achieving good ecological status/potential.</p>	<p>LPS Policy SE 13 ‘Flood Risk and Water Management’ refers to the WFD. Green Infrastructure links are covered under LPS Policy SE 6 ‘Green Infrastructure’. Revised Publication Draft SADPD Policy ENV 17 ‘Protecting water resources’ looks to protect water quality and seeks to support the WFD (¶4.100).</p>
<p>The wording could be strengthened (In bold) as follows: Development proposals must make sure that river corridors are protected and opportunities should be taken to enhance them as important natural landscape features and usable areas of open land including, where appropriate, by:</p> <ul style="list-style-type: none"> i. conserving and enhancing existing areas of value; ii. restoring and enhancing the natural elements of the river environment including related habitats and ecosystems; and iii. promoting public access. 	<p>Policy amended to add words “and enhancing” after “conserving” (criterion 1) as suggested.</p>

Policy ENV 5 'Landscaping'

Summary of main issues raised:	How the main issues have been taken into account
<p>Building upon Point 5 the following additional criterion is suggested: "Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge."</p>	<p>LPS Policy SE 13 'Flood Risk and Water Management' refers to SuDS (point 4), which could include permeable paving for example. Revised Publication Draft SADPD Policy ENV 16 'Surface water management and flood risk' seeks to manage and discharge surface water through a sustainable drainage system (bullet 3). However to emphasise the role of trees in particular as part of soft landscaping the following paragraph has been added to the supporting information of ENV 5: "Recognising their ecological and amenity value and the role that they can play in climate change mitigation and adaption, where appropriate, landscaping schemes should incorporate suitable tree planting which takes account of the site's location and conditions and reflects the function of the new trees e.g. woodland, screen belt, formal avenue, etc."</p> <p>The above also links with the Council's Environment Strategy.</p>
<p>The objectives should include the contribution that appropriate landscaping (hard and soft) can make to the achievement of air quality objectives and benefits to public health and well being.</p>	<p>¶13.49 of the justification to LPS Policy SE 6 'Green Infrastructure' states that the "Provision of multi functional GI should create: ...improved health and well-being; reduced air, water and noise pollution...". Revised Publication Draft SADPD Policy ENV 12 'Air quality' also covers air quality.</p>
<p>Point 5 should perhaps include 'native' planting as opposed to species that are 'in sympathy',</p>	<p>Native species are sometimes not appropriate.</p>
<p>Suggest that maintenance and aftercare of landscaping needs to be for the lifetime of the development. Suggested wording: "makes satisfactory provision for the maintenance and aftercare of the scheme to make sure it reaches maturity and thereafter for the lifetime of the development."</p>	<p>Ending with just the word "thereafter" implies perpetuity; alternative wording proposed more limiting.</p>
<p>Need to clarify what "blue infrastructure" refers to.</p>	<p>A definition of blue infrastructure can be found in the LPS Glossary (p390).</p>

Policy ENV 6 ‘Trees, hedgerows and woodland implementation’

Summary of main issues raised:	How the main issues have been taken into account
<p>Further justification is required in relation to the Council’s 3 to 1 tree loss policy. The approach would appear to be out of scale with the potential loss and is in excess of the need for a net benefit towards the environment as required by the NPPF.</p>	<p>Further information is provided in the ‘Green Space Strategy Update’ [ED 18]; the approach is consistent with the NPPF and LPS Policy SE 5 ‘Trees, Hedgerows and Woodland’. Where the loss of trees that make a significant contribution is unavoidable, under LPS Policy SE 5 replacement planting shall form part of the ‘ecological net gain’ as recommended by Natural England and the Revised NPPF (2019) Para 170 (a-f). The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees.</p>
<p>The policy fails to take into account the condition of any trees to be removed, or any site specific characteristics and constraints whereby such a replacement ratio may be unsuitable or not feasible.</p>	<p>The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees. Where the loss of trees that make a significant contribution is unavoidable, under LPS Policy SE 5 replacement planting shall form part of the ‘ecological net gain’ as recommended by Natural England and the Revised NPPF (2019) Para 170 (a-f).</p>
<p>Support but point 1 requires strengthening. The policy fails to deal with the wholesale removal in towns of garden hedges and their replacement by feather boarded fences that do nothing for either the environment or the aesthetics of the townscape.</p>	<p>Garden hedges are addressed under the relevant landscape, design and heritage policies in the LPS and Revised Publication Draft SADPD, for example Revised Publication Draft SADPD Policy HER 3 ‘Conservation areas’ and LPS Policy SE 5 ‘Trees, Hedgerows and Woodland’.</p>
<p>The policy should promote tree replacement planting that is site and project appropriate, taking into account the site characteristics and the quality and condition of the trees removed.</p>	<p>The policy has been amended to clarify the position - criterion 3 applies to loss of significant trees. Where the loss of trees that make a significant contribution is unavoidable, under LPS Policy SE 5 ‘Trees, Hedgerows and Woodland’ replacement planting shall form part of the ‘ecological net gain’ as recommended by Natural England and the Revised NPPF (2019) Para 170 (a-f).</p>
<p>The policy is considered to be too onerous in relation to replacement trees. In regard to hedgerows, the policy is too onerous and should be reworded to say: “Hedgerows deemed to be important under the Hedgerow Regulations 1997 should be retained and their loss, by</p>	<p>This aspect is already covered in LPS Policy SE 5 ‘Trees, Hedgerows and Woodland’. It is applied where hedgerow loss is unavoidable and there are clear overriding reasons for allowing the development.</p>

Summary of main issues raised:	How the main issues have been taken into account
exception, would require a justification”.	
The requirement for an arboricultural impact assessment (AIA) should not be required in all cases but on a site-by-site basis – add the words “where relevant” to the policy.	AIA’s are required as part of Local Validation Requirements and is currently under review in accordance with the NPPF. Meets statutory requirement as trees are a material consideration (Growth and Infrastructure Act 2013 para 6).
Concerned a three for one replacement requirement would place unnecessary burdens upon developers; suggest alternative wording: “Where tree loss is unavoidable it must be compensated for on the basis of one new tree for every tree removed”.	The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees.
The explanatory text notes that a two for one replacement would not result in net gain should one of the replacement trees fail to reach maturity. However, the management of any tree planting can be secured by planning condition to ensure that any new trees within a development that die or fail to reach maturity are replaced accordingly.	The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees. Further information provided in the ‘Green Space Strategy Update’ [ED 18].
Do not feel that Ancient Woodland, woodland and Hedgerows are adequately addressed / mitigated for in this policy in relation to the impacts of HS2a.	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.
If the Council are seeking a ‘net environmental’ gain, this could be achieved in many other ways than seeking a 3:1 tree ratio, and achieved by using empirical evidence. For example, through wildlife habitats to support protected and other species either on or off site on basis of surveyed need. In absence of a clear evidential basis for the 3 for 1 approach, this part of the policy should be deleted as it is unjustified and may prove ineffective at providing other, suitable	The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees. Where the loss of trees that make a significant contribution is unavoidable, under LPS Policy SE 5 ‘Trees, Hedgerows and Woodland’ replacement planting shall form part of the ‘ecological net gain’ as recommended by Natural England and the Revised NPPF (2019) Para 170 (a-f).

Summary of main issues raised:	How the main issues have been taken into account
habitat mitigation by deflecting attention to tree planting, and in absence of an evidential base the draft policy is not positively prepared and contrary to NPPF (35).	
The section on hedgerows should be redrafted to state that any loss of protected hedgerows should be offset by mitigation	LPS Policy SE 5 'Trees, Hedgerows and Woodland' refers to mitigation, compensation or offsetting.
This policy should be amended to simply state that net environmental gains should be sought in accordance with the NPPF.	The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees. Where the loss of trees that make a significant contribution is unavoidable, under LPS Policy SE 5 'Trees, Hedgerows and Woodland' replacement planting shall form part of the 'ecological net gain' as recommended by Natural England and the Revised NPPF (2019) Para 170 (a-f).
Requests that tree replacement (where a net gain) is taken into account in the overall assessment of biodiversity enhancement as set out in Policy ENV 2.	The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees. Where the loss of trees that make a significant contribution is unavoidable, under LPS Policy SE 5 'Trees, Hedgerows and Woodland' replacement planting shall form part of the 'ecological net gain' as recommended by Natural England and the Revised NPPF (2019) Para 170 (a-f).
Replicates national guidance – remove policy	The policy accords with NPPF and expands upon LPS Policy SE 5 'Trees, Hedgerows and Woodland'.
The Policy should require equal or better tree replacement provision, on a site-by-site basis, without a defined formula.	The policy has been amended to clarify the position - criterion 3 applies to the loss of significant trees.
More emphasis could be made for the retention and protection of trees on development sites and the protection and replacement of hedge rows when access points are created to facilitate development.	LPS Policy SE 5 'Trees, Hedgerows and Woodland' and Revised Publication Draft SADPD policy ENV 6 should cover the aspects raised.
The wording of this policy needs to be better aligned with the NPPF i.e. the protection for irreplaceable ancient woodland and ancient/veteran trees needs to be more explicit. Semi-natural broadleaved woodland and high value hedgerows are priority habitats which should be considered in line with the mitigation hierarchy i.e. 'avoided (through locating on an alternative site with less harmful	The Defra metric is referenced in the supporting information to ENV 6. Revised Publication Draft SADPD Policy ENV 2 'Ecological Implementation' deals with biodiversity net gain and the Defra Metric. Policy ENV 6 has been amended to clarify the position – criterion 3 applies to the loss of significant trees. Criterion 5 deals with buffers around woodland and these are also referred to in the supporting

Summary of main issues raised:	How the main issues have been taken into account
<p>impacts), adequately mitigated, or, as a last resort, compensated for' (NPPF paragraph 175a). As a last resort replacement habitat should be sought, the area of which should be determined through the use of the Defra net gain metric which takes into account time and risk factors. The replacement ratio of 3 trees for each one lost is inappropriate for parcels of woodland. The Defra metric must be used to calculate the level of compensation required to deliver net gain for this habitat. Replacement trees should not be planted on areas of existing valuable habitat such as species rich grassland or wetlands as this will reduce its wildlife value. This policy should specify that compensation will also be required if areas of woodland are negatively impacted as a result of nearby developments (indirect impacts), as paragraph 174b of the NPPF states that plans should 'promote the conservation, restoration and enhancement of priority habitats'. All priority woodland habitats (which may also be selected as Local Wildlife Sites or potential Local Wildlife Sites pLWS) should be protected by a suitable buffer zone to reduce the level of indirect impacts. The policy guidance currently only refers to a buffer for ancient woodlands. This should be amended.</p>	<p>information to the policy. Revised Publication Draft SADPD ENV 2 'Ecological implementation' deals with all aspects of biodiversity net gain. LPS Policy SE 3 Biodiversity and Geodiversity provides guidance regarding Local Wildlife Sites. There is protection through LPS Policy SE 5 'Trees, Hedgerows and Woodland' also. NPPF ¶16 f) requires plans to avoid unnecessary duplication of policies that apply to a particular area, including the NPPF.</p>
<p>The NPPF recognises the importance of non-ancient woods and trees and their contribution in terms of character and their natural and ecosystem benefits; this should be echoed in this policy. Also, at point 4, it is important in conservation terms that replacement trees and hedgerows must be native species.</p>	<p>There is further information in the 'Green Space Strategy Update' [ED 18] regarding ecosystem benefits, for example. The supporting information to the policy refers to the need for tree species to be in keeping with urban and rural character and for consideration to be given to planting species that provide resilience to climate change.</p>
<p>Policy ENV 6 Ancient Woodland and Ancient or veteran trees should be strengthened so that it reflects the NPPF (para 175) that states: "When determining planning applications, local planning authorities should apply the following principles: ...c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".</p>	<p>There is protection through LPS Policy SE 5 'Trees, Hedgerows and Woodland'. NPPF ¶16 f) requires plans to avoid unnecessary duplication of policies that apply to a particular area, including the NPPF.</p>

Summary of main issues raised:	How the main issues have been taken into account
This policy would benefit from the planning Authority commissioning the assessments at the applicant's expense to ensure independence of the process	This is not how the system currently works.

Policy ENV 7 'Climate change mitigation and adaptation'

This First Draft SADPD policy is titled ENV 7 'Climate change' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Climate change policies should be on a par with the status of heritage related policies. This should be a primary policy in the environmental section of the Plan with all other policies linked to it.	The revised publication draft SADPD is expected to be read as a whole, alongside the requirements of the LPS.
Wording in the policy should be strengthened – the policy should state 'development must...'	Reference to 'should' in the policy is considered to be sufficiently robust in the future application of the policy. The policy lists a range of measures, not all of which will be capable of being incorporated into every development scheme.
Should include reference to 'where possible' in the policy wording.	As noted in the supporting information to policy ENV 7 in the revised publication draft SADPD, many measures, if considered at an early enough stage can be included at no additional cost in the design and layout of development proposals.
United Utilities - recommend that the policy is expanded to include 10th criteria – "Incorporate water efficiency measures".	Point 6 of the policy ENV 7 'Climate change' in the revised publication draft SADPD refers to the incorporation of water efficiency measures.
Canal and Rivers Trust - Reference should be added to the importance of waterways and the role they play in transition to a low carbon economy.	Reference to blue and green infrastructure is included in point 3 of policy ENV 7 'climate change' in the revised publication draft SADPD.
Policy should help to promote and deliver future technologies and solutions	Noted.
Policy should include provision for energy storage.	Policy ENV 11 of the revised publication draft SADPD considers the issue of proposals for battery energy storage systems.

The SADPD should consider Warmingham Brine Field as a location for renewable energy creation (solar & wind) and energy storage. A renewable energy hub could be created in this location.	The revised publication draft SADPD includes a number of criteria based policies related to the consideration of schemes for renewable energy generation, including policies ENV 9 'wind energy' and ENV 10 'solar energy'.
Natural England welcomes policy wording including mitigation and adaptation measures (NPPF Para 20d)	Noted

Policy ENV 8 'District heating network priority areas'

Summary of main issues raised:	How the main issues have been taken into account
Policy requirements are too onerous. No justification for the policy 'ask' has been provided	Policy ENV 8 follows the strategic lead set by LPS policy SE 9 'energy efficient development' which states that the SADPD will identify district heating priority areas.
Policy is not supported by specific references to development proposals and / or any viability evidence or testing. There is a lack of clarity in the policy and its implementation.	Point 2 of policy ENV 8 'district heating network priority areas' refers to development in district heating network priority areas or large scale development elsewhere contributing to the development of the network unless not feasible or viable. The SADPD is supported by a plan level viability appraisal, which considered a scenario involving the introduction of district heating networks [ED 52].
District Heating Network proposals should be sought through the Council's Community Infrastructure Levy Regulation 123 list.	The Council adopted its CIL charging schedule in February 2019 and the charge has been operational from the 01 st March 2019. The Council will prepare an infrastructure funding statement, in due course, which will set out the infrastructure items that CIL payments are expected to contribute towards.
Reference to Crewe and Macclesfield should make clear that these are principal towns – rather than main towns as currently worded.	The revised publication draft SADPD refers to the principal towns in the borough: Crewe and Macclesfield.
Concerned by reference to 'large scale development elsewhere' as this is not clearly defined. There may be suitable semi-rural locations that have potential for such heating networks.	Policy ENV 8 follows the lead set by the LPS and strategic policy SE 9 'energy efficient development' which refers to development in district heating network priority areas or in large scale development

	elsewhere. The policy then goes onto note ‘unless it is demonstrated that this is not feasible or viable’.
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Policy ENV 9 ‘Wind energy’

Summary of main issues raised:	How the main issues have been taken into account
Object to the view that fully addressing impacts automatically assume that proposal has community backing.	The wording contained in the supporting information to policy ENV 9 ‘wind energy’ is considered to be consistent with footnote 49 of the National Planning Policy Framework and the LPS.
Policy ENV 7 point 1 (iv) propose the words ‘unbuilt / natural or’ be inserted before historic environment.	The word ‘natural’ has been inserted in the text for policy ENV 9 ‘wind energy’ point 1 (iv).
Point ENV 7 point 1 (iv) replace with “Proposals should not have an unacceptable impact on aircraft safety ...” with “Proposals should not have an impact on aircraft safety”. The word ‘unacceptable’ allows for subjectivity and by removing it provides a more definitive statement.	This change has been made to point 1 (iv) of policy ENV 9 ‘wind energy’. A further change has been made following consultation on the initial publication draft SADPD to refer to air traffic safety rather than aircraft safety.
Para 4.53 should be amended using the following wording – “4.53 The presence and operation of wind turbines can present operational issues for aviation and also for the operational requirements of Jodrell Bank. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can negatively affect signals radiated from and received by aeronautical systems. The rotating blades create electromagnetic disturbance, which can degrade the performance of these systems and cause false information to be received. The amount of interference depends on the size and number of wind turbines, their location and on the material and shape of their blades. Developers are encouraged to undertake thorough pre-planning application discussions with airport operators at the earliest stage of project planning. Where consultations with the relevant operators identify that there may be impacts on aircraft safety and the operations of Jodrell Bank then proposals will not be supported”.	<p>Noted. The supporting information to policy ENV 9 ‘wind energy’ states:-</p> <p><i>“The presence and operation of wind turbines can present issues for aviation. The amount of interference depends on the number and size of wind turbines, construction materials, location and on the shape of the blades. The most significant impacts are likely to arise in connection with large turbines, but smaller installations can also have impacts and need to be assessed. Where consultations with the relevant operators identify that there may be impacts on air traffic safety then proposals will not be supported.</i></p> <p><i>In line with LPS Policy SE 14 ‘Jodrell Bank’, development proposals within the Jodrell Bank Radio Telescope Consultation Zone that impair the efficiency of the telescope or have an adverse impact on the historic environment and visual landscape setting of the Jodrell Bank Radio Telescope will not be supported”.</i></p>

<p>The policy should make specific reference to visitor accommodation and visitor amenity to take account of the impact turbines can have on the tourism and economic benefits of these uses.</p>	<p>The policy suitably addresses the impacts identified by national planning policy and builds on the strategic context set by policy SE8 'renewable and low carbon energy' in the LPS.</p>
<p>All proposals should be required to provide a visual impact assessment as part of the planning application submission to ensure that the impact of the proposals can be properly assessed.</p>	<p>Point 2 (iii) of policy ENV 9 'wind energy' in the revised publication draft SADPD refers to the need for a landscape appraisal or landscape visual impact assessment (when environmental impact assessment is required) that should carefully consider cumulative impacts.</p>
<p>United Utilities wishes to highlight that there are significant areas of Cheshire East which are public water supply catchment land. Policy ENV 7 should identify the need to engage with the statutory undertaker for water supply purposes to determine whether any proposal is on land used for public water supply catchment purposes. We recommend the inclusion of the following additional criterion under point 3 (vi). details of consultation with the relevant water undertaker.</p>	<p>Point 2 (iv) of policy ENV 9 'wind energy' in the revised publication draft SADPD refers to the need for details of consultation with statutory bodies and infrastructure providers, as appropriate. Additional guidance regarding the need for engagement with the relevant water undertaker is included in the supporting text to policy ENV 9.</p>
<p>The SADPD should provide guidance to help with the interpretation of what should be; "affected local communities have been fully addressed...and have their backing". This must ensure that renewable wind schemes can be delivered sustainably. The policy should be clear so that renewable technology can come forward. At one extreme it could imply that any and every last objection on any matter relevant to wind energy must be fully overcome and no objections can be allowed in order for development to be supported. At the other extreme it could simply require development to have support from the majority of the local community (or that the number of objections does not equate to more than 50% of the local community) to not object to a proposal in order for it to benefit from policy support.</p>	<p>The wording contained in the supporting text to policy ENV 9 'wind energy' is considered to be consistent with footnote 49 of the National Planning Policy Framework.</p>
<p>Natural England – strong references to cumulative impacts and avoiding impacts on designated sites, which is welcomed.</p>	<p>Noted.</p>
<p>The issue of sensitive landscapes is understood when it comes to impact on nearby residents, but object to the notion that wind turbines</p>	<p>Policy ENV 9 'wind energy' in the revised publication draft SADPD refers to 'suitable' areas being outside of areas highly sensitive to</p>

<p>are an eyesore and should not be allowed. Not only are they graceful structures, but they have an underlying beauty in their purpose.</p>	<p>wind energy development, including local landscape designations, the Peak District National Park Fringe and their settings. The policy also includes a number of landscape considerations, including cumulative impacts, which are one of a number of factors that will be used to consider proposals for wind energy in the borough. Each application will be considered on its own merits.</p>
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Policy ENV 10 ‘Solar energy’

Summary of main issues raised:	How the main issues have been taken into account
<p>No mention in the policy currently to developed land that provides potential for roof arrays on industrial agricultural buildings – potential to provide above ground level capacity and access to the grid</p>	<p>Proposals for roof arrays on industrial agricultural buildings would be considered in line with Policy ENV 10 ‘solar energy’ in the SADPD and other relevant policies in the Local Plan. Point 7 of the policy refers to photovoltaics for domestic / non-domestic buildings and general support for roof based schemes where they do not conflict with other parts of the Development Plan.</p>
<p>Due to reduction in government subsidies, those applications that have been approved but not constructed within three years should be subject to a full re-appraisal in the light of the LPS and emerging SADPD policies</p>	<p>Policy ENV 10 ‘solar energy’ in the SADPD would be used to consider schemes as they are submitted to the Council for consideration through the planning system once the SADPD is adopted.</p>
<p>Require reference to aircraft safety in policy ENV 10. Proposals should not have an impact on aircraft safety. Additional paragraph needs to be inserted under supporting information, as follows:- “4.58 The presence and operation of solar panels can present operational issues for aviation. In addition to their potential for presenting a physical obstacle to air navigation, solar panels can present a hazard to aircraft by: being attractive to birds to roost or nest on; creating a glint or glare hazard to pilots and air traffic control personnel and potential interference with aeronautical communication navigations systems (CNS) equipment”.</p>	<p>The supporting text to policy ENV 10 ‘solar energy’ in the SADPD has been amended to read:-</p> <p><i>“The presence and operation of solar panels can present operational issues for aviation. In addition to their potential for presenting a physical obstacle to air navigation, solar panels can present a hazard to aircraft through glint or glare impacts and potential interference with aeronautical communication navigation systems (CNS) equipment. Developers are encouraged to undertake thorough pre-planning application discussions with airport operators at the earliest stage of project planning. Where consultations with the relevant operators identify that there may be impacts on air traffic safety then proposals</i></p>

	<i>will not be supported”.</i>
Agricultural land requires good management techniques and should not be lost to alternative uses.	Noted, policy ENV 10 ‘solar energy’ in the SADPD (point 2) states that proposals should avoid the loss of best and most versatile agricultural land in line with policy RUR 5 ‘best and most versatile agricultural land’ in the SADPD.
To require opportunities for solar development to effectively 'rule out' all PDL before looking towards non-PDL imposes a significant risk that opportunities to help meet our climate change objectives would be unnecessarily lost. Low-margin development such as solar arrays will not be able to compete with higher value uses, such as residential or commercial. The policy should be flexible enough so that opportunities for development of solar arrays can come forward on areas that are not PDL where it can be demonstrated that they provide a clear and demonstrable need and the benefits outweigh the harm, as opposed to a sequential expectation that all PDL must be utilised first.	Policy ENV 10 ‘solar energy’ in the SADPD states that proposals for solar farms / parks should be located on previously developed land, wherever possible. This appropriately focuses schemes to previously developed land but acknowledges that that is not always possible. This approach is consistent with policy SE 2 ‘efficient use of land’ in the Local Plan Strategy.
Object to the policy omitting reference to landscape character assessment. The policy should reference ‘unbuilt / natural or’ before historic environment.	The word ‘natural’ has been added to point 5 of policy ENV 10 ‘solar energy’ of the SADPD. The policy makes reference to LPS policy SE 8 ‘renewable and low carbon energy’ which refers to landscape considerations.

Policy ENV 11 ‘Proposals for battery energy storage systems’

Summary of main issues raised:	How the main issues have been taken into account
Support for policy subject to the safeguards set out	Noted.
Criterion 1 should be deleted. Disagreement with sequential approach set out – PDL or existing industrial areas to be considered first - as opportunities are often lost due to competing land uses.	Policy ENV 11 ‘proposals for battery energy storage systems’ in the SADPD states that proposals for solar farms / parks should be located on previously developed land, wherever possible. This appropriately focuses schemes to previously developed land but acknowledges that that is not always possible. This approach is consistent with policy SE 2 ‘efficient use of land’ in the Local Plan Strategy.
Due to intermittent nature of renewable energy sources – increased	It is considered that policy ENV 11 ‘proposals for battery energy

call for energy storage facilities. Planning system needs to be flexible to allow for development in the right locations.	storage systems' provides the correct policy context for the consideration of such proposals.
Council should consider allocating sites for the development of renewable energy and energy storage facility. One opportunity is referenced at Warmingham brine extraction and gas storage site.	The SADPD includes a number of criteria based policies related to the consideration of schemes for renewable energy generation including proposals for battery energy storage systems.

Policy ENV 12 'Air quality'

Summary of main issues raised:	How the main issues have been taken into account
Lack comprehensive distribution of monitoring equipment to collect sufficient data and therefore to evaluate impacts effectively. The policy should include a commitment to introduce a comprehensive system and a target date.	<p>Separate legislation exists for emissions of air pollutants. The Environment Act 1995 requires local authorities to review and assess the current and future air quality in their areas and designate air quality management areas (AQMA) if improvements are necessary. CEC have declared 19 AQMAs and developed an Air Quality Strategy and Air Quality Action Plan which details remedial measures to tackle the problem.</p> <p>LPS Policy SE12 (Pollution, Land Contamination and Land Instability) supports improvements to air quality, and states that development should not contradict the Air Quality Strategy or Air Quality Action Plan.</p>
Protection of residential amenity should be expanded to include the protection of visitor amenity. It should be reworded to include "Development that is likely to produce an odour should demonstrate that there will be no negative effect on residential and visitor amenity."	The issue of odour has been removed from the SADPD as it has been addressed by LPS Policy SE 12 (Pollution, Land Contamination and Land Instability) and LPS Policy SE8 (Renewable and Low Carbon Energy).
United Utilities operates a range of wastewater treatment works within Cheshire East and notes that the Policy should take into account Para 182 of the NPPF. A third criterion should be included regarding new proposals being able to integrate with existing businesses, and existing businesses not having unreasonable restriction placed on them as a result of development permitted after they were established.	A new policy has been included within the Revised Publication Draft SADPD [to cover the Agent of Change Principle – 'ENV 15 New development and existing uses'.

<p>ENV 12 and ENV 13 are too general. The airport operations need more attention both for aircraft emissions and noise.</p>	<p>CEC don't have any requirements to monitor the aircraft emissions directly. CEC monitor in the Knutsford area for the pollutants as required by Defra and the sources of these are from road traffic. The aircraft are at a height when they pass over the town where the emissions will disperse well enough to not be considered an issue.</p> <p>Noise has been address in LPS Policy SE 12 (Pollution, Land Contamination and Instability) and within the SADPD Policy ENV 13 Aircraft Noise.</p>
<p>Elaboration of the type of mitigation measures that would be sought would give better guidance to prospective developers.</p>	<p>Mitigation measures will be locationally specific, depend on the proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions and obligations can also be used to secure mitigation where the relevant tests are met.</p>
<p>In the case of odour pollution should there not be a requirement for mitigation measures if there are demonstrable impacts on local amenities.</p>	<p>The issue of odour has been removed from the SADPD as it has been addressed by LPS policy SE 12 (Pollution, Land Contamination and Land Instability) and LPS policy SE8 (Renewable and Low Carbon Energy).</p>
<p>Support of policy when there is a notable increase in car ownership, particularly in rural areas. In addition to this is the likely impact on air quality of infrastructure proposals such as HS2a and the construction traffic associated with these works and other strategic land releases.</p>	<p>Support noted.</p> <p>CEC have developed an Air Quality Strategy and Air Quality Action Plan which details remedial measures to tackle the problem of air pollution. LPS Policy SE12 (Pollution, Land Contamination and Land Instability) states under Point 3 <i>“development should support improvements to air quality, not contradict the Air Quality Strategy or Air Quality Action Plan and seek to promote sustainable transport policies”</i>.</p>
<p>Paragraph 1 refers to mitigation through the design of sensitive receptors but recent examples of non-opening windows and mechanical ventilation is not considered to provide acceptable living conditions for residents. The policy should be amended with the insertion of “without comprising the amenity of future occupants” at the</p>	<p>Mitigation measures will be locationally specific, depend on the proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions and obligations can also be used to secure mitigation where the</p>

end of the sentence.	relevant tests are met.
It is not clear if the above policy addresses the impacts of air quality on the natural environment. Para 181 of the NPPF should be taken into account. The policy should be strengthened to include impacts on Designated Sites, as well as include potential traffic impacts of new development and new agricultural developments (e.g. intensive pig and poultry) if this is a known air quality risk.	Any major application submitted comes with an air quality assessment, or one is requested if not. These assessments also take into account deposition on nearby SSIs etc. and other ecological areas of interest if there is deemed to be a potential issue.
CEC needs to survey existing air quality in places like Bollington, not just in conjunction with and adjacent to new developments.	CEC routinely monitors the air quality in Bollington.
There is no recognition in this policy regarding the impact of low-level air borne contamination (particularly by motor vehicles) on sensitive ecological areas. Air-borne contaminants require a more stringent and robust implementation.	Any major application submitted comes with an air quality assessment, or one is requested if not. These assessments also take into account deposition on nearby SSIs etc. and other ecological areas of interest if there is deemed to be a potential issue.
The policy does not include a solid commitment to introduce an air quality strategy that will improve its air quality performance, including better coverage of the Borough with (more) diffusion tubes, better data collection (properly monitored) and robust action taken without delay wherever necessary. Measures in the Air Quality Strategy such as banning HGVs from certain roads and introducing 20mph zones are welcomed. However, in the event of a serious breach of trust that has occurred in respect of air quality management there should be a stronger policy covering this important environmental issue.	CEC adopted the new Air Quality Strategy in October 2018 so this is now covered.

Policy ENV 13 'Aircraft noise'

Summary of main issues raised:	How the main issues have been taken into account
<p>Whilst it is acknowledged that it is important to appropriately assess locations potentially affected by significant aircraft noise, there are concerns about how policy ENV 13 does not provide clarity but alternatively invites comments on the methodology to be used. The report produced by Jacobs in August 2018 (Background SADPD Evidence Base Ref - FD15) doesn't provide robust conclusions, but invites consultation on the proposed methodology.</p>	<p>The FDSADPD sought views on a proposed methodology for determining an appropriate and justified aircraft noise policy. It did not present any draft policy wording. The initial Publication Draft SADPD contained a draft aircraft noise policy which was consulted on and subsequently a revised draft aircraft noise policy is presented in the Revised Publication Draft SADPD.</p>
<p>The decision not to propose allocated sites for housing sites in Mobberley, based on the potential impact of aircraft noise, without presenting robust conclusions from an aircraft noise assessment questions the soundness of the plan.</p>	<p>As set out in the 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], it is not considered appropriate to disaggregate the overall LSC housing and employment figures to individual LSCs in the Revised Publication Draft SADPD due to the level of completions and commitment and lack of suitable employment sites. ED 05 also concludes that it is not necessary to make allocations for housing sites at the LSC tier of the hierarchy (including Mobberley).</p>
<p>It is unclear how the strong demand for open market housing in Mobberley and Knutsford, with the apparent Aircraft noise issue, is reflected in the proposed policy.</p>	<p>The proposed policy in the Revised Publication Draft SADPD seeks to avoid significant adverse aircraft noise impacts on health and quality of life, and adequately mitigate and minimise adverse impacts on health and quality of life. It requires that the issue of aircraft noise is appropriately considered and reflected in planning decisions.</p>
<p>Given that road and rail noise are far more prevalent and affect much greater proportion of the council's district it would seem appropriate that these sources should also be considered as a wider review of all the noise policy aspects of the local plan.</p>	<p>The impacts of other types of noise on new development are addressed through other Plan policies.</p>
<p>It would be useful if Policy ENV 13 were to expand on the second element of the ICAO balanced approach to reference the advice on land use planning in ICAO guidance DOC 9184, Part 2 Edition NO. 3 Dated 27/3/09. This advice can be summarised as not solely to "discourage or prevent" noise sensitive development in areas affected</p>	<p>The policy seeks to allow development in areas subject to aircraft noise between the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL) where satisfactory levels of internal ambient noise and noise in external amenity areas can be achieved. The policy has been formulated</p>

<p>by aircraft noise, but is more nuanced in suggesting that whilst there are locations that are just too noisy where noise sensitive development etc. should be prevented undue to unacceptable effects or on health and quality of life, there are other locations affected by less aircraft noise that can be developed for noise sensitive uses etc. provided adequate mitigation. This approach is reflected in the land use section of the Aviation Policy Framework (APF), The proposed policy should not solely look to “discourage or prevent” noise sensitive development in areas affected by aircraft noise as this would be excessive if no consideration is given to the degree of aircraft noise and/or the potential mitigation that could be included in a scheme to prevent unacceptable and avoid significant effects.</p>	<p>taking account of a range of relevant information and evidence as set out in the Aircraft Noise Policy Background Report [ED 15]. It provides clarity for prospective applicants and decision makers as to where schemes will be acceptable and where they will not and the need for noise mitigation measures where appropriate.</p>
<p>The Agent of Change Principle is highlighted. But is not a new concept as from at least 1994, PPG 24 paragraph 12 the inclusion of specific reference to the ‘Agent of Change’ principle in the revised NPPF amounts to a change of emphasis rather than the introduction of an alien and entirely novel concept. Given the exclusion of aircraft from civil and statutory nuisance law under the Civil Aviation Act 1982 s.76(1) or s.77(2) there already is a substantial degree of protection for airports and aircraft against imposition of legal controls against noise, and it would seem excessive and contrary to the principles in paragraph 183 of the revised NPPF to replicate this protection in the local plan.</p>	<p>The focus of the policy is on managing new development in areas affected by aircraft noise.</p>
<p>The policy ENV 13 ought to take account that the Noise Policy Statement for England. The NPSE seeks to balance the negative effects of noise with the positive benefits of development.</p>	<p>The NPSE has been taken into account in drafting the policy. This is reflected in the Aircraft Noise Policy Background Report (Jacobs, 2020) [ED 15], published alongside the revised PDSADPD, which provides its background evidence and justification.</p>
<p>The Policy ENV 13 should recognise that the PPG supplements the NPSE and NPPF policy by defining what are No Observed Adverse Effect (NOEL), Significant Observed Adverse Effects (SOAEL) and Unacceptable Adverse Effects (UAELs) i.e. these terms have specific meaning in the context noise policy and not their normal colloquial connotation.</p>	<p>Policy ENV 13 reflects this and applies these concepts with values and associated policy direction for prospective applicants and decision-makers.</p>

<p>The policy should acknowledge that whilst the PPG advises that Local Planning authorities can develop and include in their Local Plans specific noise standards to apply to various forms of proposed development and locations in their area. Care should be taken, to avoid these being implemented as fixed thresholds as specific circumstances may justify some variation being allowed i.e. Policy ENV 13 should leave room for the exercise of informed discretion.</p>	<p>It is important that policy ENV 13 provides clarity for prospective applicants and decision makers as to the acceptability or otherwise of development proposals in terms of aircraft noise. Decision makers do have discretion in that they can take into account all other relevant material considerations.</p>
<p>The PPG identifies factors that might need to be considered when making a judgment. Although the NPSE, NPPF and PPG has adopted two categories of effect from the WHO Guidelines, and then added to them a category or level not derived from the Guidelines, namely the "significant observed adverse effect level". They did not adopt or incorporate more from these Guidelines, or any other standard. Accordingly, the NPSE, NPPF and PPG do not adopt or incorporate the specific advice in the WHO's Guidelines or any other standard about what noise levels might be appropriate in the circumstances. Further, the NPSE, NPPF and PPG do not treat the WHO Guidelines or any standard as setting any specific noise threshold that must apply. Instead the decision maker can form their own judgment in the context of the proposed scheme and the site in question and in the light of the technical evidence provided</p>	<p>The Aircraft Noise Policy Background Report (Jacobs, 2020) [ED 15] does consider the WHO Guidelines but noted that these guidelines do not provide specific levels for aircraft noise. It noted that, in addition, the recommended levels have not been adopted by the UK Government in aircraft noise policy, and as such may best be considered as thresholds above which it may be appropriate to provide noise mitigation.</p>
<p>Ensure that the policy ENV 13 does not elevate the existing or recently published WHO guidelines as immutable limits that must be complied with in every case, not least because they represent the onset of effects i.e. are broadly equivalent to NOELs or LOAELs which policy permits rather than representing SOAELs that policy states should be avoided or prevented.</p>	<p>See previous response, above.</p>
<p>Regarding noise sensitive residential development, the most effective descriptors for effects of aircraft noise are day time LAeq,16 hr and night LAeq,8 hr for overall annoyance and sleep disturbance respectively, which can be derived from the airport noise contours. In order to assess the impacts on sleep of peak noise levels from individual aircraft movements, these metrics should be supplemented</p>	<p>The LAeq,16 hr and night LAeq,8 hr metrics are used in the policy along with LAFmax, the latter in terms of night-time internal noise levels related to individual noise events.</p>

<p>by site surveys of L_{Amax} values and number of events at night (covering both westerly and easterly modes of operation of the airport as departure and approach L_{Amax} values are likely to be different).</p>	
<p>The following additional references are suggested. Secretary of State decisions made regarding planning inquiries where the principle issue has been the question of aviation noise; and what levels can be regarded as representing The ProPG jointly published by the Chartered Institute of Environmental Health, The Institute of Acoustics and the Association of Noise Consultants in May 2017. This supports the implementation of policy and guidance regarding noise and planning and noise A Review of “Aircraft noise and cardiovascular disease near Heathrow Airport in London: small area study. Stephen Stansfeld, , Colin Grimwood, Bernard Berry WHO Environmental Noise Guidelines for the European Region: A Systematic Review of Transport Noise Interventions and Their Impacts on Health</p>	<p>A significant and appropriate range of evidence has been considered in formulating the draft policy including references referred to in the representation. These are set out in The Aircraft Noise Policy Background Report (Jacobs, 2020) [ED 15]</p>
<p>The effect of aircraft noise upon the amenity of local residents requires careful consideration in the planning process and development should be limited in certain affected areas. Policy should therefore be included within the SADPD that controls development (residential and other noise sensitive development) in areas adversely affected by aircraft noise and should provide details of the levels of noise at which planning permission would be refused or granted subject to appropriate protection against noise. This would limit development to that which is compatible with noise levels in the area and ensure that development is capable of occupation without undue nuisance from aircraft noise. The policy should reflect guidance contained within the National Planning Policy Framework (NPPF) and Noise Policy Statement for England (NPSE).</p>	<p>The aircraft noise policy contained in the Revised Publication Draft SADPD addresses these issues raised.</p>
<p>The aircraft noise policy should be informed by Manchester Airport’s Noise Action Plan and regularly updated noise contours. Consultation on the draft Noise Action Plan 2019-2023 took place earlier this year</p>	<p>Policy ENV 13 would operate alongside the Airport’s Noise Action Plan, to specifically manage development in the vicinity of the airport. The Noise Action Plan is the Airport’s strategy for managing aircraft</p>

<p>and it is now awaiting formal adoption. The Noise Action Plan will commit to offer predicted noise contours, which will allow the policy to take forecast noise into consideration.</p>	<p>noise to reduce impacts on communities living around the Airport. The application of policy ENV 13 on the ground is governed by the noise contours published each year by the Civil Aviation Authority.</p>
<p>Another forecast impact that can be considered when writing the aircraft noise policy is Airspace Change. This is a nationally promoted review of airspace by NATS (National Air Traffic Services) that will re-position some of the airways over the UK and will determine the future routing of aircraft in the vicinity of Manchester Airport. Consultation on Airspace Change is imminent, and we therefore advise that you are mindful of this to ensure that the aircraft noise policy is not compromised by the outcome of this.</p>	<p>The policy provides a direction to the decision maker based on where a site falls against the daytime and night-time noise contours. If the outcome of the Airspace Change process for Manchester Airport is a shift in the position of these contours then this can be reflected in decision making for subsequent applications.</p>

Policy ENV 14 ‘Light pollution’

Summary of main issues raised:	How the main issues have been taken into account
<p>No mention of Full Cut Off Lighting which should be specified for all exterior lighting and CEC’s commitment to the Dark Skies objective.</p>	<p>It would not be reasonable to expect all applicants to install FCO lighting for all exterior lighting. Each application must be considered on its own merits. Where the Council decides to grant planning permission, it may decide to impose conditions covering such matters as the need for full horizontal cut-off lighting, column heights, light levels, hours of illumination, retention of screening vegetation etc. The Institute of Lighting Engineers Guidance gives advice on acceptable levels of illumination and provides guidance on the choice of lighting equipment and the control over glare and direction of light.</p>
<p>Objection to the wording of “external lighting must include details of the lighting scheme as part of the application”. This wording requires all applications, including outline applications where the detailed design of scheme maybe unknown, to be accompanied by such details. A suitably worded condition on any planning permission would successfully deal with this.</p>	<p>The sentence “<i>application for development requiring, or likely to require, external lighting must include details of the lighting scheme as part of the application</i>” has been removed in the SADPD.</p>
<p>The wording “acceptably minimised” under Criteria 2 is ambiguous - an alternative wording should be used.</p>	<p>Comment noted. The sentence has been amended in the SADPD to state “2. Light spillage and glare will be minimised to an</p>

	<u>acceptable level.”</u>
Criteria 4 could be usefully expanded to include greater reference to preventing light pollution on habitat/wildlife corridors due to the impact lighting can have on protected species such as bats. This could also correlate with paragraph 4.67.	Comment noted. The policy builds on SE12 (Pollution, land contamination and land instability). This states “ <i>the council will seek to ensure all development is located and designed so as not to result in a harmful or cumulative impact upon air quality, surface water and groundwater, noise, smell, dust, vibration, soil contamination, light pollution or any other pollution which would unacceptably affect the natural and built environment, or detrimentally affect amenity or cause harm</i> ”.
The policy should be strengthened to require the use of ‘the most energy efficient lighting available at the time’ which also links back into policy ENV 7 Climate Change.	Comment noted. The policy refers to lighting schemes being energy efficient as possible.
Policy makes no differentiation between urban lighting where comparatively higher light levels during the hours of darkness may be reasonable tolerated, and rural lighting systems that can have a far greater and wide reaching impact across open countryside.	The policy takes into account that there will be no significant adverse impact on “the character of the area”. Additional information has however been inserted into the Supporting Information section in the Revised Publication Draft SADPD which states the following: “Particular attention should be paid to proposals involving additional lighting in/around conservation areas, or on/in proximity of listed building to prevent any harm arising to these historic assets; <u>and to lighting proposals in rural areas which can significantly affect the character of a dark location.”</u>
In rural areas where there is limited or no street lighting, the impact of light pollution rises exponentially the more remote the area is from urban conurbations and their hinterland. The impact on wildlife also has a higher impact the further the site is from urban centres. The policy therefore requires a statement that reflects the need for more robust conditioning in areas where the lack of night-time illumination is significant and valued characteristic of that area.	As above.

Policy ENV 15 ‘Surface water management and flood risk’

This First Draft SADPD policy has the reference ENV 16 ‘Surface water management and flood risk’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>The policy confuses the assessment of the hierarchy of surface water drainage with the inclusion of SUDs and should be reworded.</p>	<p>Amend bullet 3 to read: ‘...through a sustainable drainage system (SuDS). <u>The preference will be for new development to incorporate surface level sustainable drainage systems with multi-functional benefits, as opposed to underground tanked storage systems, for the management of surface water.</u> If it is demonstrated...’</p> <p>New bullet 3. A (now bullet 4): <u>Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes.</u></p> <p>Add sentence to ¶4.73 (now ¶4.88): <u>In relation to the reduction of greenfield runoff rates, applicants should include clear evidence of existing positive operational connections from the site with associated calculations on rates of discharge. This evidence is critical to make sure that development does not increase flood risk.</u></p> <p>New ¶4.73a (now ¶4.89): <u>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge.</u></p> <p>Amend ¶4.74 (now ¶4.90) to read: ‘...public sewerage network. <u>The expectation will be for only foul flows to communicate with the public sewer.</u> Applicants’</p>

Summary of main issues raised:	How the main issues have been taken into account
	<p>Add to new ¶4.74a (now ¶4.91): <u>‘Approved schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes.’</u></p> <p>New ¶4.74b (now ¶4.92): <u>‘Any development proposal that is part of a wider development/allocation should demonstrate how the site delivers foul and surface water drainage as part of a wider strategy, having regard to interconnecting phases of development. It will be necessary to make sure the drainage proposals are part of a wider, holistic strategy that coordinates the approach to drainage between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of how the approach to foul and surface water drainage on a phase of development has regard to interconnecting phases in a larger site. Infrastructure should be sized to accommodate flows from interconnecting phases and drainage strategies should make sure a proliferation of pumping stations is avoided on a phased development. This will make sure that a piecemeal approach to drainage is avoided and that any early phases of development provide the drainage infrastructure to meet the needs of any later interconnecting phases of development. In delivering drainage as part of a wider strategy, applicants will be expected to ensure unfettered rights of discharge between the various parcels of development in a wider development to prevent the formation of ‘ransom situations’ between separate phases of development.’</u></p>
<p>Discharges are not granted as of right to Canal and River Trust waterways; where they are granted, they will usually be subject to completion of a commercial agreement.</p>	<p>New ¶4.74c (now ¶4.93) <u>‘The Canal & River Trust is not a land drainage authority and surface water discharges from development into Canal & River Trust waterways are not granted as of right; where they are granted they will be subject to completion of a commercial agreement.’</u></p>

Summary of main issues raised:	How the main issues have been taken into account
Request for a further point to be added to the policy that identified the specific surface water drainage requirements in areas that are in or adjacent to the water catchment areas of ecologically sensitive and designated sites.	The impacts of development on ecologically sensitive and designated sites are covered in LPS Policy SE 3 'Biodiversity and Geodiversity', and Revised Publication Draft SADPD Policies ENV 1 'Ecological network' and ENV 2 'Ecological implementation'.
Paragraph 4.71 should be amended.	¶4.71 (now ¶4.86) amended to read: 'LPS Policy SE 13 'Flood risk and water management' seeks to reduce flood risk in the borough, through directing development to those areas that are at lowest risk of flooding from all potential sources (sequential approach). <u>Sequentially, the lowest risk area of flood zone 1 (river and sea flooding). For fluvial and sea flooding, higher probability areas of flooding are principally land in flood zones 2 and 3. Development will not be acceptable if there are reasonably available sites appropriate for that development in areas of lower probability of flood risk. In line with the requirements of the NPPF, in the first instance development should be situated in Flood Zone 1 (low risk). Where development in Flood Zone 1 cannot be accommodated, consideration should then be made towards situating development in Flood Zone 2. Development in Flood Zone 3 should only be proposed if there are no reasonably available alternative sites (subject to the exceptions test). Inappropriate development in Flood Zone 3b will not be permitted.</u>
Request for amends to supporting text to provide further detail with regards to the sequential approach and to reference that it is not always appropriate to discharge surface water runoff from certain catchments to the environment prior to appropriate levels of treatment.	New ¶4.74a (now ¶4.91) ' <u>However, it is not always appropriate to discharge surface water runoff from certain catchments to the environment prior to levels of treatment. Proposals for SuDS schemes should always be designed to incorporate sufficient treatment stages to make sure that the final discharge is treated to such a standard as is appropriate for the receiving environment. Further information is available from the Environment Agency in its groundwater protection guidance and position statements and The SuDS Manual (CIRIA).</u>
The Environment Agency has not identified/allocated any critical drainage areas within Cheshire East.	Amend ¶4.75 (now ¶4.94) to read: '...the local planning authority by the Environment Agency.' <u>The Environment Agency has not</u>

Summary of main issues raised:	How the main issues have been taken into account
	<u>identified or allocated any critical drainage areas in Cheshire East.</u>
A recommendation that, to improve clarity, paragraphs 4.76 and 4.77 should be amalgamated and amended.	Delete ¶¶4.76 and 4.77. New ¶4.76 (now ¶4.95) <u>Development(s) shall be situated to avoid the risk of flooding. Where this cannot be achieved, any development situated in areas at risk of flooding must be designed to make sure they are made safe for their lifetime and do not increase the risk of flooding onsite or elsewhere, taking into account the impact of climate change. Mitigation of flood risk shall be achieved by incorporating on-site measures. Off-site measures shall only be considered where proposed on-site measures are inadequate or where no alternative can be provided. Examples of proposals that could reduce the risk of flooding include mitigation/defence/alleviation work, retro-fitting of existing development, and off-site detention/retention for catchment-wide interventions.</u>
Mature trees can have an effect on surface water flooding.	Trees play an important environmental role, which is highlighted in the supporting information (¶4.31) of Revised Publication Draft SADPD [ED 01] Policy ENV 6 ‘Trees, woodland and hedgerows’ in relation to the control of water flow. Therefore it is not necessary to repeat this in Policy ENV 15.

Policy ENV 16 ‘Protecting water resources’

This First Draft SADPD policy has the reference ENV 17 ‘Protecting water resources’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The Environment Agency have defined Groundwater Source Protection Zones (GWSPZs) for groundwater sources, which are often used for public drinking water supply purposes. These SPZs signify where there may be a particular risk from polluting activities on or below the land surface. The prevention of pollution to drinking water	In the revised publication draft SADPD this is now covered in Policy ENV 17 “protecting water resources” which contains the words <i>“Any proposals for new development within groundwater source protection zones must accord with Environment Agency guidance set out in its document entitled ‘Groundwater Protection: Principles and</i>

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<p>supplies is critical. Our mapping system shows that none of the preferred or optional allocations are within SPZs 1 or 2. This is welcomed by United Utilities. However, with respect to any windfall sites or potential alternative sites, the planning department should be aware that early engagement with the Environment Agency and United Utilities is strongly recommended when development is proposed in GWSPZs so effective masterplanning can be undertaken. Where sites lie within a GWSPZ, it may be necessary that the applicant submits evidence of mitigation as part of their application.</p> <p>we recommend the following specific policy is included within the emerging Local Plan Review in regards to groundwater protection. “Any proposals for new development within Groundwater Source Protection Zones must accord with Environment Agency guidance set out in its document entitled ‘Groundwater Protection: Principles and Practice (GP3) August 2013’, or any subsequent iteration of the guidance.</p> <p>New development within Groundwater Source Protection Zones will be expected to conform to the following: Master planning, risk assessment, construction management</p>	<p><i>Practice (GP3) August 2013’, or any subsequent iteration of the guidance. New development within groundwater source protection zones will be expected to conform to the following:</i></p> <ul style="list-style-type: none"> <i>i. Master planning may be required to mitigate the risk of pollution to public water supply and the water environment. For residential proposals within source protection zone 1, pipework and site design will be required to adhere to a high specification to ensure that leakage from sewerage systems is avoided.</i> <i>ii. Appropriate management regimes to secure open space features in the groundwater protection zone.</i> <i>iii. A quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment.</i> <i>iv. Construction management plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters”.</i> <p>It also contains supporting information in Paragraph 4.98 “The Environment Agency has defined groundwater source protection zones for groundwater sources, which are often used for public drinking water supply purposes. These source protection zones signify where there may be a particular risk from polluting activities on or below the land surface. The prevention of pollution to drinking water supplies is critical.”</p>
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Chapter 5: The historic environment (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Although supported, these policies are examples of the synthesis of legacy policies leading to a more general and generic policy which loses the grain of specific references within the various townships</p>	<p>The revised publication draft SADPD includes a suite of policies relating to the historic environment which covers a number of relevant topic areas. The SADPD supplements the strategic policies included</p>

	in the LPS, including SE 7 ‘the historic environment’. Neighbourhood Plans can provide further, more locational specific policies, where relevant and justified to do so.
There does not appear to be the same level of focus given to our Heritage Assets as there does to other areas. We would have expected them to have been mapped in the same way as, for example, the Ecology of the area. Without a clear repository of this information it could make the impact assessments on the heritage assets and surrounding area more difficult and worryingly subjective	There are 9 policies in the revised publication draft SADPD relating to the historic environment in the borough. The SADPD supplements the strategic policies included in the LPS, including SE7 ‘ the historic environment’. A number of heritage assets, including Registered Parks and Gardens (amongst others), are included on the revised publication draft SADPD Policies Map. A number of designations that are referred to, are not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.
Cheshire East is an exceptional place to live and work. Given the number of wonderful conservation areas, listed parks and gardens and heritage features assets that Cheshire East has I expected to see this reflected and protected in the plan.	The suite of Heritage Policies is written to try and ensure that designated and non-designated heritage assets are provided with sufficient policy coverage in the revised publication draft SADPD.
HER 1-9 offer some general protection for heritage assets, however the characteristics of Knutsford’s Conservation Areas and specific reference to Listed Buildings in Knutsford has been lost in the policy detail. The Neighbourhood Plan will compensate, but the suite of heritage policies could be strengthened specifically for the Knutsford heritage assets.	The revised publication draft SADPD includes a suite of policies relating to the historic environment which covers a number of relevant topic areas. The SADPD supplements the strategic policies included in the LPS, including SE 7 ‘the historic environment’. Neighbourhood Plans can provide further, more locational specific policies, where relevant and justified to do so.
The council might usefully consider how this plan can encourage the commemoration of worthy local individuals. History is about people as well as places. If an otherwise undistinguished building is to be demolished, but has a connection with an important local person, the developer should be encouraged to mark that link in some way – such as a display of some kind, the design, or naming of the new development.	The suite of Heritage Policies is written to consider the approach to designated and non-designated heritage assets in the borough.
Crewe Town Council has recently adopted a policy on street naming very similar to the one which was adopted by Crewe & Nantwich	Street naming is a matter outside of the Cheshire East Local Plan. There is a section relating to street naming on the Cheshire East

<p>Borough Council. I'm not aware of an equivalent policy by Cheshire East Council and would suggest that it might usefully adapt and adopt the same.</p>	<p>website.</p>
<p>Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice</p>	<p>These documents are referenced in the revised publication draft SADPD.</p>
<p>The Local Plan for Cheshire East will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy.</p>	<p>Agreed, this theme runs through the suite of Heritage Policies in the revised publication draft SADPD.</p>
<p>A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. Whilst the Council has an existing evidence base for their adopted Local Plan, they need to ensure that this provides the most up-to-date evidence for the historic environment</p>	<p>The revised publication draft SADPD includes a suite of policies relating to the historic environment and appropriately references related evidence based documents where relevant to do so. The revised publication draft SADPD provides further detail on the LPS, particularly policy SE 7 'The Historic Environment'.</p>
<p>Historic England is concerned that the Plan policies do not contain policies that will deliver the conservation and enhancement of the historic environment in Cheshire East and to guide how the presumption in favour of sustainable development should be applied locally. In particular the policies in particular as drafted do very little to detail what elements of the area will be conserved and enhanced including specific references to its historic environment and the Plan needs to be amended to detail this.</p>	
<p>The chapter appears to have a series of policies covering the same types of assets. For example, a listed building by definition would sit under Policy HER 1, HER 2 (as it is designated) and HER 5 (title).</p>	<p>The suite of heritage policies in the revised publication draft SADPD is now structured to reflect specific advice on designated and non-designated assets. The revised publication draft SADPD provides further detail on the LPS, particularly policy SE 7 'The Historic Environment'.</p>
<p>It may be better to have one policy which applies to all heritage assets (as the same principle in terms of harm to the significance of the asset and its setting applies to all designated heritage assets) as required by</p>	

<p>the NPPF or alternatively, amend the proposed policies to ensure that it is clear which policy applies to which asset type. There could be separate points within the policy (or separate policies) to deal with elements of the historic environment that are not covered by this, for example, the council's position on non-designated assets, archaeology and if preferred, conservation areas. In addition to the above the Local Authority has a Registered Battlefield – Battle of Nantwich 1644 (List Entry number 1000022), yet the Plan does not appear to provide any guidance for applications affecting this asset.</p>	
<p>CPRE objects to the fact that the draft SADPD includes no policy on the protection and enhancement of the Borough's cultural heritage, whether such is focussed on the built or unbuilt/ natural environment. (An example is historic Knutsford, the 'Cranford' of author Elizabeth Gaskell). That omission should be rectified, especially with the importance of cultural heritage to the Borough's 'offer' for residents, businesses and visitors.</p>	<p>Supporting Information in paragraph 5.3 <i>Great weight must be given to the conservation of historic assets. The more significant the asset, the greater the weight that must be given to its conservation. Crucial to the conservation and enhancement of heritage assets is an understanding of what makes them significant, and how the setting contributes to that significance.</i></p>

Policy HER 1 'Heritage assets'

Summary of main issues raised:	How the main issues have been taken into account
<p>The comments of Historic England are fully supported and, where they identify weaknesses, CEC needs to strengthen the wording accordingly and ensure that proposed development meets the strengthened criteria. Historic England correctly identifies the economic contribution of designated and non-designated heritage assets and their settings and landscape views to the economic well-being of CEC historic towns.</p>	<p>The suite of heritage policies in the revised publication draft SADPD is now structured to reflect specific advice on designated and non-designated assets</p>
<p>Hope to see a continuation if not the strengthening of the protection afforded to heritage sites afforded by the old Congleton plan</p>	<p>The revised publication draft SADPD contains a comprehensive suite of heritage policies.</p>
<p>Mapping of heritage assets should be included on the policies map as is the case with ecological networks and other important features. Lack of reference to the assets leaves them exposed as there appear</p>	<p>A number of heritage assets are included on the policies map including Conservation Areas, Scheduled monuments, registered parks and gardens, registered battlefields, areas of archaeological</p>

<p>to be no reference points for planning applications</p>	<p>potential and areas of special archaeological potential. These designations that are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.</p> <p>A number of heritage assets are available on the Historic Environment Record (HER)</p>
<p>Do not object to the need for heritage statements if a proposal has an effect on a heritage asset.</p>	<p>The word “statement” has been removed and replaced with a requirement that all proposals affecting a historic asset or its setting must be accompanied by proportionate information that assesses and describes their impact on the asset’s significance.</p>
<p>Crewe Town Council welcomes the policy, but believes that a review of Crewe’s heritage and a strategy for its future interpretation and conservation is required. The town has a rich industrial and architectural heritage which is rapidly vanishing, and has received little protection through the planning system to date. A commitment to such a review and strategy in the supporting information would be a step forward.</p>	<p>Individual settlements are not mentioned in the policy wording, but a number of heritage assets are mapped on the Policies Map and non designated heritage assets are available on the Historic Environment Record (HER).</p>
<p>This policy should begin with the Council’s position on applications affecting the historic environment.</p>	<p>The introductory paragraph to the section on the historic environment highlights that heritage plays an important role in the quality and character of the borough including the economy and environment.</p>
<p>Bullet 1 doesn’t provide any guidance for those submitting an application affecting a heritage asset; rather it is a supporting sentence.</p>	<p>The wording of policy HER 1 as been amended to give greater clarity to those submitting an application affecting a heritage asset.</p>
<p>Bullet 2 should be the opening sentence of any policy, but it could be shortened as there is no need to list the types of assets within a policy. Reference should be made to the Borough’s historic environment, heritage assets and their setting rather just the latter.</p>	
<p>Bullet 3 would benefit from making it clear that there is a requirement that all applications affecting a heritage asset will be expected to submit a statement etc. rather than must be supported by a statement.</p>	

It might be helpful to include reference to the requirements contained in the Council’s validation checklist for listed building consent.	
Bullet 4: This would sit better within another section of the policy on harm.	This point is now part of Policy HER 2 “Heritage at Risk “in the revised publication draft SADPD
In addition to the requirements of this Policy, the requirements of Neighbourhood Plans on this topic must also be implemented. This requires consideration of the setting of “non-designated heritage asset” and the wording should include “and/ or its setting”.	This point is now part of the supporting information for Policy HER 7 “Non designated assets “in the revised publication draft SADPD
CPRE objects to the fact that point no. 3 does not address the importance of the setting of heritage assets. The words “non-designated heritage asset” should be followed by “and/ or its setting”.	Policy HER 1 now contains a requirement that all proposals affecting a historic asset or its setting must be accompanied by proportionate information that assesses and describes their impact on the asset’s significance.

Policy HER 2 ‘Designated heritage assets’

This First Draft SADPD policy has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
There does not appear to be any reference to the historic assets we have within Brereton parish and therefore there is concern that they will not be afforded the current level of protection they have within the existing plans in place, such as the Congleton Local Plan.	Individual settlement are not mentioned in the policy wording, but a number of the heritage asset types are mapped on the Policies Map and are available on the Historic Environment Record (HER)
There does not appear to be the same level of focus given to our Heritage assets as there does to other areas. I would have expected them to have been mapped in the same way as, for example, the Ecology of the area. The lack of reference to the assets leaves them exposed as there are no reference points for planning applications for those interested in the assets themselves.	A number of heritage assets are included on the policies map including Conservation Areas, Scheduled monuments, registered parks and gardens, registered battlefields, areas of archaeological potential and areas of special archaeological potential. These designations that are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position A number of heritage assets are available on the Historic Environment

	Record (HER)
Bullet 1: Does the policy need to define what a designated heritage asset is? Could this sit within the supporting text? This also appears to repeat content in Policy HER 1.	This policy has been deleted in the Revised Publication Draft SADPD. Paragraph 5.5 in the supporting information to Policy HER 1 'Heritage Assets' lists examples of designated heritage assets.
Bullet 2: and Bullet 3: Unacceptable harm to a heritage asset should be avoided and the policy could be simplified to have one paragraph covering this and the public benefits required rather than repeating the NPPF.	This issue has been taken into account in the drafting of Policy HER 2 "Heritage at Risk" in the revised publication draft SADPD

Policy HER 3 'Non-designated heritage assets'

This First Draft SADPD policy has the reference HER 7 'Non-designated heritage assets' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
HER 3 lacks the caveat that harm should be weighed against specified public benefit. It could be added with advantage future drafts of the SADPD should also include an appendix with detailed addresses of all Locally Listed Buildings, so that these can be readily identified	This issue has been addressed through policy HER 7 in the revised publication draft SADPD "non-designated heritage assets" which includes the words – <i>"New development will be expected to avoid, minimise and mitigate negative impacts on such non-designated heritage assets. Development proposals that would remove harm or undermine the significance of non-designated heritage assets, or their contribution to the character of a place, will only be supported where the benefits of the development outweigh the harm having regard to the level of the harm to the significance of the non-designated heritage asset"</i> .
Policy HER 3 (1) outlines what constitutes a non-designated heritage asset and part (2) sets out the test to be applied to proposals affecting non-designated assets. This states that "Where such affects are unavoidable, proposals will not be permitted unless the scale of any harm to the significance of the heritage asset has been minimised and is outweighed by the public benefits of the proposal." With reference to paragraph 197 of NPPF18, Policy HER 3 needs revisiting to ensure that it applies the correct policy test for proposals affecting non-	Non designated assets are now addressed through policy HER 7 in the revised publication draft SADPD. This policy supplements policy SE 7 The Historic Environment in the LPS which notes (through policy Point 3b i) in relation to non designated assets refers to a "balanced consideration"

<p>designated heritage assets. The test that should be applied in relation to non-designated heritage assets is a 'balanced judgment'. Paragraph 197 clearly states: "In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</p>	
<p>Crewe Town Council considers that there should be an addition to the second paragraph of this policy to make clear that where a heritage asset cannot be saved, it should be replaced with a building of equal or greater architectural quality.</p>	<p>Noted, The policy cannot stipulate this specifically. The policy does contain policy wording in line with national planning guidance aimed at minimise and mitigate negative impacts on such non-designated heritage assets.</p>

Policy HER 4 'Conservation areas'

This First Draft SADPD policy has the reference HER 3 'Conservation areas' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>CEC's Conservation Areas are not listed in the document even as an Appendix. Only 34 have had Appraisals and many of those are more than 10 years old. No commitment is made to remedying these shortfalls or perhaps an indication that these should be done by Neighbourhood Plans with appropriate supervision. It is difficult to find the Conservation Areas and Appraisals on the website and some are not the most recent editions. The widespread ignorance of the purposes, advantages and responsibilities of Conservation Areas is not confined to householders but also to developers – especially individuals and small builders. This policy is a crucial priority for strengthening preferably within the policy itself and/or within the Explanatory supporting sections.</p>	<p>All CEC Conservation Areas are listed on the Council's website and appear on the Policies Map. The Policies Map shows a number of designations that are referred to, but not defined by the development plan. The spatial extent of these designations may alter over time and the online adopted policies map will be updated periodically to reflect the latest position.</p> <p>Information on Conservation Area appraisals can be found on the Cheshire East Council website.</p>
<p>Object to limb 3 of Policy HER 4 on the basis that there is no statutory or legal requirement that states outline applications cannot be accepted within Conservation Areas. Properly supported, outline applications can be appropriate within Conservation Areas and are</p>	<p>This has been amended and appears in the supporting information, for policy HER 3 'Conservation Areas' as follows:- <i>5.16 Planning applications for development within conservation areas should be submitted as full applications because outline applications</i></p>

<p>routinely accepted and approved across England. The requirement within HER 4 is therefore unsound as it has no legal basis and is not evidenced.</p>	<p><i>do not usually offer sufficient information to make an informed judgement of the likely visual impact of a proposal on its surroundings.</i></p>
<p>There is no need for development plan policy to repeat national planning policy guidance as set out through paragraphs 189 to 202 of the NPPF.</p>	<p>Policy HER 3 ‘Conservation areas’ appropriately sets out the policy considerations for development proposals within or affecting the setting of those areas. The policy further supplements the strategic context established by the LPS (SE 7 ‘the historic environment’). The supporting information for policy HER 3 in the publication draft SADPD notes that – <i>“Where consent for demolition of buildings within a conservation area is granted, conditions will be attached to make sure that no demolition can take place until the buildings are appropriately recorded before demolition, in accordance with ‘A Guide to Good Recording Practice’ (2016, Historic England). A copy of this record should be submitted to the local authority’s Historic Environment Record”</i> (para 5.15).</p>
<p>With regard to the second part of this policy, any harm should be assessed within the context of paragraphs 193 to 196 of the NPPF. There is no justification for arbitrarily requiring the retention of all buildings that make a positive contribution as there may be circumstances whereby it is desirable for such buildings to be demolished or substantially altered. Furthermore, the reference to certain conditions prior to any demolition of a building would be subject to the planning application, or conservation area consent, process and there is no requirement for such detail to be prescribed through the local plan.</p>	
<p>The policy would benefit from reference to applications being supported which enhances those elements identified as being positive in a conservation area and within the appraisal.</p>	<p>Paragraph 5.11 of policy HER 3 ‘Conservation areas’ in the revised publication draft SADPD notes in the supporting information that <i>“Development within or affecting the setting of conservation areas will be supported where it responds positively to local character, distinctiveness and history; reflects the identity and materials; and preserves or enhances its character and appearance.”</i></p>
<p>Para 5.6 contains text that should be in the policy.</p>	<p>The details of how to find new development opportunities in Conservation Areas, remains in supporting information however the details regarding how this will be achieved is included in the policy wording for policy HER 3 ‘Conservation areas;.</p>
<p>Related documents: conservation area appraisals should be mentioned in the policy.</p>	<p>These are referenced under “related documents”</p>

Policy HER 5 ‘Listed buildings’

This First Draft SADPD policy has the reference HER 4 ‘Listed buildings’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>The policy is supported but it remains weak. Historic England’s comments are apposite and merit inclusion in a re-draft. The policy does not mention Locally Listed buildings or buildings of Townscape Merit which are a prominent feature of Knutsford’s heritage landscape. These are presumably non-designated assets and, even if they are non-designated, they and their settings are key components of Conservation Areas. Harm to these buildings constitutes a failure to preserve and enhance the designated heritage asset of the Conservation Area. These points need to be spelled out clearly in one or other of these policies.</p>	<p>These points have been addressed through further amendments made to the heritage policies HER 1- HER 9 in the revised publication draft of the SADPD.</p>
<p>Support the objectives of the policy – should there be a reference to unauthorised works will be subject to action for discontinuance and reinstatement?</p>	<p>Policy HER 4 ‘listed buildings’ in the revised publication draft SADPD sets out the requirements of development and attempts to preserve and enhance listed buildings and their settings. If damage or harm is caused wilfully this would be a matter for enforcement.</p>
<p>Bullet 1: Is it necessary to list the type of proposals that may be included within an application? Could this be too prescriptive? Is architectural and historic integrity different to significance? How is integrity defined in terms of historic buildings and the requirements of national policy and guidance?</p>	<p>The policy HER 4 ‘listed buildings’ has been amended in the revised publication draft SADPD to provide additional detail on the factors development proposals that affect a listed building or its setting should consider.</p>
<p>Under the NPPF harm to the significance is harm and not defined as indirect or direct harm. Is this meaning setting?</p>	

Policy HER 6 ‘Historic parks and gardens’

This First Draft SADPD policy is titled HER 5 ‘Registered parks and gardens’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>A registered park or garden or one of local historic interest needs more positive protection than ‘should respect and preserve its character, setting and appearance’, The criteria for the development to be able to go ahead needs to be specified.</p>	<p>Policy HER 6 Historic Parks and Gardens has been updated in the revised publication Draft SADPD and is now HER 5 “Registered Parks and Gardens”. It contains additional policy wording to provide further detail on how development proposals affecting a registered historic park and garden (or its setting) will be considered.</p>

Policy HER 7 ‘World heritage sites’

This First Draft SADPD policy is titled HER 9 ‘World heritage site’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>Policy PG 8 proposes in the order of 16 new homes in Goostrey and the supporting information states that “the housing figure for Goostrey is low due to its location in one of the most sensitive areas for radio interference for the Jodrell Bank Observatory” (JBO) (para. 2.5). Whilst it may be generally accepted that Goostrey is in one of the most sensitive areas because it is in close proximity to JBO, there does not appear to be any supporting evidence to justify the low housing figure.</p>	<p>The approach to rural areas is considered in the ‘Provision of housing and employment land and approach to spatial distribution’ report [ED 05] and the ‘other settlements and rural areas’ report [ED 46]. The Revised Publication Draft SADPD includes a suite of policies related to the rural areas to help facilitate sustainable and appropriate development in those areas.</p> <p>Policy HER 9 World Heritage site in the revised publication draft SADPD provides further information regarding the world heritage site at Jodrell Bank. This builds on the strategic policy SE 14 ‘Jodrell Bank’ in the LPS.</p>
<p>FD Policy EMP2 allocates 2.3ha of land for employment use in Holmes Chapel. The site and settlement lies within the JBO consultation zone. The Council does not have any evidence base documents to justify the proposed development within the JBO consultation zone. Given the repeated refusal of applications for</p>	<p>Policy EMP 2 ‘employment allocations’ in the publication draft SADPD includes site EMP 2.8 ‘land west of Manor Lane, Holmes Chapel’. This proposed allocation is supported by the Employment Allocations Review document [ED 12].</p>

<p>residential development in the JBO consultation zone, it is considered necessary that the Council fully justifies employment development which must have the potential to impact upon the efficiency of JBO too.</p>	
<p>The evidence base for the FD does not include any documents relating to JBO or its impacts on housing delivery.</p>	<p>The ‘Provision of Housing and Employment Land and the Approach to Spatial Distribution’ report [ED 05] considers the issue of housing delivery for the plan as a whole, and for settlements in each tier of the settlement hierarchy.</p>
<p>The absence of additional guidance has effectively resulted in a “moratorium” on new development within the Consultation Zone, unless land is allocated by the Council (despite the fact that these sites would still have an impact on the Radio Telescope and have been objected to by Jodrell Bank). The Council’s lack of understanding of the technical evidence regarding adverse effects is evident through the inconsistent approach it has adopted when determining residential schemes within the Consultation Zone – in some cases, an arbitrary line on a proposals map (i.e. settlement boundary) has been found to make a scheme acceptable despite it still impacting on the Radio Telescope. As such, together with the “universal” weight applied by the Observatory to its operations, it means that the Council does not know how to deal with this matter consistently in the overall planning balance.</p>	<p>The council acknowledges that Jodrell Bank requires appropriate protection in line with Local Plan Strategy Policy SE 14 (Jodrell Bank). The council is working closely with the Observatory (Manchester University) to prepare a specific Jodrell Bank supplementary planning document (SPD) to set out further guidance to support the implementation of policy SE 14. This will also reflect its recent inclusion on the world heritage List. Policy HER 9 (World heritage site) of the SADPD identifies how the universal outstanding value of the world heritage site will be protected. The council is very conscious that the international scientific value of the Observatory is inextricably linked to its internationally important heritage value and this will be reflected in the SPD. Given the range of policy guidance that will need to be provided to support the implementation of LPS policy SE 14 (and now SADPD policy HER 9), the use of a SPD route is considered more appropriate, rather than further policy within the revised publication draft SADPD.</p>
<p>The poor wording of LPS Policy SE14 contributes significantly to this problem. Policy SE14 sets out that any adverse effect(s) which cannot be mitigated will mean that a development should be refused. However, this Policy does not account for the fact that the University of Manchester (the statutory consultee) now object, as a matter of principle, to all new development within the Consultation Zone, regardless of its direct effects and the potential for mitigation. This means under Policy SE14 that all new developments are refused where Jodrell Bank objects (even replacement dwellings), and as such</p>	<p>See above</p>

effectively precludes any new development across a large area of the Borough – an approach inconsistent with the wider LPS.	
Object to the SADPD owing to the absence of any specific policy on Jodrell Bank.	Policy SE 14 ‘Jodrell Bank’ provides guidance on proposals within the Jodrell Bank Telescope Consultation Zone. This is further supplemented by policy HER 9 which recognises the importance of Jodrell Bank as a UNESCO world heritage site.
Policy HER 7 outlines the policy approach in relation to proposals affecting world heritage sites but this is not considered necessary within the SADPD.	Jodrell Bank is now a UNESCO world heritage site and the updated policy wording (HER 9) reflects the necessity of this policy in the revised publication draft SADPD.
The site is already afforded protection through Policy SE 14 of the LPS and the associated consultation zone. Policy SE 14 of the LPS is a restrictive policy and we object to the inclusion of a further restrictive policy in relation to proposals in this location. This additional level of protection is not necessary and is not appropriate as there are currently no UNESCO world heritage sites within the borough.	Jodrell Bank is now a UNESCO world heritage site and the updated policy wording (HER 9) reflects this.
It is important that the World Heritage Status should only apply to the physical Jodrell Bank Campus as opposed to the Consultation Zone defined by the Jodrell Bank Direction 1973 (Appendix 2) [attached]. If applied more widely, Policy HER 7 would place a significant, long-term restriction on housing and employment across a large part of the Borough and within sustainable settlements (effectively serving as a moratorium). This includes Holmes Chapel. This would not constitute positive planning.	Policy HER 9 World Heritage site in the revised publication draft SADPD contains the following wording. “Development proposals within the world heritage site at Jodrell Bank (or within its buffer zone) that would cause harm to the significance of the heritage asset (including elements that contribute to its outstanding universal value) will not be supported unless there is a clear and convincing justification; and an appropriate heritage impact assessment has evaluated the likely impact of the proposals upon the significance of the asset and the attributes that contribute to its outstanding universal value”. 3. Where development has a demonstrable public benefit, and harm to the outstanding universal value is unavoidable and has been minimised, this benefit will be weighed against the level of harm to the outstanding universal value of the world heritage site
Goostrey PC strongly supports this as it is in line with Goostrey NP Policies SC2 and HOU 1.	Noted.
JBO is an active scientific institution with a world renowned reputation	Agreed this is reflected in the updated policy HER 9 “World heritage

<p>for continuing to carry out cutting edge science. It is the third largest fully steerable radio telescope in the world. When it is also inscribed by UNESCO as having Outstanding Universal Value, it will be one of the most important assets in the Borough.</p>	<p>site” in the revised publication draft SADPD.</p>
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Policy HER 8 ‘Archaeology’

Summary of main issues raised:	How the main issues have been taken into account
<p>It is unclear whether this policy is for scheduled monuments, sites of national importance or local heritage assets. It is suggested that the policy be rewritten to set out the Council’s position on these assets in terms of whether harm is acceptable, what is required for each type of assets and also the different methods of mitigation and recording. It is important to note that scheduled monuments are of the highest significance and this policy does not protect these assets from unacceptable harm.</p>	<p>Policy HER 8 “Archaeology” in the revised publication draft SADPD has been rewritten to address these issues. It also supplements Policy SE 7 “The Historic Environment” in the LPS which includes details on non designated assets. Policy HER 7 ‘non-designated heritage assets’ in the revised publication draft SADPD also provides additional policy guidance.</p>

Policy HER 9 ‘Enabling development’

This First Draft SADPD policy has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>The Policy as currently stated under Items 1 to 4, together with the Supporting information as detailed under Paras 5.13 to 5.16 inclusive; in its present form is inadequate and selective and as such it fails to make any reference whatsoever to Historic England’s(HE) current Advice, as contained in their Policy and Guidance document, ‘HE Enabling Development and the Conservation of Significant Places published 30th September 2008 (Revised June 2012)</p>	<p>This policy (enabling development) has been deleted from the revised publication draft SADPD It is noted that Historic England has published guidance documents including the ‘Enabling Development and the Conservation of Significant Places’ (revised 2012).</p>
<p>The policy itself now sits within the framework provided by English Heritage’s Conservation Principles, Policies and Guidance for the</p>	

<p>Sustainable Management of the Historic Environment (2008), which promotes a values-based approach to assessing heritage significance. The detailed practical guidance provided here should be applied within the context provided by the Principles.'</p>	
<p>Supporting information, are inadequate as they fail to fully and properly address the requirements of Section 35 of the HE Guidance, which sets out that full information is necessary not just to demonstrate physical impact, but particularly to establish and quantify need, since the financial considerations involved are fundamental to the decision.</p>	
<p>Enabling development is a type of public subsidy, and so should be subject to the same degree of financial scrutiny, transparency and accountability as cash grants from public sources.</p>	
<p>In accordance with the NPPF, the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.'</p>	<p>Policy HER 1 'heritage assets' in the revised publication draft SADPD notes that proposals affecting a historic assets or its setting must be accompanied by proportionate information that assesses and describes their impact on the asset's significance.</p>
<p>This policy gives the opportunity to say that houses trump heritage harm. Effectively negates the purpose of the previous policies. It must be strengthened to say that only owners of heritage assets can put forward 'enabling development' proposals to ensure the survival and access to such assets.</p>	<p>This policy (enabling development) has been deleted from the revised publication draft SADPD There is a suite of policies relating to the historic environment that provide for an appropriate planning policy context, which builds upon policy SE 7 'the historic environment' in the LPS.</p>
<p>It is unclear what the purpose of the policy is within the Plan. As drafted it does not provide an appropriate framework for the management of Cheshire East's Heritage assets and therefore should be deleted from the Plan. Enabling development is defined as development that would be unacceptable in planning terms but for the fact that it would bring public benefits to a heritage asset or group of assets, sufficient to justify it being carried out and which could not otherwise be achieved. The inclusion of a policy within the Local Plan</p>	<p>This policy (enabling development) has been deleted from the revised publication draft SADPD</p>

<p>provides a policy basis for the approval of applications therefore, making such developments acceptable in accordance with the local plan.</p>	
<p>The 2018 Revised NPPF affords no more than the following statement in relation to enabling development; "Para 202. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies. In the light of this paucity of national guidance we strongly advocate the continued acknowledgment of the Historic England (Heritage England) Guidance and in particular the underlying principles that inform the Guidance.</p>	<p>This policy (enabling development) has been deleted from the revised publication draft SADPD. It is noted that Historic England has published guidance documents including the 'Enabling Development and the Conservation of Significant Places' (revised 2012).</p>

Chapter 6: Rural issues (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>The SADPD should consider the need for some bespoke policies relating to the film industry and the ability to provide certain exception policies for proposals relating to this. Policies that actively supported the filming industry in the local plan would be welcomed.</p>	<p>LPS Policy EG 2 'Rural economy' sets the approach to proposals that support the rural economy. The issues of employment development outside of settlements has been considered in the preparation of the SADPD and Revised Publication Draft Policy RUR 10 adds detail to LPS Policy EG 2 regarding employment development in the open countryside. It is considered that LPS Policy EG 2 and SADPD Policy RUR 10 provide the framework for proposals for employment development in rural areas (including the development for the film industry).</p>
<p>Within the 'Rural Economy' section there is no reference or policies in relation to the Shropshire Union Canal and the significant opportunity this asset can provide in terms of leisure and recreation facilities which will boost the rural economy.</p>	<p>The provision of leisure and recreational facilities in rural areas has been considered and the Revised Publication Draft SADPD includes policies RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries' and RUR 8 'Visitor accommodation outside of settlement boundaries'. Policy INF 10 'Canals and mooring facilities' is also of relevance, but this has not been included in the rural issues</p>

	section of the document as it applies to both urban and rural canals.
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Policy RUR 1 ‘New buildings for agriculture and forestry’

Summary of main issues raised:	How the main issues have been taken into account
Clarification required as to whether the policy should state ‘will be permitted’ or ‘will only be permitted’	Policy RUR 1 in the Revised Publication Draft SADPD has been updated to read “...will only be permitted...”.
The growth of rural businesses will be hampered and constrained; the approach does not accord with NPPF para 83. The emphasis should be on enhancement and reasonable expansion, not stringent restrictions. By being overly restrictive, the policy could push people towards utilising permitted development rights to implement a series of smaller, uncontrolled developments.	The policy is not intended to prevent buildings that are reasonably required for the operation of an agricultural or forestry enterprise, including for firm future growth plans. Criterion 1(iii) of policy has been amended to confirm that additional buildings are restricted to those required for the efficient existing or planned operation of the enterprise (rather than just its ‘efficient operation’ which could be misinterpreted as relating to the existing operation only). However, it is considered appropriate that the policy does seek to prevent buildings in the open countryside that are not required for an existing or planned business operation.

Policy RUR 2 ‘Farm diversification’

Summary of main issues raised:	How the main issues have been taken into account
The requirement for development to be necessary to support the continued viability of an existing agricultural business is too restrictive and does not sufficiently support and promote the rural economy as required by the NPPF. It is difficult to quantify whether something is ‘necessary’ or not. The approach seeks to achieve only the minimum level of intervention needed, failing to secure the long-term future of agricultural businesses.	This issue has been taken into account but the farm diversification policy is intended to support the continued operation of agricultural businesses. The plan is intended to be read as a whole and where development is proposed over and above that necessary to support the continued viability of an existing agricultural business, there are a number of other policies (including LPS Policy EG 2 ‘Rural economy’ and other policies in the rural issues chapter of the Revised Publication Draft SADPD) that could be applied. The supporting information notes that a business plan will be required to demonstrate that the proposal is necessary to support the continued viability of the

	business. Criterion 1(iv) of the draft policy has been amended to confirm that additional buildings, structures and ancillary development are restricted to those required for the planned operation of the diversified enterprise (rather than the existing operation).
This policy fails to recognise instances where an existing agricultural business has ceased operations and therefore a new use for a farmstead or farm buildings needs to be identified.	This issue has been taken into account but the farm diversification policy is intended to support the continued operation of agricultural businesses. Where a business has already ceased operations, there are other policies to guide proposals for various alternative uses, including RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries'; RUR 7 'Equestrian development outside of settlement boundaries'; RUR 8 'Visitor accommodation outside of settlement boundaries'; RUR 9 'Caravan and camping sites'; RUR 10 'Employment development in the open countryside'; RUR 11 'Extensions and alterations to buildings outside of settlement boundaries'; RUR 13 'Replacement buildings outside of settlement boundaries'; and RUR 14 'Re-use of rural buildings for residential use'.
The wording in relation to proposals for new or extensions to existing farm shops is particularly restrictive; restricting goods to be mainly produced on site in a particular locality does not account for the wider supply chains often at work for farmhouse shops. Farm shops may play a crucial component of a wider leisure or tourism development.	The proposed policy wording has been looked at carefully in relation to this issue and is considered to be appropriate. The dictionary definition of 'majority' is 'the greater number or the greater part'. Therefore, requiring the majority of goods sold to be produced on site would still allow for almost 50% of goods sold to be sourced from the wider supply chain so long as they are related to the agricultural business. It is important to note that this policy is intended to support the continued operation of an agricultural business, but the plan is intended to be read as a whole. Where a proposal for a farm shop forms a crucial component of a wider leisure or tourism development, then other policies will also apply.
The requirement for farm shops not to undermine the vitality and viability of existing local shops or retail centres introduces an impact test that is not consistent with national policy.	The requirement has been deleted from the draft policy.
A further point should be added with regards to animal husbandry and the impact on air and water pollution in areas of ecological	It is considered that this issue is addressed by other policies in the LPS (including SE 3 'Biodiversity and geodiversity' and SE 12

importance/national designations.	'Pollution, land contamination and land instability') and the Revised Publication Draft SADPD (including RUR 1 'New buildings for agriculture and forestry'; ENV 12 'Air quality'; and ENV 17 'Protecting water resources').
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Policy RUR 3 'Agricultural and forestry workers dwellings'

Summary of main issues raised:	How the main issues have been taken into account
A statement should be inserted that such dwellings cannot be sold on the open market.	An addition has been made to the supporting information to confirm that restrictive occupancy conditions will be applied to agricultural and forestry workers dwellings allowed under this policy.
A strict approach should be taken to increase in the number of buildings and other features such as roadways, parking and illumination to avoid creeping urbanisation of the rural environment.	It is considered that the draft policy addressed this issue by requiring proposals to make best use of existing infrastructure and not to unacceptably affect the amenity and character of the surrounding area or landscape.
Table 6.1 is unfairly prescriptive over the size of accommodation that could be acceptable and does not account for the range of people who may comply with the need for on-site accommodation.	The supporting information explains the why it is necessary to limit the size of dwellings allowed under this policy. However, Table 6.1 has been simplified to allow an element of flexibility and criterion 1(iii) of the policy amended to require dwellings not to significantly exceed the sizes in Table 6.1 (rather than not to exceed the standards at all). This allows for further flexibility whilst making sure the size of new dwellings is commensurate with the functional need.
The policy does not take into account the revisions to paragraph 79 of the NPPF.	The policy is considered to be in accordance with the requirements of ¶79 of the revised NPPF.

Policy RUR 4 'Essential rural worker occupancy conditions'

Summary of main issues raised:	How the main issues have been taken into account
If no long-term need is demonstrated, the dwelling should be subject to the change of use allowances set out in Policy RUR 14 – Re-use of	This issue has been taken into account and the supporting information explains why re-use as affordable housing is preferable to open

<p>rural buildings for residential use. There is no justification for change of use to be restricted to affordable housing provision, especially as the location may not be suitable to meet affordable housing needs.</p>	<p>market housing. The First Draft SADPD policy included an exemption where there is no requirement for affordable housing in the parish and a further exemption has been added in the Revised Publication Draft SADPD where there are no Registered Providers that wish to acquire the property. This would include cases where the location is not suitable to meet affordable housing needs.</p>
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Policy RUR 5 ‘Best and most versatile agricultural land’

Summary of main issues raised:	How the main issues have been taken into account
<p>Concerns about how any loss of BMV would be assessed by the council; should offer greater clarity on how BMV should be evaluated. It is unclear as to the meaning of "other benefits of the land".</p>	<p>The policy seeks to avoid the loss of best and most versatile land. Assessment of the land quality is a specialised subject and it will appropriate be for applicants to demonstrate how the benefits of the development clearly outweigh the impacts of the loss of economic and other benefits of the land. ‘Other benefits’ could refer to a variety of issues (e.g. food security; ecological) but may vary depending on the land in question.</p>
<p>The requirement to consider alternative poorer quality locations could amount to a sequential approach, which isn't promoting sustainable development or reflective of national planning policy. Concerns about how applicants are to collate the information required under part 2 of the Policy.</p>	<p>It is acknowledged that, given the limited data available on land quality), it may potentially be difficult / onerous for applicants to demonstrate that there are no lower quality sites available. This requirement of the policy has been deleted in the Revised Publication Draft SADPD.</p>
<p>The further use of BMV land is unsustainable as Cheshire is synonymous with farming and food production and fertile soil is a limited and finite resource, which has been used as such for many years and cannot be easily replicated. The policy should be strengthened to say ‘that any development on such land will be resisted’</p>	<p>This issue has been taken into account in the preparation of the plan and the policy seeks to avoid the loss of best and most versatile land. However, there may be instances where the benefits of development clearly outweigh the impacts of the loss of the economic and other benefits of the land.</p>
<p>There will be some instances when significant benefits could be delivered through the development of sites on BMV, which would outweigh the loss of a relatively small portion of high-quality agricultural land.</p>	<p>This issue has been taken into account and the policy requires proposals involving the loss of best and most versatile land to demonstrate that the benefits of development clearly outweigh the impacts of the loss of the economic and other benefits of the land.</p>

BMV definitions should be based on the quality of the land where 'reasonable land husbandry' is utilised (usually over a minimum four year period). Where land is claimed to be of 'poor quality', it must be subject to an agricultural land improvement scheme over an appropriate time-frame.	The policy seeks to avoid the loss of best and most versatile land although it is considered that a requirement to implement an agricultural improvement scheme would be overly restrictive.
It is important for the policy to recognise that development impacts (soil sealing) have an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land.	The policy seeks to maintain the best and most versatile land by avoiding its loss and supporting schemes to improve its quality or quantity.

Policy RUR 6 'Outdoor sport, leisure and recreation in the open countryside and Green Belt'

This First Draft SADPD policy is titled RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The policy is too negative and does not fully reflect that by putting such facilities outside of defined settlement boundaries provides the potential for best use to be made of development resources located in settlement boundaries.	The policy seeks to allow recreation uses in the open countryside but to minimise their impacts.
It would be helpful if the policy or its justification could provide examples or list circumstances when such facilities might be supported in the Green Belt.	Whether development in the Green Belt is inappropriate or not is a matter for the decision maker considering all the facts of the case and will depend on site specific circumstances.
The policy is over-restrictive and should be broadened to enable the benefits that the scheme would generate for the rural economy to be considered and weighed against any impacts.	LPS Policy EG 2 'Rural economy' supports recreational uses where they support the rural economy and already allows for consideration of this issue.
Further clarification should be given to the use of the term 'isolation' and whether this is intended to refer to building locations in the proposed development as a whole, or is referring to the location of the site . If the latter, the nature of some tourism and recreation facilities require a rural isolated location and therefore including this term would be overly restrictive.	The term 'isolated' in 1(iii) refers to development within the site (not the location as a whole) and the policy has been amended to make this clear.

The restriction placed on development by bullet 1. iii. is unclear and may be unduly prohibitive. Concern that the wording could prevent the growth of sports and clubs due to lack of adequate ancillary facilities being in place to support the growth.	The policy is not intended to restrict the viability and sustainability of sports club and a footnote has been added to the policy to confirm that development reasonably required for the operation of the site may include space and facilities that can be demonstrated to be required to support the viability and sustainability of sports clubs.
The policy should state that it is subject to Policy ENV 14.	The plan is intended to be read as a whole but for clarity a reference to policy ENV 14 'Light pollution' has been added to the policy.

Policy RUR 7 'Equestrian development'

This First Draft SADPD policy is titled RUR 7 'Equestrian development outside of settlement boundaries' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The restriction for additional buildings, structures and ancillary development to be the minimum level reasonably required for the operation of the facility is unclear and may be unduly prohibitive.	This issue has been taken into account but the policy should not seek to allow more buildings, structures and ancillary development than are reasonably required for the operation of the facility.
Point 3 should be clarified to state that ménages and other hardstanding in the Green Belt or open countryside should not be considered as 'brownfield' and as a result, cannot subsequently be developed.	The definition of brownfield land is already set out in the NPPF. Whether a site is brownfield land will depend on its individual circumstances but appeal decisions have shown that ménages and paddocks can be considered to be brownfield land in some cases.
The policy should state that it is subject to Policy ENV 14.	The plan is intended to be read as a whole but for clarity a reference to policy ENV 14 'Light pollution' has been added to the policy.

Policy RUR 8 ‘Visitor accommodation’

This First Draft SADPD policy is titled RUR 8 ‘Visitor accommodation outside of settlement boundaries’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The policy makes no reference to supporting existing visitor accommodation. It only supports small scale visitor accommodation and not existing facilities.	The policy is applicable to new facilities as well as new development related to existing facilities. The policy has been amended to require that the scale be appropriate to the location and setting (rather than being ‘small scale’).
The policy is not consistent with the strategic approach taken in LPS Policy EG 4. The policy does not recognise the importance of the tourism sector to the local economy and the Council is unnecessarily restricting development of visitor accommodation – inconsistent with the LPS and NPPF para 83 (c).	LPS Policy EG 4 ‘Tourism’ supports tourist development in principal towns and key service centres. It also supports tourist development in local service centres and other settlements and rural areas, subject to a number of restrictions. LPS Policy EG 6 ‘Open countryside’ also restricts development outside of settlement boundaries. This proposed policy is consistent with these strategic policies, adding further detail by setting out the matters to be considered in respect of visitor accommodation outside of settlement boundaries. The policy does allow for sustainable expansion and growth of visitor accommodation in the open countryside and is in accordance with NPPF ¶83c
The policy should clarify, and some flexibility should be built into bullet 2, to enable hotel or retail development ancillary to a rural development, based on the merits of the individual scheme and the benefits it would generate. There is no reference to the rural economy in the policy or an allowance in the policy for the consideration of the benefits to the rural economy to be considered against any impacts.	The policy does not seek to allow retail development in the open countryside and seeks to restrict new visitor accommodation to that which is appropriate to a rural area because the type of accommodation proposed is intrinsically linked with the countryside. LPS Policy EG 2 ‘Rural economy’ allows for consideration of the benefits of supporting the rural economy.
A restriction to 8 months is onerous and unnecessary and could have significant impact on the viability of rural businesses and leisure and tourism developments which the NPPF (para 83) details planning policies should be enabling.	It will be necessary to prevent unauthorised permanent occupation of visitor accommodation but the policy has been amended so that the details of the restriction can be determined on an individual basis.
The siting of static caravans is a change of use of land, which is appropriate development in the Green Belt.	The policy has been amended so that it does not seek to specify what will or will not be considered to be inappropriate development under

	Green Belt policy as this is already set out by the NPPF and LPS Policy EG 3 'Green Belt'.
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Policy RUR 9 'Caravan and camping sites'

Summary of main issues raised:	How the main issues have been taken into account
The policy is inconsistent with the NPPF as the change of use of land for caravan and camping can comprise appropriate development in the Green Belt.	The policy has been amended so that it does not seek to specify what will or will not be considered to be inappropriate development under Green Belt policy as this is already set out by the NPPF and LPS Policy EG 3 'Green Belt'.

Policy RUR 10 'Employment development in the open countryside'

Summary of main issues raised:	How the main issues have been taken into account
The wording of the policy means that any proposal in the open countryside (including for example a small office building) would be subject to an arbitrary and unnecessary judgement over whether it might at some point potentially be converted to residential use.	The policy seeks to allow small scale employment premises where a countryside location is essential and they provide local employment opportunities to support the vitality of rural settlements. It is important that the policy is not a 'back-door' to allow residential development that would not otherwise be allowed under local plan policies. It is not unreasonable that the design of new buildings should be appropriate to their intended function.
The policy should provide additional detail for employment development which, whilst not 'essentially required' to be located within rural uses, may be appropriate due to what has historically been developed over time.	The policy seeks to add detail to strategic policy PG 6 'Open countryside' by clarifying that small scale employment development may be appropriate to a rural area. The strategic policy PG 6 already allows for development that is essential for the expansion or redevelopment of an existing business.
The plan must make sure that, in appropriate rural locations, emerging technologies that help to meet our climate change objectives are not prevented from being developed by restrictive policy formation.	The supporting information confirms that this policy relates to development in the B1, B2 and B8 use classes. This issue has already been addressed through the LPS in Policy SE 8 'Renewable and low carbon energy'.

Policy RUR 11 ‘Extensions and alterations to buildings in the open countryside and Green Belt’

This First Draft SADPD policy is titled RUR 11 ‘Extensions and alterations to buildings outside of settlement boundaries’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Concerns with the blanket approach to an increase in overall building height in bullet 2. as an increase in height may not necessarily result in a disproportionate addition. A balanced and professional judgement should be exercised to consider all factors.	The policy does not impose a blanket approach and the word ‘usually’ allows the decision-maker to exercise professional judgement in cases where an overall increase in height is not disproportionate given the site context and comparison of the existing and proposed built form.
Bullet 3 should not reference a percentage; flexibility should be added to allow planning judgement on a case-by-case basis. It would be wrong to identify a certain quantitative percentage uplift in terms of defining ‘materially larger’ or ‘disproportionate’. It has been firmly established through case law that it would be wrong in law for an assessment of the openness of the Green Belt to be confined to quantitative impacts.	The policy states that proposals will ‘usually’ be disproportionate where they exceed those thresholds. This allows the decision maker to exercise professional judgement considering the merits of each case having regard to the context of the site. The First Draft SADPD Policy was clear that the assessment of whether something is disproportionate is a separate test to whether it harms the openness of the Green Belt. However, the reference to openness of the Green Belt has been deleted from the Revised Publication Draft SADPD policy as there is no test of openness under NPPF ¶145c or LPS Policy PG 3 ‘Green Belt’ where an extension is not disproportionate.
The Courts have ruled that the fall-back position can be a material planning consideration provided it is a clear possibility; therefore bullet 5 should be deleted.	The reference to the ‘fall-back position’ has been deleted from the policy.

Policy RUR 12 ‘Residential curtilages in the open countryside and Green Belt’

This First Draft SADPD policy is titled RUR 12 ‘Residential curtilages outside of settlement boundaries’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The policy should be strengthened to state that such extensions into	The purpose of the policy is to restrict extensions of curtilages and this

open countryside, green gaps and green belt will be resisted.	applies in the open countryside, strategic green gap and the Green Belt.
The reference to curtilage should be removed as by definition the curtilage of a property can only relate to an area in residential land use. The curtilage of a property is a factual determination that can change in an instant, for example, by the removal of a fence line. The only consideration for this policy should be garden extensions, which represent a change of use of land.	The policy has been amended to clarify that it applies to curtilage extensions involving a material change of use of the land. Changes to curtilages that do not involve a material change of use of land would not require planning permission.
Point 1. i. will be difficult to control without a definition of what constitutes a "reasonable sitting out area'.	Professional judgement will need to be applied to a reasonable sitting out area. Criterion 2 limits this to the minimum amount of land reasonably required.
The policy needs strengthening to protect the Open Countryside from opportunistic development by those seeing to re-classify paddocks, equestrian ménage facilities and agricultural small-holdings (fields) as domestic garden and/or brownfield sites for the express purpose of residential development.	The policy has been amended to clarify that it applies to curtilage extensions involving a material change of use of the land. Information has been added to the supporting information to confirm that the policy also applies to proposals to incorporate paddocks, equestrian facilities, agricultural land, smallholding fields and other land uses into a residential garden.

Policy RUR 13 'Replacement buildings in the open countryside and Green Belt'

This First Draft SADPD policy is titled RUR 13 'Replacement buildings outside of settlement boundaries' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The policy is not clear enough that buildings in the open countryside and buildings in the Green Belt should be approached in similar, but different, ways.	Criterion 3 is clear that the % increases for what will usually be considered to be materially larger will be different in the open countryside and the Green Belt.
The Courts have ruled that the fall-back position can be a material planning consideration provided it is a clear possibility, therefore bullet 5 should be deleted.	The reference to the 'fall-back position' has been deleted from the policy.
The policy needs to be updated to bring it in line with NPPF paragraph	This policy is specifically related to replacement buildings (for all uses)

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<p>145 to allow for development where there is not a significant impact on openness where there is affordable housing provision to meet local needs included on site.</p>	<p>and is in line with NPPF ¶145d, which involves no test related to openness. The provisions under NPPF ¶145g(ii) relates to the limited infilling or the partial or complete redevelopment of PDL, whether redundant or in continuing use for affordable housing, and does involve a test related to openness. Whilst this policy does not refer to affordable housing on previously-developed land it does not preclude it.</p>
<p>A strict approach should be taken to the objectives of the policy, which should not be eroded by acceptance of “permitted development” additions or planning applications for ancillary buildings following completion.</p>	<p>Information has been added to the supporting text to confirm that where permission is granted for replacement buildings outside of settlement boundaries, a condition withdrawing permitted development rights will be considered in each case, having regard to the character of the site and its surroundings.</p>
<p>Bullet 3 should not reference a percentage; flexibility should be added to allow planning judgement on a case-by-case basis. In the past the general consensus of materially larger is where the additional floor area exceeds a 30% increase. This general consensus applies beyond Cheshire East to many Local Authorities and has historically been established through case law as opposed to being written into policy.</p>	<p>There are a number of examples where local plans use percentage figures significantly lower than 30% to define what is materially larger. The policy does not place an absolute limit on the % and the word “usually” allows the decision maker to exercise professional judgment where appropriate.</p>
<p>It is not reasonable to state categorically that a proposed height increase or development extending ‘notably’ beyond the existing footprint would usually result in a proposal that is materially larger.</p>	<p>The policy gives guidance in that increases in overall building height and extending notably beyond the existing footprint will usually be considered materially larger. But the word ‘usually’ allows the decision maker to exercise professional judgment where appropriate.</p>
<p>It has been firmly established through case law that it would be wrong in law for an assessment of the openness of the Green Belt to be confined to quantitative impacts.</p>	<p>The first draft policy was clear that the assessment of whether something is materially larger is a separate test to whether it harms the openness of the Green Belt. However, the NPPF ¶145d involves no test of openness and this requirement has been deleted from the policy.</p>

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

Summary of main issues raised:	How the main issues have been taken into account
<p>Sites containing buildings have been and are continuing to be promoted for employment uses, although do additionally have the potential for residential conversion.</p>	<p>The policy relates to the residential re-use of rural buildings. The re-use of buildings for employment use is already taken into account in other policies, including LPS Policy PG 6 ‘Open countryside’ and Revised Publication Draft SADPD Policy RUR 10 ‘Employment development in the open countryside’.</p>
<p>The policy is inconsistent with the NPPF as it only allows for re-use of rural buildings for residential use, whereas the NPPF does not restrict the use to which a rural building can change to.</p>	<p>The policy relates to the residential re-use of rural buildings but it does not preclude their re-use for other purposes. LPS Policy PG 6 ‘Open countryside’; and Revised Publication Draft SADPD Policies RUR 6 – RUR 10 have considered the re-use of rural buildings for other purposes.</p>
<p>It is not clear what purpose would be served by restricting the conversions of outbuildings; such development may comprise sustainable development through the efficient use of redundant buildings.</p>	<p>The policy has been amended to remove this requirement.</p>
<p>To make it clear the policy should be stated as relating to rural buildings in the open countryside beyond the Green Belt. If the policy is to be relevant to rural buildings in the Green Belt, remove the wording of "so as to not require extensive building works"</p>	<p>The supporting information is clear that the policy applies in the open countryside. The open countryside is defined in LPS Policy PG 6 as “the area outside of any settlement with a defined settlement boundary”. Some areas of the open countryside are beyond the Green Belt and some are within the Green Belt but the policy applies to all areas of open countryside.</p>
<p>The policy seeks to introduce a test of "so as not to require extensive building works", which is not a test set down in Government policy or in the LPS.</p>	<p>LPS Policy PG 6 ‘Open countryside’ allows for the re-use of existing rural buildings where the building is permanent, substantial and would not require extensive alteration, rebuilding or extension. The draft policy has been amended to reflect this wording instead of ‘extensive building works’.</p>

Chapter 7: Employment and economy (general issues)

Summary of main issues raised:	How the main issues have been taken into account
No comments	No issues raised.

Policy EMP 1 ‘Strategic employment areas’

Summary of main issues raised:	How the main issues have been taken into account
<p>Requests for the following sites to be listed in the policy:</p> <ul style="list-style-type: none"> • Radway Green Business Centre, Alsager (10.4 ha, B1, B2, B8). • Capricorn, Sandbach. • British Salt Factory, Middlewich. • Manchester Metropolitan University Campus, Crewe 	<p>Each of the sites has been considered. The sites included in the policy are those listed as key employment areas in the justification to LPS Policy EG 3 ‘Existing and allocated employment sites’. Other existing employment areas (including the Radway Green Business Centre and the British Salt Factory) are still covered by LPS Policy EG 3. The site previously known as Capricorn is allocated for an employment-led mixed-use development in the LPS (Site LPS 33). The Manchester Metropolitan University Campus is not an existing or allocated employment site and therefore would not be designated a strategic employment area under this policy.</p>
Sanofi Aventis is now owned by Recipharm.	The name of the area has been updated accordingly in the policy.

Policy EMP 2 ‘Employment allocations’

Summary of main issues raised:	How the main issues have been taken into account
<p>Requests for the following sites to be listed in the policy:</p> <ul style="list-style-type: none"> • Radway Green Business Centre, Alsager (10.4 ha, B1, B2, B8). • Capricorn, Sandbach. • Old Bengers/Fisons site, London Road, Holmes Chapel • British Salt Factory, Middlewich 	<p>Each of the sites has been considered for a potential allocation in the SADPD. The Radway Green Business Centre is an existing employment site and redevelopment for employment uses is supported under LPS Policies EG 1 ‘Economic prosperity’ and EG 3 ‘Existing and allocated employment sites’. The site formerly known as Capricorn is allocated for an employment-led mixed-use development in the LPS (Site LPS 33). The former Fisons site in Holmes Chapel</p>

	has consent for A1 retail. The expansion land at the British Salt Factory in Middlewich has been considered through the Employment Allocations Review [ED 12] and is now proposed for allocation in the Revised Publication Draft SADPD policy.
Part of site EMP 2.4 (Hurdsfield Road, Macclesfield) has potential and is suitable for residential development e.g. a facility for assisted living or a care home.	The site in question falls outside of the existing allocation in the Macclesfield Borough Local Plan and is outside of the area considered through the Employment Allocations Review [ED 12]. As a result, it has been removed from the allocation on the Draft Adopted Policies Map [ED 02].
<p>Several comments on EMP 2.5 (61MU, Handforth):</p> <ul style="list-style-type: none"> • It is not suitable or viable for employment use. • Issues with ground conditions including remediation costs associated with the storage of radioactive aeroplane dials during the use of the site as RAF Handforth. • There is no evidence to support the council's overly optimistic assertion of market interest. • It makes a valuable contribution to the employment supply. • The market attractiveness of the site for a broad range of employment uses has been underestimated. • The assessment underestimates the suitability of the site for employment uses. 	These issues have been further considered through the Employment Allocations Review [ED 12], which concludes that the site should be retained as an employment allocation.
A specific site/or sites should be allocated to meet the residual requirement of 1.29ha of employment land in Knutsford.	This issue has been taken into account through the Knutsford Settlement Report [ED 34], which concludes that the 14.86 ha of identified employment land in Knutsford is "in the order" of 15 ha as required by LPS Policy PG 7 'Spatial distribution of development'.
The allocations should be covered by a site specific policy including reference to surface level sustainable drainage.	Revised Publication Draft SADPD Policy ENV 16 'Surface water management and flood risk' requires development proposals to manage and discharge surface water through sustainable drainage systems.
Reservations as to whether EMP 2.1 (Weston Interchange, Crewe), EMP 2.2 (Meadow Bridge, Crewe) and EMP 2.3 (Land east of University Way, Crewe) are genuinely available, viable, attractive to	These issues have been further considered through the Employment Allocations Review [ED 12], which concludes that Weston Interchange and Meadow Bridge should be retained as employment allocations.

<p>the market and ultimately capable of delivering the required quantum of employment land.</p>	<p>Land east of University Way has been removed from the Revised Publication Draft SADPD as employment development has now been completed on part of the site and retail development is under construction on the remainder.</p>
<p>Several comments on EMP 2.8 (Land west of Manor Lane, Holmes Chapel):</p> <ul style="list-style-type: none"> • There are no evidence documents to justify the proposed development in the JBO consultation zone. • It must be demonstrated whether EMP 2.8 would have a cumulative impact on JBO to the extent that it would prevent much needed affordable housing from coming forward. • Only a small section at the northern end of the site is still in employment use; the remainder of the site has been cleared and former employment premises demolished. • There would appear to be very limited prospects of this site coming forward for B1 and B8 uses. • The restriction to B1 and B8 is unreasonable, ignoring the lawful use of the site and does not allow for flexibility. • Mixed uses should be permitted in line with LPS Policy E3 and Holmes Chapel Neighbourhood Plan. 	<p>These issues have been further considered through the Employment Allocations Review [ED 12], which concludes that the site should be retained as an employment allocation. The policy has been amended to refer to B1/B2/B8 uses on this site and to allow other ancillary uses where they are compatible with the employment use of the site and are delivered as part of a comprehensive employment scheme (for all sites). This site has subsequently gained planning consent for an employment-led mixed use development.</p>

Chapter 8: Housing (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Additional allocations are required in the SADPD to:</p> <ul style="list-style-type: none"> • meet the overall housing requirement • to assist with maintaining a five year supply of housing • accommodate dwellings which are to be provided by larger strategic sites but will not be delivered in the plan period (associated impact on affordable housing delivery) • provide flexibility in the event HS2 is committed to come to Crewe by 2027 	<p>The Council has separately produced its housing land monitor. The most recent Cheshire East Housing Monitoring Update (HMU) provides a comprehensive review of housing delivery and supply across Cheshire East to a base date of the 31 March 2019. The 2019 HMU indicates a housing land supply figure of 7.5 years.</p> <p>The findings of the HMU have been subject to recent consideration in the recovered appeal 'Land off Audlem Road/ Broad Lane, Stapeley,</p>

<ul style="list-style-type: none"> • to assist the Council in meeting the requirement to identify 10% of the housing requirement on sites of 1 ha or less (para 68a of the revised NPPF) • Boost the supply of housing generally and because the requirement should be regarded as a minimum • The Council's trajectory compared to actual completions indicates that it has under delivered by 1,361 dwellings 	<p>Nantwich'5. In his decision letter dated the 15th July 2020, the Secretary of State confirmed that the council can demonstrate a deliverable housing land supply in excess of 5 years. The annual five year housing land supply assessment will be updated to a 31 March 2020 base date in due course.</p> <p>Confirmation of the existence of 5 year housing land supply is not sought through the examination of the SADPD.</p> <p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the 'provision of housing and employment land and the approach to spatial distribution' [ED 05] report. Document ED 05 also considers the matter of housing supply flexibility in the revised publication draft SADPD.</p> <p>A document has been prepared to consider the approach of the revised publication draft SADPD to the approach to small and medium sized housing sites in the revised publication draft SADPD [ED 58].</p>
<p>Reference made to a number of sites including:-</p> <ul style="list-style-type: none"> • Land rear of Park Lane and Crewe Road • Land at Pexhill Road, Macclesfield • Moorside Car Park, Knutsford • Land west of Crewe Road, Shavington • Land at Pavement Lane, Mobberley • Land west of Toft Road, Knutsford • Rotherwood Road, Wilmslow • Land off Newcastle Road and Holmes Chapel Road, Brereton • Land off Linley Lane, Alsager • Lymewood Drive, Disley • Land at Priory Park, Macclesfield • Land at Wybunbury Road, Walgherton • Land at Somerford Park Farm • Land off Oakleigh, Knutsford 	<p>The Council's approach to site selection is set out in individual settlement reports for Principal Towns, Key Service Centres, Local Service Centres and Other settlements and Rural Areas [ED 21 – ED 46].</p> <p>The Council has explained the approach taken in the SADPD towards the overall provision of housing and employment development, taking account of the latest 2020 monitoring information in document (ED 05) 'the provision of housing and employment land and the approach to spatial distribution'.</p>

<p>Revised NPPF / PPG definition of a 'deliverable site' and impact on 5 year supply position needs to be considered and accommodated for.</p>	<p>The HMU provides an annual update on five year supply matters. As at the 31 March 2019, there is a 7.5 year deliverable housing land supply.</p> <p>The findings of the HMU have been subject to recent consideration in the recovered appeal 'Land off Audlem Road/ Broad Lane, Stapeley, Nantwich'5. In his decision letter dated the 15th July 2020, the Secretary of State confirmed that the council can demonstrate a deliverable housing land supply in excess of 5 years. The annual five year housing land supply assessment will be updated to a 31 March 2020 base date in due course.</p> <p>Confirmation of the existence of 5 year housing land supply is not sought through the examination of the SADPD.</p>
<p>Disagree with the precision proposed by the Council to particular locations in the SADPD. Numbers should be considered as a minimum</p>	<p>The allocations proposed in the revised publication draft SADPD are prefaced with the word 'around' as a indication of the expected level of development on each site.</p>
<p>There is a clear need for additional C2 bedspaces to meet the overall housing requirement</p>	<p>Policy HOU 2 'specialist housing provision' sets out criteria for the consideration of such schemes, including those for C2 uses, in the borough.</p>
<p>Definition of affordable housing in the glossary of the SADPD needs to be updated, to reflect the NPPF</p>	<p>The definition included in the glossary of the revised publication draft SADPD is consistent with the NPPF (2019).</p>
<p>The standardised methodology for determining local housing need came into place through the publication of the revised NPPF in July 2018. The Government has since indicated an intention to potentially adjust the methodology in order to ensure that sufficient homes are being planned for. With the Government now undertaking a review of the methodology, any subsequent changes to the guidance should be considered in full to inform the level of allocations now required by the Site Allocations DPD, and to establish if further allocations are in turn now needed.</p>	<p>The revised publication draft SADPD is a 'daughter' document to the adopted strategic tier Local Plan Strategy. The Local Plan Strategy sets out the overall level of development for the Plan period through policy PG 1 (overall development requirements). The revised publication draft SADPD includes a number of non-strategic policies to supplement the Local Plan Strategy. The use of the standard methodology and local housing need assessments relate to the preparation of a strategic planning policies which would be considered through an update to the Local Plan Strategy, when identified as necessary.</p>

Bollington has been allocated too much housing	The Council has set out its approach to the provision of housing and employment land and the approach to spatial distribution in the revised publication draft SADPD in report reference [ED 05]. This report has concluded that no housing allocations are required at the LSC tier in the revised publication draft SADPD. The approach to the identification of safeguarded land is set out in document [ED 53] and site selection process documented in the Bollington settlement report [ED 24]. This approach is reflected in policy PG 8 and policy PG 12 of the revised publication draft SADPD.
Oppose site LPS 53 (land adj to J17 of the M6, south east of Congleton Road Sandbach) in the Local Plan Strategy	The site is allocated for development in the Local Plan Strategy – LPS 53 (Land adjacent to J17 of M6, south east of Congleton Road, Sandbach).

Policy HOU 1 ‘Housing mix’

Summary of main issues raised:	How the main issues have been taken into account
A large proportion of the Council’s housing supply is already fixed	Policy HOU 1 ‘housing mix’ in the revised publication draft SADPD builds on the strategic context set by LPS policy SC4 ‘residential mix’. Its intention is to support the delivery of an appropriate housing mix for those schemes brought forward in the borough over the remaining Plan period.
Council should consider allocating specific sites in the SADPD for specialist housing.	Policy HOU 2 ‘specialist housing provision’ sets out criteria for the consideration of such schemes, including those for C2 uses.
Council should be flexible and proportionate in the application of this policy. It should reflect stage in planning process (outline / reserved matters etc.)	Point 1 of policy HOU 1 ‘housing mix’ in the revised publication draft SADPD has been amended to note that a proportionate housing mix statement should be prepared at detailed / reserved matters planning stage.
Collection of evidence may be time consuming and require the input of different specialists	Policy HOU 1 ‘housing mix’ provides a ‘starting point’ for the consideration of an appropriate housing mix for schemes in the borough. The supporting information to policy HOU 1 notes that the housing mix statement should be a proportionate and up to date

	assessment.
Criterion v of Part 1 should also be reworded to make it clear that self and custom build will be encouraged, rather than a pre-requisite to any housing development. Numbers registered on the custom and self-build register may not be an accurate reflection of demand.	It is considered that policy HOU 1 'housing mix' point 1 (iv) makes an appropriate link to the requirements set out in policy HOU 3 'self and custom build dwellings' in the revised publication draft SADPD.
Factors including viability or site specific criteria will influence overall provision.	The revised publication draft SADPD is supported by a plan viability assessment [ED 52] which has taken account of the indicative housing mix set out in table 8.1 - which supports policy HOU 1 'housing mix'. Point 1 (iii) of policy HOU 1 in the revised publication draft SADPD includes reference to how the character and design of the site and local area reflect on the scheme(s) ability to accommodate a mix and range of housing.
The policy should be more specific in what the correct mix for each area would be and / or direct the reader to the correct documents to identify the mix required for the settlement	Policy HOU 1 'housing mix' includes reference to the residential mix study [ED 49] which has been prepared to support the revised publication draft SADPD. Policy HOU 1 'housing mix' includes a starting point (in table 8.1) for the consideration of the housing mix of schemes in the borough. The policy also includes references to the factors, such as character or design, which may influence the consideration of housing mix on a site by site basis.
Policy makes it incumbent on the developer to provide a comprehensive report on why it may be unable to provide all the elements, supported by a viability assessment to demonstrate what may be a range of permutations on housing mix, type, tenure, etc.	The supporting information to policy HOU 1 'housing mix' notes how the housing mix statement should be a proportionate and up to date assessment of local circumstances. The Cheshire East Residential Mix Study (2019) provides a starting point for the analysis and the policy includes a reference to a number of factors which might influence an appropriate housing mix on a site by site basis.
More bungalows are required to satisfy the needs of an ageing population	Bungalows are one of a number of housing products that could be part of an overall housing mix. This would be considered and determined on a site by site basis in line with the policies contained in the Local Plan (when read as a whole), including policy HOU 1 'housing mix'.
There is a lack of detail in the policy currently on how it would be implemented, what constitutes a housing mix statement and the level of information required. Greater clarity and flexibility is requested in	Policy HOU 1 'housing mix' sets out the considerations to be included in the housing mix statement. The supporting information notes that the housing mix statement should be proportionate and based on an

response to changes in demand and / or site market conditions	up-to-date assessment of characteristics. The policy lists a number of relevant considerations to be considered through the housing mix statement. Additional text has been added to the policy to emphasise that the housing mix statement should be prepared at detailed / reserved matters stage.
Unclear on the weight to be attributed to the housing mix statement from the decision maker	Point 4 of policy HOU 1 'housing mix' notes that housing developments that do not demonstrate an appropriate mix on the site will not be permitted.
The onus should not be on the developer but the local authority as it is their responsibility to assess and define housing requirements	The Council has prepared appropriate evidence in the form of the Residential Mix Study (Opinion Research Services, 2019) [ED 49] to support the revised publication draft SADPD. This provides a starting point for analysis that can then be supplemented on a scheme by scheme basis taking into account the factors and criteria set out in policy HOU 1 'housing mix'.
Glossary in the SADPD needs to be updated to reflect the NPPF	The glossary in the revised publication draft SADPD has been updated, where relevant, to reflect the NPPF.
Design and Access statements must already accompany planning applications and these consider the character and design of the site in the local area. Scope for overlap between this request and other documentation	The housing mix statement could cross refer to other parts of evidence prepared to accompany planning applications.
It can take 2-3 years from consent to build and occupation of sites, therefore data may become out of date quickly.	Point 1 of policy HOU 1 'housing mix' refers to taking account of the most up to date information available at detailed planning / reserved matters stage to assist the determination of schemes.

Policy HOU 2 'Specialist housing provision'

Summary of main issues raised:	How the main issues have been taken into account
Policy, as worded, is too restrictive in limiting the provision of specialist housing within settlement boundaries only. Policy should refer to sustainable locations not just settlement boundaries.	Reference to settlement boundaries has been removed from policy HOU 2 'specialist housing provision' in the revised publication draft SADPD. Planning proposals will be considered against the relevant policy provisions contained in the Local Plan as a whole. Policy PG 9

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<p>Policy should state that when a demonstrable need exists (alongside an absence of sites within the relevant settlement boundary) then sites adj to settlement boundaries which are well related and accessible to existing facilities and services should be allowed at a scale proportionate to the settlement</p>	<p>'settlement boundaries' of the revised publication draft SADPD sets out additional information regarding the approach to settlement boundaries.</p>
<p>FDSADPD does not make allocations for specialist housing. There is a need to relax the policy requirements and allocate sites to meet appropriate needs in the borough.</p> <p>FDSADPD has limited scope to meeting requirements for specialist accommodation. These point to the requirement for a specific policy to manage and equalise such demands, as per paragraph 55 and 61 of NPPF. For the above reasons, we believe the proposed Policy HOU 1 and HOU 2 of the FDSADPD cannot be considered sound, as per paragraph 35 of the revised NPPF as they are:</p> <p>Not positively prepared, as they fail to meet the area's objectively assessed need for older persons and specialist care accommodation;</p> <p>Not justified, as the policies will fail to take into account the effect of a shortfall for older persons and specialist care accommodation;</p> <p>Not effective, as they will not provide the amount of older persons and specialist care accommodation required over the plan period; and are</p> <p>Not Consistent with national policy, by failing to accord with paragraphs 59 and 61 of the Framework</p>	<p>The Council has prepared a residential mix study [ED 49] as a starting point for the consideration of such matters which has informed the policy provisions set out in the revised publication draft SADPD. Policies HOU 1 and HOU 2 of the revised publication draft SADPD set out criteria for which schemes will be considered in line with paragraph 61 of the NPPF. Policy HOU 2 'specialist housing provision' sets out a clear and specific policy approach to the consideration of schemes in the borough.</p>
<p>Paragraph 3 vi) should be removed from policy HOU 2, which refers to affordable housing being required for the creation of any Use Class C3 self-contained dwellings. Adopted LPS policy SC 5 (affordable housing) already clearly outlines the Council's affordable housing policy and the trigger points.</p>	<p>Policy HOU 2 is considered to be consistent with the approach set out in policy SC5 'affordable homes' in the LPS.</p>
<p>Reference to the requirement of open space / grounds could undermine delivery on brownfield locations. The requirement for open space / grounds should be assessed in the round.</p>	<p>The reference in point 3 (v) refers to the provision of 'suitable' open space provision. It is considered that the policy provisions in point 3(v) of the policy do not prevent the development of brownfield sites.</p>
<p>Query where the need (for specialist housing) is to be identified and whether it will be the applicant who will have to demonstrate this need</p>	<p>Policy HOU 2 'specialist housing provision' point 3 (i) notes that the type of specialist accommodation should meet identified needs. This</p>

or whether the Council intend to identify a need for each settlement.	should be demonstrated by the applicant. The Council has prepared a residential mix study [ED 49] as a starting point for the consideration of such matters at a borough level.
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Policy HOU 3 ‘Self and custom build dwellings’

Summary of main issues raised:	How the main issues have been taken into account
<p>General points</p> <ul style="list-style-type: none"> • The policy is unsound because it is not justified, effective or consistent with national policy. • The policy approach is restrictive rather than permissive. The policy should be reworded to ‘encourage’ self and custom build housing rather than impose a prescriptive requirement. • The policy should cross refer to other policies in the plan, in particular GEN 1, SC4 and HOU 1. • The Knutsford Design Guide supports this category of development. • SB plots would have to accord with the CELPS design guide and complement existing housing stock or that which is being built on adjacent sites. 	<p>It is well known that the Government intends to increase the provision of self-build and custom-housebuilding (SBCH) plots. In line with this, Criteria 1 therefore sets out a broad statement supporting this form of housing.</p> <p>An additional prescriptive requirement is however also considered necessary to ensure that plots are delivered on private sites. This may require some housebuilders to amend their existing delivery models, which may not have occurred without the stimulus of a restrictive requirement.</p> <p>The concerns regarding introducing a restrictive policy, initially proposed to apply to all residential schemes of 30+ dwellings were noted however. Amendments have therefore been made to criteria 2 and supporting text in para 8.18 to clarify that the requirement only applies in instances where the council <u>is not</u> already meeting demand from its Part 1 register.</p> <p>The initial (slightly shorter) base period ran from January 2016 to October 2016. During this period, the council registered 34 people on its Part 1 Register. This required planning permission to be granted for 34 serviced plots by 30 October 2019. The council however comfortably met this initial requirement by permitting at least 75 serviced plots. In instances such as this, criteria 2 does not apply.</p> <p>Para 8.9 makes clear that SBCH schemes must still comply with the</p>

	<p>plan's other policies. Cross references have been included where necessary.</p>
<p>Viability</p> <ul style="list-style-type: none"> • The requirement to provide SB should be assessed on a site by site basis dependent on local demand and viability considerations. The inclusion of a viability clause in the policy is supported. • No viability evidence has been provided for the policy. The impact of the policy upon developability and deliverability should be considered as part of a whole plan viability study to ensure that the cumulative impacts of policy requirements do not render the majority of schemes unviable. • The policy will result in uncertainty for developers in terms of the viability of a development when factoring in other requirements such as affordable housing, housing mix, tenure and type to meet other housing needs, developer contributions and CIL. • The requirement to include SB will impact upon the costing for services on site. There will be difficulties obtaining quotes for services to inform building and delivery costs as there will be uncertainty over the number of units. This could affect site viability. • The policy will have an adverse impact upon small to medium size housebuilders as they do not have the capacity to subsidise or offer SB plots. 	<p>Concerns regarding viability are noted and therefore para 8.19 stating that viability statements can be considered has been retained.</p> <p>An indicative 5% requirement on sites of 30 or larger has been assessed and considered viable in the council's Viability Assessment (ED 52).</p>
<p>Delivery of housing</p> <ul style="list-style-type: none"> • The policy will slow down the delivery of housing and lower the density of sites resulting in less homes being delivered. • Evidence should be collated to ensure that housing delivery from this source provides an additional contribution to boosting housing supply. • The effect of the policy will be to stymie development of sites of more than 29 units. 	<p>The policy is necessary to ensure the council's legal duties as part of the Self-Build and Custom-Housebuilding Act (SBCHA) are met and a greater variety of housing, particularly in terms of mix and design, enters the market. Studies such as the Letwin Review note that introducing greater variety of housing (such as self-build) to large sites has the potential to speed up delivery. It is hoped that this will be the case, but it is not a principle that the council relies upon to meet its strategic housing target.</p>

<ul style="list-style-type: none"> • There is no duty placed upon an authority as part of the Act to demand a private housebuilder to give up part of its own development to a third party or parties. • Requiring SB will have the effect of changing the house building delivery mechanism from one form of house building to another. It will not boost housing supply. • SBH provides opportunity for individuals to gain property in more rural areas that larger housebuilders prefer not to accommodate at the current time. 	<p>It is agreed that there is no duty in the SBCHA to require private developers to provide serviced plots. The Act gives local planning authorities complete discretion over how best to meet their legal duties.</p>
<p>Evidence of need / demand</p> <ul style="list-style-type: none"> • No evidence of demand - the council has not published a SB Register, it is premature to require larger housing sites to provide SB plots. • There is no evidence to support the inclusion of a threshold of 30 dwellings. The requirement to require SB plots should only apply if there is evidence of local demand. • If there is evidence of demand, the policy should require a minimum percentage of homes to be provided as SB. • Policy could delay development of suitable affordable housing where need is already proven. • There will be a limited demand for SB plots within larger developments because they will not deliver the types or location for the homes that that self builders are seeking. Evidence should be provided to demonstrate that those wanting to self build would consider building within a larger housing development. • Policy HOU 1 also requires developers to consider the demand for SB – what if no demand is identified? 	<p>It is clear through the SBCHA and related national planning policy that the principle underlying SBCH provision is that it should be ‘demand-led’. The policy therefore now adopts this principle in requiring consideration of unmet SBCH demand rather than a blanket requirement for self-build from large sites.</p> <p>As noted in para 8.18, the council will publish its performance in terms of self-build in its annual Authority Monitoring Report. Additional/interim information regarding performance may also be published on its self-build webpages where necessary.</p> <p>As noted above, the initial (slightly shorter) base period ran from January 2016 to October 2016. During this period, the council registered 34 people on its Part 1 Register. This required planning permission to be granted for 34 serviced plots by 30 October 2019. The council however comfortably met this initial requirement by permitting at least 75 serviced plots.</p>
<p>Meeting the obligation for SB</p> <ul style="list-style-type: none"> • There are no guarantees that the policy would be effective in delivering the homes that are needed to meet the council’s obligation. • The latest published evidence of demand for SBH in Cheshire 	

<p>East indicates that at the 1.3.2017 there were 58 applicants for SB plots and it is likely that this will have increased in the last 18 months. There is no evidence to suggest that a single SB plot has been delivered to date.</p>	
<p>Site allocations</p> <ul style="list-style-type: none"> • Self Build would be a suitable form of development at the Withinlee Road (Prestbury) site. The site is suitable, available and achievable for residential development and there is a clear demand for this type of development with the area. The site could make an important contribution to meeting the council's requirement and Prestbury's wider housing requirement. A design code could be used for all SB plots as well as a specific site allocation. • The most effective way to meet the obligation would be through the specific allocation of sites for SB in the SADPD. • West Lancashire are not implementing the requirement for allocated sites to include SB based on feedback from consultation. 	<p>Noted. The council is however meeting its self-build duty. With criteria 2 also proposed as a source of self-build supply if needed, it is not considered necessary to allocate sites for self-build.</p>
<p>Practical issues</p> <ul style="list-style-type: none"> • Health and safety issues from SB plots being developed alongside a housing scheme in terms of construction and traffic management. • Long term management, insurance and maintenance of sites – who will own the land for SB – this could cause management and security issues. • Lack of control over the design of SB plots which could impact upon sales on the wider site resulting in housing need and supply issues. • The policy should set out the circumstances that would apply if the SB plots are not taken up. If a plot is not sold within 12 months, the plot should be returned to the developer for construction, rather than offered to the council or a registered provider. SB is not equivalent to affordable housing and the 	<p>These issues are noted. Para 8.20 of the policy therefore sets out that SBCH opportunities will be controlled through conditions and/or legal agreements. It is considered that given the range of issues and scenarios, it is best these are considered on a site-by-site basis through planning applications.</p>

plots should revert back to market housing as part of the wider scheme. It is impractical to require a developer to reserve a plot for SB on a site indefinitely for the council or an RP to take it up. It is essential that a developer is able to complete construction without the need to re-establish the site later.	
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Policy HOU 4 ‘Houses in multiple occupation’

Summary of main issues raised:	How the main issues have been taken into account
The policy should be clearer in terms of how far ‘the vicinity’ stretches from the site (in metres) and what an unacceptable concentration (% of dwellings) would be.	The policy has been amended to include a threshold – no more than 10% of dwellings to be in existing HMO use within a 50 metre radius of the application site.
Reference should be made within the policy/ supporting text to the permitted development rights that exist for smaller HMO’s as the local community could assume that the policy gives a greater degree of protection than is the case.	This is reflected in the supporting text.
There should be a clear commitment to the use of Article 4 Directions where necessary and appropriate, in areas with high concentrations of HMO’s.	This is reflected in the supporting text.

Policy HOU 5 ‘Gypsy, Traveller and Travelling Showpersons provision’

This First Draft SADPD policy has been split into three separate policies in the Revised Publication Draft SADPD: HOU 5a ‘Gypsy and Traveller site provision’; HOU 5b ‘Travelling Showperson site provision’; and HOU 5c ‘Gypsy and Traveller and Travelling Showperson site principles’.

Summary of main issues raised:	How the main issues have been taken into account
This policy should relate only to those sites identified in the Gypsy and Traveller Accommodation Assessment 2018 and Policy SC7 of	Policies HOU 5a (Gypsy and Traveller Site Provision) & HOU 5b (Travelling Showpeople) ’ in the revised publication draft SADPD

<p>CELPS and should clearly state that applications for sites elsewhere in the Borough will be resisted.</p>	<p>alongside policy SC7 'Gypsies and Travellers and Travelling Showpeople' of the Local Plan Strategy note that sites will be allocated or approved to meet the needs of the most recent Gypsy and Traveller Accommodation Assessment. Each planning application is considered on its own merits in line with the policy requirements of the development plan.</p>
<p>The policy should also include additional criteria relating to local amenity, screening, numbers of units on site and occupancy conditions</p>	<p>The supporting information to policies HOU 5a (Gypsy and Traveller Site Provision) & HOU 5b (Travelling Showpeople) in the revised publication draft SADPD include appropriate references to the use of occupancy conditions. Policy HOU 5c [Gypsy and Traveller and Travelling Showperson Site Principles] alongside LPS policy SC7 'Gypsies and Travellers and Travelling Showpeople' include appropriate references to design and amenity considerations relevant to site provision in the borough.</p>
<p>The policy should make reference to a site submission at Land at Fir Farm, Newcastle Road Brereton. The site has been submitted to the Gypsy and Traveller and Travelling Showperson Call for Sites process and is proposed as a Travelling Showperson site.</p>	<p>The site has been considered through the Gypsy and Traveller Site Selection report [ED 14] as site GTTS 68 and proposed for allocation in the revised publication draft SADPD as site TS 2 'land off Fir Farm, Brereton'. The site is also referenced in policy HOU 5b Travelling Showpeople in the revised publication draft SADPD.</p>

Policy HOU 6 'Optional technical standards'

This First Draft SADPD policy is titled HOU 6 'Accessibility, space and wheelchair housing standards' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>Introduction of space standards requires evidence on need, viability and timing in line with requirements of Planning Practice Guidance. Blanket space standards could negatively impact on housing delivery and reduce capacity of allocations Compared with England in general and the North West in particular, Cheshire East has a high proportion of larger dwellings and there is no</p>	<p>Document ED 57 (Nationally Described Space Standards) provides an overview of the evidence collated on viability, need and timing in line with the requirements of Planning Practice Guidance.</p>

<p>dominance of small property sizes which would be characteristic of more densely developed urban environments</p>	
<p>Optional technical standards on accessible, adaptable and wheelchair entry homes need to consider evidence required by PPG, particularly viability evidence. Also consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that</p>	<p>The policy has been informed by the Residential Mix Study [ED 49]. The outcomes of the Residential Mix Study and the content of policy HOU 6 have been considered in the Site Allocations and Development Policies Viability Assessment [ED 52].</p> <p>The supporting information to policy HOU 6 ‘accessibility, space and wheelchair housing standards’ in the revised publication draft SADPD notes that the implementation of accessibility and wheelchair standards will take account of site specific factors such as flooding, site topography and other circumstances.</p>
<p>Policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling</p>	<p>Point 1 of policy HOU 6 ‘accessibility, space and wheelchair housing standards’ refers to wheelchair adaptable dwellings. Standard M4 (3) wheelchair user dwellings distinguishes between ‘wheelchair accessible’ (a home readily usable by a wheelchair user at the point of completion) and ‘wheelchair adaptable’ (a home that can be easily adapted to meet the needs of a wheelchair user). Planning Practice Guidance states that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be wheelchair adaptable.</p>
<p>There is a lack of clarity regarding the requirements of the policy</p>	<p>The policy has been informed by the residential mix study [ED 49] and the nationally described space standards [ED 57] studies. This has informed the approach, including to thresholds, included in Policy HOU 6 ‘accessibility, space and wheelchair housing standards’. The viability of policy HOU 6 has been tested through the SADPD viability assessment [ED 52]. It is considered that the policy wording clearly articulates the outcomes of the SADPD evidence base.</p>
<p>Support for the Council’s position on not proposing to introduce water efficiency standards</p>	<p>Noted.</p>

<p>The evidence provided within the Housing Option Technical Standards Paper appears to show that in the case of the CORE information, the Disabled Facilities Grant, Census long-term illness and ill health benefit claimants Cheshire East has lower than the national average requirements. The data collected so far therefore does little to support the need for the additional optional standards.</p>	<p>The evidence to support policy HOU 6 ‘accessibility, space and wheelchair housing standards’ is included in the residential mix study [ED 49] and the Nationally Described Space Standards report [ED 57].</p>
<p>The majority of older people wish to stay in their communities and would welcome single-storey properties / smaller properties into which to down-size / some form of supported or extra-care living (preferably ‘extra-care at home’).</p>	<p>Policy HOU 1 ‘housing mix (point 2) notes that a housing mix statement should consider how major housing schemes at detailed planning / reserved matters proposal will be capable of demonstrating how the proposal would address the needs of particular groups in the borough including those also wishing to downsize.</p>
<p>CEC must not fall onto the ‘trap’ of considering only the needs of older people in the context of this policy. CEC Adult Social Care and Children’s Social Care are experiencing a significant shortfall in suitable accessible accommodation for younger adults with disabilities and children with disabilities who wish to remain with their families in a ‘family’ environment.</p>	<p>Point 1(i) of policy HOU 6 in the publication draft SADPD includes thresholds associated with the policy requirements that all ‘major housing schemes’ in the borough will be expected to deliver in relation to accessible and adaptable dwellings and wheelchair adaptable dwellings.</p>
<p>Wheelchair accessible housing imposes a substantially higher cost again, with the cost of buildings to Part M4 (3) adding on average about £16,000 to the cost of construction.(Housing Standards Review: Cost Impacts September 2014 (EC Harris))</p>	<p>The introduction of accessibility, space and wheelchair optional technical standards, as set out in policy HOU 6, has been considered as part of the SADPD Plan wide viability report [ED 52].</p>

Policy HOU 7 ‘Subdivision of dwellings’

Summary of main issues raised:	How the main issues have been taken into account
<p>Should include reference to the need for sufficient parking and waste disposal facilities for the increased number of affordable households in the subdivided dwelling.</p>	<p>References to sufficient car parking and adequate provision for waste and recycling storage have been added to the policy.</p>

Policy HOU 8 ‘Backland development’

Summary of main issues raised:	How the main issues have been taken into account
Restrict such development to bungalows which would have the added benefit of giving much needed provision for the elderly and disabled.	Whilst bungalows could be allowed under this policy, it is not clear that restricting development to bungalows could be justified.
Request a general presumption against subdivision of existing housing plots unless there are special circumstances.	There are a number of policies related to residential standards and design to control inappropriate development but it is not clear that a general presumption against subdivision of all plots could be justified.
Tandem development should be discouraged where it would prejudice appropriate redevelopment schemes occupying several plots or the area as a whole	This issue has been taken into account but it may be difficult to enforce where there is no certainty as to whether an alternative scheme would come forward or would be appropriate.
Objection to policy which will allow back land development and urban cramming	Proposals must comply with policies on residential standards and design.
No definition of backland development (or cross reference to one) leads to ambiguity which will not assist development management decisions. A definition or guidance should be referred to.	A definition has been added to the glossary.

Policy HOU 9 ‘Extensions and alterations’

Summary of main issues raised:	How the main issues have been taken into account
Reference should be made also to "husband, wife, partner" in explaining 'immediate family connection'.	Immediate family connection was defined in First Draft SADPD [FD 01] ¶8.33. It was assumed that the husband, wife, or partner would be an occupant of the main dwelling and would not require a self-contained residential annexe. The requirement for a self-contained residential annexe to be for occupation by a person with an immediate family connection to an occupant of the main dwelling has been removed from the Revised Publication Draft SADPD policy.

Policy HOU 10 ‘Amenity’

Summary of main issues raised:	How the main issues have been taken into account
The policy does not go far enough to protect existing businesses from new residential development; suggestion of a new policy that reflects the ‘Agent of Change’ principle.	Revised Publication Draft SADPD [ED 01] Policy ENV 15 ‘New development and existing uses’ incorporates the agent of change principle.

Policy HOU 11 ‘Residential standards’

Summary of main issues raised:	How the main issues have been taken into account
The policy should be deleted as it is too prescriptive and unnecessary, and is therefore not compliant with national policy.	The Policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility that could allow developments to be tailored to their circumstances.
Rigid space standards between dwellings do not allow for creative design solutions. The policy should simply refer to good design practice, rather than arbitrary separation distances and standards. The proposed standard requiring 18m separation distance between front elevations does not allow for variation in streets widths as set out in Manual for Streets.	The Policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility that could allow developments to be tailored to their circumstances. ¶8.46 of the Revised Publication Draft SADPD [ED 01] refers to the Cheshire East Borough Design Guide supplementary planning document (2017), which supports an innovative design led approach and promotes opportunities for reduced distance standards through good design.
One set of residential standards should be set for the whole Borough and this should be in line with those set out in the Cheshire East Design Guide. Queries regarding how the standards are to be implanted alongside the CE Design Guide.	The standards are considered to be in line with those used in the Design Guide.
12m of separation between habitable and non-habitable rooms between dwellings is a generally accepted industry standard, not 14m.	The standards are considered to be in line with those used in the Design Guide. The policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility.
Flexibility to the spacing standards should be applied to the type of housing proposed. Different types of housing can also have an influence on the impact of relationships to adjoining properties.	The policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility.

Policy HOU 12 'Housing density'

Summary of main issues raised:	How the main issues have been taken into account
<ul style="list-style-type: none"> • Council should apply the policy flexibly and pragmatically based on the site, type and nature of the proposed development. • Opposes blanket approach and density applied on all sites. • Text should be added 'determined on a site by site basis' after 'achieve a net density'. • Additional evidence should be supplied to justify the proposed net density 	<p>Policy HOU 12 'housing density' (point 1) notes that residential development proposals will <u>generally</u> be expected to achieve at least 30 dwellings per hectare. It also sets out a number of factors that might influence an appropriate density on the site and the circumstances where higher densities will be supported.</p>
<p>Broad application of 30dph consistent with requirements of paras 122/123 of the NPPF.</p>	<p>Noted.</p>
<p>Concerned how this policy will be implemented alongside the approach and requirements set out in the Design Guide SPD.</p>	<p>Point 4 of policy HOU 12 'housing density' notes that higher densities will be supported where innovative design solutions are proposed and consistent with the Design Guide SPD.</p>
<p>Policy should be amended to take account of local circumstances including additional factors such as market aspirations and viability considerations.</p>	<p>Point 3 (v) of policy HOU 12 'housing density' notes that in determining an appropriate density, local market conditions and viability will be taken into account.</p>
<p>Policy should be re-structured so that points i-v are applicable to both Parts 1 and 2.</p>	<p>The policy has been restructured so that points i-vii follow parts 1 & 2 of the policy.</p>
<p>The nature of the housing proposed will have an impact on density. For instance. Specialist housing for older people generally achieves a higher density than conventional housing. It is recommended that an additional criteria be added at H12 1 (i) 'the nature of the residential development proposed'</p>	<p>Point 3 (i) of policy HOU 12 ' housing density' notes that the mix and type of housing proposed will be taken into account in determining an appropriate density.</p>
<p>Reservation about part 2 i) as it will not necessarily be appropriate to have a higher density within the whole of the settlement boundary of larger settlements including on the periphery</p>	<p>Proposals for housing developments should use land efficiently in line with LPS Policy SE 2 'Efficient use of land'. Policy HOU 11 'Housing density' sets out the council's expectations on the net density of sites in the borough. It does recognise that there will be sites where higher or lower densities will be more appropriate and sets out the factors</p>

	that should be taken into account.
The maximum average density anywhere in Goostrey village is only 12.8dph, therefore it doesn't make sense for the SADPD to impose a general (and un-evidenced) 30dph and require an even higher density in LSC's, many of which are small country villages.	Point 3 of policy HOU 12 'housing density' notes a number of factors, including the nature, setting and scale of the proposal that should be taken into account, alongside other factors, when determining an appropriate density.

Policy HOU 13 'Housing delivery'

Summary of main issues raised:	How the main issues have been taken into account
Support to references in the policy to the preparation of masterplan's and the sub-division of sites where they can assist decision making and overall delivery.	Noted.
Preparation of masterplan's / design assessments should be to help delivery and not introduce additional tiers of assessment and scrutiny that could delay proposals. This should be acknowledged in the policy wording.	Policy HOU 13 'housing delivery' (point 1) notes that masterplans will be supported to help bring forward and co-ordinate the delivery of housing and infrastructure in the borough.
Policy should enable site promotor to produce the relevant masterplans	The policy does not prevent the site promotor from producing the relevant masterplan. The suitability of such an approach will be considered on a site by site basis.
Concern over part 4 (i) over planning conditions requiring development to start in a shorter timeframe than the default period. This provision is referenced in para 76 of the NPPF (July 2018) and so should be deleted from the SADPD. If the policy is kept, then it needs to be expanded or clarified to take account of local circumstances. Development may not always be able to start quickly as a consequence of site conditions and other obligations. Part 4 (i) of the policy could lead to an increase in the number of planning applications which lapse.	Point 4 of policy HOU 13 notes that the council will 'consider' imposing planning conditions where this would expedite the development without threatening its deliverability or viability.
Part 4 (i) is not compliant with para 55 of the revised framework	The approach set out in point 4(i) of policy HOU 13 'housing delivery' is consistent with paragraph 76 of the NPPF.

Part 4 (ii) of the policy and the requirement to sign planning obligations in an expedient fashion. The Council requires evidence to justify the obligations they request in line with the requirements of regulation 122 of the CIL regulations	Noted. Point 4 of policy HOU 13 has been revised. Point 4 of policy HOU 13 states that the council will consider imposing planning conditions where this would expedite the development without threatening its deliverability of viability.
Larger sites, give rise to a much more complex range of issues.	Noted.
Part 4 – require commitment from the Council to deal with reserved matters and discharge of conditions in a timely fashion.	Noted.
Part 4 (ii) many factors outside the applicant / local planning authority control impact on the signing of planning obligation and so not practical in practice.	Noted. Point 4 of policy HOU 13 has been revised. Point 4 of policy HOU 13 states that the council will consider imposing planning conditions where this would expedite the development without threatening its deliverability of viability.
Not clear how this policy would be monitored and enforced.	The objectives of the policy are to expedite the delivery of housing to maintain at least a five year supply of housing land and meet the overall development requirements of the Local Plan. The achievement of a five year supply of housing is included in the monitoring framework (indicator SC2) [ED 54]. Point 4 of the policy refers to the use of planning conditions to support the delivery of housing in a timely fashion.
Signing and agreement of pre-commencement decisions in advance of granting planning consent will aid overall delivery.	Noted.
The Council should refocus the policy to consider what mechanisms could be put in place to bring about a development in a positive manner.	Points 1 – 4 of policy HOU 13 'housing delivery' are examples of mechanisms that can support the delivery of housing in the borough.
Offsetting infrastructure/policy requirements until later in the development where appropriate; and	The approach to infrastructure and development contributions is set out in policy IN 1 (infrastructure) and IN 2 (developer contributions) in the Local Plan Strategy.
Support for modern methods of construction which could lead to positive impact on delivery, alongside the sub-division of sites.	Noted.
The finalisation of planning obligations and S.106 agreements can be delayed by the involvement of third parties. Important that	Noted.

communication is maintained, allowing for open and practical dialogue.	
A viability assessment should be published alongside the SADPD, in line with para 34 of the NPPF.	A plan wide viability assessment has been prepared to support the revised publication draft SADPD [ED 52].

Policy HOU 14 'Small sites'

This First Draft SADPD policy is titled HOU 14 'Small and medium-sized sites' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Rather than the 'up to 30 homes' specified in the policy, the size of the site should be considered in the context of the surrounding area. Each site should be considered on its own merits on a site by site basis to ensure they remain viable and deliverable.	The identification of a figure in the policy has the benefit of giving a clear direction to decision makers. This benefit is lost in the absence of specifying a figure. Leaving this judgement to individual applications would be difficult and could result in protracted discussions on this point, potentially delaying application decision making. Whilst accepting that there is no universally accepted definition of what constitutes a small site, the figure that the council has identified is based on a report prepared by the Local Government Information Unit and the Federation of Master Builders published in 2016 as noted in the supporting information to the policy.
This is a positively-worded policy and it recognises that small and medium-sized sites have the capability of making a contribution to the delivery of housing land in the borough.	This comment is welcomed and the policy now appears in the SADPD.
A number of objection sites, which would fall within the definition of small sites, have been promoted for allocation.	These have been assessed as appropriate through the council's site selection methodology.
The policy seems to be at odds with the NPPF which talks about the benefits of large scale, planned developments.	Paragraph 59 of the NPPF highlights that to support the Government's objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land can come forward where it is needed. In line with this, paragraph 68 of the NPPF says that small and medium sites can make an important contribution to the housing requirement of an area, and are often built-out relatively quickly. The

	policy is not at odds with national planning policy.
NPPF paragraph 68 outlines that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. It therefore follows that small sites should be allocated in each settlement across the borough to ensure a consistent delivery of housing for local people.	This does not follow and there is no requirement in national policy to allocate small sites in each settlement in the borough.
Use of 30 units as a definition of a 'small site' for policy purposes is supported, recognising that there is no industry standard for what a 'small site' may be.	This comment is welcomed and the policy now appears in the SADPD.
The policy does little to actively encourage small sites to come forward.	It is a positively worded policy that allows decision makers to give positive weight to qualifying applications.
The policy does not set out a policy requirement but merely indicates that the Council recognise the benefits of small sites and will give them positive weight.	This is agreed.
The Council has not addressed NPPF paragraph 68 which indicates that, through development plan and brownfield registers, land to accommodate at least 10% of their housing requirement should be identified on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. Further sites should be identified through the SADPD to assist in securing at least 10% of the supply on such sites.	This is addressed in the published supporting evidence report The Approach Towards Small Sites [ED 58]
SADPD Para 8.47 highlights: "In a joint report by the Local Government Information Unit and the Federation of Master Builders in December 2016,(15) a small site was considered to be one that was unlikely to be developed by large volume house builders. In the absence of a better measure this was defined as a site with the capacity for 30 units or fewer, or 1.5 hectares or less in size." Given this and to make allowances for different approaches to density the Policy should also refer to an area of 1.5 hectares	The council considers that a dwelling number is the best measure to determine whether a site is a small and medium sized one. A high density scheme on a 1.5 ha site could involve very considerably more homes than 30 and would be a scheme more likely to be delivered by a larger builder. This site size threshold has therefore not been included in the policy.

Chapter 9: Town centres and retail (general issues)

Summary of main issues raised:	How the main issues have been taken into account
No comments received	No issues raised.

Policy RET 1 'Retail hierarchy'

Summary of main issues raised:	How the main issues have been taken into account
Support for 'Town Centre First' approach	Noted.
Generic policies lose the fine detail of the 'legacy' local plans, particularly the Macclesfield Local Plan	Retail policies in the revised publication draft SADPD supplement the strategic policy EG 5 'promoting a town centre first approach to retail and commerce' in the Local Plan Strategy. Neighbourhood Plans can also provide additional guidance on retail and town centre matters, where necessary and supported by appropriate evidence.
Object to identification of neighbourhood parades in the retail hierarchy – facilities do not accord with the NPPF and its definition of 'town centres' and should be deleted from retail hierarchy	The supporting information to policy RET 1 'retail hierarchy' notes that neighbourhood parades of shops do not fall within the definition of town centres in the glossary of the NPPF.
Support for Welsh Row (Nantwich) Local Urban Centre	Noted
Support for Crewe and Alsager definition in the retail hierarchy	Noted
Mention needs to be given to Barn Road, Congleton and connections into the town centre particularly when the Congleton Link Road is constructed.	Reference to the Congleton Retail Park, on Barn Road is included in the retail section of the Congleton Settlement Report [ED 27]. It is noted that the Congleton Retail Park is considered an out of centre retail park for retail purposes.
Congleton Town Centre retail role, needs to be protected and enhanced by promotion of retail activity in the town centre	The boundaries of Congleton Town Centre and Primary Shopping Area are defined in the revised publication draft SADPD Policies Map [ED 02]. Congleton is a key service centre with a town centre in the retail hierarchy. Table 9.1 'retail policies' in the revised publication draft SADPD highlight the policies that apply to town centres, such as Congleton, in the borough.

Retail hierarchy should recognise the Local Centre included in the North Cheshire Garden Village.	The approach to the retail hierarchy in the revised publication draft SADPD is consistent with the hierarchy of retail centres identified in policy EG 5 'promoting a town centre first approach to retail and commerce' in the Local Plan Strategy. The status of sites promoted in the LPS through specific allocations will be considered in future updates of the Local Plan.
Edleston Road (Crewe) is mentioned as a neighbourhood parade of shops, this should be expanded to include Coronation Crescent, Bramhall Road, Readsdales Avenue and Coleridge Way	Following a review of the named centres in the Crewe Settlement report [ED 28] – Coronation Crescent, Bramhall Road, Readsdales Avenue and Coleridge Way have been added as neighbourhood parades of shops in the retail hierarchy (policy RET 1).
Support for recognition of Macclesfield at top tier of the retail hierarchy. Opportunity to add a paragraph to policy RET 1 which specifically recognises Macclesfield as being at the top of the retail hierarchy.	Macclesfield is appropriately referenced as a Principal Town Centre (alongside Crewe) in the retail hierarchy.
Support the Macclesfield Town Centre boundary.	Noted.
Welcome approach of not designated retail parks in the retail hierarchy as to not undermine the function of Macclesfield Town Centre.	Noted.
Wilmslow – Davenport Green (Knutsford Road Wilmslow) should be considered for inclusion as a neighbourhood parade of shops.	Following a review of Davenport Green in the Wilmslow Settlement Report [ED 43], the centre has been included as a neighbourhood parade of shops in the retail hierarchy (policy RET 1).
The Poynton Neighbourhood Plan seeks to amend the boundary of the town centre to include the School Lane parade of shops, whereas the SADPD omits the School Lane parade from the town centre and also reduces the size of the town centre.	Following a review of the retail centres in the Poynton Settlement Report [ED 39] – School Lane is considered to be a neighbourhood parade of shops in the retail hierarchy (policy RET 1).
Disagreement with Alsager recommendations in terms of establishing a local urban centre at Crewe Road (Alsager).	Following a review of the town centre boundary contained in the Alsager Settlement Report [ED 22]. The previously proposed local urban centre at Crewe Road (Alsager) has been deleted following the first draft Site Allocations and Development Policies document with part of the area of land at Crewe Road, included within the proposed town centre boundary shown on the Policies Map [ED 02] and

	reflected in the retail hierarchy (RET 1).
Development management should consistently apply the retail hierarchy.	Noted.

Policy RET 2 'Planning for retail needs'

Summary of main issues raised:	How the main issues have been taken into account
FDSADPD fails to ensure that retailing needs in Cheshire East will be met, with particular reference to Knutsford. Evidence base should be updated to explore and allocate sites for retail uses.	Policy 'RET 2' planning for retail needs sets out the retail convenience and comparison floorspace arising in the borough will be met principally through the delivery of sites allocated in the LPS that include an element of retailing to meet local needs; further retail development in central Crewe and central Macclesfield on sites in the town centre and the delivery of site LPS 47 'Snow Hill, Nantwich'
Object to inclusion of LPS 47 (Snowhill)	LPS 47 'Snow Hill, Nantwich' is an allocated site in the Local Plan Strategy, adopted in July 2017.
Rigorous application required of policies RET 3 and RET 7 to ensure no impact on existing centres.	Noted.
Policy RET 2 should make reference to Mill Street in Crewe to be consistent with LPS 1 (Central Crewe)	Policy RET 2 makes appropriate reference to LPS 1 (Central Crewe) in part 2 of the policy.
Support for the approach taken in Policy RET 2 which recognises that additional retail floorspace should and can be delivered in Macclesfield and Crewe. Policy could be strengthened through an additional paragraph to the policy which states that retail development in out or edge of centre sites will not be required to meet the projected capacity	It is considered that Policy RET 2 makes appropriate references to the status of Crewe and Macclesfield. The policy should be read alongside other policies in the Local Plan, including policy RET 3 'sequential and impact tests' in the revised publication draft SADPD..

Policy RET 3 'Sequential and impact tests'

Summary of main issues raised:	How the main issues have been taken into account
Impact Assessment should be required for any mixed use development including A1-A5 uses on developments on the edge of the town centre.	Point 2 of policy RET 3 'sequential and impact tests' in the revised publication draft SADPD clearly set out the threshold for and the location whereby the retail impact test will be required.
Reference to Local Urban Centres within the sequential test is confusing as they are not being treated as 'town centres' for the purposes of the policy.	Local urban centres are treated as a 'defined centre' for the purposes of the sequential and impact test in policy RET 3 (sequential and impact tests) in the revised publication draft SADPD.
Part 2 of RET 3 should be redrafted to accord with paragraph 89 of the revised NPPF which only requires the assessment of impact for retail and leisure uses not all main town centre uses.	Part 2 of policy RET 3 'sequential and impact tests' in the revised publication draft SADPD now refers to the impact test relating to proposals for retail and leisure uses.
Question as to why the same Primary Shopping Area distinction are not afforded to the town centres. For all town centres, there should be a distinction between convenience and comparison goods outside the PSA and the rest of the town centre boundary.	Point 2 of the policy has been revised to clearly set out the threshold for the impact assessment for town centres in the borough.
Broadly supportive of the proposed inclusion of locally set thresholds provided that they are justified by robust evidence in line with the requirements of the assessment criteria in the PPG	Noted.
Point 1 of the policy should be amended to consider greater flexibility in relation to ancillary developments in rural locations which would be exempt from the sequential test.	Text has been added to the supporting information for policy RET 3 (sequential and impact test) in the revised publication draft SADPD which notes that the sequential test will not be applied to applications for small scale rural offices or other small scale rural development
The text should reflect the revised framework, for example para 86 of the NPPF (July 2018).	The approach to policy RET 3 'sequential and impact tests' in the revised publication draft SADPD is considered to be consistent with paragraph 86 of the NPPF.
RET 3 should also make reference to the applicants demonstrating flexibility in terms of scale and format of their proposals	Text has been added to the supporting information for policy RET 3 (sequential and impact test) in the revised publication draft SADPD which notes that flexibility should be demonstrated on matters such as format and scale.

<p>Support for locally set thresholds in relation to impact assessments but a request for the table used in the policy to be clearer. Suggest that the reference to the requirement for Retail Impact Assessments for Class A1 proposals outside of town centre boundaries is removed the implication being any proposals for Class A1 development larger than 500sqm outside of the PSA must be the subject of a RIA</p>	<p>Point 2 of the policy has been revised to clearly set out the threshold for the impact assessment for town centres in the borough.</p>
<p>Point 3 - wording of this paragraph is unclear and should be split into two separate sentences. The first sentence should relate to extensions of existing stores re-worded so a RIA is required if the extension would result in the size of the unit (as a whole) exceeding the thresholds set in Paragraph 2. The proposed re-wording of the second sentence relating to applications to vary the range of goods will need to be altered to reflect the splitting of the paragraph.</p> <p>A new paragraph (Paragraph 4), which is by its very nature applicable to the first, second and third paragraphs, should be added which contains just the second sentence of Paragraph 3 which states that proposals that fail to satisfy a sequential test and/or impact assessment will be refused.</p>	<p>Point 3 of policy RET 3 'sequential and impact tests' in the revised publication draft SADPD has been restructured and split into two sentences.</p> <p>Point 4 of policy RET 3 'sequential and impact tests' has been added to make clear that where any proposal fails to satisfy the sequential test and/or is likely to have a significant adverse impact on one or more of the considerations set out in criterion (2) on a defined centre, it will be refused.</p>

Policy RET 4 'Shops fronts and security'

Summary of main issues raised:	How the main issues have been taken into account
<p>There is support for this policy provided there is some sensitivity in the design of shop fronts and security shutters particularly in Conservation Areas</p>	<p>Support noted.</p> <p>Point iii) of the policy states "<i>new shopfronts in conservation areas should incorporate traditional design elements and materials.</i>"</p> <p>Supporting text further states - "<i>proposals for the installation of metal shutter boxes, external grilles or other obtrusive features will not be acceptable in conservation areas or listed buildings.</i>"</p> <p>Conservation Areas and Listed Buildings is further addressed in LPS Policy SE7 (The historic environment) and policy contained in Chapter 5 (The historic environment) of the Revised Publication Draft SADPD.</p>

Policy RET 5 'Restaurants, cafés, pubs and hot food takeaways'

Summary of main issues raised:	How the main issues have been taken into account
<p>With Policy RET 7, in part, setting a series of tests for the change of use away from Class A1, Policy RET 5 adds an additional layer in managing the impact of Class A3, A4 and A5 uses on amenity. Whilst the use of conditions to control the implications of such uses on amenity is sensible, conditions must comply with tests in NPPF.</p>	<p>The wording has been amended in the Revised Publication Draft SADPD to state: “Where permission is granted for such uses or for an extension of such use, conditions appropriate to the permitted use will may be imposed relating to community safety, hours of opening, noise, odour and fumes, the disposal of refuse, and restricting the sale of hot food to be consumed off the premises.”</p>
<p>Suggests the need for a fall-back position established through previous grants of planning permission to be considered in the imposition of planning conditions.</p>	<p>As above.</p>
<p>RET 5 is too strong in stating “conditions will be imposed” and should be rephrased to “conditions may be imposed”.</p>	<p>As above.</p>
<p>Should include all schools otherwise contrary to item 91c in the NPPF.</p>	<p>¶91c of NPPF (2018) states “<i>enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling</i>”. The policy does not specifically state all schools.</p> <p>Secondary school pupils have greater mobility and independence compared to primary school pupils. Most primary school children are not usually permitted to leave the school at lunchtime, and given the age of the children, it is unlikely that they would travel to and from school unaccompanied by an adult. It is therefore considered that the policy should remain the same.</p>

Policy RET 6 ‘Neighbourhood parades of shops’

Summary of main issues raised:	How the main issues have been taken into account
An addition to the policy should state that in the event of non-viability of a convenience store in a new development, a community use should be the priority for re-allocation of the premises	The policy approach set out in RET 6 ‘neighbourhood parade of shops’ builds upon the strategic approach set out in LPS policy EG 5 ‘promoting a town centre first approach to retail and commerce’. This seeks to protect small parades of shops where they are important to the day to day needs of local communities. The supporting information to policy RET 6 ‘neighbourhood parades of shops’ in the revised publication draft SADPD makes an appropriate cross reference to Policy REC 5 ‘community facilities’.
Support the inclusion of the east end of Welsh Row (Nantwich) for the allocation RET 6. Object to the inclusion of a sliver of land on Waterlode (Nantwich) for the allocation RET 6	Following a review of evidence as set out in the Nantwich Settlement Report [ED 38] Welsh Row is proposed as a Local Urban Centre with the boundaries proposed highlighted on the Policies Map [ED 02].
Support the policy provided that the neighbourhood parade of shops does not detract from the town centre offer	Noted.
Support reference to REC 5 community facilities	Noted.

Policy RET 7 ‘Ensuring the vitality of town and retail centres’

This First Draft SADPD policy is titled RET 7 ‘Supporting the vitality of town and retail centres’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Policy should make a clearer distinction between day / night time uses	Policy EG 5 in the Local Plan Strategy in point 6 notes support for proposals to develop the evening and night time economy in Principal Towns and Key Service Centres subject to ensuring amenity impacts are addressed.
No longer a requirement to identify primary / secondary frontages. Need to review approach in line with revised NPPF (July 2018)	Primary and secondary frontages are no longer defined on the Policies Map [ED 02] nor included in the revised publication draft

	SADPD. The approach to defining primary and secondary frontages has been used to help define primary shopping areas and town centre boundaries as documented through individual settlement reports.
Part 4 of the policy should be revised and made more flexible to respond to market conditions. Part 4 of policy – need to define ‘over concentration’ and ‘significant break’	Policy RET 7 ‘supporting the vitality of town and retail centres’ has been restructured to remove references to primary and secondary frontages as these are no longer defined on the policies map in line with the revised NPPF requirements.
Comments received in relation to: <ul style="list-style-type: none"> • Nantwich Town Centre boundary • Crewe primary shopping area and town centre boundaries • Alsager primary shopping area and town centre boundaries • Congleton Primary Shopping Area boundary & town centre boundary • Alderley Edge Local Centre boundary • Holmes Chapel Local Centre • Macclesfield town centre boundary • Poynton town centre boundary • Goostrey local centre boundaries • Knutsford town centre boundary 	Primary and Secondary frontages are no longer shown on the Policies Map for Principal Town Centres and Town Centres. Settlement reports have been prepared for Principal Towns, Key and Local Service Centres [ED 21 – ED 44] which include consideration of retail matters in the revised publication draft SADPD.
Objection to draft Policy RET 7 on the basis that the approach proposed in the draft policy is unnecessarily restrictive, and that the proposed wording is too vague. In accordance with para 85 of the NPPF, planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, and allow a suitable mix of uses (including housing) in order that their distinctive characters are reflected. Policy RET 7 should be reworded to be more flexible, in order that it is supportive of changes in town centre composition that are a reasonable response to market conditions. It is considered this is particularly relevant to (and important for) centres that are at the lower levels of the proposed retail hierarchy.	Policy RET 7 in the revised publication draft SADPD has been restructured following the removal of primary / secondary frontages from the policies map and revisions to the NPPF.
Macclesfield – object to proposed deletion of Macclesfield Local Plan	Policies in the SADPD, alongside the policy approach in the Local

policies MTC 19 – 21.	<p>Plan Strategy will replace a large number of the policies contained in the legacy local plans (Crewe, Congleton and Macclesfield Local Plan documents).</p> <p>Neighbourhood Plans can also provide additional guidance on retail and town centre matters, where necessary and supported by appropriate evidence.</p>
Should avoid a retail led focus on town centres – reference made to the LGA report Revitalising Town Centres (May 2018)	Policy RET 7 focuses on retail uses in primary shopping areas – where retail development should be concentrated in line with the requirements of the NPPF. There is a broad focus on main town centre uses as demonstrated in point 1 of policy RET 7.

Policy RET 8 ‘Residential accommodation in the town centre’

Summary of main issues raised:	How the main issues have been taken into account
Support for policy, particularly the redevelopment of car parks if it can be shown to at least maintain number of car parking spaces in the town	Noted.
<p>Careful balance needed in decision making between night time economy related uses and residential uses</p> <p>Balance needed that residential amenity issues do not prejudice the primary role of the town centre and its retail function</p> <p>The NPPF is clear in introducing the requirement for the ‘agent of change’ (i.e. a new use amongst established use(s)) to provide appropriate noise mitigation measures so as not to restrict the continued operations of existing uses.</p>	Point 2 of policy RET 8 notes that in line with Policy ENV 15 ‘New development and existing uses’, proposals for new residential accommodation in the town centre should be integrated effectively with existing businesses and community facilities.
The introduction of upper floors in the town centre for residential accommodation is welcomed	Noted.
Item 3 of policy point 1 should include should include additional wording after “remains” which comprises “or suitable alternative provision can be made available within reasonable walking distance	A cross reference has been added to point 1 (iii) of policy RET 8 to policy INF 2 ‘public car parks’ in the revised publication draft SADPD.

Object to point 3 as not consistent with the wording of policy INF 2. It is also important that “adequate alternative” is properly defined by the inclusion of a requirement that it is equally convenient for the facilities served, and is available for the same time periods at the same cost.	
Should include suitable and safe access together with adequate bin and cycle storage.	Additional text has been added through point 3 of the policy RET 8 ‘residential accommodation in the town centre’ to make reference to access arrangements and well located waste and recycling facilities.

Policy RET 9 ‘Environmental improvements, public realm and design in town centres’

Summary of main issues raised:	How the main issues have been taken into account
Support, should specify that criteria should be met for development to proceed unless exceptional reasons indicate otherwise	The introduction to Policy RET 9 notes that in line with LPS Policy SE 1 'Design', development proposals in principal town centres and town centres, as defined on the adopted policies map, will be permitted provided they make a positive contribution to their surroundings and reflect stated and clear design principles outlined in the policy
Support, unsure of precise meaning of paragraphs 3v & 6i	Paragraph 3v has been deleted from policy RET 9.
Object to reference to public art and reference to vertical mix of uses in the town centre, could have an impact on viability	Point 2 (vi) of the policy has been amended with the insertion of ‘where possible’ following the reference to the incorporation of public art.
Duplication of SE1 (Design) in the Local Plan Strategy and should be deleted	Policy RET 9 is considered to add further policy detail regarding the implementation of SE1 (design) for proposals in the town centre.
Support for intention to support public realm and high design standards	Noted.
Design should be mindful of beauty and historic assets and not accept ‘newness’ that quickly looks dated	Noted.

Policy RET 10 ‘Crewe town centre’

Summary of main issues raised:	How the main issues have been taken into account
The boundary of the Northern Edge Development Area should be amended so that it does not extend beyond the boundary of the town centre onto the opposite of West Street.	The Northern Edge Development Area has been amended to reflect the town centre boundary.
The four “character areas” of Crewe town centre shown at figure 9.1 are broadly valid. The boundaries between these areas should not be regarded as inflexible.	Noted.
Point 3 on page 105 refers to “Proposals anywhere in the town that are likely to prejudice the comprehensive redevelopment of the RADA”. It would be more robust if the phrase “in the town” was omitted. Where does “the town” begin and end?	Noted – point 3 of policy RET 10 ‘Crewe town centre’ now refers to ‘proposals that are likely to prejudice the comprehensive redevelopment of the RADA will not be permitted’.
Point 9 refers to the connectivity between the Town Centre and the Retail Park. This is the key factor in planning the future of the town centre.	Noted
It is disappointing that there is no comparable statement for Crewe to that at 9.54 which refers to the “significant heritage assets” of Macclesfield. Crewe has a number of assets which should be protected.	Point 6 of policy RET 10 ‘Crewe town centre’ refers to the setting of heritage assets when referring to town centre public realm improvements.
There should be a far greater emphasis on the creation of green spaces in the town centre including where they could enhance the key link between the town centre and railway station.	Point 6 of policy RET 10 ‘Crewe town centre’ refers to improving the quality of public spaces, including green spaces in the town centre.
The policy should include specific reference and commitment to both a public realm strategy and a heritage strategy for Crewe Town Centre.	The supporting information to policy RET 10 ‘Crewe town centre’ in the revised publication draft SADPD notes that <i>‘a number of complementary strategies have been prepared (or are in preparation) for Crewe, including the Town Centre Regeneration Delivery Framework and the Crewe Hub Area Action Plan. The council will give consideration as to how proposed developments relate to these strategies and contribute towards a strategic approach for public realm improvements across the town centre’.</i>

<p>The policy repeats policy RET 8 (Residential accommodation in the town centre) which allows for the residential redevelopment of car parks subject to certain requirements, including the provision of “adequate alternative” parking provision. This term should be properly defined- so that this provision is equally convenient, available during the same hours and with the same parking charges.</p>	<p>Policy RET 10 ‘Crewe Town Centre’ refers to high quality residential accommodation being supported in the town centre in line with policy RET 8 ‘residential accommodation in the town centre’ (point 6)..</p>
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Policy RET 11 ‘Macclesfield town centre’

This First Draft SADPD policy is titled RET 11 ‘Macclesfield town centre and environs’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>The SADPD is missing any site specific guidance for individual sites within the identified character areas. Park Green area part of Silk Quarter; there should be separate policies for the Silk Quarter and Historic Quarter. Car parking is not addressed in relation to the West of Churchill Way site and the town centre as a whole. The reference to large format development being permitted subject to meeting other policy requirements does not provide the specific planning guidance that the Central Exchange Centre and the town centre require. Christchurch area is not properly addressed.</p>	<p>Policy RET 11 has been re-written to reflect the Macclesfield Strategic Regeneration Framework (SRF). The Character Areas provide specific guidance and are shown on the draft adopted policies map (online interactive version) [ED 02]. Christchurch is referenced in the policy under Churchill Way boulevard character area. Regarding car parking, LPS Policy SD 1 ‘Sustainable Development in Cheshire East’, Strategic Location LPS 12 ‘Central Macclesfield’, LPS Policy CO 2 ‘Enabling business growth through transport infrastructure’ and Appendix C (car parking standards) all address car parking.</p>
<p>The land use elements of the policy require support through the implementation of economic strategies for the town centre through appropriate governance mechanisms. There is a case for the Council to take a more active role in site acquisition and development promotion, including the designation of Local Development Orders and exercise of compulsory purchase powers to bring forward “problem sites”.</p>	<p>Policy RET 11 has been re-written to reflect the Macclesfield SRF. The Character Areas provide specific guidance and are shown on the interactive policies map [ED 02]. The Macclesfield Settlement Report [ED 35] refers to the Local Development Orders that have been designated.</p>
<p>Objection is raised to the omission of the Christ Church area from the list of Macclesfield town centre character areas and the text of RET 11 which confirms that the Council will, in principle, support opportunities for improving and regenerating Macclesfield town centre as defined in</p>	<p>Policy RET 11 has been re-written to reflect the Macclesfield SRF. The Character Areas provide specific guidance and are shown on the draft adopted policies map (online interactive version) [ED 02]. Christchurch is referenced in the policy under Churchill Way boulevard</p>

Summary of main issues raised:	How the main issues have been taken into account
<p>Figure 9.2 'Macclesfield town centre character areas'. Christ Church is excluded from the list and discussion and therefore from the list of priority areas for regeneration. There is a lack of a Conservation Area Appraisal for Christ Church area and specific guidance for the Christchurch area. Christ Church was a featured building of the Borough Council's HARP project in 2017-18 and much work was done to look at options to support its regeneration with the Churches Conservation Trust as building owners. The viability and marketing of any future use is likely to be negatively impacted by the removal of the church and the majority of its Conservation Area from the town centre. (will convey a "nothing to see beyond here" message). There is a failure to reference, respect or reflect Christ Church and its Conservation Area in the SADPD documents.</p>	<p>character area. The HARP project is referenced in the 'Macclesfield Settlement Report' [ED 35].</p>
<p>Request some form of planning guidance for the Christ Church area to provide an updated framework to guide development, facilitate positive change and ensure that high quality place making is embedded into future development projects affecting the area. Support the rejuvenation of the town centre as a high priority of the Borough Council but the future of the Christ Church area also needs some positive planning due to its location, its heritage, its quality and its potential to support and enhance the whole town centre and the town itself.</p>	<p>Policy RET 11 has been re-written to reflect the Macclesfield SRF. The Character Areas provide specific guidance and are shown on the draft adopted policies map (online interactive version) [ED 02]. Christchurch is referenced in the policy under Churchill Way boulevard character area.</p>
<p>The policy is vague and high level and it may be more suitable for it to be removed and instead worked into a (or a series of) more detailed and comprehensive Supplementary Planning Document(s). If policy remains it needs reworking. Reference to new retail developments underpinning the retail function of Macclesfield should be made whilst encouraging further developments for town centre uses. Concern about Historic Market Quarter and how the policy is used in managing the balance of uses along Chestergate. Churchill Way Car Park should be included as a site in the 'Sites' section of the FDSADPD and that the Policies Map should be amended to reflect this. Policy</p>	<p>Policy RET 11 has been re-written to reflect the Macclesfield SRF.. The Character Areas provide specific guidance and are shown on the interactive policies map. This together with the Macclesfield SRF provides flexibility rather than allocating specific sites. A revised smaller Primary Shopping Area is shown in the Publication Draft SADPD to be consistent with the NPPF, with further detail available in the Macclesfield Settlement Report [ED 35].</p>

Summary of main issues raised:	How the main issues have been taken into account
wording similar to that of Policy MTC7 of the MBLP, but with flexibility for a wider range of uses (including food retailing) would be appropriate. Addendum to the above suggests a revised Primary Shopping Area boundary.	
There is a need to draw Macclesfield's PSA boundary tightly around parts of the town centre where there is a real concentration and predominance of Class A1 uses as well as those locations where CEC have aspirations to deliver retail developments. There is no justification for the extension of the PSA to include the three areas (Chestergate west of Churchill Way, the southern part of Jordangate and Mill Street south of Roe Street); it would be sensible to include the Churchill Way and Exchange Street car parks.	A revised smaller Primary Shopping Area is shown in the Revised Publication Draft SADPD to be consistent with the NPPF, with further detail available in the Macclesfield Settlement Report [ED 35]. Car parks are not classed as main town centre uses.

Chapter 10: Transport and infrastructure (general issues)

Summary of main issues raised:	How the main issues have been taken into account
The transport and infrastructure policies contained in Chapter 10 of the SADPD fail to consider the importance of delivering motorway service areas and are therefore not in accordance with the NPPF. Paragraph 104 e) of the revised NPPF, notes how planning policies should provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. Footnote 42 of the revised for the NPPF confirms that: "Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user. The NPPF footnote confirms that roadside services are unlikely to be	There is no evidence pointing to the need for new such facilities. There are two existing motorway service areas within the borough (Sandbach Services M6 between Junctions 16 and 17 operated by Roadchef; and Knutsford Services M6 between Junctions 18 and 19 operated by Moto) and one adjacent to the borough boundary (Lymm Poplar 2000 Services located at M6 Junction 20 and M56 Junction 9 and operated by Moto).

<p>nationally significant infrastructure projects, therefore it is concerning that SADPD as currently drafted fails to consider this matter within the Cheshire East context.</p>	
<p>There is a need for an allocation to provide roadside facilities in relation to the A500. The A500 is identified as a Strategic Link from Nantwich as both a link to the M6 and a link to employment opportunities in Crewe. It links Crewe and Nantwich with Stoke and the M6 to the east, and then connects with the A51 which links to Chester to the north-west. Our client has specifically proposed the land at Newcastle Road, Willaston as an allocation for roadside facilities.</p>	<p>There is no identified need for such new facilities. There are existing roadside facilities on the A500 at its junction with the M6.</p>
<p>Recommended Additional Policy - Investment in Future Infrastructure It is requested that local policy is worded to recognise United Utility sites, located within the green belt or open countryside, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected on the proposals map and in development plan policy to read “Development proposals at existing utility sites in the green belt or open countryside either in the form of infilling or redevelopment, will be supported where they are needed to respond to future growth and environmental needs.” This would enable UU to best meet the growth and development aspirations of the borough, by ensuring that the fundamental infrastructure requirements of these future developments can be achieved.</p>	<p>A specific policy to this effect has not been included in the Plan. United Utilities already benefit from extensive permitted development rights under Part 13 of the Town and Country Planning (General Permitted Development) (England) Order 2015. Any policy would not have been unconditional in that it would have had to set out the range of important planning considerations that development proposals (where they needed planning permission) would have needed to address. In the case of development in the Green Belt, the policy could not give proposals which comprise inappropriate development in the Green Belt an automatic exemption from having to demonstrate exceptional circumstances. Whether exceptional circumstances exist should properly be considered through the planning application process in the light of the particular circumstances and justification surrounding the particular proposal.</p>
<p>The increased levels of car ownership in the rural areas and the resultant problems of a demand for car parking over and above the standards set out by the Council. This problem is further emphasised by the construction of integral garages in new build housing which are not large enough to accommodate the average family car.</p>	<p>Car parking standards have been already set through Appendix C of the Local Plan Strategy. The introductory text of Appendix C says that the residential standards will be applied as minimum standards and will be applied taking account of the location of the development site including the availability of public transport locally and its proximity to services and facilities. No further policy has therefore been included in the DSADPD in response to these comments</p>
<p>The plan fails to address the impact of HS2 in the Cheshire East area,</p>	<p>The SADPD sets out non-strategic planning policies and is being</p>

<p>in particular in the southern parishes, which is already being widely discussed and is the subject of a number of published strategies.</p>	<p>prepared in line with the strategic policies of the Local Plan Strategy (LPS). The LPS does not address the full land use implications of HS2 and therefore this also falls outside the scope of the SADPD. The council is preparing a separate Crewe Hub Area Action Plan which is setting a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This is subject to its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.</p>
<p>The plan fails to address the impacts of fracking on local communities, particularly on traffic, local communities and the local environment.</p>	<p>Hydraulic Fracturing commonly known as “fracking” will be covered in the third part of the Council’s Local Plan, the Minerals and Waste Development Plan Document, currently in preparation.</p>
<p>There is no policy on the provision of electric car charging points in the plan notwithstanding the Governments stated objective to support a shift to electric vehicles over the next 20 years.</p>	<p>This is already addressed in LPS policy CO 2 (Enabling Business Growth Through Transport Investment). In addition, PDSADPD policy INF 3 says that development proposals should incorporate appropriate charging infrastructure for electric vehicle in safe, accessible and convenient locations.</p>

Policy INF 1 ‘Cycleways and footpaths’

This First Draft SADPD policy is titled INF 1 ‘Cycleways, bridleways and footpaths’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>In the application of Part 2 of this Policy, the Council should be mindful that the diversion or stopping up of a public footpath, bridleway or other public road is subject to a separate process to planning. As such, given the associated risk of the planning application process, it will often be the case that this process is not entered into by an Applicant until after a planning application has been granted or there is a resolution to grant planning permission.</p>	<p>In response this to this issue Policy INF 1 in the revised publication draft SADPD is supported in paragraph 10.3 by the wording: “<i>The diversion or stopping up of a public footpath, bridleway or other public road in association with a planning application must be considered before the granting of planning permission</i>”.</p>
<p>Suggest that wording should be added to Policy INF 1 which confirms support for diversions where they will secure improvements to the</p>	<p>In response to this issue, Policy INF 1 in the revised publication draft SADPD], contains the policy wording: “2. <i>Development proposals that</i></p>

<p>usability of cycleways, bridleways and footpaths where feasible and viable.</p>	<p><i>involve the diversion of cycleways, footpaths, bridleways will only be permitted where the diversions provide clear and demonstrable benefits for the wider community.”</i></p>
<p>Should be expanded to also include 'canal towpaths'. Towpaths are not designated as public bridleways or footpaths and are not all cycleways, but play a key role in providing linkages and in terms of sustainable travel routes. Upgrading and better utilising the canal towpaths is included as part of the PROW Improvement Plans and the objectives of the Cheshire East Local Transport Plan. Including canal towpaths would also relate better to adopted Local Plan Strategy policy CO1 in terms of sustainable travel which at criteria 2v, specifically supports works to canal towpaths and recognises their value as sustainable transport routes.</p>	<p>In response to this issue, Policy INF 1 in the revised publication draft SADPD contains the policy wording: 1. <i>Development proposals that would lead to the loss or degradation of a public right of way (such as a footpath, cycleway or bridleway) or a permissive path (such as a canal towpath) will not be permitted.</i></p>
<p>Specific mention should be made to the opportunity provided by canal towpaths to increase sustainable active travel... We suggest the following amendments: Cycleways, bridleways, towpaths and footpaths 1. Development proposals that would lead to the loss or degradation of a cycleway, bridleway, canal towpath or footpath will not be permitted. 2. Development proposals that involve the diversion of cycleways, footpaths or bridleways will be permitted where the diversions provide clear and demonstrable benefits for the wider community. 3. Development proposals should seek to contribute positively to: i. the Cheshire East Cycling Strategy; ii. the Cheshire East Rights of Way Improvement Plan Strategy and Implementation Plans; and iii. the walking, cycling and public transport objectives of the Cheshire East Local Transport Plan. 4. Development proposals should seek, where feasible, to provide links to national cycle routes, long-distance footpaths, canal towpaths and rights of way networks</p>	<p>In response to this issue, Policy INF 1 in the revised publication draft SADPD has been revised as appropriate.</p>
<p>Support this policy but would suggest that it should go further to</p>	<p>In response to this issue, Policy INF 1 in the revised publication draft</p>

<p>include proposed standards of construction, materials to be used etc.</p>	<p>SADPD point 5 contains the following policy wording: <i>5 Design and access statements must be accompanied by maps showing links to community facilities and existing public rights of way as per the Active Design guide principle in the Cheshire East Borough Design Guide supplementary planning document.</i></p>
<p>The Council's commitment to improving connectivity by walking, cycling and public transport in draft Policy INF 1 ("Cycleways, bridleways and footpaths") is supported. However, as per NPPF, it should be recognised that "opportunities to maximise sustainable transport solutions will vary between urban and rural areas".</p>	<p>In response to this issue Policy INF 1 in the revised publication draft SADPD is supported in paragraph 10.2 by the wording <i>"National planning policy highlights that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. It also says that planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including national trails. Maximising sustainable transport opportunities supports active lifestyles, well-being and, therefore, good health".</i></p>
<p>We must put the responsibility on the applicant to identify where adding to or upgrading the nearby cycleways footpaths and bridleways would help especially where new routes or diversions are proposed inside new development and an opportunity exists to link to existing routeways.</p>	<p>In response to this issue Policy INF 1 in the revised publication draft SADPD includes point 4 <i>"Development proposals should seek, where feasible, to provide links to national cycle routes, long-distance footpaths, canal towpaths and rights of way networks"</i>. It is further supported by the supporting information in paragraph 10.2 <i>"Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including national trails."</i> This will be achieved through the imposition of planning conditions.</p>
<p>Perhaps put here - 3) Design and Access statements must be accompanied by map showing links to community facilities and existing PROW as per the Active Design guide principle</p>	<p>In response to this issue Policy INF 1 in the revised publication draft SADPD point 5 contains the words <i>"Design and access statements must be accompanied by maps showing links to community facilities and existing public rights of way as per the Active Design guide principle in the Cheshire East Borough Design Guide supplementary planning document"</i>.</p>
<p>All applications for diversions must consider wider infill and multi modal upgrades to the route.</p>	<p>In response to this issue policy wording in Policy INF 1 in the revised publication draft SADPD point 2 notes <i>"Development proposals that</i></p>

	<i>involve the diversion of cycleways, footpaths, or bridleways will only be permitted where the diversions provide clear and demonstrable benefits for the wider community”, along with the supporting information in paragraph 10.2 regarding protecting and enhancing public rights of way.</i>
Where a neighbourhood plan is in place this must be checked for path and cycleway improvements.	Neighbourhood Plans, once made, form part of the Development Plan.

Policy INF 2 ‘Public car parks’

Summary of main issues raised:	How the main issues have been taken into account
Support both the objectives and rigorous future application of the policy	Comment welcomed
Car parks need protecting and must not be seen as easy game for brownfield development.	The thrust of the policy is to retain car parks. It only allows for their redevelopment with other uses where strict conditions are met.
Strengthen the wording to say that any development on car parks must deliver a substantial increase in parking spaces in excess of any new demand that may be generated by new development - e.g. office.	Under the first condition in the policy through which the loss of existing public car parking spaces could be allowed the spaces lost would need to be adequately replaced on the site or nearby. This would be in addition to the parking requirements generated by the proposed development on the site. Under the two other conditions, it would be unreasonable for the council to insist on substantial additional public car parking provision since that would go beyond the requirement for car parking generated by the development proposal itself.
Car parks are often the only public space in a town as all the small green space is being acquired. All car park development should have to provide some green space / landscaping.	Any development proposals will be subject to the requirements of a range of Local Plan policies. These include proposed SADPD policy ENV 5 (Landscaping) which seeks appropriate landscaping schemes as part of new development and REC 3 (Green space implementation) which requires all major non-residential development (creating 1000sqm of new floorspace or on a site 1 ha or larger) to provide green space as a matter of good design and to support health and well-being. Local Plan Strategy policy SE 6 (Green Infrastructure)

	already establishes the requirement to provide open space as part of new residential development.
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Policy INF 3 ‘Highway safety and access’

Summary of main issues raised:	How the main issues have been taken into account
The policy needs strengthening as loose wording will allow developers to “creep in”	The wording is considered sufficiently robust in relation to the future application of this policy.
The lack of electric car charging points on all new development should be rectified as this mode of transport is becoming increasingly popular	Electric charging points are addressed in LPS Policy CO2 (Enabling business growth through transport infrastructure) and SADPD Policy INF 3 (Highway safety and access). This policy addresses highway safety and access and expands on seeking development proposals to <i>“incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations.”</i> Additional wording has been inserted in the Revised Publication Draft SADPD on charging points for major development.
Policy needs strengthening and should read “Development Proposals must’ etc. This would strengthen Highway Authorities position at appeal	The word ‘should’ is considered sufficiently robust in relation to the future application of this policy.
Should be applied in the context of the cumulative impact of a proposed development with other activities and demand on the road network in the same area.	Point 2 of Policy INF 3 (highway safety and access) notes that all development proposals that generate a significant amount of movement should be supported by a travel plan and either a transport statement or transport assessment.
The impact of additional B2, B8 uses and HGV traffic on a fragile rural network has been substantial and must be evaluated properly prior to granting permission	Comment noted. This policy addresses HGV traffic on the rural network and states: <i>“development proposals should: vi. not generate movements of heavy goods vehicles (HGVs) on unsuitable roads, or on roads without suitable access to the classified highway network.”</i>
Point ii has got to happen. Travel plans and highway design must happen before site commences. Design must be in the Nation planning way – i.e. pedestrians, cyclist then cars.	Comment noted.

<p>Bus provision must be considered in road widths for bus stops and parking bays.</p>	<p>LPS Policy CO1 (Sustainable Travel and Transport) includes policy on bus priority and states the Council will expect development to... <i>“4. Improve public transport integration, facilities, capacity, levels, access for all users and reliability including...(v) considering options to enhance Bus Priority at junctions and the provision of dedicated bus lanes.”</i></p>
<p>Point iv is too weak – build the road for vehicles then consider how pedestrians cross is unacceptable.</p>	<p>This policy ensures that measures are made for those that want to travel by sustainable modes of transport. Further details of promoting sustainable modes of transport and encouraging a modal shift away from the car is addressed in LPS Policy CO1 (Sustainable travel and transport), Policy CO2 (Enabling Business Growth through Transport Infrastructure), Publication Draft SADPD Policy GEN 1 (Design Principles) and Policy INF 1 (Cycleways, bridleways and footpaths).</p> <p>Policy INF 1 (Cycleways, bridleways and footpaths) references the Active Design Guide which provides a hierarchy of movement with pedestrian and wheelchair users coming first, followed by cycling, public transport and then private vehicles.</p>
<p>As part of the support for the Bollington Neighbourhood Plan, studies were carried out by professional consultants to recommend improvements to address traffic and parking problems and improve parts of the public realm. Further consultation of the community needs to be carried out and ways must be found to implement the final recommendations.</p>	<p>Comment noted. The policy states that <i>“all development proposals that generate a significant amount of movement should be supported by a travel plan and either a transport statement or transport assessment”</i>.</p>
<p>No evidence of applications coming in has been seen where highways have done any serious non vehicle highways assessments- It is particularly poor on employment development sites forgetting cycle storage, showering and routes and bus service contributions.</p>	<p>Comment noted. The policy states that <i>“all development proposals that generate a significant amount of movement should be supported by a travel plan and either a transport statement or transport assessment”</i>.</p>
<p>The planning application form needs to be changed to steer applicants to do good design on highways with pedestrians, cyclists and public transport designed in from the beginning - not an afterthought after the outline with road access application has been agreed.</p>	<p>Promoting sustainable modes of transport is a key theme that runs through the LPS and Publication Draft SADPD. LPS Policy CO1 (Sustainable travel and transport) covers modal shift from car travel to public transport, cycling and walking. SADPD Policy GEN 1 (Design Principles) seeks to maintain or improve access, connectivity and</p>

	permeability in and through the development site particularly for walking and cycling. SADPD Policy INF 1 (Cycleways, bridleways and footpaths) references the 'Active Design Guide' which provides a hierarchy of movement with pedestrian and wheelchair users coming first, followed by cycling, public transport and then private vehicles.
No mention of Sport & Public Health England - Active Design guide	The Active Design Guide has been incorporated into LPS policy INF 1 Cycleways, bridleways and footpaths in the Revised Publication Draft SADPD.

Policy INF 4 'Manchester Airport'

Summary of main issues raised:	How the main issues have been taken into account
Not strong enough policy and will allow Manchester Airport to do whatever it wants with the Green Belt for operational reasons. This policy should say that operational necessities need to be clearly evidenced.	The policy allows for development that is necessary for the operational efficiency and amenity of the airport. Therefore, it does not allow for development that is not necessary. The definition of an airport operational area allows development to be concentrated in the most appropriate location. Whether a proposal represents 'not inappropriate' development in the Green Belt is a matter for the decision maker, considering the requirements of LPS Policy PG 3 and the NPPF.
Wording of policy needs to be strengthened to reflect that this is a defined area within which development and uses that are necessary for the operational efficiency and amenity of the airport are expected. The designated Operational Area should be viewed as tantamount to exceptional circumstances in relation to green belt.	The policy confirms that development and uses that are necessary for the operational efficiency and amenity of the airport will usually be permitted. The reference to Green Belt has been deleted from the policy but proposals in the Green Belt will remain subject to Green Belt policy as set out in LPS Policy PG 3.
The policy should allow for surface car parking within the operational area.	The list of example types of development and uses is not exhaustive. It is considered that surface car parking would be covered by 'transport infrastructure'.
Objection where operational use is for car parking. The airport is relying too much on revenue and ability to land grab for car parking. The policy does not give weight to environmental consequences.	Car parking is a legitimate part of the airport operation and is required for the operational efficiency and amenity of the airport. Concentrating airport related uses in the operational area prevents such uses being

More effort should be made to achieve more journeys to and from the airport by sustainable modes.	spread more widely in other locations in the Green Belt. LPS Policy CO 4 'Travel Plans and Transport Assessments' will apply to any proposals in the operational area within Cheshire East; however most of the significant built development associated with the airport is within the City of Manchester and would be subject to its policies on sustainable travel.
What about the impact of such growth on noise, air quality and vehicular traffic? For Cheshire East Council not to critically consider, but "usually permit", development at Manchester Airport would represent a failing in its duty of care to the Borough's residents.	The policy only allows for development that is necessary for the operational efficiency and amenity of the airport and proposals will also be subject to all other relevant policies in the development plan. Any proposals in the operational area will be determined in accordance with the development plan and other material considerations in the same way as any other application. In determining any application, consideration should be given as to whether the development is necessary for the operational efficiency and amenity of the airport.
Manchester airport has many responsibilities, including limiting noise. Cross reference should be made to Policy ENV 13 (Aircraft Noise).	Aircraft noise reduction is covered by legal agreements attached to the planning consent for runway 2. The aircraft noise policy seeks to direct noise-sensitive development away from the areas most affected by aircraft noise.

Policy INF 5 'Aerodrome safeguarding'

This First Draft SADPD policy has the reference GEN 5 'Aerodrome safeguarding' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The policy should be within Chapter 3 General Requirements because the aerodrome safeguarding policy relates to general development issues and non-airport development off-site and not purely the development of the airport itself.	The policy has been moved to the General Requirements section of the plan (reference GEN 5 in the Revised Publication Draft SADPD).
The text at Paragraph 10.10 should be deleted and the following new text inserted: "The Safeguarding Authority for Manchester Airport will assess planning applications and consider their impact on whether the	The supporting information has been updated to take account of the text proposed.

development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a visual hazard; interference with communication systems including RADAR systems and ground to air communication and whether its construction will present any hazard to flight safety”.	
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Policy INF 6 ‘Airport public safety zone’

This First Draft SADPD policy has the reference GEN 6 ‘Airport public safety zone’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The policy should be within Chapter 3 General Requirements because it is a general development requirement rather than Airport related development.	The policy has been moved to the General Requirements section of the plan (reference GEN 6 in the Revised Publication Draft SADPD).
Has this been checked against LPS 37?	Strategic site LPS 37 is not within a public safety zone.

Policy INF 7 ‘Airport car parking’

This First Draft SADPD policy is titled INF 5 ‘Off-airport car parking’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The heading should be amended to “Off-Airport Car Parking” to make it clear that policy relates to car parking provision outside of Manchester’s Operational Area.	Proposals within the operational area will be considered against the Manchester Airport policy (INF 4) and the airport car parking policy has been amended so that it is clear that it relates to proposals outside of the operational area.
Point 4 should include a requirement for on-site attenuation in addition to making maximum use of permeable materials	The policy has been amended as suggested.
Paragraph 10.14 should be made clear that only authorised off-airport car parks are being referred to	The supporting information has been amended as suggested.
The wording is excessively restrictive and therefore not effective. The	The policy does not intend that applicants provide a numerical

<p>council will need to clarify the car parks that it proposes to use as the measure against which capacity will be assessed. In the absence of such, it will not be possible for potential future operators to be able to determine whether demand is met. A table of the airport car parks and the lawful off-site car parks should be included in the plan with their approved capacity.</p>	<p>calculation of the capacity / occupancy of existing car parks but some evidence that car parks are regularly at or near capacity would be required, e.g. a parking survey. The inclusion of a table of existing car parks would be difficult as they have a wide geographical spread in a number of different authorities and some only operate during irregular periods. In addition, such a table would inevitably become out of date very quickly.</p>
<p>Clause 2 states that where demand against supply can be proven, that preference will be given to locations identified in the 'Manchester Airport economy and Surface Access Plan' or replacement guidance. The current Surface Access Plan (2016) recognises that as passenger numbers increase to the airport that improved sustainable transport options need to be provided but that, even with these, approximately 50% of visitors to the airport will continue to access the airport by car along with 60% of employees. The stated aim for car parking is that parking will be provided on site and that the airport will "work with Local Planning Authorities to monitor off-site car parks and oppose proposals where appropriate" With this as a stated aim, by definition, the delivery of off-airport parking cannot be in accordance with the Sustainable Development Plan which has a core objective of seeking to locate all car parking on site and increase use of rail and bus options. The policy should be amended to identify those locations/areas of search that the council would consider appropriate for additional long stay / park and ride off-site car parks.</p>	<p>Criterion 2 does not rule out locations not identified in the surface access plan. If there is a need for new car parking but the Sustainable Access plan does not identify off-airport locations then preference cannot be given to those locations and effectively criterion 2 would not apply.</p>
<p>Clause 3 of the policy states that proposals will be considered inappropriate without, effectively, a sequential approach having been taken to location and that proposals will preserve the openness of the Green Belt. As parking provision will need to be secure and therefore likely to require boundary fencing and lighting, the basis of how the council would consider proposals is not clear. The documents listed as supporting the SADPD do not appear to include a Green Belt Review which has considered potential locations for parking along the routes proposed by Manchester Airport. The 2013 Green Belt Assessment prepared to support the preparation of the Local Plan Part 1 only</p>	<p>The Green Belt requirements are in line with LPS PG 3 and national policy in respect of local transport infrastructure. These policies require such infrastructure to demonstrate a requirement for a Green Belt location. If the proposal could be accommodated outside of the Green Belt, then it cannot demonstrate a requirement for a GB location. These policies also require proposals to preserve openness and not conflict with the purposes of including land within the Green Belt. The Green Belt Assessment Update produced in 2015 assesses parcels of land around the main settlements against the defined purposes of the Green Belt to inform Green Belt boundary alterations</p>

appears to have assessed the impacts of potential housing development. Given this, it is felt that it would be almost impossible for effective park and ride schemes to be approved on the basis of Clause 3 of proposed Policy INF 7.	in plan-making. Development proposals in the Green Belt seeking to demonstrate that proposals are not inappropriate, or amount to very special circumstances need not refer to the Green Belt Assessment Update.
Airport must have a travel and transport plan that reduces the need for private vehicle travel.	The Manchester Airport Sustainable Development Plan: economy and surface access fulfils this requirement.
Such permissions should be stopped for 3 years whilst all other options are assessed and prioritised for implementation	The policy seeks to restrict the provision of new off-airport car parking unless they are needed. A blanket ban on proposals would not be a sound approach.

Policy INF 8 ‘Protection of land and routes for proposed infrastructure’

This First Draft SADPD policy is titled INF 6 ‘Protection of existing and proposed infrastructure’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
No strategy for HS2 and its impact on local transport and traffic arteries is indicated.	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council is preparing a separate Crewe Hub Area Action Plan which is setting a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This is subject to its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.
Policy seeks to protect key infrastructure proposals and the text refers to Middlewich Eastern Bypass as one such scheme. CWaC have no specific comments on this other than to note the joint working that has taken place on this and that the scheme is being progressed by way of planning applications to both authorities.	Cheshire East welcomes and appreciates the positive and collaborative approach that has taken place, and continues to take place, between the two councils in bringing forward the planned Middlewich Eastern By Pass.

Policy should be phrased in a more positive way such as development should be located and implemented in such a manner as to promote modal choice and use of alternatives to the private car.	This is addressed through other Local Plan policies, most significantly LPS policy CO 1 (Sustainable Travel and Transport). There is no need to repeat these policy provisions.
Improved connectivity to Manchester Airport should be supported under the policy to facilitate economic growth and development.	The Local Plan Strategy already gives support, through policy CO 1 (Sustainable Travel and Transport) to the delivery of a safe sustainable high quality integrated transport system that encourages a shift away from car travel to public transport, cycling and walking, supportive of the needs of businesses. There are no specific infrastructure schemes relating to connectivity to and from Manchester Airport that require safeguarding in relation to Manchester Airport. No such schemes are identified in the Local Plan Strategy or Infrastructure Delivery Plan.
Infrastructure should consider new routes for pedestrians, cyclists, buses and trains.	These could fall within the scope of the policy. The policy as now set out in the Revised Publication Draft SADPD and now renumbered to INF 6 lists four specific transportation schemes where land is proposed to be safeguarded for their construction. These include the land required for a new railway station at Middlewich in conjunction with the re-opening of the Sandbach-Middlewich-Northwich rail line for local passenger services.

Policy INF 9 ‘Hazardous installations’

This First Draft SADPD policy has the reference INF 7 ‘Hazardous installations’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
No comments.	No issues raised.

Policy INF 10 ‘Telecommunications infrastructure’

This First Draft SADPD policy has the reference INF 8 ‘Telecommunications infrastructure’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>We welcome the reference to aviation within policy INF 10 but suggest that the wording of the policy is consistent with ENV 9 and that which we suggest for ENV 10. At point 1 under criteria iv. replace current text “there will be no unacceptable interference with electrical equipment, air traffic services or the Jodrell Bank Radio Telescope” with “there will be no impact on electrical equipment, air traffic services or the Jodrell Bank Radio Telescope”. As per our earlier advice in relation to policy ENV 9, the word ‘unacceptable’ could be viewed subjectively and should be deleted.</p>	<p>This issue is now covered under Policy INF 8 “Telecommunications infrastructure” in the revised publication draft of the SADPD. The Policy wording now excludes the word “unacceptable”, which could be interpreted as subjective. The policy requires developers to demonstrate that installations have been kept to a minimum and to demonstrate all feasible alternatives have been explored as well as spelling out that</p> <p>iii. <i>there will be no significant adverse impact on visual and residential amenity, or on the character of any building or the wider area; and</i></p> <p>iv. <i>there will be no interference with air traffic services.</i></p> <p>Jodrell Bank and its specific circumstances and requirements are covered in LPS Policy SE 14 ‘Jodrell Bank’, Paragraph 4.56 <i>Development proposals within the Jodrell Bank Radio Telescope Consultation Zone that impair the efficiency of the telescope or have an adverse impact on the historic environment and visual landscape setting of the Jodrell Bank Radio Telescope will not be supported.</i></p>
<p>An additional paragraph will also need to be inserted under Supporting Information, as follows:- “The Safeguarding Authority for Manchester Airport will assess Telecommunications Infrastructure planning applications and Prior Notification Permitted Development proposals to consider their impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a visual hazard; interference with communication systems including RADAR systems and ground to air communication by its radio frequency or microwave link path and whether its construction will present any hazard to flight safety.”</p>	<p>This policy supplements Policy GEN 5 “Aerodrome Safeguarding” in the revised publication draft SADPD. This issue is addressed in paragraph 3.28 in the revised publication draft SADPD “<i>The safeguarding authority for Manchester Airport will assess planning applications and consider their impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a visual hazard; interference with communication systems including radar systems and ground to air communication and whether its construction will present any hazard to flight safety.</i>”</p> <p>Therefore it is unnecessary to add additional wording to this policy.</p>
<p>Part 1iv of the policy states that there will be “unacceptable</p>	<p>This issue is now covered under Policy INF 8 “Telecommunications</p>

<p>interference with electrical equipment, air traffic services or the Jodrell Bank Radio Telescope”. Our objection is based on the lack of any evidence in the plan or evidence base in order to test the appropriateness of this part of the policy and it is also not quantified at to what is deemed to be an unacceptable impact. Therefore evidence must be produced, then tested and if it is found to be justified clearly set out in the policy.</p>	<p>infrastructure” in the revised publication draft SADPD. The Policy wording now excludes the word “unacceptable”, which could be interpreted as subjective. The policy requires developers to demonstrate that installations have been kept to a minimum and to demonstrate all feasible alternatives have been explored as well as spelling out that</p> <ul style="list-style-type: none"> iii. there will be no significant adverse impact on visual and residential amenity, or on the character of any building or the wider area; and iv. there will be no interference with air traffic services. <p>Jodrell Bank and its specific circumstances and requirements are covered in LPS Policy SE 14 ‘Jodrell Bank’, Paragraph 4.56 Development proposals within the Jodrell Bank Radio Telescope Consultation Zone that impair the efficiency of the telescope or have an adverse impact on the historic environment and visual landscape setting of the Jodrell Bank Radio Telescope will not be supported.</p>
<p>Policy INF 10 (“Telecommunications infrastructure”) requires that “all new properties ... should be developed with fibre to the premises enabling them to have a superfast broadband network connection.” The requirement to improve digital connectivity is supported by the Estate, but it should also be recognised that improvements can be achieved by other means (e.g. by satellite connections in rural areas). Furthermore, schemes that actively deliver improved internet connectivity (particularly where it can support rural communities and sustainable patterns of living such as home-working and entrepreneurialism) should be actively supported.</p>	<p>Policy INF 8 “Telecommunications infrastructure” in the revised publication draft SADPD supplements Policy LPS Policy CO 3 Digital connections which stipulates in paragraph 14.3, that “ <i>new developments must be future-proof” with appropriate digital infrastructure that will meet existing and future communication needs</i>” Therefore it is not felt necessary to add any additional wording to Policy INF 8.</p>

Policy INF 11 ‘Utilities’

This First Draft SADPD policy has the reference INF 9 ‘Utilities’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>United Utilities are supportive of Policy INF 11 and specifically paragraph 10.28 of the supporting Policy. United Utilities seeks to</p>	<p>In response to this issues Policy INF 9 “Utilities” in the revised publication draft SADPD includes the following policy wording to</p>

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<p>emphasise the challenge is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice.</p>	<p>address this issue 1. <i>“All development proposals should demonstrate that the infrastructure capacity for surface water disposal, water supply, wastewater treatment, gas and electricity will be sufficient to meet forecast demands arising from them and that appropriate connections can be made. For larger schemes this will require a site wide utilities master plan to establish principles during the construction process and early liaison with infrastructure providers”.</i></p>
<p>United Utilities highlights concerns regarding those large sites which are in multiple ownership. These can be developed in an uncoordinated and fragmented manner dictated by random land ownership boundaries. In practice where sites are in multiple ownership, the achievement of sustainable development can potentially be compromised by developers / applicants working independently. We therefore encourage the council to make early contact with all landowners, seeking to understand how they intend to work together, preferably as part of a legally binding framework. It should be demonstrated that there is a formal mechanism in place which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning and deliverability. We believe that raising this point at this early stage is in the best interest of achieving challenging housing delivery targets from the allocated sites in the most sustainable and co-ordinated manner</p>	<p>In response to this issues Policy INF 9 “Utilities” in the revised publication draft SADPD, includes the following policy wording to address this issue 1. <i>“All development proposals should demonstrate that the infrastructure capacity for surface water disposal, water supply, wastewater treatment, gas and electricity will be sufficient to meet forecast demands arising from them and that appropriate connections can be made. For major schemes this will require a site wide utilities master plan to establish principles during the construction process and early liaison with infrastructure providers”.</i> Supporting information in paragraph 10.23 addresses the issue of a co-ordinated approach on large sites <i>“ Utilities provision and connections on large sites, which will take several years to build out, should be planned in a comprehensive way between phases and developers. For example, developers should have a comprehensive and joined up approach towards foul and surface water drainage on both early and later phases across a larger site, and aim to avoid a proliferation of pumping stations.”</i></p>
<p>With respect to larger development sites, we recommend the following additional text at the end of criterion 1 of Policy INF 11. “...It will be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.” With respect to investment in future infrastructure to respond to growth and meet changing environmental needs, we recommend the</p>	<p>Policy INF 9 “Utilities” in the revised publication draft SADPD, supplements LPS Policy IN 1 'Infrastructure'. This sets out that the provision of adequate utilities infrastructure is essential to deliver the planned sustainable growth set out in the LPS. It also refers the Infrastructure Delivery Plan, which contains more detail regarding Cheshire East’s infrastructure requirements to achieve sustainable development. It is therefore unnecessary to repeat this in Policy INF 9” Utilities.”</p>

<p>following additional criterion to Policy INF 11. “The Council will support the principle of investment in infrastructure to respond to the needs of the borough. Infrastructure is key to the delivery of sustainable development and economic growth and meeting development needs. Cheshire East Council will be supportive of infrastructure investment which facilitates the delivery of wider sustainable development and meeting environmental objectives by water and sewerage providers.”</p>	
<p>Draft Policy INF 11 seeks to establish that all development proposals will be required to demonstrate that the utilities infrastructure capacity would be sufficient to meet forecast demands arising from the proposed development and that appropriate connections to utilities infrastructure can be made. We consider that Policy INF 11 is unsound and object on this basis. The policy fails to differentiate between types of development. Logically, only major development proposals should be required to demonstrate that infrastructure capacity will be sufficient to meet forecast demands and the policy text should reflect this.</p>	<p>In response to this issues Policy INF 9 “Utilities” in the revised publication draft SADPD, includes the following policy wording to address the issue of sufficient capacity. 1. “All development proposals should demonstrate that the infrastructure capacity for surface water disposal, water supply, wastewater treatment, gas and electricity will be sufficient to meet forecast demands arising from them and that appropriate connections can be made. .For major schemes this will require a site wide utilities master plan to establish principles during the construction process and early liaison with infrastructure providers”.</p>

Policy INF 12 ‘Canals and mooring facilities’

This First Draft SADPD policy has the reference INF 10 ‘Canals and mooring facilities’ in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>The Canal and River Trust supports the principle of having a standalone canal and mooring policy but believe it could be usefully expanded in Part 1</p>	<p>Support noted. Part 1 has been amended in the Revised Publication Draft SADPD to include the following: i. Where appropriate maintain Seek to provide an active frontage and positive connection with the waterway; ii. be designed to make a positive contribution to the visual appearance of the canal corridor through high standards of design, materials, external appearance, layout, boundary treatments and landscaping;</p>

	<ul style="list-style-type: none"> iii. safeguard or enhance the canal’s role as a biodiversity, heritage and recreational and tourism asset and landscape feature; iv. <u>not harm the structural and operational integrity of the canal or its related infrastructure assets;</u> v. safeguard and, where possible, enhance and improve public access to, and the recreational use, of the canal corridor; <u>vi. integrate the waterway, towpath and canal environment into the public realm in terms of design and management of the development; and</u> <u>vii. optimise views to and from the waterway and generate natural surveillance of water space through the siting, configuration and orientation of buildings, recognising that appropriate boundary treatment and access issues may differ between the towpath and the offside of the canal.</u>
<p>The Canal and River Trust has no objection in principle to new moorings/marinas. The Trust does have a general presumption against the development of new online moorings, subject to certain criteria. In terms of marinas, such development would require the Trusts consent to connect to waterways owned by them, and prospective developers must enter and successfully complete the Trusts application process. The Canal and River Trust suggests additional wording in Part 2 of the policy.</p>	<p>No objection noted and Part 2 expanded in the Revised Publication Draft SADPD to include the following: Proposals for new mooring facilities will be permitted where they:</p> <ul style="list-style-type: none"> i. do not have an unacceptable impact on recreational users and other waterway users; iii. do not have an unacceptable impact on water resources and navigational safety; and iv. the built development is of an appropriate scale and ancillary to mooring facilities.
<p>FCC Environment considers that the canal is a significant asset to the rural economy but INF 12 refers to, at best “where possible enhance”. The proactive approach in the Cheshire East Visitor Economy Strategy 2016-2020 should be reflected in the Local Plan.</p>	<p>Point 1(v) has been re-worded in the SADPD as illustrated above.</p>
<p>Text policy states that it will allow “for future development of liner or lay-by mooring facilities, new marina developments, or extensions to existing facilities”. However the Policy does not adequately allow for this given that a sequential approach is proposed as opposed to</p>	<p>Point 2 has been amended. The word ‘only’ has been removed, as has point 2(ii) in the SADPD as illustrated above.</p>

consideration of the merits of each application against the impacts.	
Too restrictive for permanent moorings which allows them only in open countryside if adjacent to a settlement boundary and where there is a demand. Policies should be drafted to enable decisions to be made on a case by case basis rather than a sequential restrictive policy.	As above.
Site specific constraints may not allow development proposals to maintain an active frontage and positive connection with the waterway. The Policy should be reworded to include the words “where appropriate”.	Point 1 has been amended. The wording in 1(i) “where appropriate” has been removed and re-worded with “ seek to provide an active frontage and positive connection with the waterway.”
The Canal and River Trust recommend additional wording of the supporting text (¶10.28 and ¶10.29); the insertion of links which provides further detail to help support developers with planning applications; and to remove the reference to the ‘Trusts Developers Guide’ which was withdrawn in early 2012.	Additional wording has been inserted under the section ‘Supporting Information’ and additional links have been included.

Chapter 11: Recreation and community facilities (general)

Summary of main issues raised:	How the main issues have been taken into account
Better definition needed as to what is meant by recreation and community facilities; confusion between indoor and outdoor greenspace and open space. Sports playing facilities should be recognised separately.	The LPS Glossary provides useful definitions of community infrastructure, outdoor sports facilities, open space and blue and green infrastructure. The ‘Green Space Strategy Update’ [ED 18] expands on some of these issues.
The policies should take a more positive tone - seeking to support enhanced and new facilities not just trying to protect existing. This wealthy borough should have greater ambition for the health and wellbeing of its residents.	LPS Policies SC 1 ‘Leisure and Recreation’, SC 2 ‘Indoor and Outdoor Sports Facilities’ and SC 3 ‘Health and Well-Being’ set the strategic content. The Revised Publication Draft SADPD policies add more detail.

Policy REC 1 ‘Green/open space protection’

Summary of main issues raised:	How the main issues have been taken into account
<p>The play pitch strategy forms part of the research and evidence to inform the Local Plan. Representations were made to the draft play pitch strategy by the club but they have not all been taken into account. The Playing pitch strategy should be updated to reflect Poynton Sports Club’s facilities and deficiencies.</p>	<p>The Playing Pitch Strategy has been updated and is now referred to as the ‘Cheshire East Playing Pitch Strategy and Action Plan’ [ED 19] and the ‘Playing Pitch Strategy Assessment Report Update [ED19a].</p>
<p>Suggest that the first part of Policy should be deleted as it appears to exclude the possibility of any form of development within identified areas of open space; such an approach would be inconsistent with paragraph 97 of the NPPF; suggest that the second part of the policy is retained and a further exception added:iv - ‘where the community benefits of the proposed development would clearly outweigh any harm arising from the loss of part, or all, of any area of open space’. This would reflect instances whereby a development would secure the long-term viability and condition of an area of open space. (Comments made in respect of a Mill Pond in Bollington where some development of the pond is sought)</p>	<p>Strong presumption against development of open space in accordance with the NPPF. Each site would be considered on its own merits in line with the policy, when read as a whole.</p>
<p>Representations received regarding land to the west of Eaton Bank; object to the allocation of the land as open space; detailed comments submitted covering nature of site, site assessment, relationship to NPPF, ecological aspects etc. Have no objection to policy wording but request removal of an area of land from the open space designation (wider area suggested plus smaller area shown hatched red on accompanying plan).</p>	<p>The draft adopted policies map (online interactive version) [ED 02] has been amended to limit the area to wooded corridor/bank, to maintain a green link.</p>
<p>Representations received regarding land at Pownall Park, North of Gorse Road, Wilmslow; 2 areas discussed – one site extant permission for two dwellings 16/4518M (kitchen garden/ancillary garden area; other site formerly part of school grounds with permission for 1 dwelling (replacement recreation/pitch provision secured via a new playing pitch on the former tennis court area of the</p>	<p>The general approach is to change policy designations on the interactive map once developments have taken place. Sites are at present undeveloped, and the kitchen garden site is naturally regenerating. The other site is a grassed area with a tree lined boundary. The sites will be removed from the open space layer on the draft adopted policies map (online interactive version) [ED 02]</p>

<p>school). Request that both sites should no longer be protected open space but be within the settlement boundary only.</p>	<p>once development has taken place. (Latest planning position – planning permission approved for 4 dwellings (on the two sites combined - 19/1067M approved 01/05/19))</p>
<p>Representations regarding land to the south of Lilybank Drive, Knutsford; details of the site are provided (for example within Legh Road Conservation Area, open space, no public access, Sanctuary Moor to the south, part of Local Wildlife Site); evidence base justifying the continued designation of the site as open space is out of date and not sufficient; has not taken into account all typologies of open space and tested them against the requirements of NPPF ¶100. Argue that the open space allocations are based upon out-of-date evidence, which renders the proposed SADPD plan unjustified, not positively prepared and inconsistent with national planning policy. Request removal of open space designation and/or allocate site for small scale housing development.</p>	<p>The site is clearly part of Sanctuary Moor, with flooded and vegetated areas. Local Wildlife Sites are an important ecological resource. The site has been considered using the site selection methodology (SSM) ('Site Selection Methodology Report' [ED 07]), as detailed in the Knutsford Settlement Report [ED 34], which concludes that, taking into account and balancing the range of factors considered in the SSM, it is recommended that no sites should be allocated in the SADPD for housing or employment development in Knutsford.</p>
<p>Green Space Strategy Update [FD 18] - It is not possible to see the detail in Appendix 1: Baseline Map, due to the enlargement of the image required. In Appendix 2: Thematic Map, there is no indication of the Dane Meadow country park in Holmes Chapel, which is a very important area of green space.</p>	<p>Green spaces are shown on the draft adopted policies map (online interactive version) [ED 02]. Dane Meadow Country Park is shown and referenced in the 'Green Space Strategy Update' [ED 18].</p>
<p>The policy should be extended to include a definition of all green spaces, and not just school playing fields. Nearly every settlement in the Borough has substandard green space provision and this policy presents an opportunity to ask for more green space rather than just the protection of that which already exists.</p>	<p>LPS Policy SE 6 'Green Infrastructure' covers green space requirements.</p>
<p>Suggested updates and amendments to the Green Space Strategy Update:</p> <ul style="list-style-type: none"> • Type 6 facilities <ul style="list-style-type: none"> ○ 279 25KOW NORTH DOWNS Longridge size is full size football pitch so 1ha. requires improved drainage & moving drain access covers to bring back in use as per PPS strategy ○ 273 1KOW BARNCROFT Mobberley Road part of 	<p>The issues have been addressed through the carrying out of an appropriate review. Updated outdoor sport information is contained in the new 'Cheshire East Playing Pitch Strategy and Action Plan' [ED 19] and 'Playing Pitch Strategy Assessment Report and Update' [ED 19a]. This contains recommendations for improvements to sites. Booths Park rugby pitch has been added to the green space layer and the draft adopted policies map (online interactive version) [ED 02]. It is also referenced in the 'Cheshire East Playing Pitch Strategy and</p>

<p>wider amenity area with Friends group in place.</p> <ul style="list-style-type: none"> ○ 277 13KOW LONGRIDGE COMMUNITY SPACE requires community plan for future development- paths & safety surfacing not a priority over new features ○ 276 13KOW SOUTHFIELDS Shaw Heath would benefit from extra equipment ○ 275 13 KOW LONGRIDGE COMMUNITY SPACE the football facility should be a full adult pitch , requires drainage and rebuilding and marking out. Size should be around 1ha. ○ 309 14KOW St Johns Wood ACADEMY MUGA is not private it is municipal leased to Adelaide Academy Trust <ul style="list-style-type: none"> ● Type 4 facilities <ul style="list-style-type: none"> ○ The playing field at Booths Park, used by Rugby, is opposite Toft Cricket club has been missed off the assessment. Mentioned elsewhere in responses. ○ 258 260 3KBW Knutsford Academy lower AVERAGE condition REQUIRES RESURFACING & SAFETY IMPROVEMENTS RE POSTS ○ 263 & 262 4KBW Knutsford Academy upper Tennis courts & NETBALL COURTS POOR quality REQUIRES RESURFACING & SAFETY IMPROVEMENTS RE POSTS ○ 636 4KBW Knutsford Academy Leisure Centre football pitches PPS ID66 used by community - Knutsford FC. ○ 310 5KNW Knutsford FC quality GOOD PPS ID77 tenure is not secure - 1 yr rolling lease. Would benefit from increased drainage and using adjacent land for extra pitch. ○ 621 14KOW St Johns Wood ACADEMY school. There is no football pitch it was built over for sports hall. This entry should refer to the football pitch on 25KOW PPS suggestion bring back into use. 	<p>Action Plan' [ED 19] and 'Playing Pitch Strategy Assessment Report and Update' [ED 19a].</p>
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Sport England requested amendment to wording.	This has been addressed through amended wording – refers to all playing fields for clarity – criterion 1.
Re point 1 - there needs to be some flexibility if there have been errors or omission on the Policies map so amend as: including but not limited to those shown on the policies map.	This has been addressed through the addition of wording to criterion 1i: “but not limited to”.
Playing field at Booths Park Knutsford opposite Toft Cricket has been missed off the policies map, and from the Green Spaces technical assessment. It appears on App 8 of the Knutsford Neighbourhood plan as location 14. The land is currently in use for Rugby. Also query the inclusion on the FD 02 Policies Map of 2 areas of protected open space in Knutsford. Land at Leaks Terrace in the Town Centre of Knutsford ref GKNW and at the Brooks Street Hollow Lane Mobberley Road ref 18KOW.	This has been addressed through the carrying out of an appropriate review. Booths Park rugby pitch has been added to the green space layer and the draft adopted policies map (online interactive version) [ED 02]. It is referenced in the ‘Cheshire East Playing Pitch Strategy and Action Plan’ [ED 19] and ‘Playing Pitch Strategy Assessment Report and Update’ [ED 19a].
There may be circumstances where the sustainability benefits of redevelopment and delivering a beneficial use could clearly and demonstrably outweigh any limited open space benefit that may exist. The policy should state that where an area of open space has been shown to offer limited or no public benefit, development should be supported subject to compliance with the other policies of the plan.	There is a strong presumption against development of open space, in accordance with the NPPF. Each site would be considered on its own merits in line with the policy, when read as a whole.
Garden land at Oak House, Victoria Road, Macclesfield incorrectly shown at LPS stage as Open Space; now shown correctly as within dwelling curtilage on Draft SADPD policies map; Once adopted, and to avoid any confusion, request that this draft new Policies Map supersedes the currently adopted version (First Part).	The Revised Publication Draft SADPD [ED 01] is supported by a draft adopted policies map [ED 02].
Policy must be adhered to, in conjunction with the requirements of the Bollington Neighbourhood Plan	Made Neighbourhood Plans form part of the Development Plan for Cheshire East.
The playing pitch and Indoor facilities 'strategies' were not updated after the comments received on them during their consultation - thus the consultation summary report should form part of the related	The consultation report on the 2017 Playing Pitch Strategy is available to view on the Cheshire East website ³⁵ . There is new and updated information included in the ‘Cheshire East Playing Pitch Strategy and

³⁵ https://www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/playing_pitch_strategy.aspx

documents	Action Plan' [ED 19] and 'Playing Pitch Strategy Assessment Report and Update' [ED 19a], as well as the 'Indoor Built Facilities Strategy Progress and Evidence Review' [ED 20a].
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Policy REC 2 'Indoor sport and recreation implementation'

Summary of main issues raised:	How the main issues have been taken into account
Requests flexibility in the application of the requirements of Policies REC 2 and REC 3 for developments comprising specialist housing. Such developments would not have the same effects on demand for open space as typical open market and affordable housing schemes, and as such should not be subject to the same open space requirements. Policy needs to be amended to clearly distinguish between the types of development to which the Policy requirements would apply.	It is considered that all development remains included in the policy, as indoor sport and recreation facilities are attended by an increasing range of users to improve their health outcomes, irrespective of the type of accommodation they live in.
Contributions should be directed to the nearest accessible facility to the development	Criterion 2 directs contributions to nearest accessible facility.
Policy should also make reference to the consideration of pooling contributions.	Reference to pooling of contributions has been added to the supporting information of the policy (paragraph 11.8).
Further evidence needs to be provided to justify the policy and to explain its relationship with CIL payments in operation to allow detailed consideration of the policy to whether it conforms with NPPF (35).	Contributions for sport and recreation are based on the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the majority of requests are made as part of a Section 106 Agreement as appropriate.
Do not think that this contribution is clearly necessary to make all development acceptable in planning terms. Each development should be considered on its own merits and only those obligations necessary to mitigate the impact of the development should be sought.	The 'Cheshire East Indoor Built Facilities Strategy' [ED 20] has been based on the numbers generated per dwelling. All developments may generate additional demand plus the need to improve health and wellbeing. This is set out in LPS Policies SC 1 'Leisure and recreation and SC 2 'Indoor and outdoor sports facilities'.
The requirement for additional indoor sport and recreation facilities must be based on up to date evidence prepared by the Council and must show that new demand generated results in an unacceptable	All requests for contributions are based on the 'Cheshire East Indoor Built Facilities Strategy [ED 20] assessment of need, which was prepared independently for the council by Knight, Kavanagh & Page,

<p>under provision of facilities. Only where this evidence justifies such a requirement should a contribution be warranted.</p>	<p>in line with Sport England guidelines. Requests are made based on the needs for all relevant settlements in Cheshire East based on increased demand as a result of development.</p>
<p>Policy should be modified to only require a contribution where (a) there is an identified deficiency in the quantum or quality of an indoor sport or recreation facility within the catchment of the proposed development, or (b) where a development will lead to a deficiency in the quantum or quality of an indoor sport or recreation facility. Any contribution should only be sought where it is necessary to make the development acceptable in planning terms, and where it would meet all of the tests set out under Regulation 122 of the Community Infrastructure Levy Regulations 2010.</p>	<p>All requests for contributions are based on the 'Cheshire East Indoor Built Facilities Strategy [ED 20] assessment of need, which was prepared independently for the council by Knight, Kavanagh & Page, in line with Sport England guidelines. Requests are made based on the needs for all relevant settlements in Cheshire East based on increased demand as a result of development.</p>
<p>Contributions should not be required simply for upkeep/maintenance as this will be captured from the Council Tax revenue generated from a new development.</p>	<p>All requests for contributions are based on the 'Cheshire East Indoor Built Facilities Strategy [ED 20] assessment of need, which was prepared independently for the council by Knight, Kavanagh & Page, in line with Sport England guidelines. Requests are made based on the needs for all relevant settlements in Cheshire East based on increased demand as a result of development.</p>
<p>The Active People Survey is now Active Lives Survey; Sport England would advise against the use of this data to inform contributions as it only provides sample data relating to current activity and does not take into account current or future supply and demand data. This information should be taken from the BFS which provides demand/supply information and recommendations on what additional/improved facilities are required to meet this demand. Although supportive of contributions being spent locally, there are concerns around justification so Sport England would recommend that the policy is amended to reflect that requested contributions are to be informed by the requirements and recommendations and action plans set out by the evidence base.</p>	<p>The 'Cheshire East Indoor Built Facilities Strategy' [ED 20] is based on an assessment of demand generated as part of the adopted LPS. Revised Publication Draft SADPD Policy REC 2 makes it clear that calculations for major capital works will be based on the Sport England Facility calculator or any subsequent replacement. The Indoor Built Facilities Strategy is referred to in criterion 1 and additional information has been added to the supporting information to the policy: "The settlement Action Plan in the Council's IBFS provides demand/supply information and recommendations on what additional facilities are required to meet demand".</p>
<p>Sport England recommends the inclusion of a policy to ensure that existing indoor sports facilities are not lost unless a robust and up to date evidence base is in place and identifies the facility as surplus to</p>	<p>This is covered under LPS Policy SC 2 'Indoor and Outdoor Sport Facilities'.</p>

requirements.	
Suggest that the second facility description be a bit broader. Instead of studio space say physical activity space so not limited to traditional sport e.g. chairbics; this would link to use of community halls also.	This has been addressed through additional wording: “or similar appropriate physical activity space”.
Feel that this policy should be strengthened in its wording to prevent the loss of existing sport and recreation facilities.	LPS Policy SC 2 ‘Indoor and Outdoor Sport Facilities’ protects existing provision.
Make it mandatory that developers have an active design mapping how new residents will access existing and new sports facilities.	In some instances, such as more rural locations, a village hall may be the nearest accessible facility (criterion 2 of policy).
Each Leisure Centre should have a facilities plan for investment	All contributions sought will continue to be through Section 106 Agreements. The Council continues to develop, in partnership with the leisure trust, a capital programme of facility improvements
Strategic developments should contribute to a sports planning officer at CEC for major facilities and an activity coordinator at Town and Parish level in line with the active design guide mentioned in the LPS.	Sports planning is undertaken in line with the ‘Cheshire East Indoor Built Facilities Strategy’ [ED 20] by the Council’s commissioning officer.

Policy REC 3 ‘Green space implementation’

Summary of main issues raised:	How the main issues have been taken into account
Requests flexibility in the application of the requirements of Policies REC 2 and REC 3 for developments comprising specialist housing. Such developments would not have the same effects on demand for open space as typical open market and affordable housing schemes, and as such should not be subject to the same open space requirements. Policy needs to be amended to clearly distinguish between the types of development to which the Policy requirements would apply.	Green space is sought on a site by site basis, and each site is considered on its merits.
Queries the requirement for 20 years maintenance to be paid for by the developer for strategic open space. Suggest that the figure would appear arbitrary and lacks any justification by the Council within the supporting Policy text.	Additional information has been added to the supporting information of the policy (paragraph 11.12) and supporting information is contained in the ‘Green Space Strategy Update’ (2020) [ED 18].

<p>Regarding maintenance, a more justified approach would be to require maintenance fees from the developer during the construction phase and until the open space matures (i.e. up to 5 years), with future costs covered by the revenue generated from the development (i.e. Council Tax). Request that the Policy is amended to reflect this approach.</p>	<p>It is considered to be standard practice for open space to be maintained in perpetuity.</p>
<p>Regarding maintenance - if there is to be a maintenance plan, then there should be no requirement for a commuted sum as well.</p>	<p>Maintenance plans are current practice; background information is contained in the 'Green Space Strategy Update' [ED 18].</p>
<p>Consideration should be given as to how new green space can be used to help manage the impact of surface water run-off and integrate with the blue water environment to provide multi-functional benefits. Recommend a fifth criterion to Policy REC 3 as follows. "Development proposals should consider how new green space can be used to manage the impact of surface water run-off and integrate with the blue water environment to provide multi-functional benefits."</p>	<p>LPS Policy SE 13 'Flood Risk and Water Management' and Revised Publication Draft Policy ENV 16 'Surface water management and flood risk' cover this matter.</p>
<p>The management of green space provision should be in perpetuity in all situations.</p>	<p>This is current practice.</p>
<p>No justification or evidence is provided for the provision of sports facilities at 40 sq.m per family home; and it is unclear as to what a family home is. It is requested that sports facilities should be based on evidence of need, specific to a local area, rather than have a broad brush policy. Any financial or space requirements should be derived on a per bedroom basis (starting with 2 bedrooms).</p>	<p>After consultation with Sport England the policy has been amended as follows (criterion 4): "The provision of, or contribution to, outdoor playing pitch sports facilities will be informed by the Playing Pitch Strategy and Sport England Sport Pitch Calculator. Other outdoor sports provision not covered by the Playing Pitch Strategy will be sought on a site by site basis using 10 sq.m per family home as a benchmark figure." Background information can be found in paragraph 11.11 of the supporting information and the 'Green Space Strategy Update' (2020) [ED 18].</p>
<p>The provision of green space might be consistent with good design and it might support health and well-being, but there should be no explicit requirement that this is a requirement of all major non-residential development. In many instances this will simply not be justified or required and accordingly the policy is overly restrictive and would potentially impact upon development viability, investment</p>	<p>Green space is sought on a site-by-site basis – each site is considered on its merits.</p>

decisions and investment coming forward.	
The policy could be expanded to include the provision of more local green space together with the improvement of links between existing and proposed green spaces	LPS Policy SE 6 'Green Infrastructure' seeks provision of more green space and linkages.
There is no justification provided for the requirement for 20 years of maintenance payments to be made to the authority in relation to strategic open space. This approach appears disproportionate. Payments should only be required during construction and up to maturity after 5 years	Additional justification added to the supporting information of the policy and background information added to the 'Green Space Strategy Update' (2020) [ED 18].
The Policy is too inflexible with regards to those circumstances where off-site provision may need to be provided/or more appropriate. For example, the Policy should allow for off-site green space provision where on-site delivery is proven to be impractical (due to site constraints – for example to meet density/efficient use of land) and/or where the green space provided would hold no recreational value to residents.	Flexibility is contained in the policy – criterion 2 allows off-site provision.
20 years would seem an arbitrary figure with little regard given to the type of strategic open space which is provided.	Additional justification added to the supporting information of the policy and background information added to the 'Green Space Strategy Update' (2020) [ED 18].
Maintenance of open space is usually transferred to a management company for the lifetime of the development	There are a variety of options regarding the maintenance of open space; the 'Green Space Strategy Update' (2020) [ED 18] provides additional information. The justification for the transfer of strategic open space to the Council in some instances is given in the supporting information for the policy and in [ED 18].
Clarity regarding the provision of outdoor sports provision – can take up a significant amount of space and location on-site may not always be suitable – guidance currently within policy incomplete.	A new criterion 4 has been added to the policy, plus supporting information gives further guidance, as well as the background information in the 'Green Space Strategy Update' (2020) [ED 18].
Although Sport England has no issues with a standards approach being used in the relation of green space provision - do not support this approach for the sports covered by the PPS. Neither our playing pitch strategy guidance or our assessing needs and opportunities	Criterion 4 has been amended following consultation with Sport England: "The provision of, or contribution to, outdoor playing pitch sports facilities will be informed by the Playing Pitch Strategy and Sport England Sport Pitch Calculator. Other outdoor

<p>guidance advocates the use of standards. Local standards do not identify specific needs therefore a strategy based on achieving a local or national standard will not address the needs of that area. Therefore, would recommend that REC 3 point 4 is updated to require the provision of, or contributions for, outdoor sports facilities are informed by the PPS and Sport England's Sport Pitch Calculator. This is because the PPS takes into account current and future demand and has a specific action plan to ensure the correct facilities are provided in the right locations. Sport England are willing to offer support to the Council in using these tools.</p>	<p>sports provision not covered by the Playing Pitch Strategy will be sought on a site by site basis using 10 sq.m per family home as a benchmark figure.”</p>
<p>Why is there no mention of green space being included in the developments of the four town centre areas discussed in section 9?</p>	<p>LPS Policy SE 6 'Green Infrastructure' and other general policies deal with green space provision.</p>
<p>Additional point needs adding regarding open space proposals from “saved” policies/Local Plans e.g. Land adjacent to Booths Mere/Longridge for playing fields (2.4 ha) and Land at Manchester Road for playing fields (3 ha). This needs putting back in before the new SADPD can accurately replace the saved MBC policies.</p>	<p>Updated information regarding outdoors sport needs is set out in the 'Cheshire East Playing Pitch Strategy and Action Plan' [ED 19] and 'Playing Pitch Strategy Assessment Report and Update' [ED 19a],</p>
<p>Add in the evidence consultation summary report that was generated following KKP pitch and indoor assessments also add reference to the ACTIVE design principles and see if you can get contributions to a Council Sports facility planning officer.</p>	<p>The consultation report on the 2017 Playing Pitch Strategy is available to view on the Cheshire East website³⁶.</p>
<p>Clarify what is meant by green space as compared to open space and sports space. What is a walking circuit or trim trail?</p>	<p>The LPS Glossary contains definitions of open space and green and blue infrastructure; further information is also available in the 'Green Space Strategy Update' (2020) [ED 18].</p>
<p>Policy must be adhered to, in conjunction with the requirements of the Bollington Neighbourhood Plan.</p>	<p>Made Neighbourhood Plans form part of the Development Plan for Cheshire East.</p>
<p>As space is at such a shortage in Cheshire East it is important that the land itself to provide playing pitches is provided to increase the amount of sports space. Brownfield big sites - also important to keep</p>	<p>Criterion 4 has been amended following consultation with Sport England: “The provision of, or contribution to, outdoor playing pitch sports facilities will be informed by the Playing Pitch Strategy and</p>

³⁶ https://www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/playing_pitch_strategy.aspx

land back for green open sports recreation space.	Sport England Sport Pitch Calculator. Other outdoor sports provision not covered by the Playing Pitch Strategy will be sought on a site by site basis using 10 sq.m per family home as a benchmark figure.”
Paragraph 11.11 - Green spaces 2018 update technical data contains some inaccuracies.	The green space technical appendices will be updated once the internal OS database has been updated; the draft adopted policies map (online interactive version) [ED 02] reflects the updated and current position. Updated appendices for outdoor sport (2019) have been completed.

Policy REC 4 ‘Day nurseries’

Summary of main issues raised:	How the main issues have been taken into account
No comments received	No issues raised.

Policy REC 5 ‘Community facilities’

Summary of main issues raised:	How the main issues have been taken into account
All community facilities should be retained whether the contribution is positive or not. On the whole every community facility makes a positive contribution not only to the community within which it is located but to the wider area.	If the facility makes a positive contribution then it should be retained under the policy.
Fails to address the need for new community facilities, which are required in order to meet existing needs and to support ongoing growth	A further criterion has been added to the policy so that proposals for new community facilities will be supported where they are in accordance with policies in the development plan.
Policy should require development proposals to retain and propose new community facilities.	LPS Policy IN 1 ‘Infrastructure’ already requires new and improved social and community facilities as part of new development.
The policy should include a further element “development proposals should seek to retain, enhance and maintain (in proportion to their impact) community facilities’ that make a positive contribution to the social or cultural life of a community...”	‘Enhance and maintain’ has been added to the policy requirements.

Chapter 12: Site allocations (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Sufficient deliverable land should be identified in the SADPD to incorporate flexibility over the plan period. The council should over allocate to provide flexibility and contingency for instances when sites do not come forward as envisaged, for example a 20% buffer.	The employment land requirement set out in LPS Policy PG 1 already includes 20% flexibility. Flexibility in housing supply has been taken into account in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
The spatial distribution of sites should follow the settlement hierarchy set out in LPS Policy PG 2.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers how the indicative levels of development set out in LPS Policy PG 7 'Spatial distribution of development' will be delivered.
The lack of progress on the strategic sites affects the Council's ability to demonstrate a deliverable five year supply.	As shown in the latest Housing Monitoring Update, the council is able to demonstrate a 5 year deliverable housing land supply.
Where a development site is situated adjacent to a watercourse, the Environment Agency request an undeveloped buffer zone of at least 8 metres is provided, measured from the bank top of the river. The Environment Agency require unobstructed access to any 'main river' at all times and a minimum of 8m undeveloped buffer zone from top of bank and/or toe of any flood defence for maintenance and emergency purposes. They welcome discussion on any development proposing the deculverting of watercourses.	These requirements have been incorporated into site policies where appropriate.
Large sites that are located in proximity to the strategic road network should be developed in a way that the phasing of development is appropriate to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to make sure there is minimal disruption to existing road users. The SADPD should East provide details of the likely planning use class that is intended for the employment site allocations in future iterations of the SADPD. This is to gain a better understanding of the potential traffic generation associated with the employment site allocations. Clarification is needed as to whether any assessment of the cumulative traffic impact of the site allocations,	In accordance with the Site Selection Methodology [ED 07], Highways England have been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6. This is set out in each of the relevant settlement reports.

across the entirety of the borough and taking into account cross-boundary issues with adjacent local authority areas has been undertaken.	
Before allocating any site there would need to be some evaluation of the impact that the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment.	In accordance with the Site Selection Methodology [ED 07], the potential impact on heritage assets is a consideration in site selection. Where potential impacts are identified, heritage impact assessments [ED 48] have been carried out.
Suggestion of additional policy wording for sites in relation to sustainable drainage.	Revised Publication Draft SADPD Policy ENV 16 requires development proposals to manage and discharge surface water through sustainable drainage systems.

Crewe (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Sydney Cottage Farm (housing) (CFS 89, FDR 1934) • Land off Gresty Lane, Shavington (housing) (CFS 111, FDR 2798, FDR 2785, FDR 2982, FDR 3020) • Land at Newcastle Road, Willaston (roadside uses) (CFS 200, FDR 2404) • Land E of Nantwich Bypass, Willaston (housing) (CFS 210, FDR 1752) • Land to the south west of Crewe (housing) (CFS 310, FDR 2260) • Land at Sydney Road (housing) (CFS 314/ FDR 2259) • Land south of Bradeley Hall Farm (housing) (includes parts of CFS 320, 360, 367, 369, 392, FDR 2722) • Land to the rear of Hunters Lodge Hotel (housing)(CFS 360, FDR 2728) • Land west of Middlewich Road (housing, school, local centre, open space) (West Crewe Sustainable Urban Extension) 	<p>All sites submitted for consideration have been added or amended to the pool of sites considered in the Crewe Settlement Report (Stages 1 and 2 of the Site Selection Methodology). As set out in the Crewe Settlement Report [ED 28] there are no remaining housing or employment requirements for the town.</p>

<p>(CFS593, FDR 2791)</p> <ul style="list-style-type: none"> • Land to the south of Park Road, Willaston (housing) CFS 599, FDR 1320) • Land west of Broughton Road (housing) (FDR 2258) • Land off Sydney Road (housing) (FDR 1412) 	
<p>Insufficient land allocated in Crewe to reflect the settlement's position at the top of the settlement hierarchy.</p>	<p>The non-strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe. As such, there is no requirement to identify additional sites for housing or employment over the remaining plan period.</p>
<p>Enough land should be made available for residential development to ensure flexibility/ sufficient choice and competition in the market.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe.. As such, there is no requirement to identify additional sites for housing or employment over the remaining plan period.</p>
<p>LPS allocations are unlikely to deliver in full over the plan period.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy. Any review of sites allocated in the LPS is a matter for the monitoring and/or review of that plan.</p>
<p>The adopted housing requirement is a minimum; more sites should be allocated to ensure housing needs are met.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the</p>

	<p>overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe, including an additional level of flexibility. As such, there is no requirement to identify additional sites for housing or employment over the remaining plan period.</p>
Provision should be made for small sites of 1 hectare or less to meet the NPPF requirement.	The council's approach to small sites is set out in ED 58 'The Approach Towards Small Sites' and demonstrates that supply on sites of 1 hectare or less exceeds the NPPF requirement.
The council has not demonstrated a 5 year housing land supply. Five year housing land supply will be considered at the examination of the SADPD. The buffer to be applied to the calculation of 5 year housing land supply will be at least 10% when the SADPD is examined.	The council does not seek the confirmation of five year housing land supply through the examination of the SADPD. The latest published 5 year housing land supply position can be found in the Cheshire East Housing Monitoring Update (Base Date 31 March 2019). This demonstrates a 7.5 year supply of specific deliverable sites.
Additional sites should be allocated in the SADPD to accommodate the growth which will be delivered as a result of HS2.	<p>While the LPS contain strategic planning policies and allocations, it is a 'pre-HS2 plan' and therefore does not address the full implications of HS2. The LPS does however recognise the importance of Crewe Station as a communications hub and envisages that a more detailed Area Action Plan may be necessary to address HS2 related development in Crewe (Local Plan Strategy See Strategic Priority 1, p.44 and p.179 in particular). The Council is preparing an Area Action Plan for a focused area around Crewe Railway Station and its immediate environs.</p> <p>Allocating additional sites within the town via the SADPD would significantly exceed the expected levels of development envisaged in the LPS. The full implications of HS2 should be addressed through a future local plan update, where the implications and proposals of HS2 may be understood.</p>
While there is no need for the allocation of additional employment	The non- strategic policies in the SADPD have been prepared to be

<p>sites, two further employment sites are proposed in the SADPD. The allocation of additional housing sites would help to support this local investment by providing new homes for the additional workforce generated by these proposals.</p>	<p>consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe. As such, there is no requirement to identify additional sites for housing over the remaining plan period.</p>
<p>The identification of further land for new homes will help to support the Councils economic growth and regeneration aspirations for the settlement.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe. As such, there is no requirement to identify additional sites for housing over the remaining plan period</p>
<p>The general size threshold of 5ha or 150 dwellings, identified in the SADPD consultation is an arbitrary size threshold which serves no useful planning purpose and will inhibit the opportunity for wider comprehensive proposals.</p>	<p>All sites submitted for consideration through the Call for Sites (2017), the First Draft SADPD (2018) and the Initial Publication Draft (2019) consultations have been considered in accordance with the site selection methodology.</p>
<p>An assessment should be carried out of the need for roadside facilities.</p>	<p>Footnote 42 of the NPPF states that policies for facilities such as roadside services should be developed through collaboration between strategic policy making authorities and other relevant bodies. The non-strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy. It is not the role of the SADPD to revisit strategic policy matters.</p>
<p>The Green Gap should be reviewed to enable land which does not contribute to the Gap to be excluded.</p>	<p>The boundaries of the Strategic Green Gap are reviewed in [ED 08] 'Strategic Green Gap Boundary Definition Review.</p>

Site 599 has been incorrectly attached to Site 207 and should be reassessed.	Noted. This has been rectified in the Crewe Settlement Report [ED 28].
Concern over infrastructure needed to support new housing.	No new housing sites are proposed in the SADPD for Crewe.
If HS2 does not materialise, the housing and employment requirement should be reviewed.	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy. While the LPS contain strategic planning policies and allocations, it is a 'pre-HS2 plan' and therefore does not address the full implications of HS2.</p> <p>Any review of the adopted housing and employment requirements set out in the LPS is a matter for the monitoring and/or review of that plan.</p>
Site allocations should make use of brownfield land.	Noted. Two employment site allocations are proposed for Crewe – CRE 1 and CRE 2 and these specifically relate to the expansion of existing employment sites to facilitate further investment, expansion and job creation by two established key employers.
Query whether any cumulative traffic impact assessment has been carried out of all the site allocations, across the entirety of the borough and taking into account cross-boundary issues with adjacent local authority areas.	Noted. The Highways Agency have been consulted as part of the Site Selection Methodology and maintain that, based on the available evidence, there are no individual sites that should not be progressed to the next stage of consultation on the SADPD based on their anticipated impacts on the capacity and safety of the Strategic Road Network. Highways England recommend that during the lifetime of the Local Plan, a Transport Study is undertaken in order to monitor the performance of the Local Plan in its entirety on individual strategic road network junctions as the development sites come forward
The development trajectory of significantly sized sites should be provided to indicate the potential traffic impact associated with phased build outs.	<p>Noted. However, sites proposed for allocation in the SADPD are of a non-strategic size.</p> <p>The Highways Agency have been consulted as part of the Site Selection Methodology and maintain that, based on the available evidence, there are no individual sites that should not be progressed to the next stage of consultation on the SADPD based on their</p>

	<p>anticipated impacts on the capacity and safety of the Strategic Road Network. Highways England recommend that during the lifetime of the Local Plan, a Transport Study is undertaken in order to monitor the performance of the Local Plan in its entirety on individual strategic road network junctions as the development sites come forward</p>
<p>The level of development being proposed within Crewe alongside key development sites in Macclesfield, Handforth, Nantwich and Wardle have the potential to result in a significant traffic impact.</p>	<p>Noted. No additional housing sites are proposed within Crewe.</p>
<p>Large sites that are located in proximity to the Strategic Road Network should be phased to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to ensure there is minimal disruption to existing road users.</p>	<p>Noted. However, sites proposed for allocation in the SADPD are of a non-strategic size.</p> <p>The Highways Agency have been consulted as part of the Site Selection Methodology and maintain that, based on the available evidence, there are no individual sites that should not be progressed to the next stage of consultation on the SADPD based on their anticipated impacts on the capacity and safety of the Strategic Road Network. Highways England recommend that during the lifetime of the Local Plan, a Transport Study is undertaken in order to monitor the performance of the Local Plan in its entirety on individual strategic road network junctions as the development sites come forward</p>
<p>The majority of proposed site allocations for employment purposes do not set out the final use class that is envisioned will develop the site and this should be clarified.</p>	<p>There are two proposed employment allocations in Crewe both of which relate to employer led development. Policy CRE 2 Land off Gresty Road specifies B1 and B8 uses. Policy CRE 1 Land at Bentley Motors is covered by the existing approved Bentley Motors Development Framework and Masterplan. Planning permission has been granted on a large part of this site for production and manufacturing facilities.</p>

Site CRE 1 'Land at Bentley Motors'

Summary of main issues raised:	How the main issues have been taken into account
The site contains major water and wastewater infrastructure which should be considered as part of any proposal to redevelop the site.	This is referred to in the supporting text to draft Policy CRE 1 Land at Bentley Motors.
The retention of the existing sports facility is supported.	Noted. This is reflected in the draft policy.
Cricket may take place at the site. The policy should make provision for a buffer zone of 80m from the crease. If this cannot be accommodated, a ball strike assessment should be carried out as part of a planning application. Any housing layout should also ensure that there is no indirect impact on the functionality and capacity of the playing fields.	The site is being allocated for employment uses only. The draft policy requires the retention of the existing sports facility unless they are proven to be surplus to need, or suitable improved provision is created having regard to the requirements of LPS Policy SC 2 'Indoor and outdoor sports facilities'.
<p>Bentley Motors support the allocation but raise a number of concerns in relation to the detailed wording of the policy, including:</p> <ul style="list-style-type: none"> • The requirement to maintain the existing sports facility at the site. This is contrary to the approved masterplan and current outline application. • Any walking and cycling routes can be facilitated only on land in their ownership. • The reference in the policy to the need to take account of heritage assets, retention of the wide verge and the historical relationship between Pym's Lane and the buildings along it. Bentley comment that there are no listed buildings on site, nor are any buildings on the local list. No additional protection is supported. 	<p>Noted. The allocated site includes the 'Legends' leisure facility, playing field and associated open space. These facilities should be retained unless it can be demonstrated that they are surplus to need or improved alternative provision is made in a location that is well related to the functional requirements of the relocated use and its existing and future users. Proposals that involve the loss of the existing leisure facility, playing field and associated open space will be assessed having full regard to LPS Policy SC 2 'Indoor and outdoor sports facilities'.</p> <p>The draft policy has been reworded to require as part of a travel plan, improve walking and cycling routes through the site and seek to maximise connections for pedestrians and cyclists to and from the site including, for cyclists, the Connect2 Crewe to Nantwich Greenway.</p> <p>The draft policy has been reworded to require that development proposals have regard to heritage assets and their setting in accordance with LPS Policy SE 7 'The historic environment' and Policy HER 7 'Non-designated heritage assets'.</p>

Site CRE 2 'Land off Gresty Road'

Summary of main issues raised:	How the main issues have been taken into account
<p>Morning Foods Ltd support the allocation and inclusion of site within settlement boundary however a number of detailed comments are provided in terms of the wording of the policy, including:</p> <ul style="list-style-type: none"> • The requirement to maintain the all of the woodland, this is the only route for foul drainage to discharge of the site to connect to the sewer on Crewe Road. • Evidence of tree quality should be provided to justify the requirement to maintain the woodland. • There is no justification for the requirement to retain/ respect historic field boundaries/ hedgerows. • The buffer to be provided along Gresty Brook should be agreed at the planning application stage. It is unnecessary for the policy to specify a particular requirement. • There is no sewer in the eastern part of the site. • Alternative wording is suggested. 	<p>The policy has been reworded to require the existing woodland to be retained unless there are clear overriding reasons for any loss and the provision is made for net environmental gain by appropriate mitigation, compensation or offsetting in line with LPS Policy SE 5 'Trees, hedgerows and woodland'.</p> <p>The requirement for the buffer along Gresty Brook is two fold. The first is to ensure unobstructed access to the Brook for maintenance and emergency purposes and the second, is for ecological purposes.</p> <p>The supporting text refers to the need to take account of (as relevant) existing utilities infrastructure crossing the site including any water/wastewater pipelines, together with provision for foul and surface water drainage.</p>

Macclesfield (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Need for flexibility and the consideration of allocating smaller/medium sites.</p>	<p>As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met.</p>
<p>Council confirmed that it would consider sites of less than 150 dwellings at the SADPD stage. The SADPD does not propose any allocations in Macclesfield as there is no requirement to allocate further sites in Macclesfield. This means that there is no opportunity to put a site forward for allocation before 2030 and for the Council to properly consider it through the plan-making process. This approach is</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met. Further information about the process is contained in the 'Site Selection</p>

<p>not justified because the Council has not considered its strategy of only allocating sites of a strategic size against the reasonable alternative of allocating smaller sites instead of or in addition to those strategic sites. Further sites should be allocated to assist meeting the housing requirement.</p>	<p>Methodology Report' [ED 07].</p>
<p>Request that the new King School site (the Fallibroome Farm site and the existing Derby Fields facilities) is removed from the Green Belt and included in the list at Policy PG 11. Alternatively, the site should be given special status within the SADPD to allow additional development to meet educational needs. Request that a site specific policy is developed that will allow the School to undertake work relating to its specific operation as a school, without having to demonstrate very special circumstances for each proposal. There is no policy in the plan allowing additional development to support educational needs.</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report.</p>
<p>If the Council accepts that it has not applied sufficient caution to the housing position at Macclesfield and reasserts the 107 unit supply from the LPS, then it will be incumbent to allocate land on the edge of the settlement boundary and revisit the review of the settlement boundary.</p>	<p>As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met.</p>
<p>Churchill Way Car Park should be included as a site in the 'Sites' section of the FDSADPD and the Policies Map should be amended to reflect this. Policy wording similar to that of Policy MTC7 of the MBLP, but with flexibility for a wider range of uses (including food retailing) would be appropriate (also reported under Policy RET 11).</p>	<p>The approach to the Town Centre is discussed in the 'Macclesfield Settlement Report' [ED 35]. Policy RET 11 in the Revised Publication Draft SADPD covers Macclesfield town centre and environs.</p>
<p>Should the planning authority's detailed examination of committed and allocated sites reveal that they are constrained in some manner, and cannot be relied upon to deliver the assumed level of housing, then detailed consideration should be given to allocating some or all of the representation land at The Tytherington Club</p>	<p>As set out in the Macclesfield Settlement Report [ED 35], the housing requirements in Macclesfield have already been met. It is therefore not considered necessary to allocate this site.</p>
<p>Whilst our client does not object to any of the site allocations proposed, we consider that additional allocations should be included</p>	<p>Site considered in Other Settlements and Rural Areas Report [ED 46].</p>

<p>within the SADPD. Our client therefore wishes to put their site forward as an omission site - Proposed allocation – Land at the former George & Dragon Public House, Higher Hurdsfield</p>	
<p>Sites put forward:</p> <ul style="list-style-type: none"> • Land at Lark Hall Estate • Land to the East of Pexhill Road, Macclesfield (CFS 106) for around 70 dwellings. It forms part of a much larger piece of land which is safeguarded for development beyond 2030 under LPS 19 of the CELPS. • Land at Gawsworth Road • Land at Prestbury Road – 5 hectare site (3 hectare net) for up to 90 homes at an assumed density of 30 dph • Macclesfield Rugby Union Football Club - The whole site should be allocated (i.e. residential development at the front of the site and rugby club at the rear of the site) or alternatively just the area proposed for residential development • Land at the Tytherington Club (Manchester Road) • Former George and Dragon, Higher Hurdsfield (OSRA) 	<p>As set out in the ‘Macclesfield Settlement Report’ [ED 35], the housing requirements in Macclesfield have already been met. It is therefore not considered necessary to allocate these sites. For the OSRA site, see the ‘Other Settlements and Rural Areas Report’ [ED 46].</p>

Alsager (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land off Fanny’s Croft (Green Belt, mixed use development of 125 homes and 1,208 m2 employment or solely 1,208 m2 employment on the north west part of the site) – CFS 406 • Land north of Heath End Farm (housing) – CFS 380 • Land at Close Lane (2ha housing) – CFS 306 • Land off Linley Lane (Green Belt, 230 dwellings) – CFS 295 • Land at Linley Lane and Crewe Road (Green Belt, 20 dwellings) – CFS 218 • Land off Crewe Road (50 dwellings) – CFS 408 	<p>All Alsager sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered for their suitability for allocation in the ‘Alsager Settlement Report’ [ED 22] using the methodology set out in the ‘Site Selection Methodology Report’ [ED 07].</p>

<ul style="list-style-type: none"> • Land at Manor Farm, off Dunnocksfold Road (40ha, dwellings) • Land off Close Lane (extra care) 	
<p>Additional sites could meet the needs of Newcastle-under-Lyme, a neighbouring authority with a shortfall in the number of dwellings for the plan area and a history of under-delivering.</p>	<p>CEC received a letter from Newcastle-under-Lyme formally asking for CEC to assist in meeting their housing needs. CEC subsequently responded in the negative and received a further letter back. The current position is that CEC are not able to assist with this request.</p>
<p>There is no flexibility in supply in Alsager if difficulties in delivery are experienced on one or more of the allocated sites. The allocations for Alsager are all large strategic brownfield sites, with the added complications of timely remediation requirements.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>Further housing allocations should be identified in Alsager, incorporating a 10% flexibility allowance for housing provision in Alsager.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound. As highlighted in the 'Alsager Settlement Report' [ED 22] there is no requirement to allocate further housing sites in Alsager.</p>
<p>The employment land shortfall has been ignored, which does not meet with Strategic Priority 1.</p>	<p>As highlighted in the 'Alsager Settlement Report' [ED 22] the residual of 2.26ha should be considered in the context of the overall requirement for Alsager of 40ha; this is 6%. LPS Policy PG 7 'Spatial Distribution of Development' expects Alsager to accommodate 'in the order of 40 ha'; it is reasonable to conclude that the provision of 37.74ha of employment land would fall under this expectation, being 94% of the total. Consideration has also been given to the fact that that the overall employment requirement includes 20% flexibility, which is built into the employment land requirement for Alsager.</p>
<p>All reasonable alternative sites have not been considered.</p>	<p>It is up to the local Authority as to what is considered to be a reasonable alternative. All Alsager sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Smaller, non-strategic sites that may be suitable for release from the Green Belt around Alsager should be considered.</p>	<p>All Alsager sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered for their</p>

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	suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
The housing target is a minimum, not a maximum target.	The overall development figures that Alsager is expected to accommodate are set out in Policy PG 7 'Spatial Distribution of Development' of the LPS and are expressed as 'in the order of'. As stated in ¶8.73 of the LPS, 'these figures are intended as a guide and are neither a ceiling nor a target.'
The Plan does not allocate any small or medium sized sites in Alsager. It is therefore considered to be unsound and inconsistent with the NPPF.	¶68 a) of the NPPF requires at least 10% of a LPA's housing requirement to be identified on sites no larger than 1ha through the development plan and brownfield land registers. It does not say that every settlement in the Borough must have this proportion. Alsager is a KSC and therefore it is reasonable to expect that the site allocated there are strategic in nature.
There is a lack of extra care development in Alsager.	LPS Policy SC 4 'Residential Mix and SADPD Policy HOU 2 'Specialist housing provision' relate to meeting the needs of older persons.
Disagreement with the local urban centre boundary, primary and secondary frontages, and town centre boundary	This has been considered through Chapter 5 'Retail planning' and Appendix 2 of the 'Alsager Settlement Report' [ED 22].

Congleton (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Support for the employment allocation in LPS 27 (Congleton Business Park Site). The area allocated as employment should not be considered for a mix of uses.	Noted.
Support for LPS 26 (Radnor Park) object to clause K of policy with reference to Jodrell Bank. Council should be very clear and robust that the allocations in the Plan stand and will be delivered.	The policy wording for site policy LPS 26 is included in an adopted Development Plan. The Local Plan Strategy was adopted in July 2017.

<p>Further information provided for the following sites:-</p> <ul style="list-style-type: none"> • CFS 447 (Land adj to the River Dane) • CFS 448 (Land adj to Viking Way) • CFS 449 (HMRC site, off Viking Way) • CFS 220 (Land off Giantswood Lane) • CFS 374 (Belbro Farm) • CFS 434 (Sandbach Road) • CFS 607 (Land off Chelford Road) • CFS 56 (112 Broadhurst Lane) • CFS 439 (Land East of Moss Lane) • CFS 430 (Land at Waggs Road / Fol Hollow) <p>New site submissions have been received, as follows:-</p> <ul style="list-style-type: none"> • Land to the north of Sandbach Road • Danebank Mill, Congleton 	<p>The need for further site allocations and the assessment of sites (where necessary) has been considered through the preparation of an individual settlement report for Congleton (reference ED 27). The Congleton settlement report concludes that no further site allocations for housing land is required in the SADPD but the need to allocate additional land for employment development is considered further through the settlement report. An allocation for employment uses is included in the SADPD – policy reference CNG 1 ‘land off Alexandria Way’.</p>
<p>Further site allocations needed in Congleton as current approach is dependent on strategic sites delivery.</p>	
<p>Further site allocations are required to support affordable housing delivery in the town.</p>	
<p>Figure in the adopted Plan presented as a minimum and support the need for further site allocations in the town.</p>	

Site CNG 1 ‘Land off Alexandria Way’

Summary of main issues raised:	How the main issues have been taken into account
No comments have been received regarding this site.	No issues raised

Handforth (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Several sites put forward for consideration: <ul style="list-style-type: none"> • Knowle House • Clay Lane (Green Belt, 50 homes) • Dean Dale Farm (Green Belt, 150 homes) 	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered all the sites put forward in Handforth and the need for further allocations, concluding that no further site allocations in the SADPD for Handforth are required.
The remaining requirement for Handforth should be met through further allocations. Not meeting the local need deprives the town of affordable housing units and leads to less sustainable patterns of development and increased travel.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered the need for further allocations, concluding that no further site allocations in the SADPD for Handforth are required.
The level of development being proposed in Handforth will have the potential to result in a significant traffic impact.	The overall level of development in Handforth is already determined through the LPS Policy PG 7 'Spatial Distribution of Development'.

Knutsford (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Several sites put forward for consideration: <ul style="list-style-type: none"> • Land to the south of Lilybrook Drive Knutsford • Land East of Oakleigh • Land at Booths Park • Moorside Car Park • Land to the west of Toft Road 	As set out in the Knutsford Settlement Report [ED 34], the development requirements of the Borough have largely been met in the LPS. In Knutsford taking into account existing completions/take up and commitments, there was a residual of 0 dwellings and 0.14 ha of employment land to be found over the remaining Plan period. Therefore it was not necessary to consider any housing sites in the revised publication draft SADPD as there was no further requirement in the plan period. The Council is not proposing to allocate additional employment land in the in the revised publication draft SADPD for Knutsford. The residual employment requirement should be considered in the context of the overall requirement of 15 hectares of employment land allocated for Knutsford. LPS policy PG 7 'Spatial
The failure to allocate any additional sites within and around Knutsford to meet employment, housing, retail and other land use requirements leads to the possibility of the SADPD being rendered unsound, as the development requirements of Knutsford will not be sufficiently met. We urge the Council to re-look at this as a matter of urgency as part of the next stage of the SADPD, where there will also be a need to re-assess	

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<p>the green belt boundaries around Knutsford given insufficient brownfield land being available.</p>	<p>Distribution of Development’ expects Knutsford to accommodate ‘in the order of’ 15 hectares of employment land. It is reasonable to conclude that the provision of 14.86 hectares of employment land would fall under this expectation. Consideration has also been given to the fact that the overall employment requirement in the LPS includes 20% flexibility.</p>
<p>We propose that Moorside Car Park is allocated for residential use (C3), specialist care apartments (C2) or alternatively as employment land to assist Knutsford in meeting its needs. Without prejudice to this, the site should also be considered as safeguarded land to meet development needs beyond 2030. We consider that Moorside Car Park should be removed from the Green Belt in any event. The site comprises previously developed land which is contained by permanent transport infrastructure (the road and the railway line) on all sides. The site does not serve any Green Belt purpose and should be released from the Green Belt.</p>	<p>Moorside Car Park remains in the Green Belt and has not been allocated for employment or housing because Knutsford has met its housing and employment requirements through the site allocations in the Local Plan Strategy (LPS) The details of this are set out in the Knutsford Settlement Report [ED 34] and referred to above.</p>
<p>Proposed allocation – land west of Toft Road, Knutsford. Our client’s site should have been considered as a separate parcel to KN01. It is surprising that the Green Belt Assessment Update did not seek to do so. In our view, had it been considered separately, it would not have been identified as having a ‘major contribution’. We request that this is addressed as part of the further Green Belt Assessment through the SADPD process.</p>	<p>Knutsford has met its housing and employment requirements through the site allocations in the Local Plan Strategy (LPS) The details of this are set out in the Knutsford Settlement Report [ED 34] and referred to above.</p>
<p>Bruntwood is seeking that land at Booths Park be allocated in the SADPD for residential development to deliver high quality homes to help meet local need and pent up demand in the early part of the Plan period. Furthermore, it is seeking that a policy is introduced through the monitoring and implementation framework indicators which ensures that Safeguarded sites are considered to be brought forward for earlier housing delivery on a settlement by settlement basis, if the strategic residential allocations are for any reason delayed. At the very least, there should be a policy-led approach that requires safeguarded land to be released before Green Belt sites are released. These two</p>	<p>Booths Park is a strategic allocation, of safeguarded land, in the Local Plan Strategy. Safeguarded land is not allocated for development at the present time and would be considered at the time of a full scale Plan review.</p>

amendments would help ensure that a Positive and Effective Plan is prepared, with greater flexibility to ensure that the key objective of delivering the objectively assessed need is achieved.	
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Middlewich (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites submitted for consideration:</p> <ul style="list-style-type: none"> • Cledford Lagoon (mixed use development/ safeguarded land) (CFS 164, FDR 838) • Land at Tetton Lane (housing) (CFS 387, FDR 2730) • Land to the east and west of Croxton Lane (CFS 600, FDR 1280) • Centurion Way (housing) (CFS 635, CFS 635A, FDR 286) • Land adjacent to Watersmeet, Nantwich Road, (housing) (FDR 860) 	<p>All sites submitted/ amended have been added to the pool of sites considered in the Middlewich Settlement Report [ED 36] (Stages 1 and 2 of the Site Selection Methodology).</p>
<p>Insufficient land allocated in Middlewich to meet the housing requirement.</p>	<p>Noted. The Middlewich Settlement Report [ED 36] explains the site selection process. This has resulted in the recommendation of two additional sites for residential development providing around 125 dwellings. Taking into account completions and commitments at the 31 March 2020, this would result in the provision of 1922 dwellings in Middlewich. This is considered to be 'in the order of' 1,950 homes'. This figure is not a target or a minimum requirement. Some settlements such as Sandbach, which lie close to Middlewich, have significantly exceeded their expected level of development. In the absence of their being any other site options that perform well, it is considered reasonable not to recommend any additional sites and given that the extent of any remaining requirement is now very limited.</p>
<p>Reliance on large-scale sites to deliver the majority of housing in Middlewich poses deliverability risks particularly in the short term.</p>	<p>The LPS and SADPD will provide a range of sites in Middlewich of strategic and non strategic size. Sites proposed In Middlewich in the Revised Publication Draft SADPD range from 50 dwellings to 75 dwellings.</p>

<p>Greater choice and flexibility is required in terms of size and location of housing sites to provide sufficient certainty that the housing requirement will be met.</p>	<p>Together the LPS and SADPD will provide a range of sites for housing development of different sizes. Sites proposed In Middlewich in the Revised Publication Draft SADPD range from 50 dwellings to 75 dwellings.</p>
<p>Middlewich is an important settlement for growth. It is the closest Local Service Centre to Crewe which is due to see significant economic growth over the next 20 years with the building of HS2. It is likely that both Middlewich and Crewe will need to accommodate additional housing growth above that set out in the Local Plan Strategy and the draft Site Allocations document within the next few years.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>While the LPS contain strategic planning policies and allocations, it is a 'pre-HS2 plan' and therefore does not address the full implications of HS2.</p> <p>The Middlewich Settlement Report [ED 28] identifies development requirements in Middlewich.</p>
<p>MID 2 is an inferior site to that submitted at Centurion Way. The only 'red lights' in the site assessment for Centurion Way apply equally to many of the site allocations within Cheshire East. Housing needs cannot be met without utilising such sites.</p>	<p>Noted. The Centurion Way site has been considered through the Site Selection Methodology and a smaller parcel of the site has been assessed as suitable for residential development.</p>
<p>Query whether any cumulative traffic impact assessment has been carried out of all the site allocations, across the entirety of the borough and taking into account cross-boundary issues with adjacent local authority areas.</p>	<p>Noted. The Highways Agency have been consulted as part of the Site Selection Methodology and maintain that, based on the available evidence, there are no individual sites that should not be progressed to the next stage of consultation on the SADPD based on their anticipated impacts on the capacity and safety of the Strategic Road Network. Highways England recommend that during the lifetime of the Local Plan, a Transport Study is undertaken in order to monitor the performance of the Local Plan in its entirety on individual strategic road network junctions as the development sites come forward</p>
<p>The development trajectory of significantly sized sites should be provided to indicate the potential traffic impact associated with phased build outs.</p>	<p>Noted. However, sites proposed for allocation in the SADPD are of a non-strategic size.</p> <p>The Highways Agency have been consulted as part of the Site Selection Methodology and maintain that, based on the available</p>

	evidence, there are no individual sites that should not be progressed to the next stage of consultation on the SADPD based on their anticipated impacts on the capacity and safety of the Strategic Road Network. Highways England recommend that during the lifetime of the Local Plan, a Transport Study is undertaken in order to monitor the performance of the Local Plan in its entirety on individual strategic road network junctions as the development sites come forward
The largest employment site over the plan period is LPS 44 'Midpoint 18' in Middlewich. Access to the SRN from Middlewich is generally obtained via accessing M6 J18, and therefore the development of the 'Midpoint 18' site has the potential for a significant traffic impact on this SRN junction.	This site was allocated for employment development in the LPS. These matters were considered through the examination of that plan.
Large sites that are located in proximity to the Strategic Road Network should be phased to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to ensure there is minimal disruption to existing road users.	All large sites were allocated for development in the LPS and these matters were considered through the examination of that plan. The Revised Publication Draft SADPD proposes 2 additional sites which are non-strategic in size.
The majority of proposed site allocations for employment purposes do not set out the final use class that is envisioned will develop the site and this should be clarified.	No new employment allocations are proposed within Middlewich in the SADPD.

Site MID 1 'Land off St. Ann's Road'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The proposed capacity and viability of the site will have to be substantiated in view of the numerous site-specific constraints.	This site has been deleted in the Revised Publication Draft SADPD.

Site MID 2 'East and west of Croxton Lane'

Summary of main issues raised:	How the main issues have been taken into account
A gravity sewer runs through the allocation. Any applicant will need to establish a detailed constraints plan.	Reference is made to the gravity sewer in the supporting text.
The site is adjacent to the Trent & Mersey Canal towpath and the Canal is within a Conservation Area. Development of the site should embody the requirements of Policy INF 12.	Any development proposals for the site would be assessed having regard to the plan as a whole and it is not necessary to cross reference Policy INF 12 in the policy.
The towpath should be considered as part of the public realm and pedestrian access provided.	This is a matter that is capable of being considered at the detailed planning application stage.
Opportunities for surface water drainage to the canal should be considered.	This is a matter that is capable of being considered at the detailed planning application stage.
The allocation of the site is supported and it is suitable and sustainable location for residential development. The removal of the site from the open countryside is supported.	Noted.
The Middlewich Settlement Report (FD36) provides a traffic light assessment of the site. This identifies two 'red light' issues which would equally apply to alternative sites. There are also a number of amber issues with no evidence that these can be resolved.	Site selection findings for all sites assessed for residential development can be found in the Middlewich Settlement Report [ED 36]. Of the traffic light criteria scoring amber, these can be addressed through mitigation measures with regards to landscape, highways impact and access, flooding and drainage, ecology and neighbouring land uses. This is explained further in the Settlement Report.
The site would have a severe impact upon settlement character and urban form. The site would result in an intrusive incursion adjacent to the settlement.	The site has been given a red rating in relation to settlement character and urban form in the Traffic Light Assessment. However this is because existing residential development lies to one side of both sites. With sensitive layout and design, the impact upon settlement character and urban form could be mitigated.
The site would compromise the rural character of the Trent and Mersey Conservation Area, resulting in harm to a heritage asset.	A Heritage Impact Assessment (HIA) has been undertaken for this site (See Middlewich Settlement Report [ED 36] Table 17. The HIA concludes that the site could accommodate residential development and would only cause minor harm to the setting of the part of the canal

	with mitigation measures in place.
The site is inappropriate being next to a household refuse depot and conflicts arising from noise and odour.	This is a matter that is capable of being mitigated and the draft policy states that development proposals must provide an offset from the existing recycling centre and achieve an acceptable level of residential amenity for prospective residents including in terms of noise and disturbance.
The allocation is unsound because it is not justified, effective or consistent with national policy.	Noted. The site has been assessed as being suitable, available and achievable for housing development. It will contribute towards meeting the housing figure for Middlewich identified in the Local Plan Strategy.

Nantwich (general issues)

Summary of main issues raised:	How the main issues have been taken into account
A site at Broad Lane Nantwich is being promoted	Nantwich has met its housing and employment requirements as set out in the Nantwich Settlement Report [ED 38]. This has meant that no site allocations are required in the in the revised publication draft SADPD for employment or housing uses.
A site on land at Audlem Road, Nantwich is being promoted (it already has permission and is at Reserved Matters stage).	
The emerging site allocations documents needs to provide more flexibility to ensure that housing needs are met in the short term in Nantwich. Broad Lane represents a suitable and sustainable site which can be delivered in the short terms and should therefore be allocated for housing. The figures set out within the adopted and emerging policies is a minimum, therefore Cheshire East Council is encouraged to allocate more sites to ensure housing needs are met.	
Muller Property Group object to the non-inclusion of the sites listed below. Land to the south of Nantwich, between Peter Destapleigh Way and Broad Lane Stapeley.	
The level of development being proposed within Crewe alongside key development sites in Macclesfield, Handforth, Nantwich and Wardle have the potential to result in a significant traffic impact. Large sites that are located in proximity to the Strategic Road Network, should be	The developments referenced are strategic sites already allocated in the Local Plan Strategy. The delivery of which will be dealt with through the policies within the LPS and development management. This is not an issue covered by the in the revised publication draft

<p>developed in a way that the phasing of development is appropriate to mitigate the impact of development on existing highway infrastructure. Additional infrastructure should be delivered alongside site development to ensure there is minimal disruption to existing road users.</p>	<p>SADPD.</p>
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Poynton (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land east of Waterloo Road, Poynton (150 dwellings, Green Belt) – CFS 418 • Land at Woodleigh, 77 Chester Road, Poynton (20-40 dwellings, Green Belt) – CFS 560 • Land Adjacent to Lostock Hall Road, Poynton (80-100 units, Green Belt) - CFS 562 and 565 • Lostock Hall Farm, Poynton (10-15 dwellings, hotel, business and leisure uses, Green Belt) – Most of CFS 563 • Land south of Glastonbury Drive, Poynton (30-35 dwellings, Green Belt) – CFS 329 • Towers Yard Farm, Towers Road, Poynton (30 dwellings, Green Belt) – CFS 51 	<p>All Poynton sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Concerns that the current draft site allocations in the SADPD will not deliver the number of dwellings anticipated in the Local Plan Strategy and therefore the Council should identify alternative 'contingency' sites. The Poynton sites in the First Draft SADPD are subject to issues that could cause significant delay.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>The Poynton Settlement Report does not make reference to omission sites.</p>	<p>All Poynton sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>

<p>The population growth figures for Cheshire East are now evidenced to be less than those used for the LPS, equating to 22,840 homes over the plan period; the housing requirement and flexibility factor for Poynton needs to be adjusted.</p>	<p>It is not the role of the SADPD to revisit strategic policy. The overall development figures that Poynton is expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the LPS. This has been considered at length through the LPS examination process and was found to be sound.</p>
<p>2017 data for housing and employment completions, take-up and commitments has been used in the Poynton Settlement Report.</p>	<p>The 'Poynton Settlement Report' [ED 39] has been updated using housing employment and housing figs as at 31.3.20.</p>
<p>Rejecting CFS 412 on the grounds of lower probability of flooding compared to other sites is not a valid reason for rejecting the site.</p>	<p>As indicated in the 'Poynton Settlement Report' [ED 39] (¶4.15) as almost the whole site is in Flood Zone 3, with part in Flood Zone 3b, the sequential test was applied, and it was found that there were other available sites appropriate for residential development in areas with a lower probability of flooding. The site is also contaminated and is an existing employment site that would be lost.</p>

Site PYT 1 'Poynton Sports Club'

<p>Summary of main issues raised:</p>	<p>How the main issues have been taken into account</p>
<p>No evidence in the SADPD to say that Poynton Sports Club is surplus to requirements or that its redevelopment has the support of Sport England. The site is a green lung in the heart of the community that is highly valued.</p>	<p>Poynton Sports Club is a private facility. Sport England has been consulted and has asked for the policy wording to be amended. Amend point 3 to read: 'demonstrate how the sports facility will be replaced locally, <u>and that it is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy & Action Plan to an equivalent or better quantity and quality</u>, and <u>that the relocated facility is</u> fully brought into use in advance of the loss of any existing facilities to ensure continuity of provision.'</p>
<p>No evidence to say that the site can deliver 80 dwellings.</p>	<p>The Delivery Statement submitted by the site promoter includes an indicative plan showing a proposed layout for the site, with 97 dwgs. However, the housing figs in the delivery statement range between 80 and 90. The precise number of dwellings would be considered through the planning application process.</p>

No evidence to indicate that an operator of the sports club has been identified or any interest expressed.	It is the Council's understanding that the current sports club will manage and operate the proposed new sports club site.
A buffer of no less than 10 metres to the woodland on the north and east of the site does not take into account the existing site specifics.	The requirement for the buffer is for nature conservation purposes. Priority Habitats such as the woodlands on the northern and eastern boundary of the sports club are a material consideration for planning. The intention of the buffer is to retain and encourage the development of woodland edge habitats and avoid and indirect impacts on the woodland from the proposed housing (issues with gardens backing onto woodland are a frequent issue). The buffer can be used as part of the open space design for the scheme, and it is consider that it would not prevent the best use being made of the allocation.
Suggestion of additional policy criteria with regards to the establishment of an appropriate relationship with the trees as part of a planning application, informed by a detailed Arboricultural Assessment.	This is not considered necessary to include in the policy.
The allocation site should be extended to include the woodland belt on the north and eastern boundary to enable that area to be subject to overdue management and future maintenance.	The woodland is protected open space (REC 1) and an ecological corridor (ENV 1); it is not considered necessary to include it in the allocation as it is not proposed to be developed.
To have Poynton Sports Club fully operational from PYT 2 prior to the commencement of development on PYT 1 has the potential to significantly delay the delivery of housing on site PYT 2.	The Delivery Statement submitted by the site promoter suggests that housing delivery is anticipated two to three years after the sites are allocated.
The Plan should acknowledge and recognise Safeguarded Land as identified in the Local Plan Policy PG 4.	There is no further requirement for safeguarded land in Poynton.
Poynton recently experienced flooding in 2016 with ordinary watercourse run-off identified as a causative factor; further advice should be sought from the Lead Local Flood Authority. The Environment Agency has no specific infrastructure requirements for the site.	The Lead Local Flood Authority has been consulted throughout the site selection process.
The policy does not take into account the actions and recommendations made in the evidence base; suggestion that the policy is reworded to state that an enhanced facility should be	Amend point 3 to read: 'demonstrate how the sports facility will be replaced locally, <u>and that it is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built</u>

provided in line with the BFS recommendations and PPS action plan.	<u>Facilities Strategy and the Cheshire East Playing Pitch Strategy & Action Plan to an equivalent or better quantity and quality, and that the relocated facility is</u> fully brought into use in advance of the loss of any existing facilities to ensure continuity of provision.’
Traffic impact accessing the site has not been given enough weight. The junction at Glastonbury Road is difficult to negotiate as it has no roundabout island or light system in place. Further traffic at this point would need to include a traffic control or signalling point.	Cheshire East Highways have been consulted throughout the site selection process.
Poynton Sports Club has a restrictive covenant in perpetuity, dating back from when it was bequeathed from the Vernon Estate, protecting this from other uses and most especially from development.	It is the Council’s understanding that there are no covenants issues that would prevent the Plan’s proposals from being implemented.

Site PYT 2 ‘Land north of Glastonbury Drive’

Summary of main issues raised:	How the main issues have been taken into account
No evidence to indicate that an operator of the sports club has been identified or any interest expressed.	It is the Council’s understanding that the current sports club will manage and operate the proposed new sports club site.
Club house and changing facilities for such a commercial sports centre would be unacceptable in any form in the Green Belt.	NPPF ¶145 states: ‘A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:... b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.’
The extent of the allocation should reflect at minimum the land that is under option and required for the relocation proposal, and also follow the topography and boundaries on the ground.	The site boundary on the draft adopted policies map [ED 02] has been amended to reflect the land under option and required for the relocation proposal.
A Grampian condition that covers the relocation and redevelopment should be added into the policy wording.	It is not considered necessary to include a Grampian condition in the policy - the mechanism of how to achieve policy is down to the decision maker. Planning application approval could include a

	Grampian condition.
Criterion 5 should be deleted as all developments have a right to be connected to a sewer.	<p>Amend point 5 to read: 'make sure that seek to avoid the discharging of surface water is not discharged to the gravity sewer crossing the site;'</p> <p>Amend ¶12.59 (now ¶12.65) to read: 'A gravity sewer runs through the site from the south-west corner to the north-west of the site; no the discharging of surface water should be discharged to the sewer should be avoided given the availability of Poynton Brook to the north.'</p>
Criterion 7 does not fully reflect the NPPF; it should be amended to reflect the wording in paragraph 45 of the NPPF.	<p>Amend point 7 to read: 'make sure that the layout and design of development, including all boundary treatments and related infrastructure preserves the openness of the Green Belt and the wider character of the countryside in the sensitive gap between Poynton and Bramhall/Hazel Grove.'</p> <p>Amend ¶12.60 (now ¶12.66) to read: 'The site lies within the Green Belt in an important open gap between Poynton and adjacent areas of Greater Manchester. The area has already been affected by the building of the A6 – Manchester Airport Relief Road and so is vulnerable to further erosion of its open character. Careful design is required to minimise and mitigate the impact of development – including important views into the site from the A532 road and other vantage points, as well as the wider character of the countryside in the sensitive gap between Poynton and Bramhall/Hazel Grove.'</p>
The policy does not reference the leisure facilities that will be lost by the allocation of PYT 1.	<p>Amend point 4 to read: 'make sure that any club house building is an appropriate facility ...'</p> <p>Amend ¶12.53 (now ¶12.59) to read: 'The allocation of the site allows for a new club house building to be constructed on the site, ...'</p>
The policy makes no reference to the additional requirements for sport and leisure facilities set out by the Council's evidence base.	This has been considered through the supporting information to the policy (¶12.61) in relation to account being taken of the 'Cheshire East Playing Pitch Strategy and Action Plan' [ED 19], and the 'Cheshire

	East Indoor Built Facilities Strategy' [ED 20].
The site functions as an important barrier between Poynton and the Stockport, Hazel Grove area. The proposal conflicts with PG 3, which conditions the need for retention of gaps between settlements. The proposal will unacceptably affect the landscape character of the area and does not preserve the openness of the Green Belt.	This has been considered through the supporting information to the policy (¶12.66) and point 7 of the policy itself in relation to the openness of the Green Belt and the gap between Poynton and Greater Manchester.
Concerns with the impact on biodiversity, flora and fauna in relation to Poynton Brook (wildlife corridor), Poynton Pool (significant wildlife value) and deciduous woodland (priority habitat), from noise levels, lighting and hard surfaces. The proposed buffer of 8m is not sufficient to safeguard the ecology network.	The policy highlights the requirement for protected species, Poynton Brook, its wet ditches and woodland to be retained and protected through buffering. In addition policies in the LPS and SADPD, for example LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'ecological implementation' will help to mitigate any negative effects arising from the proposed development.
Traffic impact has not been assessed.	Cheshire East Highways have been consulted throughout the site selection process.
Moving the sports club and facilities to the school site where a leisure club exists already would be a better alternative of assisting school funding and encouraging sports in schools.	There has been no information submitted through the SADPD process to state that there is land available at Poynton Leisure Centre for the relocation of Poynton Sports Club.
Surface water runoff from the proposed artificial surfaces and ground works cannot be accommodated by Poynton Brook, which is already susceptible to flooding.	The Lead Local Flood Authority has been consulted throughout the site selection process. Poynton Brook is to be retained and protected through the provision of an 15m wide buffer to either side of the bank tops (point 1 of the Policy).
Noise levels will be worse than those from the SEMMS route.	Mitigation is available through LPS Policy SE 12 'Pollution, Land Contamination and Land Instability', for example.
Flood lights will create an unacceptable spread of light.	This has been considered through point 6 of the policy.
A countryside location is not necessary (other non-countryside sites are available in Poynton).	Three other sites were put forward through the call for site process for sports and leisure uses as set out in ¶4.75 of the Poynton Settlement Report [ED 39], however, they are all located in the open countryside (and Green Belt).
There is inadequate infrastructure now and proposed to accommodate	Infrastructure providers were consulted as part of the site selection

further development.	process. The provision of infrastructure is also covered in LPS Policies IN 1 'Infrastructure' and IN 2 'Developer Contributions'. Chapter 10 'Transport and infrastructure' of the Revised Publication Draft SADPD contains policy relating to infrastructure.
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Site PYT 3 'Land at Poynton High School'

Summary of main issues raised:	How the main issues have been taken into account
The main water easement and large gravity sewer in the site boundary will affect the deliverability of any development proposals.	These would need to be taken into account as part of any detailed planning application.
There is no indication that the proposals that would result in the loss of in-use playing fields have the support of Sport England. The requirements of the policy are strict as there is no facility in the policy that would allow for a financial contribution to deliver the alternative playing field as opposed to a physical provision.	<p>Sport England has been consulted and has asked for the policy wording to be amended. Add point 3: <u>'demonstrate that the sports facility is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy & Action Plan'</u></p> <p>New ¶12.61a (now ¶12.68): <u>'The intention would be to mitigate the loss of the playing field with the provision of a new 3G pitch at Poynton High School, adjacent to the existing Leisure Centre. The Cheshire East Local Football Facility Plan (December 2018) highlights a new floodlit 11v11 3G FTP at Poynton High School as a priority project for potential investment.'</u></p>
No discussions have taken place with the Poynton Sports Club or Jones Homes in relation to off-setting any playing field loss at Poynton High School on Poynton Sports Club's relocation site, which will be privately owned land and is being purchased with the full intention of meeting Poynton Sports Club's existing and growing needs; not further deficiencies elsewhere.	The 'Poynton Settlement Report' [ED 39] has been amended with regards to Sport England's comment to clarify that the relocation site is private land and the owners/site promoters have no plans to accommodate additional provision above that which is required.
Poynton High School should demonstrate the ability to address planning policy and Sport England's requirements by securing appropriate land to provide equal or better facilities than those being lost. Poynton has an identified shortfall of sports facilities, including	Add point 3: <u>'demonstrate that the sports facility is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy & Action Plan'</u>

<p>grass football pitches. The site should be retained for improvements/future expansion of the Leisure Centre.</p>	<p>New ¶12.61a (now ¶12.68): <u>The intention would be to mitigate the loss of the playing field with the provision of a new 3G pitch at Poynton High School, adjacent to the existing Leisure Centre. The Cheshire East Local Football Facility Plan (December 2018) highlights a new floodlit 11v11 3G FTP at Poynton High School as a priority project for potential investment.</u> ¶12.69 of the supporting information to the policy also seeks to address this point.</p>
<p>The policy should make sure that any proposed housing layout ensures there is no indirect impact which would result in an adverse effect on the functionality or capacity of the playing fields.</p>	<p>Add point 4: <u>make sure that any proposed housing layout does not have a direct impact that would result in an adverse effect on the functionality or capacity of the playing field.</u></p>
<p>Poynton Sports Club's relocation site is the correct place for a 3G pitch as the Club will have the firm funding to deliver it.</p>	<p>Poynton High School, adjacent to the Leisure Centre is also an appropriate place to have a 3G pitch, with Poynton Leisure Centre being a public facility and Poynton Sport Club is a private facility.</p>
<p>Query as to whether it has been demonstrated 25 units can be achieved with associated on site open space/affordable housing policy requirements, as well as the sewer and water mains. This could lead to a high-density development, which may be out of character with the local area.</p>	<p>The precise number of dwellings would be considered through the planning application process. The policy has been worded through the use of the word 'around' to allow for some flexibility. The design and layout of the proposed development would also be considered through the planning application process.</p>
<p>The provision of a 3G pitch at Poynton High School is dependent on generating the funds. The prospect for funding is dependent on whether there is spare, allotted, capital available once Vernon Infant School has been sold.</p>	<p>Provision of a 3G pitch at Poynton High School is dependent on a number of factors, which include planning permission, section 77 approval and availability of sufficient funding. Housing land is identified at Poynton High School (Site PYT 3), which will generate a capital receipt and facilitate the provision of a 3G pitch.</p>
<p>Development of the site would prevent the school from meeting the sports needs of its future pupils.</p>	<p>Cheshire East Education has been consulted during the site selection process for both the LPS and the SADPD.</p>
<p>The playing field offers visual amenity; there is no evidence base to support the loss.</p>	<p>Landscape was considered through the site selection process.</p>
<p>The requirement to re-provide the existing sports facilities on the site offers protection, it is positive that the policy refers to the PPS and mentions the requirement of a sinking fund and FA testing should a</p>	<p>Add point 3: <u>demonstrate that the sports facility is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing</u></p>

<p>3G pitch be provided. The policy could be amended to allow for improvement or enhancement of the sports facilities to address some of the recommendations contained in the PPS action plan to meet current and additional demand created by the new housing provision.</p>	<p><u>Pitch Strategy & Action Plan</u>. This is also considered through ¶12.69 of the supporting information to the policy.</p>
<p>Policy amendments suggested with regards to ball strike.</p>	<p>Amend point 2 to read: ‘provide <u>satisfactory measures an 80m buffer zone</u> to protect the proposed dwellings from the risk of ball strike from the adjacent playing field, where adequate safety margins are not in place. <u>If this cannot be accommodated, a full ball strike risk assessment should be carried out and any required mitigation provided.</u>’</p> <p>Amend ¶12.63 (now ¶12.70) to read: ‘If there aren’t adequate safety margins then the proposed development is at risk of ball strike, therefore satisfactory measures need to be taken to mitigate this, for example ball stop fencing or netting. <u>a full ball strike risk assessment should be carried out. Satisfactory mitigation measures could include ball stop fencing or netting.</u>’</p>
<p>For playing fields to be allocated for development a replacement site should be identified and allocated. There is no evidence that alternative land has been identified to replace the lost playing field. The proposed loss of school playing fields is contrary to the Government’s national priority agenda of promoting physical activity in children.</p>	<p>Add point 3: <u>‘demonstrate that the sports facility is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy & Action Plan</u></p> <p>New ¶12.61a (now ¶12.68): <u>‘The intention would be to mitigate the loss of the playing field with the provision of a new 3G pitch at Poynton High School, adjacent to the existing Leisure Centre. The Cheshire East Local Football Facility Plan (December 2018) highlights a new floodlit 11v11 3G FTP at Poynton High School as a priority project for potential investment.’</u> This has also been considered through the Poynton Settlement Report [ED 39].</p>
<p>If the loss is offset by transfer to site PYT 2 it will increase the size of the sport facilities at PYT 2, and will mean that the school will have to provide for managing the movement of children to and from PYT 2, which raises safety issues.</p>	<p>The ‘Poynton Settlement Report’ [ED 39] has been amended with regards to Sport England’s comment to clarify that the relocation site is private land and the owners/site promoters have no plans to accommodate additional provision above that which is required.</p>

<p>The site would not align with the latest proposals in the Poynton Neighbourhood Plan as there is some potential for a conflict with the emerging policies for the retention of existing playing fields in the Poynton Neighbourhood Plan.</p>	<p>Sport England has been consulted and has asked for the policy wording to be amended. Add point 3: <u>demonstrate that the sports facility is an enhanced facility in line with recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy & Action Plan</u></p> <p>New ¶12.61a (now ¶12.68): <u>The intention would be to mitigate the loss of the playing field with the provision of a new 3G pitch at Poynton High School, adjacent to the existing Leisure Centre. The Cheshire East Local Football Facility Plan (December 2018) highlights a new floodlit 11v11 3G FTP at Poynton High School as a priority project for potential investment.</u> ¶12.69 of the supporting information to the policy also seeks to address this point.</p>
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Site PYT 4 'Former Vernon Infants School'

Summary of main issues raised:	How the main issues have been taken into account
<p>The playing fields are still used by local members of the community; a local football club uses the location.</p>	<p>New ¶12.66a (now ¶12.74): <u>The intention would be to reconfigure and improve drainage of the playing field and provide a changing room.</u></p>
<p>It is presumed that any redevelopment would also restrict on-site parking for use by future residents only and not to be used by people accessing the playing fields.</p>	<p>The design and layout of the proposed development, including parking provision would be considered through the planning application process.</p>
<p>A very high-density scheme would seem at odds with the character of the surrounding area.</p>	<p>The design and layout of the proposed development would be considered through the planning application process.</p>
<p>There is no indication whether an alternative location for the playing field has been found or whether Sport England has approved the proposals in principle. There is no facility in the policy that would allow for a financial contribution to deliver the alternative playing field as opposed to a physical provision, so the requirements of the policy are strict.</p>	<p>Sport England has been consulted and have asked for the policy wording to be amended. New ¶12.66a (now ¶12.74): <u>The intention would be to reconfigure and improve drainage of the playing field and provide a changing room.</u></p>

<p>No discussion has taken place with Poynton Sports Club/Jones Homes in relation to off-setting any playing field loss at Vernon School on Poynton Sports Club's relocation site, which will be privately owned land and is being purchased with the full intention of meeting Poynton Sports Club's existing and growing needs. If the loss is offset by transfer to site PYT 2 it will increase the size of the sport facilities at PYT 2.</p>	<p>The 'Poynton Settlement Report' [ED 39] has been amended with regards to Sport England's comment to clarify that the relocation site is private land and the owners/site promoters have no plans to accommodate additional provision above that which is required.</p>
<p>It should be demonstrated national, local and Sport England's policy requirements in relation to loss of playing fields can be met without relying on facilities at the Poynton Sports Club Relocation site.</p>	<p>This has been considered through the policy and its supporting information.</p>
<p>The draft Neighbourhood Plan states that the site would only deliver 25 dwellings.</p>	<p>The number of dwellings has been considered through the 'Poynton Settlement Report' [ED 39].</p>
<p>The supporting information makes reference to a culvert running through the site and confirms that the route has not been identified as yet, which has the potential to be a significant constraint. Any development proposal that offers to deculvert this section of the watercourse is welcomed and adequate justification should be provided should an alternative course of action be taken.</p>	<p>This was considered through points 5 and 6 of the policy and ¶12.76 of its supporting information. However, further investigation has found that the culvert appears to be located more than 8m from the site boundary with the policy updated to reflect this.</p>
<p>Support for the policy requirement to re-provide the existing sports facilities on the site as this offers protection and it is positive that the policy refers to the PPS. The policy could be amended to allow for improvement or enhancement of the sports facilities to address some of the recommendations contained in the PPS action plan to meet current and additional demand created by the new housing provision.</p>	<p>This has been considered through the policy and its supporting information.</p>
<p>Policy amendments suggested with regards to ball strike and effects on the functionality and capacity of the playing field.</p>	<p>Amend point 3 to read: 'provide satisfactory measures an 80m buffer zone to protect the proposed dwellings from the risk of ball strike from the adjacent playing field, where adequate safety margins are not in place. <u>If this cannot be accommodated, a full ball strike risk assessment should be carried out and any required mitigation provided.</u>'</p> <p>Amend ¶12.67 (now ¶12.75) to read: 'If there aren't adequate safety</p>

	<p>margins then the proposed development is at risk of ball strike, therefore satisfactory measures need to be taken to mitigate this, for example ball stop fencing or netting. <u>a full ball strike risk assessment should be carried out. Satisfactory mitigation measures could include ball stop fencing or netting.</u></p> <p>Add point 3b: <u>'make sure that any proposed housing layout does not have a direct impact that would result in an adverse effect on the functionality or capacity of the playing field.'</u></p>
For playing fields to be allocated for development a replacement site should be identified and allocated.	This has been considered through the 'Poynton Settlement Report' [ED 39], the policy and its supporting information. New ¶12.66a (now ¶12.74): <u>'The intention would be to reconfigure and improve drainage of the playing field and provide a changing room.'</u>
The delivery of the allocation is in doubt as there is no proposal to deal with the planning policy and Sport England's requirement that must be met to allow such loss of playing facilities on land in the owner's control.	This has been considered through the 'Poynton Settlement Report' [ED 39], the policy and its supporting information. New ¶12.66a (now ¶12.74): <u>'The intention would be to reconfigure and improve drainage of the playing field and provide a changing room.'</u>

Sandbach (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Whilst the Council's position is that no further residential development is required in Sandbach to meet the minimum housing requirement for the settlement, the figure set out in policy PG 7 of the CELPS is not a ceiling and additional allocations would assist the Council in being able to meet the 36,000 dwelling figure.	The overall development figures that Sandbach is expected to accommodate are set out in LPS Policy PG 7 'Spatial Distribution of Development' and are expressed as 'in the order of'. As stated in ¶8.73 of the LPS, 'these figures are intended as a guide and are neither a ceiling nor a target.'
More housing is required to: assist in terms of the five year housing land supply; to accommodate the dwellings which were to be provided on the larger strategic sites but will now not be delivered in the plan period; to provide flexibility in the event that HS2 is committed to come to Crewe by 2027; to assist the Council in meeting the requirement to identify 10% of the housing requirement on sites of 1	As set out in the Sandbach Settlement Report [ED 41], the housing requirements in Sandbach have already been met.

ha or less; and to acknowledge the continuing need to boost the supply of housing generally and because the requirement should be regarded as a minimum.	
There is no information on land situated to the south of the Arclid Brook towards Heath Road which is identified as LPS53. This site should not be allocated in the new Local Plan/the allocation should be removed.	The site LPS53 has been allocated in the Local Plan Strategy. The LPS has already been through independent examination and was found sound. The LPS was adopted 27 July 2017. It is not part of the SADPD to revisit strategic site allocations in the LPS.
The development of housing in Sandbach has already exceeded expected development levels; there is therefore no requirement for this additional housing allocation at LPS53.	As above.
Several sites put forward for consideration: <ul style="list-style-type: none"> • Land to the rear of Park Lane and Crewe Road. • Land South of Old Mill Road, Sandbach • Land at The Hill, Sandbach (these sites are located to the east of Sandbach and are to the north and south of The Hill (A533), off School Lane and Houndings Lane). • Marsh Green Farm, Vicarage Lane, Sandbach • Land west of Bradwall Road, Sandbach • Land to the rear of Twemlow Avenue and Marlborough Drive, Sandbach. This should be included within the settlement boundary. 	As set out in the Sandbach Settlement Report [ED 41], the housing requirements in Sandbach have already been met. It is therefore not considered necessary to allocate these sites.

Wilmslow (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Several sites put forward for consideration: <ul style="list-style-type: none"> • Land at Stockton Road/Welton Drive • Land at Rotherwood Road (Green Belt, 22 homes) • Land at Maple Farm, Strawberry Lane (4.3ha, housing) • Land at Rotherwood Road (Green Belt, 26 homes) • Land at Mobberley Road and Sandy Lane (Green Belt, 20 	The Wilmslow Settlement Report [ED 43] has considered all the sites put forward in Wilmslow and the need for further allocations, concluding that no further site allocations in the SADPD for Wilmslow are required.

homes) • Land at Sunny Bank Farm	
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Alderley Edge (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land to the north of Beech Road (Green Belt, 75 homes) - CFS 130b • Land at Mayfield, Wilmslow Road (Green Belt, 8-10 homes, 0.35ha) • Additional land at Ryleys Farm, Chelford Road • Whitehall Meadow, Wilmslow Road (Green Belt, 50 homes, 3.4ha) • Land to the west of Heyes Lane (Green Belt, housing) – CFS 366 • Land to the west of Congleton Road (Green Belt, housing) – CFS 359/400 • Land to the east of Heyes Lane (Green Belt, housing) – CFS 370 	<p>All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].</p>
<p>Concerns over the assessments of a number of individual sites not proposed for inclusion in the First Draft SADPD.</p>	<p>Issues relating to individual sites have been taken into account through the assessments in the Alderley Edge Settlement Report [ED 21].</p>
<p>The number of dwellings and safeguarded land to be distributed to Alderley Edge should be increased. The housing requirement for Alderley Edge is disproportionately low and is not commensurate with its scale and function.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.</p>
<p>Insufficient land has been identified to meet the 250 homes requirement.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that</p>

	there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.
Land for development should be allocated on a “Brownfield First” basis and that land should only be considered for release from the Green Belt once this option has been exhausted.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.
Alderley Edge currently suffers from limited resources (parking, infrastructure and schools) for its population.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.

Site ALD 1 ‘Land adjacent to Jenny Heyes’

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Heyes Lane is busy and the proposed site is adjacent to a 60 mph section. It is narrow, with many parked cars and some degree of rush hour traffic. The new access point is not safely achievable; this site is not deliverable as there is no safe vehicular and pedestrian access point to the land.	Highways issues have been taken into account in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
Constraints and the need to respect the Green Belt fringe means the means the site could not deliver 10 dwellings.	The suitability and capacity of the site is taken into account in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The site is remote from existing transport and social infrastructure.	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The potential flood risk constraints means that there may be viability issues to delivery and /or a reduced quantum of development on the	Flood risk issues are taken into account in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in

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site with little or no opportunity to provide affordable housing.	the Revised Publication Draft SADPD.
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Site ALD 2 'Ryleys Farm, north of Chelford Road'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Concerns of traffic problems	Highways issues have been taken into account in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The traffic light assessments are inaccurate with a number of suggestions for changes.	These are taken into account through the Alderley Edge Settlement Report [ED 21] where the traffic light assessments are produced in accordance with the criteria set out in the Site Selection Methodology [ED 07].
The site boundary should be amended to accommodate vehicular access to the appropriate standards.	Access issues are considered through the assessments in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The site should be extended to accommodate more dwellings, provide a stronger and durable Green Belt boundary.	Capacity and Green Belt boundary issues are considered through the assessments in the Alderley Edge Settlement Report [ED 21] .
There is scope to reduce the landscape buffer in relation to the impact on heritage assets.	Heritage issues are considered through the Heritage Impact Assessments [ED 48] and the Alderley Edge Settlement Report [ED 21].
The scale of development proposed on the site is in excess of that supported by the local community and parish council who would prefer to see smaller allocations around the town. The proposal appears to concentrate almost the entire allocation of new housing in a single site, with one builder, which fails to provide the variety of styles, sizes and designs required to maintain the village character and heritage	The scale of development proposed is considered through the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
Concern regarding air pollution, harm to heritage assets and their setting and impact on infrastructure.	These issues are considered through the assessments in the Alderley Edge Settlement Report [ED 21].

A sufficient space for an environmental barrier should be allowed between the houses and existing property.	This site is not proposed for inclusion in the Revised Publication Draft SADPD
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Safeguarded land ALD 3 ‘Ryleys Farm (safeguarded)’

This First Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 ‘Green Belt and safeguarded land boundaries’.

Summary of main issues raised:	How the main issues have been taken into account
The traffic light assessments are inaccurate with a number of suggestions for changes.	These are taken into account through the Alderley Edge Settlement Report [ED 21] where the traffic light assessments are produced in accordance with the criteria set out in the Site Selection Methodology [ED 07].

Safeguarded land ALD 4 ‘Land at Horseshoe Lane’

This First Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The majority of the site cannot be safeguarded for future development as it is already developed.	This issue has been considered through the Alderley Edge Settlement Report [ED 21]. The site has been removed from the plan.

Audlem (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Parish Council broadly supportive of policy. However there is concern about the development of a 2 metre wide footway from the development site to the junction with Heathfield Road. Little Heath Green is also designated as a protected green space. In addition there is no footpath on the east side of Cheshire Street on the other side of	The designated open space (Little Heath) in the Audlem Neighbourhood Plan would not have been affected by the site allocation but in any case the proposed site allocation has been deleted from the Revised Publication Draft SADPD.

Heathfield Road.	
Designation of Audlem as a Local Service Centre is supported.	Support noted.

Site AUD 1 'Land South of Birds Nest'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
The previous application to build 20 houses on the site was refused by Cheshire East Council and dismissed at appeal. Why are both these decisions now being challenged?	The original application for the site (16/3040N) was determined against previous policies in the Crewe and Nantwich Replacement Local Plan 2011, which will eventually be replaced by the SADPD. The site allocation has however been deleted in the Revised Publication Draft SADPD.
The 2m wide footpath was previously withdrawn. Why is it being proposed again? A more sensible solution to the village access would be to form a pedestrian crossing from near the end of Heathfield Road going west side of Cheshire Street.	Encouraging sustainable modes of transport is a core theme running through the LPS and the SADPD. To widen the footpath will encourage more people to walk to the centre of Audlem rather than relying on the private car and here was no objection raised by the Highway Advisor in the original planning application (16/3040N) for widening the existing footway running parallel to Cheshire Street further south of this site. Nevertheless the proposed site allocation has been deleted from the Revised Publication Draft SADPD.
The green is designated Open Space in the Audlem Neighbourhood Plan and as Amenity Greenspace in Cheshire East's Open Spaces Assessment 2012. This should be left alone.	The designated open space (Little Health) in the Audlem Neighbourhood Plan would not have been affected by the proposed site allocation but in any case the proposed allocation has been deleted from the Revised Publication Draft SADPD.
On the previous application it was considered essential to provide a 2m wide wildlife corridor along the length of the boundary between the two fields and further to the south and adjacent field to the east. A road between the two would render the wildlife corridor ineffective.	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. As set out in the 'Audlem Settlement Report' [ED 23] there is no requirement for housing or employment in Audlem.

Site AUD 2 'East View'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>On the previous application it was considered essential to provide a 2m wide wildlife corridor. A road or footpath between the two fields would nullify its effect and require the possible removal of trees/hedging, ditch and pond. The corridor was required for all wildlife and not just newts.</p>	<p>This site is no longer being proposed as an allocated site though the Revised Publication Draft SADPD. Further details can be seen in the 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report and the 'Audlem Settlement Report' [ED 23].</p>

Bollington (general issues)

Summary of main issues raised:	How the main issues have been taken into account
N.B - see BOL 1 for a comprehensive summary of general points also	
<p>More sites should be allocated in the Draft SADPD</p>	<p>The provision of housing and employment land and the approach to spatial distribution [ED 05] report has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Bollington. However there is a requirement for safeguarded land.</p>
<p>Owners of Hollin Hall Hotel wish to put forward their land for removal from the Green Belt and allocation of a small parcel of the land for residential development</p>	<p>All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Various residents suggest the BC Transport site as a possible mixed-use site - the firm BC Transport was sold to a large national haulier, Kinaxia Logistics, who currently own a total of nine companies, including BC Transport and William Kirk Ltd., who are based on the nearby Adlington Trading Estate with much better access to main</p>	<p>The BC Transport site is discussed in the Bollington Settlement Report [ED 24].</p>

Summary of main issues raised:	How the main issues have been taken into account
roads. Suggest that the company will seek to obtain the highest efficiency and will look for opportunities to rationalise its operations. Suggest that the company has indicated that it will seek to move the BC Transport operation to a more convenient location and hence the site owners will seek to dispose of the site within the remaining period of the Local Plan.	
Vacant properties in town	All possible sites considered as part of site selection methodology [ED 07].
Bollington Town Council – comprehensive representation covering the following (also reflects many of the points raised by residents):	
The approach towards allocating housing numbers to the various Local Service Centres is considered defective.	The provision of housing and employment land and the approach to spatial distribution [ED 05] report has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Bollington. However there is a requirement for safeguarded land. The approach to the identification of safeguarded land is set out in document [ED 53].
Need for more involvement of Town Council	A number of meetings have been held with town and parish councils, as set out in table 1 of this consultation report.
Call for sites process - Despite the deficiencies of relying only on sites submitted in response to the call for sites, significantly larger numbers of potential sites have been submitted in LSCs other than Bollington, which have lower levels of constraint including Green Belt category than Bollington. In some cases, comments have been submitted in connection with other LSCs expressing the view that they need a higher level of development.	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
Density – Bollington high density compared to other LSCs	
The Town Council feels that a more appropriate allocation for Bollington would be between 330 - 350 dwellings, which with 318 approved and built would leave between 12 and 32 to build before 2030	

Summary of main issues raised:	How the main issues have been taken into account
Failure to demonstrate special circumstances re green belt release	
Failure to observe the Bollington Neighbourhood Plan	Made Neighbourhood Plans form part of the Development Plan for Cheshire East. The Neighbourhood Plan is referenced in Bollington Settlement Report [ED 24].
ONS figures mean figure of 400 should be revisited	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
Dwellings at East Tytherington should be counted	
Needs consideration of types of housing and design	
Sites put forward will exacerbate traffic and safety problems	
Traffic Light Assessments flawed	
Clough Bank BC Transport - It is essential that CEC/BTC hold discussions with Kinaxia, the site owners and their planning advisers to establish their intentions over the next 12 years. It should also be noted that the Neighbourhood Plan will require “no net loss of employment numbers” and a mixed-use approach to developing the land but this should not be difficult on this large site.	The BC Transport site has been discussed in the Bollington Settlement Report [ED 24].
Site BOL 3 – concern re access	Highway issues are considered as part of the site selection methodology and are considered in the Bollington Settlement Report [ED 24].
Site BOL 4 – unacceptable to review GB assessment (major to significant), traffic concerns and landscape	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
Site BOL 1 and 2 - concerns re contamination, drainage, highways, ecology, separation of Bollington Cross & Lowerhouse, previous 2013 SHLAA rating was unsuitable, private land at Springbank	
Ample opportunity to meet needs through brownfield sites	
Consultation portal ridiculously obstructive and difficult to use	The Council aim is to make access to documents as easy as possible.
Proposals instigated by developers; why only look at sites put forward by developers	The approach to site selection is set out in the site selection methodology report [ED 07]

Summary of main issues raised:	How the main issues have been taken into account
Not local need housing	All aspects considered as part of Bollington Settlement Report [ED 24].
Special nature of Bollington should be retained	
Proximity to Peak District	
No explanation regarding why new housing/development good for business and employment	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
If the envisaged 400 houses cannot be built without taking Bollington green belt this is not a problem because there is no intrinsic reason why they are needed in Bollington. Many sites in the North of East Cheshire would be as good or better for commuting to Greater Manchester/Stockport and so lower value sites can be selected	
Bus service data out of date	Data updated as much as possible in Bollington Settlement Report [ED 24].
Capacity of the settlement is the key issue	Aspects considered as part of Bollington Settlement Report [ED 24] .
Lack of open space	
350 houses more than adequate – need justification for 400	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
<p>Sites put forward:</p> <ul style="list-style-type: none"> • Land at Shrigley Road (amended site boundary) – site put forward for mixed use development including 38 houses (including affordable) • Land at Dyers Court Mill Pond, Ingersley Vale, Bollington • Land at Hollin Hall Hotel • Land at Jackson lane and Grimshaw Lane (2 parcels) 	Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07].

Site BOL 1 'Land at Henshall Road'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of main issues raised:	How the main issues have been taken into account
<p>Owner of site supports the allocation and has provided detailed supporting information both previously as part of the Call for Sites exercise in April 2017 and SHLAA information in March 2017. This previous information is summarised in the representation. New information considers flooding and drainage, the sewer crossing the site and the site's impact on the Green Belt.</p> <ul style="list-style-type: none"> • Flooding and drainage: As United Utilities had made comments regarding the wastewater system, the owner has commissioned a site specific drainage assessment. This states that any development of the site could be delivered without increasing flood risk elsewhere, and flow control could be used with on site attenuation to accommodate storm events up to and including the 1 in 100 year plus climate change event. With regard to foul drainage, the attached report includes a pre-development enquiry response from United Utilities, who confirm that "foul will be allowed to drain to the public combined / foul sewer network at an unrestricted rate/ The connection(s) to the public sewer can be at a point(s) convenient to yourself". The report by Waterco confirms that gravity discharge appears to be feasible. • Sewer: Regarding the sewer crossing the site any future development could be laid out and provided to facilitate any necessary easements that may be required. Now that additional drainage information has been obtained from United Utilities, the masterplan will be updated to demonstrate that the sewer that crosses the site would not act as an impediment to any future development of the proposed allocation and that the site continues to be a deliverable allocation. 	<p>Support noted. Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED24] using the methodology set out in the Site Selection Methodology Report [ED 07]. The site has been considered appropriate to identify as safeguarded land.</p>

<ul style="list-style-type: none"> • Green Belt: Should the site be removed from the Green Belt, then boundaries to the Green Belt would be readily recognisable and permanent. Extensive residential development already exists to the south, west and east of the site, and the northern boundary of the site is constrained by its topography and a group of mature trees. These constraints form a natural line between the periphery of the existing development of Hall Hill to the west and Springbank to the east, providing a natural “rounding off” of the settlement in this location. • In conclusion - The proposed allocation of BOL 1 for around 40 dwellings is supported, and considered to be justified, effective and consistent with national policy, and based upon robust and up to date evidence. It is therefore respectfully requested that the LPA continue to propose BOL 1 as a housing allocation in the next draft of the Site Allocations DPD 	
<p>United Utilities – concerns about wastewater infrastructure; first preference would be other sites within the Borough under consideration but welcome early dialogue to discuss concerns; imperative that any proposal is for foul only flows connecting to the public sewer. There is wastewater infrastructure that passes through these sites and therefore it will be important that any applicant clearly establishes a detailed constraints plan to inform any development layouts.</p>	<p>Updated drainage information submitted by agent for site (including discussions with United Utilities) assessed as part of the site selection process in the Bollington Settlement Report [ED 24].</p>
<p>There are drainage issues with large drainage pipes/culverts under the sites and United Utilities have stated that they would prefer development to take place on other sites.</p>	
<p>There is persistent local flooding on the north east side adjacent to Springbank</p>	
<p>Object strongly to the proposal by Cheshire East Council (CEC) to take the parcels of land identified as BOL 1,2,3,4 out of the green belt as shown in the Sites Allocation Development Policies Document. This plan does not clearly state exceptional circumstances for the use</p>	<p>The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] , the LSCs safeguarded land distribution report [ED 53] and the</p>

<p>of green belt and has not adequately evidenced nor justified these proposed alterations with their supporting documents</p>	<p>Bollington Settlement Report [ED 24].</p>
<p>The suitability assessments of the sites are flawed and inaccurate, not enough detail has been ascertained on the strains on the current infrastructure, including roads/schools/medical and the environmental/ecological issues.</p>	<p>Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07].</p>
<p>Green Belt reasons for objection:</p> <ul style="list-style-type: none"> • These sites act as a check for the urban sprawl of Bollington. • Prevent the distinct areas of Bollington from merging into each other. • Provide green areas within the urban confines of Bollington. • Provide green areas for recreation • The green belt as it is, promotes urban regeneration by the recycling of derelict urban land. • From previous documents, the sites are referred to as Sites BT11, and BT19, were assessed independently as having a significant contribution to the green belt. (CEC Green Belt Assessment 2015). • There is absolutely no case for release of Green Belt land for development. Any such release will lead to unacceptable overdevelopment and destruction of the amenities of the town. • Many more potential development sites were submitted for a number of the other Local Service Centres than for Bollington in the SADPD 'Call for Sites' exercise and other Local Service Centres have more lower grade Green Belt areas than Bollington. The required total of 3,500 houses can easily be found from other sites without any need to release Green belt at significant or major grading in Bollington. • No attempt appears to have made to look for alternative sites that have been proposed following the Call For Sites a year ago in other LSAs that have lower gradings of Green Belt allocated to them. 	<p>Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED24] using the methodology set out in the Site Selection Methodology Report [ED 07] which includes a green belt assessment.</p> <p>The approach to Bollington has also been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report and the LSCs safeguarded land distribution report [ED 53].</p>

<ul style="list-style-type: none"> The traffic light assessments to assess the level of Green Belt do not appear to place enough weighting on the landscape, environmental issues and therefore, health and well-being on the existing local population. 	
<p>Infrastructure concerns :</p> <ul style="list-style-type: none"> The infrastructure of Bollington has not been upgraded in respect of growth in the last 25 years. Bollington Cross and Dean Valley schools are heavily subscribed and additional dwellings will add pressure upon the schools and surrounding infrastructure. Including GP surgery. The Constraints to Development put the figure at ZERO, and there is no amount of other factors that can fit housing into an infrastructure and service provision that can take ZERO more new builds. Bollington's water system, for example is SINGLE pipe, not double; it is therefore already over used and should not be taking additional load. 	<p>Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07].</p> <p>The approach to Bollington has also been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report.</p>
<p>Housing figure for Bollington questioned /Housing Issues:</p> <ul style="list-style-type: none"> 400 houses seems to be an arbitrary figure that is not adequately derived by CEC in their discussions. The Spatial Distribution Disaggregation Report (FD05) is contradictory and contains errors. Statements are made, and numbers produced, without any method shown as to how they have been derived. The allocation of 400 dwellings in Bollington is overwhelmingly out of proportion when the density of population is considered. It is vital that you demonstrate a transparent review of the proposed allocations in other Local Service Centres that are less densely populated. (Bollington has the highest housing density of the Local Service Centres at 5.92 dwellings/hectare, whereas Prestbury has a housing density of 1.24 houses/hectare, Chelford 1.24 houses/hectare, and Alderley Edge 5.83 houses/hectare.) It should be noted that this site was included in the 2013 	<p>The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report ED 24].</p> <p>The site has been considered appropriate to identify as safeguarded land.</p>

SHLAA considerations and was ranked as unsuitable, not achievable and not developable though available

- Over the 8-year period of the Plan since 2010, sites have been found in Bollington for commitments of 318 houses, approximating 40 houses /year. There is a further 12 years to go in the Plan and other brownfield, windfall and infill sites are certain to come forward to meet the reasonable and appropriate development needs of the town.
- The allocation of 400 houses to Bollington is unfair and out of proportion to the proposed allocations for other Local Service Centres: In particular, it is ridiculous that Bollington should be allocated 400 houses and has already had to accept commitments of 318 houses 40% of the way through the Plan period when Prestbury has been allocated an overall total of 130 houses, Alderley Edge 250 houses, Chelford 235 houses and Disley 258 houses for the whole plan period.
- Serious deterioration of the town over the last 15 years brought about by rapid over-development.
- Justification for housing figure was based on the ONS population predictions which have since been revised downwards.
- The NP assessment of future needs has been revisited and now finds a figure of 350 houses more than adequate for future requirements, including allowance for an ageing population.
- Each of the six numerical options for calculating the division of 3,500 dwellings between the 13 Local Service Centres is flawed, and the seventh option adopted is completely arbitrary. Insufficient account is taken of constraints and previous history.
- No attempt whatever has been made in the SADPD part of the CEC Local Plan to assess the actual development needs of Bollington. The whole exercise is based on dividing up the allocation of 3,500 dwellings between the Local Service Centres without consideration of what is best for each of them.

<p>They have only considered sites submitted by owners/developers in the 'Call for Sites' and not tried to identify the most suitable places.</p> <ul style="list-style-type: none"> • There is no need for Bollington to accommodate additional housing, as evidenced by the considerable length of time existing properties take to sell, in some cases as much as several years. Whilst landowners will obviously wish to build it is not clear where the demand to purchase such houses will come from. I would also note that the substantial number of houses recently built in Bollington West but misallocated to Macclesfield's share would, if correctly attributed, meet the entirely arbitrary quota for Bollington without further permissions being required. That the council is not minded to correct this misallocation does not alter the fact that these houses have been built in Bollington. • If the arbitrary quota for housing is to be met it makes more sense to build where needed (closer to the areas, such as Stockport and Manchester, that they will ultimately serve). 	
<p>Highway issues :</p> <ul style="list-style-type: none"> • Safe road access to the sites is difficult and additional houses would make this worse. Particularly when exiting onto the single main road through Bollington. • Highways access to both (Hall Hill) sites will significantly exacerbate already significant traffic problems. • The addition of 40 houses with say 2 cars/house exiting onto the main B5090 road with restricted sight lines on a bend will exacerbate traffic safety and congestion • The main arterial road is lined throughout with houses that do not have facilities for parking. This leads to the necessity for house owners to park on the main road and this combined with the increasing numbers of cars travelling through the town is leading to localised congestion and pollution particularly affecting those that live in the immediate vicinity. • Need for new roads as well as houses 	<p>Highway issues are considered as part of the site selection methodology and are considered in the Bollington Settlement Report [ED 24].</p>

<ul style="list-style-type: none"> • In addition, there is only footpath on one side of the main Bollington road at this point, access for school children walking to Tytherington School is required, as part of the local transport strategy. This has not been considered alongside the increase in traffic flow through Bollington putting extra risk on those children walking to school. • More traffic dangerous for cyclists 	
<p>Brownfield sites:</p> <ul style="list-style-type: none"> • Within the Local Plan period 2010-2030 Bollington has built more dwellings than required, and any future housing needs can be met from brownfield sites, as indicated in the Bollington Neighbourhood Plan. Have the right density of housing @ circa 6 per hectare. • Within the next decade, brownfield sites will become available, should there be a rational and appropriate need for development in Bollington. • BC Transport Site: In the next few years, the BC Transport site is rumoured to becoming available for redevelopment. Certainly local discussions have taken place, and the council have been involved, yet this has failed to be taken into account. This site could link up with other sites and provide a regeneration corridor through Bollington. (Brownfield development should come before greenbelt!) • Use derelict buildings • The SADPD should consider other sites that have not been submitted by developers and interested parties that do not encroach on greenbelt. For example, what is happening to the site of St John's Church on Church Street? There are surely other brown field sites in Bollington that can be utilised. 	<p>The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24]. The BC Transport Site is discussed in the Bollington Settlement Report [ED 24].</p>
<p>Ecology/Environment:</p> <ul style="list-style-type: none"> • In the survey by Cheshire Wild Life Trust for the Neighbourhood Plan, the whole of the site was assessed as being a wild life corridor and having medium habitat 	<p>Ecology issues are considered as part of the site selection methodology and are considered in the Bollington Settlement Report [ED 24]. Only 1.4 ha (the southern part of the site) has been considered</p>

distinctiveness with high distinctiveness in the northern part. Ecologically rich.

- Migration to and from Hall Hill to the Lowerhouse Pool area of hundreds of frogs and toads. Should building be carried out their habitat would be lost. In addition, there are many bats who feed on the insects around Hall Hill. We cannot afford to lose any more of the animals and invertebrates that inhabit our town. I wonder if a survey of the flora and fauna on Hall Hill has been carried out?
- Is one of Bollington's precious green lungs of which there is a deficit.
- Separates Bollington Cross from Bollington and Lowerhouse wish to retain land as part of its historic value.
- The proposed development would result in the unnecessary destruction of hundreds of large mature trees together with the associated wildlife habitat. The removal of the trees would also have a significant effect on the visual attractiveness of the surrounding area
- It is important to note that nightingales are regular summer visitors to the Hall Hill site.
- The site supports priority habitats and semi-natural habitats of medium distinctiveness. Any proposals to develop this site must be accompanied by a detailed ecological appraisal undertaken at the appropriate time of year. In line with Local Plan Policy SE3 and national planning guidance (as set out in the NPPF 2018) the areas of priority habitat should be retained, enhanced and buffered.(CWT)
- A biodiversity net gain assessment for the proposed development should be undertaken (NPPF 174b and 175d) and the residual impacts should be calculated, including any indirect impacts. We advise that due to the presence of extensive areas of semi-natural habitat the overall impact is likely to be substantial and it is unlikely that this could be mitigated/compensated for on site. Off site provision will

appropriate to identify as safeguarded land.

As the northern woodland area is priority woodland habitat any future development principles would need to retain and protect this area of woodland (remains outside the safeguarded land) and this area would need to be enhanced as open space with appropriate management of the woodland. Ecological net gain would be assessed as part of any future development management process.

<p>probably be required to ensure net gain for biodiversity in line with the relevant planning policies and published guidance (Local Plan policy SE3, NPPF paragraphs 118a, 170d, 174b, 175d, 25 Year Plan for the Environment Chapter 1, policy 1 - Michael Gove 2018, Nerc Act 2006). (CWT)</p>	
<p>Contamination:</p> <ul style="list-style-type: none"> • The site is heavily contaminated with chemicals and rusting drums from its previous use for tipping by Bollington Print Works up to about 1980. • During a local Bollington meeting, it was stated that metal drums were stacked 50 drums high on top of each other. These containers include contaminants arsenic, cadmium, and other inks containing a multitude of toxic heavy metals. Residents remember witnessing the dumping of pipe lagging which was contaminated with asbestos. • Suggest cyanide among the contaminants • A stream leaches toxic waste from the higher Henshall Lane site to the lower Ashbrook road site. • Contaminated land issue – will affect insurance and ability to get mortgages • Concerned that disturbance of the ground for new house building will adversely affect existing neighbouring residences. • If extensive restoration required will affect costs and sale of properties so may be fewer affordable homes plus remediation works will result in increased traffic movements 	<p>Contamination issues are considered as part of the site selection methodology and in the Bollington Settlement Report [ED 24].</p>
<p>Bollington has made a Neighbourhood Plan, which has been accepted in a local referendum by a substantial majority. Within the plan, over 90% of the people who responded from Bollington have stated categorically that they don't want the green belt to be built upon.</p>	<p>Made Neighbourhood Plans are part of the Development Plan. The Plan is referenced in the Bollington Settlement Report [ED 24].</p>
<p>No account is taken of the Neighbourhood Plan findings concerning this piece of land as a separator between the historic communities of Bollington Cross, Bollington and Lowerhouse or of the results of the Questionnaire in which over 70% of respondents considered it very</p>	

important, important or were neutral that this site was an important open space and over 65% of respondents disagreed strongly, disagreed or were neutral that development should be permitted on this area.	
Neighbourhood Plan ignored.	
<p>The CEC Plan is in conflict with the Bollington NP Policies in the following sections :</p> <ul style="list-style-type: none"> • VI, Community Attributes • HO.P1, HO. P2, HO.P3, HO.P4, New dwellings, Housing Location/allocation, Housing type and design • EGB.P1, Released Green Belt • NE.P1,NE.P2 Natural environment and • MA.P1 Moving around. 	
It should be noted that a public meeting was held at Bollington Cross School May 2016 at which the owner's agent presented plans for developing this site with 36 bungalows. The meeting was attended by about 80 persons and there was total opposition to the proposals by those present.	Noted
The natural boundary for any useable part of this site (for community or other use) is a line between the corner of the Hall Hill housing estate and the southern side of the turning head at the end of Springbank at No. 28 Springbank. The strip of land between the site and Springbank is privately owned and there is no possibility of access to this site from Springbank.	Noted. Highways access for the site could be created off Henshall Road.
It also appears to be highly likely that a further "landgrab" of site CFS352 from existing Green Belt would be initiated in the future since it forms part of the same overall green area.	The revised publication draft SADPD is supported by a detailed site selection methodology including consideration of Green Belt matters [ED 07]. The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report.
Please withdraw the CEC proposals for green belt alterations in Bollington.	
Re-instate the railway	Noted

On the issue of lowering our carbon footprint: in order to meet our climate targets we should not be building new fossil-fuel dependent housing. We should be looking for conversions of existing structures and use of brownfield. Any new build should be geared to renewable energies and sustainable build designs.	There are policies in the Local Plan regarding climate change adaptation and design.
Against green belt development - Bollington is on the edge of the peak district and has a large number of visitors to the village who enjoy the fact it is a characterful village with green spaces within it and around it to enjoy.	The approach to Bollington has been considered in the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07]] and the Bollington Settlement Report [ED 24].
Support - agree that the Henshall Road site (561) should be developed. Over the last twenty or thirty years, this site has become overgrown and is now something of an eyesore. The current owner has, perhaps deliberately, let the site deteriorate, and building houses on it would improve the environment. As a quid pro quo for the windfall of his land being approved as building land, the owner should be required to restore site 352, rebuild the wall running down Moss Brow, and donate the land to Bollington.	Support noted. The site has been considered appropriate to identify as safeguarded land.

Site BOL 2 ‘Land at Greg Avenue/Ashbrook Road’

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
See BOL 1 for general points regarding green belt, infrastructure, housing figures etc.	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
The junction of Ashbrook Road and Henshall Road is highly dangerous and any additional traffic on Ashbrook Road would aggravate both this and the junctions with Springbank and West Close.	Updated highways information has been considered in the Bollington Settlement Report ED 24]. This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.

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<p>The natural boundary for any useable part of this site (for community or other use) is a line between the corners of the Greg Avenue and Springbank housing estates. The wooded close to the west of this line is part of a wild life corridor having medium habitat distinctiveness with some high distinctiveness. Animals such as badgers, foxes and bats are frequently seen in the area.</p>	<p>Ecology considered as part of the site selection methodology and has been considered in the Bollington Settlement Report [ED 24]. This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
<p>The wild life on this green field site is more diverse than the Middlewood Way. Distinctive wet and dry grassland creates micro habitats. Insect life is prolific including, elephant hawk moths, cinnabar moths, six spotted burnetts, small blues, to name just a few. Mammals and bird life is thriving - nightingales, wood peckers, tree creepers, nut hatches, Cliff chaffs, red kites, sparrow hawks, peregrines, buzzards and tawny owls thrive. The ecosystem this space creates is significant and adds to the nature corridors which support wildlife. A healthy population of amphibians exist in the wet parts of the field.</p>	
<p>Many residents use this field for recreation and have done for years. The green spaces in Bollington are short of the governments recommended allowance.</p>	<p>Noted</p>
<p>The proposed site will require access via Ashbrook Rd, this road is already beset by parking problems from residents' cars. The decision to site the Veterinary Services in Ashbrook road has worsened the situation. In the evenings a number of cars from residents of Henshall Road (a main road on which they choose not to park) further accentuate the problem. Access for emergency vehicles would be severely limited by this parking. At times it can prove difficult to get a car through the parked cars.</p>	<p>Updated highways information has been considered in the Bollington Settlement Report [ED 24]. This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p> <p>Highway concerns are important in the site selection process as certain sites will obviously have more suitable access than others.</p>
<p>This site has very restrictive access particularly the Ashbrook Road end. When Ashbrook Road was developed the developers built driveways which are so steep cars are unable to park safely. Cars become a danger to pedestrians as vehicles slip down these slopes very easily. Therefore the only option available is parking on the road. When cars are parked upon both sides of the bottom part of the road it leaves half a cars gap in-between. This is prohibitive to accessing the</p>	

<p>said site.</p>	
<p>Resident suggests that the fire station have also suggested that Greg Avenue would be a problem with access for them.</p>	
<p>It is noted that Ashbrook Avenue is rated as Amber in the CFS352a allocation and acknowledged as narrow. On this basis, it is again surprising that the same access is given a Green rating for this site. The use of Ashbrook Avenue would be extremely problematic for refuse and emergency vehicle access. A turning head would need to be provided which would have a significant impact upon the developable land within the site. Due to the length of Ashbrook Avenue and its potential to be blocked by on-street parking, a further emergency access should be provided via Greg Avenue but this is presumably subject to third party land constraints. It is considered that a more suitable rating for this site would be 'Amber'.</p>	
<p>Traffic again a problem whether via Ashbrook Road or Greg Avenue. I ask you again more traffic on a narrow road with 2 schools, one nursery, a fire station, a mill and a tip at the bottom. This is lunacy from a safety point.</p>	<p>Updated highways information has been considered in the Bollington Settlement Report [ED 24]. This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
<p>Drainage - parts of Ashbrook Road already suffer from major problems requiring many call outs to suppliers to attend and rectify the problems. To add further housing on to the end of this sewage/water system would cause further more serious problems.</p>	<p>Updated drainage information has been considered in the Bollington Settlement Report [ED 24]. The cumulative impact of drainage concerns has been reflected in the site selection process.</p>
<p>Again highly unsuitable for building with bogs springs and lots of sinking mud.</p>	<p>This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
<p>Underground stream</p>	
<p>The water courses run across the site originating from the old tip. Contaminates of organic and inorganic chemicals will have seeped into the Ashbrook Road site over many years. Residents playing in the tip when open have highlighted the chemicals they saw being dumped. Arsenic, printing inks, millpond waste from Shrigley Dyers and asbestos stripped from the pipes of mills in Bollington. Late night</p>	<p>Contamination issues considered as part of the site selection methodology and have been considered in the Bollington Settlement Report [ED 24].</p>

unregulated dumping of chemical waste happened regularly.	
Metal drums were piled fifty high, containing contaminates which will be eroding and leaching its poisonous cocktail downhill towards the Ashbrook site.	
In the past the developer has had the site tested for methane release which we believe presented him with serious difficulties historically.	
Flooding regularly happens at the bottom end of Ashbrook road as the culvert and drainage systems have caused the utilities endless problems.	Updated drainage information has been considered in the Bollington Settlement Report [ED 24]. This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.
A school is situated close to this site excavating the land would pose a serious health risk to children.	Contamination issues considered as part of the site selection methodology and have been considered in the Bollington Settlement Report [ED 24].
Other brownfield sites must be developed before green-belt sites are built upon - Macclesfield has such areas in its town centre that must be used first before the Green Belt is used for housing	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].

Site BOL 3 'Land at Oak Lane/Greenfield Road'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of main issues raised:	How the main issues have been taken into account
see BOL 1 for general points	
This site has been the subject of repeated pressure from the owner for release from the Green Belt for some years. This has been resisted on the principle that it lies in the Green Belt. In the traffic light assessment, item 16 (Greenfield) is ranked red, items 2, 6, 11 and 13 are ranked amber and all other items green. There is considerable	All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07]

doubt about suitable access to this site and opposition from local residents to the potential additional congestion that would be caused on Greenfield Road	<p>which includes a green belt assessment.</p> <p>Updated highways information has been considered in the Bollington Settlement Report [ED 24].</p> <p>The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report.</p> <p>This site has been considered appropriate to identify as safeguarded land.</p>
Possible sighting of Great Crested Newt that requires investigation	Ecology considered as part of the site selection methodology and has been considered in the Bollington Settlement Report [ED 24].
Suggestion that there is an old mine under the site and no right of access	Minerals, contamination and highways are considered as part of the site selection methodology and have been considered in the Bollington Settlement Report [ED 24].
Greenfield Road is very narrow with parked cars therefore difficult to navigate – more housing will exacerbate traffic problems	Updated highways information has been considered in the Bollington Settlement Report [ED 24].
Severe ecological and environmental impact	Ecology considered as part of the site selection methodology and has been considered in the Bollington Settlement Report [ED 24].
Response from owners of land that may be required to facilitate access: “The purpose of this letter is to bring to your attention that we are the owners of the land that will be required for access and potentially also for drainage, and that we have not been approached or consulted in any way by the promotor and specifically we did not consent to this land being included in any response to the call for sites. That said, we can confirm that if the site does receive an allocation and come forward for residential development we may reluctantly, and subject to contract, allow our land to be included.”	Comment noted
Previous refusals for permission	All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the
Loss of green lung land/open space	
Increased traffic – affects those walking children to school or walking to work	

Overdevelopment of site	<p>methodology set out in the Site Selection Methodology Report [ED 07].</p> <p>The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report.</p> <p>This site has been considered appropriate to identify as safeguarded land.</p>
Overlooking for surrounding properties	
Why change a lovely bridle track down to the canal which horse riders use and walkers and runners	
How can you accommodate the houses and retain boundary trees and hedges and widen track	
If houses must be built is not possible to build fewer and at the very least include a small play area for the local children to enjoy, safe in the knowledge they won't get run over? A couple of swings, a slide and a roundabout are all that would be required, as a minimum, and that could easily be installed within the boundary of a small house. This would benefit the local area for years to come	<p>All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07].</p> <p>The site has been considered appropriate to identify as safeguarded land.</p>
Will any widening of the track incur into the "preservation area" of Kerridge?	<p>All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07]. Updated highways information has been considered in the Bollington Settlement Report [ED 24].</p> <p>The site has been considered appropriate to identify as safeguarded land.</p>
Land has a Kerridge address and should not qualify to meeting Bollington's needs	
<p>This comment rebuts the Traffic Light Assessment score issued for Highways Access for Site BOL 3:</p> <p>The limitations of access to this plot are acknowledged in the Traffic Light Assessment but I would rate these as more severe than the 'Amber' score given in the assessment. There is an existing 'pinch point' at the junction with Greenfield Drive adjacent to no. 37 which prevents two cars passing or the required forward visibility to form safe access. The 'pinch point' is approximately 3.7m wide which is insufficient for two cars to pass (as outlined in Manual for Streets page 79). To provide the required forward visibility and widening discussed above would either require third party land through the acquisition of part of the driveway to no. 37 Greenfield Road, or further incursion into greenbelt land. Both of these are unlikely to be achievable and on</p>	

<p>this basis I would suggest a more appropriate score for highways access would be 'Red'.</p>	
<p>Support for allocation of site from owner for the following reasons:</p> <ul style="list-style-type: none"> • Logical infill and rounding off opportunity; fills in gap and rounds off settlement • Site surrounded on three sides by existing built development and settlement boundaries • Long history regarding possible release of site – considered for release in 1994 • Defensible green belt boundary would be established along the track • Site in no beneficial use • 2013 Town Council response to Core Strategy Consultation: “This small piece of land is an anomaly, it is neglected and overgrown and an eyesore as well as a neighbourhood nuisance. The site does not act as a green lung or a public open space and appears in the SHLAA reference for possible development from year 6-10. The Town Council’s view is that it could be taken out of the Green Belt without affecting its integrity and developed much sooner than that.” • Owner confirms that site benefits from access rights via Greenfield Road 	<p>Support noted; information welcomed - particularly access rights information and previous support from Town Council.</p> <p>The site has been considered appropriate to identify as safeguarded land.</p>

Site BOL 4 ‘Land to the east of 41a Shrigley Road’

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
<p>see BOL 1 for general comments</p>	
<p>The site behind 41a Shrigley Road lies in the Peak Park Fringe and was assessed in the Arup Green Belt Review as part of parcel BT01 and graded as making a major contribution to the Green Belt. It is</p>	<p>The revised publication draft SADPD is supported by a detailed site selection methodology including consideration of Green Belt matters [ED 07]. The Council’s approach to the need (or otherwise) to make</p>

<p>unacceptable that CEC should seek to peel off a part of a site assessed by independent consultants and revise the grading downwards to suit an unjustified housing allocation. This site is at the northern end of Bollington and any development here will lead to increased traffic flow through the length of the Town.</p>	<p>allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. Updated highways information has been considered in the Bollington Settlement Report [ED 24]. This site has not been identified as safeguarded land in the revised publication draft SADPD and as such remains in the green belt.</p>
<p>The traffic problems along Shrigley Road are huge, with heavy lorries trying to pass parked cars. Building more housing at 41A Shrigley Road would make the problem much worse, with an exit road from the site needed to join Shrigley Rd. In particular, the proposed site to the rear of 41a Shrigley Road (15 dwellings) will exacerbate an already congested parking situation on Shrigley Road. Presently parking extends as far as the former abattoir site effectively rendering a significant length of Shrigley Road as a single track. The addition of 15 dwellings is likely to further increase the number of vehicles that are parked on the road taking into account the vehicles per property in addition to visitor's vehicles. This potentially would encourage parking on both sides of the road and inevitable encroachment onto the pavement. This is currently evident on Shrigley Road outside properties 9 to 15 up to the post box.</p>	<p>Updated highways information has been considered in the Bollington Settlement Report [ED 24]. This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
<p>The land was for many years a hen farm & flower farm & has recently been used to graze sheep and chickens; the Valley sweeps down from Charles Head, via the Harrop Valley and on into Bollington - Imagine this with a block of 15 houses stuck in the centre of it; would be sorry to see our lovely countryside spoilt</p>	<p>The impact on the landscape has been considered in the Bollington Settlement Report [ED 24].</p>
<p>The drains are ancient and probably inadequate.</p>	<p>Updated drainage information has been considered in the Bollington Settlement Report [ED 24].</p>
<p>Concerns regarding removal of additional sewerage and surface water. In periods of moderate rainfall the sewer in Shrigley Road is severely stressed resulting in heavy water flows down the road gutters. Concern with respect to development of more dwellings up Shrigley Road is the aspect of water removal by a sewer which is clearly inadequate for current flow rates without any loading from additional property development.</p>	<p>This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>

<p>The development behind 41a Shrigley Road makes inroads into an area identified some years ago as prime green belt and the protection of it, along with other green belt, was included in the Bollington Local Plan, subsequently accepted/adopted by CEC</p>	<p>All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07] which includes a green belt assessment.</p> <p>This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
<p>This is not a case of rounding off the Green Belt boundary where there is existing development on 3 sides of the land - this proposed development has heritage-style houses to the west side, a Listed Building to the south, and open countryside to the north and east. The proposed development would actually produce a spur of housing jutting out into the Green Belt which would be particularly visible from Shrigley Road. There would be no natural boundary to the north, and it would open up the way for further development of the remainder of BT01 in another "rounding-up" exercise.</p>	
<p>This area of Bollington (like the rest of it) has a chronic parking problem and most house-holders in Shrigley Road are forced to park up the road in a line as far as the old abattoir. At peak travel times and during waste-collections, the resulting single lane working with almost no passing places can lead to severe congestion and long delays - often drivers resort to mounting and running along the pavement to pass each other. Another 30 more cars commuting through Bollington to the main road will not help.</p>	<p>Updated highways information has been considered in the Bollington Settlement Report [ED 24].</p>
<p>This would be very much a "Backland Development" subject to Housing Policy HOU 8 and 10 which calls amongst other things for sympathetic development with the existing surroundings - this is unlikely be achieved: a) the existing dwellings would lose a great deal of their privacy, light and outlook, b) there would be an increase in "human noise-pollution" at the back of the dwellings, c) the look of the new dwellings is unlikely to blend in effectively with the existing styles and the Old Vicarage.</p>	<p>All Bollington sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07].</p> <p>This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
<p>Prominent site – will take many years for trees to screen site.</p>	
<p>Increase in hardstanding and reduction of natural habitats</p>	
<p>Design – need to be in keeping with traditional Bollington style</p>	

<p>The service infrastructure in Bollington dates back up to 200 years adding more stress to this will merely cause further breakdowns, note water pipes bursting several times in last few years on corner of Church Street and Ingersley Vale and the emergency work about to start on Palmerston Street amongst others</p>	
<p>The site is essential for local wildlife with owls, foxes, badgers, squirrels, hares and bats regularly seen in the area in question</p>	
<p>Conservation Area will be impacted by the development; re-enforcement of wire fencing insufficient to mitigate impact</p>	
<p>The area of this site is included as significant ecologically in the Bollington Neighbourhood Plan.</p>	
<p>This comment rebuts the Traffic Light Assessment score issued for Highways Access for Site BOL 4 in the supporting documentation.</p> <ul style="list-style-type: none"> • The rating of 'Green' for highways and access in this location is considered to be overly optimistic. • May be reliant on third party ownership • Visibility splays of 2.4m x 43m (in accordance with Manual for Streets) - would be required from the site access point. In the southbound direction it is likely that vehicle speeds will exceed this as they travel on a downhill gradient and the 43m distance may need to be increased. • Parking restrictions may be needed • On the above basis, we would consider that 'access would be difficult to achieve' would be a more accurate description and on this basis it should be awarded a 'Red' score 	<p>Updated highways information has been considered in the Bollington Settlement Report [ED 24].</p>
<p>The pavement needs improving to be safe, especially if more starter homes for young families are to be built on the site - which I certainly think they should</p>	<p>Noted – see above</p>
<p>Concerns regarding conflict of traffic around the bus stop</p>	<p>Noted – see above</p>
<p>This site lies adjacent to a Local Wildlife Site designated for its species-rich grassland, deciduous woodland and the aquatic habitats</p>	<p>Ecology considered as part of the site selection methodology and has been considered in the Bollington Settlement Report [ED 24].</p>

<p>associated with Sowcar brook. Any proposals should ensure there are no indirect impacts on the Local Wildlife Site. These may include light pollution, invasive species introduction (via the disposal of garden waste), polluted ground water run-off, or predation by domestic pets. We advise that to reduce the indirect impacts a buffer zone of at least 15m is required. A biodiversity net gain assessment for the proposed development should be undertaken (NPPF 174b and 175d) and the residual impacts should be calculated, including any indirect impacts. Any residual impacts following mitigation will need to be addressed so that biodiversity net gain is achieved in line with local and national planning policies (NPPF 118a, 170d, 174b, 175d, Local Plan policy SE3, 25 Year Plan for the Environment Chapter 1, policy 1, Nerc Act 2006). (CWT)</p>	<p>This site has not been identified as safeguarded land at the revised publication draft SADPD stage and as such remains in the green belt.</p>
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Bunbury (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>The proposed settlement boundary should be amended to include Bunbury Heath</p>	<p>Bunbury Heath largely consists of an area of ribbon development along Whitchurch Road (A49) and separated from the majority of the village by several fields. Including Bunbury Heath would therefore require a considerable and unnecessary change amendment to the existing settlement boundary. The revised settlement boundary is set out in the Bunbury Settlement Report [ED 42].</p>
<p>Given Bunbury's limited services, provision of 110 dwellings is too high. This should be a maximum of 60, with the remaining allotted to Shavington.</p>	<p>See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
<p>The following sites should not be included within the proposed settlement boundary:</p> <ul style="list-style-type: none"> • Bunbury Playing Fields • paddock between the extant permissions at Land off, Hill Close, and no.6 Bunbury Lane 	<p>These sites have been removed from the settlement boundary as requested.</p>
<p>Several sites have been put forward for consideration:</p>	<p>No allocations are considered necessary at the Local Service Centre</p>

<ul style="list-style-type: none"> land to the south of Bunbury land adjacent to Wyche House 	<p>tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
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Chelford (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Additional information submitted for site CFS 342 (Mere Hills Farm) including a response to the Council's Green Belt Site Assessment</p>	<p>Additional information has been considered in the production of a revised settlement report for Chelford (ref ED 26).</p>
<p>Chelford has already received its quota of new homes No justification for the overall numbers allocated to Chelford. Levels of development proposed do not fit with the vision for a local service centre – 'modest increase' Chelford's current planned total of housing, represents a 36% increase in housing stock and population, which will rise to 40% should the proposed site off Knutsford Road go ahead.</p>	<p>The provision of housing and employment land and the approach to spatial distribution [ED 05] report has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Chelford. However there is a requirement to identify areas of safeguarded land. The approach to the LSC distribution of safeguarded land is set out in document [ED 53] and the identification of safeguarded land has taken place in the Chelford settlement report [ED 26].</p>
<p>Dissatisfaction with approach to safeguarded land in relation to the following matters:-</p> <ul style="list-style-type: none"> Approach to reallocating Bollington's safeguarded land requirements to Chelford Level of safeguarded land allocated has no relationship to the future needs of Chelford Approach is not reflective of the 'hybrid option' in the spatial distribution report Selection of safeguarded land site (CFD 2) on basis of location, scale, loss of Green Belt land and highways impacts 	<p>The provision of housing and employment land and the approach to spatial distribution [ED 05] report has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Chelford. However there is a requirement to identify areas of safeguarded land. The approach to the LSC distribution of safeguarded land is set out in document [ED 53] and the identification of safeguarded land has taken place in the Chelford settlement report [ED 26].</p>
<p>Decision making is neither objective nor justified in the evidence. Examples include the weight attributed to the Red/Amber/Green ratings applied to sites and other relevant factors that influenced decision making.</p>	<p>The Chelford Settlement Report [ED 26] sets out the approach to site selection and has considered relevant availability, achievability and suitability factors in coming to a position on the identification of safeguarded land included in the SADPD.</p>
<p>Chelford does not have the relevant services to cope with an increase</p>	<p>The LSC safeguarded land distribution report [ED 53] has considered</p>

in population	a number of relevant planning factors across all of the local service centres to determine a proposed level of safeguarded land at Chelford.
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Site CFD 1 ‘Land off Knutsford Road’

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 ‘Green Belt and safeguarded land boundaries’.

Summary of main issues raised:	How the main issues have been taken into account
Site promoter has provided further information regarding site CFD 1	Additional information has been considered in the production of a revised settlement report for Chelford (ref ED 26).
Land should remain as car parking alongside the bowling green & local shops used by the community	This site has been considered appropriate to identify as an area of safeguarded land following evidence contained in the Chelford settlement report [ED 26] and the LSC safeguarded land distribution report [ED 53]
Object to the development of the site, as it is in Green Belt Limited difference, in Green Belt terms, from site CFD 1 and CFS 342 at Mere Hills Farm	The settlement report for Chelford [ED 26] has considered Green Belt considerations in an iterative way in line with the site selection methodology [ED 07]. The settlement report includes Green Belt site assessments alongside all other relevant considerations and clearly sets out conclusions and justification for sites proposed to be identified as an area of safeguarded land in the SADPD.
Pressure on local surgery and cumulative impact on traffic and general infrastructure	These points have been considered and included within the Chelford settlement report [ED 26]. Site CFD 1 is considered appropriate to identify as an area of safeguarded land following evidence contained in the Chelford settlement report [ED 26] and the approach to the LSC safeguarded land distribution report [ED 53].

Safeguarded land CFD 2 ‘Land east of Chelford Railway Station’

This First Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 ‘Green Belt and safeguarded land boundaries’.

Summary of main issues raised:	How the main issues have been taken into account
Further information has been provided by the site promotor	Additional information has been considered in the production of a revised settlement report for Chelford (ref ED 26).
7.8 hectares and the loss of Green Belt land is excessive	Site CFD 2 is considered appropriate to identify as an area of safeguarded land (for 4.63 ha) following evidence contained in the Chelford settlement report [ED 26] and the LSC safeguarded land distribution report [ED 53].
Site specific considerations:- <ul style="list-style-type: none"> • Highway impacts • Loss of agricultural land • Impact on local infrastructure and services • Impact on settlement character and urban form 	The Chelford Settlement Report [ED 26] sets out the approach to site selection, in line with the site selection methodology [ED 07] and has considered relevant availability, achievability and suitability factors (including matters such as highways, agricultural land and impact on settlement character and form) in coming to a position on the sites identified as safeguarded land in the SADPD[ED 01]. Stage 6 of the site selection process includes engagement with statutory consultees and infrastructure providers and the outcomes of this is documented in the Chelford Settlement Report [ED 26].
Large scale development in Chelford will increase out commuting and will turn into a dormitory village. The majority of out commuting does not occur via public transport but by private car.	The approach to the LSC safeguarded land distribution report [ED 53] has considered a number of relevant planning factors across all of the LSCs. The Chelford Settlement Report [ED 26] has considered the approach to the identification of sites at Chelford as areas proposed as safeguarded land in the SADPD.
Suggestion that linkages could be made to the main settlement areas through a railway line crossing would place a large cost on development. The land east of the railway line has no access to main sewers.	Site CFD 2 ‘land east of Chelford Railway station’ is proposed as an area of safeguarded land. The site may be required in future reviews of the local plan to meet identified development needs at that time..

The decision to add additional land in Chelford as safeguarded because of a loss of such sites in Bollington bears little resemblance to objectivity.	The LSC safeguarded land distribution report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the LSCs in the northern part of the borough
The distinction between major and significant contributions to green belt is unclear and made all the more confusing by the everyday definition of significant which suggests having a major effect.	Definitions of 'major' and 'significant' are consistent with the terms used in the Green Belt Assessment Update (2015) which supported the Local Plan Strategy.

Disley (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Several sites put forward for consideration: <ul style="list-style-type: none"> Bentside Farm Parcel A (part of CFS 112) Bentside Farm Parcel B (part of CFS 113) Lymewood Drive (CFS 275 plus possible extra land) 	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Disley Settlement Report [ED 29].
Brownfield sites should be considered.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
The air quality at Redhouse Lane / A6 junction is already unacceptable. A bypass or tunnel is needed to address pollution levels in Disley centre.	Air quality issues are considered through the Disley Settlement Report [ED 29]. In addition, any proposals would be subject to Revised Publication Draft SADPD policy ENV 12 'Air quality'.
Local schools are over capacity. Nurseries, doctors and dentists are all full.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.
With the new road links and employment opportunities at Manchester Airport the demand for housing in Disley will go up.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for

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	additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
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Site DIS 1 ‘Greystones Allotments’

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
A replacement site for the allotments would have to be in the Green Belt. There are other sites in the Green Belt that are preferable in terms of access to services and facilities. The replacement sites identified by the parish council all make a major contribution to the Green Belt and one is not nearby	The provision of allotments is not an inappropriate use in the Green Belt and the parish council has identified potential replacement sites nearby. However, this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The parish council has stated that there is no guarantee that the site will actually be developed.	Disley Parish Council is the landowner. It has confirmed (in statements dated and a letter dated) that the site would be made available for development during the plan period. However, this site is not proposed for inclusion in the Revised Publication Draft SADPD.
There are other sites available in more sustainable locations.	This has been considered through the Sustainability Appraisal [ED 02] and the Disley Settlement Report [ED 29].
The site is constrained by traffic and railway noise as well as air quality.	These issues are considered through the Disley Settlement Report [ED 29].
Replacement allotments would have an impact on plot holders; soil quality should be considered; plot holders should be consulted about the replacement. There is no problem with drainage or parking for the allotments at this site.	This site is not proposed for inclusion in the Revised Publication Draft SADPD.

Safeguarded land DIS 2 'Cloughside Farm'

This First Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Release of Green Belt would set a precedent for more Green Belt land to be developed in Disley and beyond.	Green Belt boundaries can only be altered in exceptional circumstances through the preparation or updating of plans. The identification of safeguarded land is intended to make sure that Green Belt boundaries endure in the longer term.
Concerns over access is difficult; highways impacts; pedestrian safety; traffic congestion; flooding and drainage; ecology; and landscape.	These issues are considered through the assessments in the Disley Settlement Report [ED 29]. Following consideration of all the issues, this site has been removed from the plan.
The air quality at Redhouse Lane / A6 junction is already unacceptable (AQMA) and more houses would make this worse as well as the new A6-Manchester Airport road.	Air quality is considered through the assessments in the Disley Settlement Report [ED 29].
Local schools are over capacity. Nurseries, doctors and dentists are all full.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees have been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.
The land is in agricultural use.	Agricultural land quality is considered in the Disley Settlement Report [ED 29].
There are other sites available which are more accessible to the services and facilities in Disley.	An accessibility assessment has been completed in the Sustainability Appraisal [ED 02] and considered in the Disley Settlement Report [ED 29].
The canal forms a current defensible Green Belt boundary.	Green Belt issues are considered in the Disley Settlement Report [ED 29].
Impacts on White Cottage which is a listed building.	Heritage impacts are considered in the Heritage Impact Assessments [ED 48] and the Disley Settlement Report [ED 29].

Goostrey (general issues)

Summary of main issues raised:	How the main issues have been taken into account
One site put forward for consideration: Land adjacent to 51 Main Road (6 dwellings) - CFS 296	All Goostrey sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered in the 'Goostrey Settlement Report' [ED 30] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
There is an absence of evidence on the impact that further development would have on Jodrell Bank Observatory across the whole of the consultation zone.	The importance of Jodrell Bank Observatory was considered through the LSCSDDR [PUB 05]. The Council is looking to produce a Supplementary Planning Document that provides further guidance on LPS Policy SE 14 'Jodrell Bank'.
Goostrey should have further development to accord with the Local Plan Strategy and the Framework.	As stated in ¶8.34 of the LPS it is anticipated that Goostrey's development needs will be largely provided for in Holmes Chapel; there was not a separate development figure for Goostrey outlined in the LPS. The approach to Goostrey is considered in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the Goostrey Settlement Report [ED 30].
The population figure was queried.	A footnote has been added to 'Goostrey Settlement Report' [ED 30] to clarify the area to which the population figure relates.

Haslington (general issues)

Summary of main issues raised:	How the main issues have been taken into account
Land east of Slaughter Hill should be considered for allocation (CFS195) to meet the requirement for Haslington.	The site has been considered and included in stages 1 & 2 of the site selection methodology as documented in the settlement report for Haslington [ED 32]. The settlement report identifies (at stage 3 of the site selection methodology – decision point) that on the basis of the provision of housing and employment land and approach to spatial distribution' report [ED 05] that no allocations are required at Haslington in the SADPD.

Holmes Chapel (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land north and south of Middlewich Road (22ha mixed use inc 6.8ha residential, 10.9ha employment) –CFS 425 • Land east of Manor Lane (flexible use area – B1, B2, B8, C1, C2, C3, D1, D2) – part of CFS 108 and CFS 272 • Land at London Road (north of Recipharm) (brownfield, housing) • Land at London Road (north of Dunkirk Farm) (70 dwellings) – part of CFS 139, 140 and 257 • Land off Manor Lane (specialist homes, 4.37ha) – CFS 428 • Land south of Middlewich Road (housing and employment, 49.3ha) – includes all of CFS 280 and CFS 421 and part of CFS 425 	<p>All Holmes Chapel sites submitted through the Call for Sites exercise, the First Draft SADPD consultation have been considered in the ‘Holmes Chapel Settlement Report’ [ED 33] using the methodology set out in the ‘Site Selection Methodology Report’ [ED 07].</p>
<p>The vision for Holmes Chapel is flawed and short-sighted as it allocates housing and employment land that has already been granted or is already a commitment. A significant proportion of the housing commitments for Holmes Chapel only benefit from outline permission.</p>	<p>The approach to Holmes Chapel has been considered through ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] and the ‘Holmes Chapel Settlement Report’ [ED 33].</p>
<p>Holmes Chapel has the capacity to grow, but the existing village centre has limited green space, is extremely short of parking facilities, and is heavily built up, so there is an acute need to expand in both an eastern and western direction to accommodate this growth.</p>	<p>The approach to Holmes Chapel has been considered through ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] and the ‘Holmes Chapel Settlement Report’ [ED 33]. The selection of sites has been considered through the ‘Holmes Chapel Settlement Report’ [ED 33].</p>
<p>An appropriate level of flexibility should be provided locally to meet housing need, to account for the realistic probability that not all existing planning commitments will come forward in the plan period.</p>	<p>The approach to housing supply flexibility is addressed in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05].</p>
<p>There should be no further significant development permitted in Holmes Chapel until a full appraisal of the Village’s current</p>	<p>Any planning applications will be determined on their merits and potential for infrastructure improvements will be considered.</p>

infrastructure and facilities has been undertaken and proposals for augmenting those, in line with projected additional demand, have been developed and agreed. The SADPD should enable the delivery of growth to Holmes Chapel and seek to safeguard land to address the fundamental concerns relating to the settlements' highways infrastructure, and other principal infrastructure concerns.	
Concerns that the expected pupil growth has not been considered correctly.	Education was consulted during the initial disaggregation and site selection process.
The community has identified development needs through the Neighbourhood Plan that will not be delivered by the committed and more limited forms of development in Holmes Chapel as provided for through the LPS and SADPD.	The approach to Holmes Chapel has been considered through 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Holmes Chapel Settlement Report' [ED 33]. The selection of sites has been considered through the 'Holmes Chapel Settlement Report' [ED 33]. Neighbourhood Plans are able to set development figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.

Site HCH 1 'Land east of London Road'

Summary of main issues raised:	How the main issues have been taken into account
Suggested policy wording amendment to criterion 4 to better reflect the Council's intention regarding cycling connectivity.	Amend point 4 to read: ' <u>provide not prejudice the Council's objectives to deliver</u> a cycling route on the A50, <u>which could link between</u> the site <u>and to</u> the village centre'
Concern that the approach taken in terms of site selection and proposed end-use constrains the scope of economic and employment growth that could otherwise be attracted to Holmes Chapel, and brings into question the responsiveness of the SADPD towards meeting identified employment needs.	The approach to Holmes Chapel has been considered through 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the Holmes Chapel Site Selection Report [ED 33]. The selection of sites has been considered through the 'Holmes Chapel Settlement Report' [ED 33].
It is unclear what area of the site would be needed by Recipharm for its expansion, and if and when any expansion would actually take place.	The area of the site needed for expansion is HCH 1, and the expansion of Recipharm is considered in the 'Holmes Chapel Settlement Report' [ED 33].

<p>The allocation simply responds to the needs of one particular industry. Workers living in Holmes Chapel, not employed in the pharmaceutical industry, will have no option other than to continue to travel greater distances out of Holmes Chapel to access job (as no other new jobs will be provided for). It will increase the reliance of Holmes Chapel on the pharmaceutical industry, effectively seeing the settlement evolve into a one industry settlement (if Recipharm were to expand).</p>	<p>There is a requirement for 380ha of employment land Borough-wide as stated in LPS Policy PG 1 'Overall Development Strategy'. There is no need to provide a mix for every LSC, or even KSC. The Local Plan (read as a whole) is considered to provide an extensive range and distribution of employment land.</p>
<p>The allocation should be extended to include the large field to the north east, otherwise a long term view is not taken about future employment land development requirements.</p>	<p>The site has been considered through the 'Holmes Chapel Settlement Report' [ED 33].</p>

Mobberley (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites submitted for consideration:</p> <ul style="list-style-type: none"> • Pavement Lane Mobberley • Land off Ilford Way Mobberley • Knutsford Road Mobberley • Ryecroft Lane, land south of Mobberley 	<p>Mobberley's safeguarded land requirements are set out in the Mobberley Settlement Report [ED 37], alongside the implementation of the site selection methodology for the village. The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
<p>The decision not to propose allocated sites for housing sites in Mobberley, based on the potential impact of aircraft noise, without presenting robust conclusions from an aircraft noise assessment, questions the soundness of the plan.</p>	<p>The revised publication draft SADPD is supported by an updated policy on aircraft noise (policy ENV 13). The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
<p>Site being prompted at Ryecroft Lane, land south of Mobberley land interest, 4.45ha Capable of delivering 180 or C2</p>	<p>The site has been considered through the Mobberley settlement report [ED 37]. The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
<p>These representations seek to allocate the land east of Pavement Lane for new residential development between the southern edge of the existing defined settlement and the north side of Pavement Lane Farm which consists of barns which have been converted into</p>	

dwellings	
Land at Ilford Way Mobberley represents an important underused brownfield development resource that offers the potential to deliver employment and residential and potentially other uses in the form of a high quality mixed use sustainable development.	Land at Ilford Way Mobberley was subject to the site selection methodology [ED 37]. However The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].
Land at Warford Park, Faulkners Lane, Mobberley and specifically the proposed allocation of land for C2 purposes.	The site has been considered through the Mobberley settlement report [ED 37]. The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].

Prestbury (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land off Heybridge Lane, Prestbury Road (CFS 331a) • Area A, land at Bridge Green (CFS 154) • Area B, land at Bridge Green (CFS 155) • The Bowery (CFS 391 plot 4 plus additional land) • Butley Heights (CFS 391 plot 5 plus additional land) • Land at Heybridge Lane (PH Properties) (new site) • Land north of Withinlee Road (CFS 576) • Yew Tree Barns (part of site CFS 331b) • Land off Macclesfield Road, Prestbury (part of site CFS 331b) • Abbey Mill extension (CFS 58) • Oaklands, Heybridge Lane (CFS 331a plus additional land) 	<p>All Prestbury sites submitted through the Call for Sites exercise and the First Draft SADPD consultation have been considered for their suitability for allocation in the Prestbury Settlement Report [ED 40] using the methodology set out in the Site Selection Methodology Report [ED 07].</p>
<p>The allocations proposed in Prestbury are insufficient to meet the residual needs of the settlement; the housing requirement for Prestbury should be increased. The lack of employment sites undermines the sustainability of the village.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a</p>

	requirement for safeguarded land.
A flexibility factor should be applied to the requirements for Prestbury.	Flexibility in housing supply has been taken into account through The Provision of Housing and Employment Land and the Approach to Spatial Distribution [ED 05].
Object to the proposed Abbey Mill extension development (CFS 58): traffic implications; parking issues; safety concerns; loss of Green Belt; ecology issues; currently used for leisure uses; air pollution. Support for the Cognatum scheme to deliver retirement homes and a new car park for the bowling club (CFS 58).	Issues relating to individual sites have been taken into account through the assessments in the Prestbury Settlement Report [ED 40].
There is a need for starter homes and affordable family housing in Prestbury. There is pent-up demand for retirement accommodation, which would help to release larger properties for families.	The Revised Publication Draft SADPD includes Policy HOU 1 'Housing mix' which requires developments to provide a mix of housing types to meet local needs.
There have only been 18 completions so far in the plan period. Demolitions are common in Prestbury and the net completions figure may be lower than 18. The commitments and completions data shows that Prestbury is on target to meet its 130 requirement without site allocations.	The Prestbury Settlement Report [ED 40] takes account of net completions and commitments.
There is a need to allocate land for self-build plots in Prestbury.	The Revised Publication Draft SADPD includes Policy HOU 3 'Self and custom build dwellings' which supports self-build housing and requires large developments to provide serviced plots for custom and self-build housing.
The site selection process is over reliant on the call for sites exercise and should be more proactive in bringing forward brownfield sites.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
The highways network is congested at peak hours. Safe pedestrian access must be provided.	Highways issues (including pedestrian access) are taken into account through the assessments in the Prestbury Settlement Report [ED 40].
The density of the Prestbury character areas should be respected.	The Revised Publication Draft SADPD includes Policy HOU 12 'Housing density', which requires the landscape and townscape character to be taken into account when determining an appropriate

	density of development.
Community benefits should be the primary consideration in choosing sites, not Green Belt factors.	Candidate sites have been assessed in line with the published Site Selection Methodology [ED 07].
Sites should be accessible to the village centre and facilities.	The accessibility assessments in the Sustainability Appraisal [ED 02] consider the distance to a variety of services and facilities.
Suggestion that the Macclesfield Rugby Club site should be used for Prestbury's housing needs.	Although in the parish of Prestbury, the Macclesfield Rugby Club site is adjacent to the urban area of Macclesfield. It has been considered through the Macclesfield Settlement Report [ED 35]
Brownfield sites in Macclesfield should be used instead.	Brownfield sites in Macclesfield will count towards meeting the development requirements of Macclesfield rather than Prestbury.
The need for new housing is questionable given the uncertainty of Brexit and the departure of AstraZeneca. The government's standard methodology gives a reduced housing requirement; the 'in the order of' wording means there is no requirement for a fixed number of new homes in Prestbury.	Policies and proposals in the SADPD have been prepared to be in accordance with the strategic policies in the LPS, including the overall level of development set out in Policy PG 1 'Overall development strategy'.

Site PRE 1 'Land south of cricket ground'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Concerns over delivery due to access issues and potential for ball-strike from the cricket club.	This site has been deleted from the Revised Publication Draft SADPD.
Concerns of traffic problems	Highways issues are considered through the Prestbury Settlement Report [ED 40].
Safety issues resulting from its remoteness to the village. Pedestrian access is via a narrow footpath.	The site is close and well linked to the village centre. Pedestrian access is considered through the Prestbury Settlement Report [ED 40].
The site doesn't deliver any community benefits	This site has been deleted from the Revised Publication Draft SADPD.

The land at no. 2 Castle Hill is not within the site promoter's ownership and should be excluded.	This site has been deleted from the Revised Publication Draft SADPD.
Given the access constraints and surrounding low density area, the development should be reduced to 10 units. Given the historic planning approvals, the low density housing policy and access constraints, the number of units should be reduced to between two and eight.	Access and density issues are considered through the Prestbury Settlement Report [ED 40]. This site has been deleted from the Revised Publication Draft SADPD.

Site PRE 2 'Land south of Prestbury Lane'

This First Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of main issues raised:	How the main issues have been taken into account
30 dwellings on this site is too many. The proposed development would not be in keeping with the surrounding low density area.	The capacity of the site has been considered through the assessments in the Prestbury Settlement Report [ED 40]. The Revised Publication Draft SADPD now proposes this site as safeguarded land.
Concerns of traffic problems.	Highways and traffic issues are considered through the Prestbury Settlement Report [ED 40]
The site doesn't deliver any community benefits	The site is not proposed for development.
Would not help to maximise the use of village centre shops and facilities due to its remoteness. Pedestrian access would be difficult.	The assessments in the Prestbury Settlement Report [ED 40] have considered pedestrian access. The site promoter has demonstrated that a new pedestrian access can be provided to link to the public footpath network. The site is within walking distance of the village centre.
Prestbury Lane junctions are accident hotspots and whilst provision to improve the junctions would be welcomed, it is not considered that this could be achieved.	The Prestbury Settlement Report [ED 40] considers highways issues. If allocated in the future, junction mitigation measures may be required but it is considered that these could be achieved.
The site makes a major contribution to the Green Belt as evidenced in	The Prestbury Settlement Report [ED 40] includes a Green Belt Site

the 2013 Green Belt Assessment.	Assessment, which demonstrates that the site makes a 'contribution' to Green Belt purposes.
The traffic light assessments are inaccurate with a number of suggestions for changes.	These are taken into account through the Prestbury Settlement Report [ED 40] where the traffic light assessments are produced in accordance with the criteria set out in the Site Selection Methodology [ED 07].
The marshy land provides habitats for many species.	Ecology issues are taken into account in the Prestbury Settlement Report [ED 40].
Development would be highly visible and there would be significant landscape impacts.	Landscape impacts are taken into account in the Prestbury Settlement Report [ED 40].
The higher, southern end of the plot is a 'bog' that doesn't drain all year round.	Flooding and drainage issues are taken into account in the Prestbury Settlement Report [ED 40].
The mitigation measures required may mean the site is not economically viable.	Viability issues are taken into account in the Prestbury Settlement Report [ED 40].
Affordable housing here would not be affordable in real terms.	There are a number of ways in which affordable housing can be delivered, in accordance with local needs. These can include affordable rent; starter homes; discounted market sales housing; and other affordable routes to home ownership. However, the site is proposed for safeguarded land in the Revised Publication Draft SADPD.
Concerns over water and wastewater infrastructure and drainage in the local area.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees (including water and wastewater providers) have been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6
Local services (including the school) are at full capacity or oversubscribed.	The site is proposed for safeguarded land in the Revised Publication Draft SADPD.
The site should be expanded and include PRE 3.	The selection of sites is considered in the Prestbury Settlement Report [ED 40]. The Revised Publication Draft SADPD proposes the larger site (including the land previously proposed for development and the

	land previously proposed for safeguarded land) be designated as safeguarded land.
It appears that no air quality assessment of the potential impact of the development has been done.	Air quality issues are taken into account in the Prestbury Settlement Report [ED 40].
The field is used for agriculture (housing cows).	Agricultural land quality is taken into account in the Prestbury Settlement Report [ED 40].

Safeguarded land PRE 3 'Land south of Prestbury Lane (safeguarded)'

This First Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of main issues raised:	How the main issues have been taken into account
Concerns of traffic problems.	Highways and traffic issues are considered through the Prestbury Settlement Report [ED 40]
The site doesn't deliver any community benefits	The site is not proposed for development.
Would not help to maximise the use of village centre shops and facilities due to its remoteness. Pedestrian access would be difficult.	The assessments in the Prestbury Settlement Report [ED 40] have considered pedestrian access. The site promoter has demonstrated that a new pedestrian access can be provided to link to the public footpath network. The site is within walking distance of the village centre.
Prestbury Lane junctions are accident hotspots and whilst provision to improve the junctions would be welcomed, it is not considered that this could be achieved.	The Prestbury Settlement Report [ED 40] considers highways issues. If allocated in the future, junction mitigation measures may be required but it is considered that these could be achieved.
The site makes a major contribution to the Green Belt as evidenced in the 2013 Green Belt Assessment.	The Prestbury Settlement Report [ED 40] includes a Green Belt Site Assessment, which demonstrates that the site makes a 'contribution' to Green Belt purposes.
The traffic light assessments are inaccurate with a number of suggestions for changes.	These are taken into account through the Prestbury Settlement Report [ED 40] where the traffic light assessments are produced in accordance with the criteria set out in the Site Selection Methodology

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	[ED 07].
The marshy land provides habitats for many species.	Ecology issues are taken into account in the Prestbury Settlement Report [ED 40].
Development would be highly visible and there would be significant landscape impacts.	Landscape impacts are taken into account in the Prestbury Settlement Report [ED 40].
The higher, southern end of the plot is a 'bog' that doesn't drain all year round.	Flooding and drainage issues are taken into account in the Prestbury Settlement Report [ED 40].
The mitigation measures required may mean the site is not economically viable.	Viability issues are taken into account in the Prestbury Settlement Report [ED 40].
Affordable housing here would not be affordable in real terms.	There are a number of ways in which affordable housing can be delivered, in accordance with local needs. These can include affordable rent; starter homes; discounted market sales housing; and other affordable routes to home ownership. However, the site is proposed for safeguarded land in the Revised Publication Draft SADPD.
Concerns over water and wastewater infrastructure and drainage in the local area.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees (including water and wastewater providers) have been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6
Local services (including the school) are at full capacity or oversubscribed.	The site is proposed for safeguarded land in the Revised Publication Draft SADPD.
The site should be expanded and include PRE 2.	The selection of sites is considered in the Prestbury Settlement Report [ED 40]. The Revised Publication Draft SADPD proposes the larger site (including the land previously proposed for development and the land previously proposed for safeguarded land) be designated as safeguarded land.
It appears that no air quality assessment of the potential impact of the development has been done.	Air quality issues are taken into account in the Prestbury Settlement Report [ED 40].
The field is used for agriculture (housing cows).	Agricultural land quality is taken into account in the Prestbury

	Settlement Report [ED 40].
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Shavington (general issues)

Summary of main issues raised:	How the main issues have been taken into account
The housing requirement for Shavington should be increased.	The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].
No additional requirements in relation to housing and employment land are supported.	
Proposed settlement boundary should not include a substantive area of the Wybunbury Ward, Wybunbury Parish and the Wybunbury Combined Parishes neighbourhood plan area.	The Settlement and infill boundaries review [ED 06] sets out the methodology for defining settlement boundaries. It is largely based around the built environment (both existing and expected) and physical features as opposed to existing administrative boundaries.
The principle of reviewing the settlement boundary is supported.	
<p>The following sites should be (re)considered for housing:</p> <ul style="list-style-type: none"> • Grove Farm • 414 Newcastle Road • 272 Newcastle Road • Land off Gresty Lane. • 199 Crewe Road, • Land rear of 199 Crewe Road, • Land south of the A500, • Depot and land west of Crewe Road • Rope Lane 	No allocations are considered necessary at the Local Service Centre tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].

Wrenbury (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>The site north of Cholmondeley Road is considered to be suitable for residential development and is available and achievable. The site should be allocated for housing and the settlement boundary amended to reflect this.</p>	<p>No allocations are considered necessary at the Local Service Centre tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
<p>New Road, Wrenbury is considered to be suitable for housing development. The site although refused and dismissed at appeal was not subject to any technical reasons for refusal. The site was considered suitable for development within the 'Site Assessment Report' (May 2018) prepared by AECOM in support of the emerging Wrenbury Neighbourhood Plan.</p>	

Other settlements and rural areas (OSRA) (general issues)

Summary of main issues raised:	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land to the north of the Main Road, Wybunbury (34 homes) • Land to the south of Church Way (south and east), Wybunbury (89 homes) • Land to the west of Bridge Street, Wybunbury (21 homes) • Land off Congleton Road South, Church Lawton (25 homes) • Land at Big Stone Cottage, Middlewich Road, Cranage (30 homes) • Land south of Monks Lane, Acton (52 homes) • Land east of Chester Road, Acton (1.5ha, public house) • Stable yard, Dorfold Hall (0.25ha, wedding and events venue) • Yarwood Heath, Nr M56. (Green Belt, 9ha employment land) • Land off Crewe Road, Winterley (55 homes) • Crewe Road, Winterley (105 homes) 	<p>All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Other Settlements and Rural Areas Report [ED 46] but as set out in that report, there is no requirement to make further site allocations within this tier of the settlement hierarchy.</p>

- Various sites at Siddington (part Green Belt)
- Land at School Lane, Marton (27homes) - CFS 365 and 382
- Land at Marton Lane, Marton (Housing)
- Land at Congleton Road, Marton (housing)
- Monks Heath Hall workshops, Monks Heath (Green Belt, 1.21ha employment land) – CFS 206
- Tarmac, A536 Congleton Road, Eaton (15 homes)
- Land opposite Weaver View, Over Road, Church Minshull (20 homes)
- Former George and Dragon public house, Rainow Road, Higher Hurdsfield (6 homes)
- Land off Newcastle Road and Holmes Chapel Road, Brereton Green (135 homes)
- Boar's Head Public House, 1 Wybunbury Road, Walgherton (40 homes)
- Haslington Hall, Holmshaw Lane, Haslington (1.76ha, housing)
- Land off Newcastle Road, Hough (29 homes)
- Bucklow Garage, Bucklow Hill (Green belt, 8 homes)
- Land off Crewe Road, Winterley (13 homes)
- Land off Monks Lane, Hankelow (2 homes)
- Tweedale Farm, Wardle (12.5ha mixed use inc marina, tourist accommodation and retail/restaurants)
- Land at Cemetery Road, Weston (Strategic Green Gap, 65 homes)
- Land off Newcastle Road, Brereton Green (29 homes)
- Land north of Bolshaw Farm Lane, Heald Green (Green Belt, 5 homes)
- Windy Ridge, Greendale Lane, Mottram St Andrew
- Alstonfield, Castle Hill, Prestbury
- Eaton Cottage, Macclesfield Road, Congleton (54 homes).
- Bucklow Garage, Bucklow Hill
- Land at Warford Park, Faulkner Lane
- Land east of Hilbre Bank, Alpraham

<ul style="list-style-type: none"> • Land north and south of Clay Lane, Over Peover • Warmingham Brine Field • Buxton Road Depot, Disley • Stone Cottage, 14 Summerhill Road, Prestbury 	
<p>The true extent of the developable area of the Wardle Employment Improvement Area is overstated. The level of development being proposed in Wardle has the potential to result in a significant traffic impact.</p>	<p>The SADPD has been prepared in accordance with the strategic policies set out in the LPS, including policy LPS 60 'Wardle Employment Improvement Area'. The employment land requirements set out in LPS Policy PG 1 are set out as gross land requirements and the strategic employment sites in the LPS (including at Wardle) are expressed as a gross site areas (not net developable areas).</p>
<p>Sites should be allocated for development in the OSRA.</p>	<p>The Other Settlements and Rural Areas report [ED 46] considers whether it is necessary to allocate further sites within this tier of the settlement hierarchy.</p>
<p>Wybunbury displays the characteristics of a Local Service Centre.</p>	<p>The SADPD has been prepared in accordance with the strategic policies set out in the LPS, including policy PG 2 'Settlement hierarchy' which considers Wybunbury to fall within the 'Other Settlements and Rural Areas' tier.</p>
<p>The shortfall of homes in OSRA is not based on up-to-date evidence.</p>	<p>The Other Settlements and Rural Areas report [ED 46] takes into account the latest available data on completions and commitments at 31 March 2020.</p>
<p>The OSRA requirement should be disaggregated.</p>	<p>This issue is taken into account through the Other Settlements and Rural Areas report [ED 46].</p>
<p>The flexibility factor should be applied to OSRA.</p>	<p>The employment land requirement set out in LPS Policy PG 1 already includes 20% flexibility. Flexibility in housing supply has been taken into account in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].</p>

Gypsy, Traveller and Travelling Showpersons sites (general issues)

Summary of main issues raised:	How the main issues have been taken into account
United Utilities welcome further engagement on the sites considered for allocation, following the further call for sites stage	Noted.
Historic England notes the importance of considering the historic environment in site allocations and Plan making. Reference made to guidance documents available on the Historic England website.	Noted. Heritage matters are included as part of the traffic light assessment of site suitability in the Gypsy and Traveller Site Selection Report [ED 14].

Site G&T 1 'Land east of Railway Cottages, Nantwich'

This First Draft SADPD site has the reference G&T 1 'Land east of Railway Cottages, Nantwich (Baddington Park)' in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
United Utilities, site outside of drainage area and is rural in nature, where infrastructure may be limited	Noted. The site has planning permission for six permanent Gypsy and Traveller Pitches (ref 19/5261N). The allocation for the intensification of use on the site should be read alongside the Local Plan as a whole. Policy HOU 5c 'Gypsy, Traveller and Travelling Showpersons site principles' in the SADPD notes that sites <i>'provide for an appropriate level of essential services and utilities including mains electricity, a connection to a public sewer or provision of discharge to a septic tank, a mains water supply and a suitable surface water drainage system, prioritising the use of Sustainable Drainage Systems (SuDS) in line with LPS Policy SE 13 'Flood risk and water management'</i>
This site could contribute towards meeting the Council's requirement for a 5 year supply of sites. A demonstrated 5 year supply of sites could reduce the amount of sites, granted temporary planning permission across the borough.	Noted.

Site G&T 2 'Land at Coppenhall Moss, Crewe'

Summary of main issues raised:	How the main issues have been taken into account
A planning application for a permanent Gypsy and Traveller site was withdrawn in 2012 and circumstances have not changed since then.	The site has been considered through a site selection process as documented in the Gypsy and Traveller Site Selection Report [ED 14].
Highway access, safety and local traffic congestion are all issues.	These are matters considered through the traffic light suitability assessment for the sites, as documented in the Gypsy and Traveller Site Selection Report [ED 14]. The site scores 'amber' for highways access and impact. Policy G&T 'land at Coppenhall Moss, Crewe' requires the provision of an appropriate visibility splay and access arrangements from Parkers Road / Kent's Lane.
Development of houses in the local area has caused pressure on local facilities.	Stage 6 of the site selection process included consultation with infrastructure providers / statutory consultees as documented in the Gypsy and Traveller Site Selection Report [ED 14].
Land owned by CEC and an opportunity to provide a sustainable site	Noted.
Area identified by HS2 as a construction compound / maintenance depot.	The site is located to the north of the area identified for an HS2 construction compound.

Site TS 1 'Lorry Park, off Mobberley Road, Knutsford'

Summary of main issues raised:	How the main issues have been taken into account
<p>Site specific comments:-</p> <ul style="list-style-type: none"> Lorry park is extensively used and a valued facility A Travelling Showperson should not be located next to a tip Objections received to the proposed allocation and potential loss of the Lorry Park. 	<p>The site has been considered through a site selection process as documented in the Gypsy and Traveller Site Selection Report [ED 14]. This has included engagement with external infrastructure and statutory bodies which has informed the Council's assessment regarding the suitability of the site for future allocation.</p> <p>Proposed policy wording for site TS 1 Lorry Park, off Mobberley Road includes as follows; <i>'provide a buffer from the existing recycling centre to achieve an acceptable level of residential amenity for prospective</i></p>
<p>A 'hard copy' petition of 140 signatures. The title of the petition was 'Resident Petition Against Travelling Showpeople Residential Site Being Placed at Knutsford Lorry Park on Mobberley Road'.</p>	

<p>The council has also been made aware of an e-petition on the change.org website. The subject of the petition states ‘say no to a Travellers Showpersons site in Knutsford’. As at 13 March 2019, the website reports that 375 signatures have been made to the e-petition on the change.org website. However, the council is not able to verify the nature of the signatures reported on the system.</p>	<p><i>residents including in terms of noise and disturbance’.</i></p>
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Chapter 13: Monitoring and implementation

Summary of main issues raised:	How the main issues have been taken into account
<p>Monitoring should also include improvements to train services, air quality, pollution from motor vehicles and aircraft noise.</p>	<p>This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council’s yearly Authority Monitoring Report (AMR). The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.</p>
<p>Monitoring should be carried out on a settlement-by-settlement basis and Green Belt/ non Green Belt.</p>	<p>A separate Local Plan Monitoring Framework document [ED 54] has been developed. A proportionate approach to monitoring has been taken, with information available on a settlement-by-settlement basis where available and appropriate. The amount of Green Belt in the Borough is detailed in Chapter 3 of the AMR.</p>
<p>Annual updates of housing and employment needs should be undertaken to address and review relevant policies. The Site Allocations and Development Policies Document should identify those policies from the Local Plan Strategy that will need to be reviewed should there be a shortfall/ uplift in housing completions or employment take up.</p>	<p>This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council’s yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.</p>
<p>The Site Allocations and Development Policies Document should include a list of triggers that would prompt a full review of the local</p>	<p>This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of</p>

plan.	the monitoring framework is to list the monitoring indicators that will appear in the Council's yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.
The host of agencies and partners involved in bringing forward the allocations in addition to those listed in the Local Plan Strategy should be listed in the Site Allocations and Development Policies Document.	This has been considered through the development of a separate Local Plan Monitoring Framework document [ED 54]. The purpose of the monitoring framework is to list the monitoring indicators that will appear in the Council's yearly AMR. The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary.
The Site Allocations and Development Policies Document does not contain a new monitoring and implementation framework and relies on the framework set out in the Local Plan Strategy. There are areas where actions could be improved upon and opportunities to further monitor proposed policies, for example the delivery of self or custom build homes.	This has been addressed through the development of a separate Local Plan Monitoring Framework document [ED 54].

Chapter 14: Glossary

Summary of main issues raised:	How the main issues have been taken into account
Revised NPPF definition of affordable housing should be reflected in the Glossary.	The glossary has been amended to include the latest NPPF definitions.
Infill boundary as well as infill village and infill development should be defined.	The definition of an infill village refers to infill boundaries.

Appendix A: Housing and employment monitoring

This First Draft SADPD appendix has been deleted in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Further growth at LPS53: Land adjacent to J17 of M6, south east of Congleton Road, over and above 450 units should be restricted.	The SADPD does not seek to amend the allocation of strategic site LPS 53.
Table A.3 Housing Distribution: local service centres does not reflect current completions or commitments. For example, 318 dwellings already committed or completed for Bollington. There is a disconnect between expected demand and current projections of demand. New figures are available and these should be used.	The latest available data on completions and commitments have been used in the preparation of the Revised Publication Draft SADPD.
The employment land requirement for Alsager has reduced (37.13 hectares) from that identified in the adopted Local Plan Strategy (40 hectares). It is unclear why the employment land allocation has reduced. Further clarification is required on windfall.	The Alsager Settlement Report [ED 22] considers issues related to employment land in Alsager.

Appendix B: Related documents and links

This First Draft SADPD appendix is Appendix A Related documents and links in the Revised Publication Draft SADPD.

Summary of main issues raised:	How the main issues have been taken into account
Shavington Settlement Report (FD42) - object to the extension of Shavington Settlement Boundary (including the Shavington Triangle) as this includes land historically within the Wybunbury Ward, Wybunbury Parish and the Wybunbury and Combined Parishes Neighbourhood Plan area.	The Settlement and infill boundaries review [ED 06] sets out the methodology for deciding boundaries. It is largely based around the built environment (both existing and expected) and physical features as opposed to existing administrative boundaries. This enables more sustainable settlement patterns.
Residents of Stock Lane, Dig Lane and Clannor Heath identify themselves as Wybunbury residents.	The revised settlement boundary is considered in the Shavington Settlement Report [ED 42].
The inclusion of parts of Wybunbury into Shavington results in	

<p>development 'creep' and coalescence of the settlements. The proposed boundary should be amended so that Newcastle Road is the southernmost boundary.</p>	
<p>Shavington Triangle could become an infill village in its own right, of a similar size to Hough village with boundaries following the curtilages of dwellings on the west side of Dig Lane, Stock lane and Newcastle Road.</p>	
<p>While two parishes share the area of a proposed infill village at Wychwood Park, this does not set a precedent. Newcastle Road forms a clear enforceable boundary to the north of the Triangle.</p>	
<p>Documents FD03a, FD5, FD24 do not demonstrate the exceptional circumstances for Green Belt release at Bollington. The housing figure of 400 dwellings and balance of 82 are not justified. The traffic light assessment is flawed and contains inaccuracies. Insufficient consideration is given to highways, congestion, landscape impact, environmental/ ecology issues and impact upon infrastructure. There is no clear definition for the red, amber green system or weighting of criteria. There are other sites in local service centres in the Green Belt that have been sifted out. These sites should be reviewed.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Bollington and these have been removed from the Revised Publication Draft SADPD. However there is a requirement for safeguarded land. Exceptional circumstances are considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53]. Issues regarding the traffic light assessments of sites in Bollington are considered in the Bollington Settlement Report [ED 24] where the traffic light assessments are produced in accordance with the criteria set out in the Site Selection Methodology [ED 07].</p>
<p>FD 05 is not justified. There is no evidence to support the housing requirement of 3500 dwellings for the local service centres. Local service centres have a limited range of services and facilities and do not support the same level of growth as principal towns and key service centres.</p>	<p>Policies and proposals in the SADPD have been prepared to be in accordance with the strategic policies in the LPS, including the spatial distribution of development set out in Policy PG 7 which expects Local Service Centres to accommodate in the order of 3,500 new dwellings over the plan period.</p>

Interim Sustainability Appraisal consultation

The table below includes a summary of the main issues raised through the Interim Sustainability Appraisal consultation and how these have been taken into account. Issues and responses are also included in the Appendix J of the Publication Draft Sustainability Appraisal Report [PUB 03].

Summary of main issues raised:	How the main issues have been taken into account
<p>CRE 2 Land off Gresty Road – the SA recognises the potential impacts to the SSSI/SAC however, the suggested wording has been added to the supporting text and not the policy itself.</p>	<p>Any amends made to the policy will be appraised, with the SA updated accordingly. Policy SE 3 ‘Biodiversity and geodiversity’ seeks to protect European Sites. However, the HRA assessment of likely significant effects identifies that no recreational impacts are anticipated from this site given that it is put forward for employment development. In addition, given the distance of the site from Wybunbury Moss and the lack of hydrological connectivity, no likely significant hydrological effects are identified. The site is put forward for E(q) and B8 uses only and is therefore unlikely to involve industrial or agricultural processes that could lead to air quality impacts upon the SSSI.</p>
<p>MID 2 Land to east and west Croxton Lane – The SA should consider if there are any pathways for impacts on Sandbach SSSI.</p>	<p>Any amends made to the policy or supporting information will be appraised, with the SA updated accordingly. As referred to on p50 of the Revised Publication Draft SA [ED 03] the proposal for around 50 homes at Site MID 2 only just triggers the IRZ for rural residential development, and there is also a large urban area between the SSSI and Site MID 2. The high level HRA screening for the proposed sites in Middlewich concluded that all sites being considered for future allocation through the site selection process are at least 7km from the nearest European site (Midland Meres and Mosses Phase 1 Ramsar (Bagmere SSSI)) and no potential impact pathways were identified regarding any European site. LPS Policy SE 3 ‘Biodiversity and geodiversity’ seeks to protect European Sites.</p>
<p>HCH 1 Land east of London Road – The SA doesn’t recognise the Natural England Impact Risk Zone (IRZ) triggers.</p>	<p>Amend bullet 4, p35 to read <u>‘The site also falls within Natural England’s IRZ for the River Dane, however Natural England have no concerns regarding this allocation on the basis that United Utilities have sufficient capacity to supply and deal with</u></p>

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Summary of main issues raised:	How the main issues have been taken into account
	<p><u>wastewater. United Utilities were consulted as part of the infrastructure providers/statutory consultees consultation and made no comment on the site.</u></p> <p>The HRA assessment of likely significant effects for air quality identifies that the site is approximately 2.7 km from Bagmere SSSI. The proposed development could be for the expansion of an adjacent pharmaceutical business, which mainly functions to manufacture inhalation products. The new site could provide pharmaceutical facilities including manufacturing and product innovation including formulation, filling and packing activities. The site does not and would not engage in the manufacture of chemicals or biological agents, so emissions are low. Furthermore, Cheshire East Council has consulted with Natural England regarding potential air quality impacts of this proposed site and no concerns have been raised regarding Bagmere SSSI. Additional advice has been received from Natural England as a result of further information being provided, whereby Natural England have no concerns regarding this allocation on the basis that United Utilities have sufficient capacity to supply and deal with wastewater. United Utilities were consulted as part of the infrastructure providers/statutory consultees consultation and made no comment on the site.</p>
<p>EMP 2.3 Land east of University Way – The SA doesn't recognise that the IRZ is triggered for Air pollution on Oakhanger Moss SSSI, it is not clear if this has been considered.</p>	<p>The traffic light form is to be amended to include reference to the IRZ, wording is to be added to the supporting information of the policy and the appraisal updated accordingly. Please note that this site is not included in the Revised Publication Draft SADPD.</p>
<p>EMP 2.5 – 2.8 Employment Allocations – It is not clear how the environmental impacts to these sites have been assessed or how this will be reflected in policy wording. We have identified IRZ triggers and priority habitats in relation to these sites.</p>	<p>The environmental impacts for the sites have been assessed through the traffic light forms – the IRZs have been triggered for uses that the sites are not proposed for and therefore it was not considered necessary to report on this in the traffic light forms; the exception being EMP 2.7 (New Farm, Middlewich). In relation to IRZs the SADPD and LPS should be read as a whole, with impacts on SSSIs covered in LPS Policy SE 3 'Biodiversity and Geodiversity', however the impact</p>

Summary of main issues raised:	How the main issues have been taken into account
	<p>on IRZs will also be reflected in the supporting information of EMP 2. The high level HRA screening identified that these potential employment sites are located sufficient distance from any European sites that no hydrological or air quality impacts are anticipated as a result of these potential developments. Furthermore, no recreational pressures are anticipated as a result of the increased employment provision.</p>
<p>G & T 2 Land at Coppenhall Moss – SA does not seem to recognise that the IRZ for discharges to Sandbach Flashes SSSI.</p>	<p>The Revised Publication Draft SA [ED 03] (p51) recognises the IRZ for Sandbach flashes. No impact pathways were identified in the HRA screening.</p>
<p>The ‘where possible’ caveat in paragraph 4.5 suggests that biodiversity/natural environment considerations are less important than economic or social ones.</p>	<p>To clarify, paragraph 4.5 of the initial Publication Draft SA does not contain the caveat ‘where possible’ in relation to biodiversity; the relevant paragraph is 4.38. The words ‘where possible’ in this instance form part of a concluding recommendation in the SA for development proposals, acknowledging that that there may be instances where it is not possible to provide a net gain for biodiversity; it is not formal policy wording. Revised Publication Draft SADPD Policy ENV 2 Ecological implementation requires all development proposals to deliver an overall measurable net gain for biodiversity, with major developments and developments affecting semi-natural habitats supported by a biodiversity metric calculation.</p>
<p>The Interim SA deeply under values the sterilisation of minerals.</p>	<p>The SADPD and its accompanying SA takes a balanced approach to minerals planning within the context of achieving the overall vision and strategic priorities of the Local Plan as identified in the Local Plan Strategy (LPS), which was adopted in July 2017. Ultimately, deciding whether this balance has been achieved is a matter of planning judgment.</p> <p>Following comments on the initial Publication Draft SADPD in relation to minerals, the Council has amended the SA to identify that some of the proposed allocations may have a “major negative” impact on minerals resources. As a result the Council has proposed to introduce</p>

Summary of main issues raised:	How the main issues have been taken into account
	<p>the need for a Mineral Resource Assessment (MRASS) to be undertaken on those proposed allocated sites which are located within areas identified by BGS as containing a sand resource (sand & gravel and silica sand) or close to such areas i.e. within 250m. This applies to sand resources which are 3ha or greater in size (as any less is not considered likely to be economically viable) or which adjoin a wider sand resource (regardless of the size of the allocated site). The MRASS will enable the Council to better understand the potential impact that the proposed development may have on the mineral resources. This should include whether it is feasible to require prior extraction of the mineral before development proceeds and whether the proposed development has the potential to sterilise any future extraction of the wider mineral resource. Therefore, the requirement for a MRASS will enable the Council to make a more informed planning judgment regarding mineral resource impacts when determining planning proposals on relevant allocated sites</p>
<p>The proposed policies will have a negative impact on the historic environment.</p>	<p>Any amends made to the historic environment policies will be appraised, with the SA updated accordingly.</p>
<p>Further consideration required with regard to noise in the Health Impact Assessment.</p>	<p>Amend description of impact under Enhance pollution prevention and control to read 'The SADPD, in conjunction with the LPS, seeks to make sure that development does not result in a cumulative or harmful impact on land, residents, air and water quality ... <u>This may also help to make sure that noise sensitive development, which could lead to harm or is detrimental to amenity, is not close to existing sources that generate noise.</u>'</p>

First Draft SADPD Habitats Regulations Assessment consultation

The table below includes a summary of the main issues raised through the First Draft SADPD Habitats Regulations Assessment (“HRA”) consultation and how these have been taken into account.

Summary of main issues raised:	How the main issues have been taken into account
GTSS 66 – HRA should take account of air quality impacts on the Tatton Mere SSSI.	The HRA [ED 04] has considered the air quality implications of site GTSS 66 (TS 1) on Tatton Mere SSSI. It concludes that TS 1 is currently a lorry depot. The conversion of this site to a Travelling Showperson site from a Lorry Park, as well as the overall small size of this proposed site (3 plots), means that it is unlikely that there will be any overall increase from the baseline in air quality impacts resulting in traffic on the Mobberley Road, where it falls within 200m of Tatton Meres SSSI. Therefore, there are no likely significant effects anticipated from this proposed allocation in respect of air quality impacts.
South Pennine Moors SPA –the site has the presence of birds including farm, coastal habitats and estuary birds. Need to consider the impact of extra vehicles and air pollution on that site.	Table 5-5 (assessment of likely significant effects on European sites) in the SADPD HRA [ED 04] concludes no likely significant effects from the SADPD proposals on the South Pennine Moors SPA.
Midland Meres and Mosses – has open water and bog’s which support rare plants. Disagree with conclusions on HRA	The Midland Meres and Mosses (phase 1) Ramsar site is considered in the HRA [ED 04] and is screened out. The Midland Meres and Mosses (phase 2) Ramsar site is also screened out in the HRA [ED 04].
Mersey Narrows – contains rare birds and is a haven for wildlife. Disagree with position set out in HRA	Table 5-5 (assessment of likely significant effects on European sites) in the SADPD HRA [ED 04] concludes no likely significant effects from the SADPD proposals on the Mersey Narrows SPA.
Object to the levels of development and sites proposed for Bollington	This is a matter for plan making rather than specifically the Habitats Regulations Assessment.
Natural England comments:- <ul style="list-style-type: none"> • move table 4.1 into section 5 • the HRA should make it clearer which sites are being 	The Council’s consultants have considered comments from Natural England in preparing the HRA [ED 04] and have:- <ul style="list-style-type: none"> • Moved table 4.1 into section 5

<p>proposed to be allocated in the SADPD.</p> <ul style="list-style-type: none"> • further assessment needed for sites EMP2.3 (land east of University Way) and CFS 423a (Land East of London Road) • consider combining tables 4.1 and 5.3 in the revised report • Further information required on the in combination assessment of likely significant effects section to include consideration of Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 • Further work required on chapter 6 appropriate assessment focused on the features and conservation objectives of the European site. 	<ul style="list-style-type: none"> • Amended the sequencing of the report to highlight the sites being considered for allocation / safeguarded land in the SADPD. • Provided additional information on sites including CFS 423a (land east of London Road). • Provided additional justification for their consideration of ‘in combination’ assessments and made amendments to Chapter 6 (appropriate assessment) of the report [ED 04].
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Gypsy and Traveller and Travelling Showpeople Call for Sites consultation

The table below includes a summary of the main issues raised through the Gypsy and Traveller and Travelling Showpeople Call for Site consultation and how these have been taken into account.

Summary of main issues raised:	How the main issues have been taken into account
<p>Land at Firs Farm, off the A50 was submitted to the Council through the call for sites consultation. Site has been promoted for Travelling Showperson use.</p>	<p>The site has been considered through the Gypsy and Traveller Site Selection report [ED 14] as site GTTS 68 and proposed for allocation in the SADPD as site TS 2 ‘land off Firs Farm, Brereton’.</p>

Appendix D: Initial Publication Draft SADPD consultation main issues

The initial Publication Draft SADPD consultation took place between 19 August and 30 September 2019. This included consultations on the initial Publication Draft SADPD Sustainability Appraisal and the initial Publication Draft SADPD Habitats Regulations Assessment. This Appendix sets out the key issues raised in each of these consultations, and how these have been taken into account.

Initial Publication Draft SADPD consultation

Chapter 1: Introduction / general issues

Summary of the main issues raised	How the main issues have been taken into account
<p>Concerns were raised regarding the consultation process, including:</p> <ul style="list-style-type: none"> • The online consultation may not be accessible to communities with low levels of literacy; the online-only consultation excludes elderly people. • It only allows objections to be recorded; there is no way of registering support for the non-inclusion of further site allocations in particular settlements. • The consultation period was unreasonably short as many town and parish councils do not meet in August and this is also a time of holidays. • The form is complicated and no guidelines or FAQs were published to assist people to complete it. • There was little publicity around the consultation. 	<p>Printed copies of documents and response forms were available in a number of deposit locations, including libraries. Comments were accepted on all aspects of the plan; for example comments supporting the non-allocation of sites in a particular Local Service Centre were recorded against paragraph 12.3. The consultation period was for a full six weeks, as required by the Regulations and the council's Statement of Community Involvement. Full details of the consultation exercise are set out in the Consultation Statement [ED 56]</p>
<p>The SADPD has been prepared in the absence of a strategic spatial strategy for minerals. LPS Policy SE 10 requires the SADPD to address minerals issues; it does not comply with the NPPF (¶¶204 & 208) as minerals are not afforded adequate protection. The SADPD risks the unnecessary sterilisation of nationally-significant mineral resources.</p>	<p>As set out in the council's Local Development Scheme, the council is preparing a separate Minerals and Waste DPD to bring forward minerals and waste policies and to identify specific sites for minerals/waste management. Therefore, it is considered that the SADPD should not seek to add detail to the LPS Policy SE 10 'Sustainable provision of minerals' as this is best addressed through</p>

	the Minerals and Waste DPD. Minerals issues have been considered in the selection of sites, in accordance with the Site Selection Methodology Report [ED 07].
It is considered that the SADPD fails to address the impacts of fracking on local communities, particularly with regards to environmental safeguards and traffic generation.	The LPS already includes a number of environmental and infrastructure policies, which are supplemented by further detailed policies in the SADPD. The Minerals and Waste DPD will specifically consider the issue of hydraulic fracturing.
A number of responses were received seeking to retain existing saved policies and designations from legacy local plans, including: <ul style="list-style-type: none"> • MBLP policy H12 'Low density housing areas'; • Areas of special county value for landscape; 	SADPD Policy HOU 12 'Housing density' does not define 'low density housing areas' but requires consideration of the landscape and townscape character; the nature, setting and scale of the proposal; the character of the site; and the need to preserve amenity. SADPD Policy GEN 1 'Design principles' also required proposals to contribute positively to the borough's quality of place and local identity through appropriate character, appearance and form in terms of density. LPS Policy SE 4 'The landscape' contains policy on Local Landscape Designation Areas, which are shown on the draft adopted policies map [ED 02].
Some responses consider that the proposals in the SADPD conflict with particular made neighbourhood plan policies, including: <ul style="list-style-type: none"> • The Bollington Neighbourhood Plan; • The Disley Neighbourhood Plan. • The Hulme Walfield and Somerford Booths Neighbourhood Plan. 	Neighbourhood plans are considered in each of the settlement reports [ED 21-ED 44] and the Other Settlements and Rural Areas Report [ED 45]. The non-strategic policies contained in the SADPD are in conformity with the LPS strategic policies.
Concern is raised that the SADPD seeks to meet housing numbers prescribed in the LPS, rather than the lower numbers set out in the national methodology. It is also considered that the SADPD underestimates the contribution that will be made from windfall sites.	The overall development strategy for the borough is set out in the adopted LPS Policy PG 1 'Overall development strategy'. The non-strategic policies in the SADPD are in accordance with the strategic policies of the LPS and it is not the role of the SADPD to revise strategic policy.
A number of detailed issues were raised in respect of the plan viability assessment: <ul style="list-style-type: none"> • Gross development value: it is considered that the 'high' value locations should be split into 'lower high' and 'upper high'; 	The revised plan wide viability assessment [ED 52] has considered the issues raised by representations in respect of the Plan viability assessment (in section 3 of report [ED 52] onwards) and assumptions have been adjusted where appropriate to do so.

Shavington should be considered a 'low' value location; a cautious approach to gross development values should be adopted; values in the prime area are considered excessive; the gross development value assumptions for each location should be revised based on evidence supplied.

- Benchmark land value: The benchmark land value for greenfield sites (assuming 70% net developable area) is below the benchmark land value for brownfield sites; the landowner premium has been applied on a gross basis, when it should be on a net acreage basis to reflect site specific constraints; the landowner premium has been applied consistently across the borough without taking account of the gross development value of the location; the reference to assumptions in the 2017 Keppie Massey report is flawed as the report pre-dates the CIL examination which resulted in a reduction in CIL charges and the report is also more than two years old; a cautious approach to benchmark land values should be adopted; the benchmark land values should be revised based on evidence supplied; brownfield land values should reflect an industrial value plus 20%.
- Costs: The assessment should take account of additional construction costs related to external works; It is considered that a separate allowance for professional fees on abnormal costs should be made; the allowances for abnormal costs are inadequate; opening-up costs should be factored-in; whilst VAT can usually be recovered from brownfield site acquisitions, it does have the effect of increasing the stamp duty payable, which should be taken into account; an additional allowance for costs arising from the requirements of the Design Guide SPD should be added; the assessment does not take site surveys, planning consultancy fees or planning application fees into account; site assessment and promotion costs should be considered; the cost of garages should be factored-in; a schedule of likely S106 contributions should be included; the cost of development finance is considered to be

<p>set too low; the allowance for Cat 2 and Cat 3 dwellings (under the National Described Space Standards) should be increased; the cost per electric vehicle charging point is too low; the assessment should allow for increased off-site abnormal costs arising from the provision of electric vehicle charging points; the attributed cost for district heating networks is not based on evidence..</p> <ul style="list-style-type: none"> • All strategic sites should be individually tested. • The housing mix set out in policy HOU 1 will result in a lower floorspace/site are density than the range typically expected, therefore sites will not be used as efficiently as possible and meaning less value can be generated from the land. • The assumed level of developers' profit of 17.5% is considered punitive and the market reality is that most will require a return of 20-25%. 	
<p>A continued increase in housing will add pressures to primary care and the clinical commissioning groups would welcome advance notice of new housing developments.</p>	<p>The housing provision set out in the SADPD is in line with the overall level of provision set by the LPS Policy PG 1 'Overall development strategy'. The added detail provided by the SADPD will give greater certainty over the scale and location of development in individual settlements.</p>
<p>A number of comments were submitted in relation to the policies map, including:</p> <ul style="list-style-type: none"> • Specific sites that should be shown as allocated on the policies map; • Specific sites that should be shown as included within settlement boundaries on the policies map; • Specific sites that should be shown as not within the Green Belt on the policies map; • Specific sites that should not be shown as within the Strategic Green Gap on the policies map; • Ecological networks (referred to in policy ENV 1) should be shown on the policies map; • Specific areas of protected open space should not be shown 	<p>The draft adopted policies map [ED 02] reflects the policies and proposals in the plan. The justification for allocation or non-allocation of any particular site is set out in the Site Selection Methodology Report [PED 07], individual settlement reports [ED 21-ED 44] and the Other Settlements and Rural Areas Report [ED 46]. The justification for settlement boundaries shown on the map is set out in the Settlement and Infill Boundaries Review [PED 06] and the individual settlement reports [ED 21-ED 44]. The justification for the boundaries of the Strategic Green Gap is set out in the Strategic Green Gaps Boundary Definition Review [ED 08]. Consideration of individual areas of open space is provided under policy REC 1 'Green/open space protection'.</p> <p>The Ecological Network is shown as a separate map in the printed</p>

<p>as such on the policies map.</p> <ul style="list-style-type: none"> • The annotation for the Poynton Relief Road refers to policy INF 8 instead of INF 6; • The policies map should more closely align with the LPS policies map in respect of sites LPS 26; LPS 27; LPS 46; and LPS 53. • The policies map does not include any references to minerals and does not show the saved policies from the Cheshire Minerals Plan. • The policies map should be fully integrated with the LPS adopted policies map so they can be read as one. • The area to which policy GEN 5 (Aerodrome Safeguarding) applies should be shown on the policies map. • The Manchester Airport Public Safety Zone should be shown on the policies map. • The retail allocation within the Congleton Local Plan (under policy DP4) should be shown on the policies map. 	<p>version of the draft adopted policies map [ED 02]. It is also shown in the online interactive version of the map. However, the map shows a large number of overlapping designations and ecological network covers a significant proportion of the borough. It is difficult to show every single designation clearly without covering other designations, but the notation has been reviewed to show the network more prominently without obscuring the other designations in the final Due to its advanced stager towards construction, the Poynton Relief Road protected area has been removed from the policies map but other protected infrastructure schemes should refer to INF 6 and this has been corrected.</p> <p>The draft adopted policies map reflect the LPS site allocations as shown on the existing adopted policies map and includes LPS policies so can be read as one.</p> <p>The current adopted policies map shows the saved policies from the Cheshire Minerals Local Plan. Whilst these will be replaced by the policies in the Minerals and Waste DPD, upon adoption of the SADPD, any remaining saved policies will be shown on the final version of the policies map.</p> <p>Policy GEN 5 ‘Aerodrome safeguarding’ applies to development across the borough. The Manchester Airport Public Safety Zone is referred to by the plan (Policy GEN 6) but not defined by it. The addition of the public safety zone to the policies map is not required to make the plan sound.</p> <p>Policy DP 4 of the Congleton Local Plan will be deleted upon adoption of the SADPD and should not be shown on the policies map.</p>
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Chapter 2: Planning for growth (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>It is stated that the LPS was only found sound on the basis that the SADPD would allocate further sites and the plan would be subject to early review to account for the fact that the plan did not consider the</p>	<p>The SADPD allocates sufficient land to enable to the overall development strategy set out in the LPS to be delivered over the plan period. The plan strategy will be reviewed within five years of its</p>

<p>implications of HS2. The SADPD does not plan positively for growth.</p>	<p>adoption as required by the NPPF.</p>
<p>The housing supply plus proposed allocations are not considered to be sufficient to meet identified needs. The supply is overly reliant on large scale sites, which poses deliverability risks particularly in the short term. The overall provision of housing should be increased, particularly on small sites.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers the need to make further site allocations at all tiers of the settlement hierarchy. The Approach to Small Sites report [ED 58] considers the approach to small sites.</p>
<p>The SADPD should continue to apply the flexibility factor for LSCs as required by the LPS Inspector’s report. Over-provision in principal towns and KSCs does not justify a lack of flexibility in LSCs. The 36,000 dwellings requirement is a minimum and should not be treated as a ceiling. The council has failed to properly consider the flexibility issue through the sustainability appraisal; removal of the flexibility factor will not ensure that the housing land requirement is deliverable over the plan period; it is not an appropriate strategy in the context of NPPF ¶59 which seeks to boost housing supply.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers the approach to flexibility in the housing supply.</p>
<p>The removal of the flexibility factor for LSCs will deliver only a marginal oversupply that does not provide any flexibility in the event that some committed or allocated sites either fail to come forward or deliver fewer dwellings than envisaged. It is inconsistent with the LPS evidence base and the conclusions of the examining inspector. It will increase impetus on settlements at the upper and lower end of the settlement hierarchy to deliver additional dwellings. It fails to ensure that an appropriate scale of development is provided in all of the LSCs to support sustainable and inclusive communities comprising a range of households, including affordable and family housing. It means that locally-arising needs on the north of the borough will not be met, contrary to 8.30 of the LPS. It will fail to significantly boost the supply of new housing as required by the NPPF.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers the approach to flexibility in the housing supply and the approach to making site allocations in Local Service Centres..</p>
<p>The council should not rely on principal towns and key service centres exceeding their expected level of development, as there are a number of strategic sites that may not deliver as anticipated.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers the approach to flexibility in the housing supply and the approach to making site allocations in Local Service Centres.</p>

<p>Whilst the overall plan flexibility increased from 9.9% in 2016 to 12.6% in 2017, it decreased to 11.7% in 2018. There is no guarantee that supply flexibility will increase further through the plan period as claimed, and it may actually reduce.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers the approach to flexibility in the housing supply.</p>
<p>Increased flexibility is a reflection of market demand which should not be suppressed, given the objective to boost housing supply and given the shortfall in housing completions since the start of the plan period.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] considers the approach to flexibility in the housing supply and the approach to making site allocations at each tier of the settlement hierarchy.</p>
<p>Based on the 2019 figures, 91% of the overall LSC housing requirement figure has been built or committed in the first nine years of the plan period. Eleven years of the plan period remain and only 300 additional houses are required in LSCs. In the period 2016-19 windfall permissions in the LSCs have delivered an average of 191 houses per year. Even allowing for a slowdown in future windfall sites coming forward, the housing target is likely to be achieved within the next 2-3 years without further allocations.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for housing site allocations at LSCs. However there is a requirement for safeguarded land.</p>
<p>Further land for residential development around Crewe should be identified to ensure the requirement is met if existing commitments and allocations do not deliver as expected.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Crewe Settlement Report [ED 28] consider the need for further housing allocations in Crewe, concluding that there is no requirement for further housing allocations in the town.</p>
<p>Sites should be allocated in the other settlements and rural areas as the housing requirement is a minimum figure and there is no guarantee that commitments in these areas will be delivered. Reliance on neighbourhood plans to allocate sites is not an effective strategy and there is no requirement for them to do so.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas report [ED 46] have considered the need for rural areas allocations in the revised draft SADPD. They conclude that there is no need for site allocations in OSRA.</p>
<p>The SADPD should disaggregate the housing requirement figure for the other settlements and rural areas, at least for the designated neighbourhood area in accordance with NPPF ¶65</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas report [ED 46] have considered the potential for disaggregation of the LPS PG 7 indicative levels of development for the OSRA. They conclude that there is no need to disaggregate the figure to individual settlements or parishes.</p>

<p>Housing sites should be allocated in OSRA to provide a realistic prospect of meeting the overall housing requirement; to assist in achieving and maintaining a five year housing land supply; to accommodate dwellings envisaged on larger strategic sites but which will now not be delivered during the plan period; to provide flexibility in the event that HS2 comes to Crewe by 2027; to assist with the requirement to identify 10% of the housing requirement on sites of 1 ha or less; to boost the supply of housing generally and because the requirement should be regarded as a minimum.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas report [ED 46] have considered the need for rural areas allocations in the revised draft SADPD. They conclude that there is no need for site allocations in OSRA. The Approach to Small Sites report [ED 58] considers the approach to small sites.</p>
<p>The LPS (¶8.34) is clear that allocations in OSRA will be made through the SADPD and / or neighbourhood plans.</p>	<p>LPS ¶8.34 states that in LSCs and OSRA, development will be restricted to locations well related to the built-up extent of these settlements. The identification of such sites will be achieved through the allocation of suitable sites and/or the designation of settlement boundaries addressed as part of the SADPD and/or neighbourhood plans. The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas report [ED 46] have considered the need to make site allocations in OSRA through the SADPD, concluding that there is no requirement to do so.</p>
<p>The decision not to disaggregate the housing requirement for OSRA is contrary to NPPF ¶65 which requires strategic policies to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Without disaggregating the figure, it is not possible to know whether the 2,950 figure is being met appropriately across the borough and whether the specific needs of specific settlements are being met.</p>	<p>NPPF ¶65 requires strategic policies to set out a housing requirement for designated neighbourhood areas. The strategic policy for spatial distribution of development is already set out in LPS Policy PG 7. The SADPD policies are non-strategic policies to add detail to the strategic policies of the LPS. As strategic policies have already been adopted, the council will provide indicative figures, if requested to do so by the neighbourhood planning body as required by NPPF ¶66.</p>
<p>The flexibility factor for OSRA should be re-instated. Table A.4 of the adopted CELPS proposed a flexibility of 428 dwellings (i.e. 15%). Therefore, according to the adopted CELPS, 470 dwellings were required in the OSRAs at 31st March 2018 (i.e. 42 plus 428).</p>	<p>Flexibility in housing supply is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution Report [ED 05].</p>
<p>Insufficient land is allocated to meet the housing requirement over the plan period; there is not enough flexibility in the trajectory; the council</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for</p>

<p>is currently unable to demonstrate a five year supply of deliverable housing sites.</p>	<p>additional allocations in the revised draft SADPD and the approach towards housing supply flexibility. The council is able to demonstrate a 5 year deliverable supply of housing land as evidenced in the latest Housing Monitoring Update.</p>
<p>The objectively-assessed need for Cheshire East includes an element of C2 bedspaces which includes a requirement for older person's accommodation of 2,180 dwellings but this figure is not set out in the LPS or SADPD. Up to 2018, there has been 303 C2 completions against a requirement of 872 over the same period. This leaves a minimum of 1,877 bedspaces/units to be delivered in the remaining 12 years. There have been only 15 completions in the rural areas and no completions in rural areas in the north of the borough. There is a need for additional C2 bedspaces to meet the requirement. Only one LPS strategic site (LPS 33) includes a specific requirement for C2 and there is significant uncertainty whether C2 uses can be delivered in the plan period.</p>	<p>The Cheshire East Residential Mix Assessment (2019) [ED 49] considers the need for specialist older person housing across the borough up to 2030. There is a current estimated need of 6,862 specialist housing units for older persons but this is expected to increase by a further 5,573 over the 2018-30 period, meaning that the total required additional provision up to 2030 for specialist housing for older people is estimated at 12,435. All of these properties are already counted within the Objectively Assessed Needs identified in the Local Plan Strategy.</p> <p>The Cheshire East Residential Mix Assessment (2019) [ED 49] identifies that it is unlikely that all of the identified needs for older people will be delivered by specialist accommodation alone. Many householders identified as needing specialist accommodation will choose to remain in their own homes with appropriate assistance from social care providers, assistive technology and appropriate adaptations or downsize to more suitable accommodation. Furthermore, the health, longevity and aspirations of older people mean that they will often live increasingly healthier lifestyles and therefore future housing needs may be different from current identified needs. The SADPD includes a policy approach to consider the suitability of schemes in the borough including policy HOU 2 'specialist housing provision'.</p>

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

This initial Publication Draft SADPD Policy is titled PG 8 ‘Development at local service centres’ in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>The plan has made the presumption that an aging population is not mobile and has no willingness to move out of their area to access greater and more convenient services.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Mobberley Primary School is full and Disley Primary School is oversubscribed.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>There is no justification for the embargo on future housing permissions in Bunbury, Goostrey, Haslington, Holmes Chapel, Mobberley, Shavington and Wrenbury, and no policy to support it.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs. The overall LSC housing number is expressed as ‘in the order of’ and is neither a target nor a ceiling. All applications will continue to be determined on their own merits.</p>
<p>There is a lack of published, up to date evidence, which undermines the housing policies in the SADPD and allocations in the Green Belt LSCs and Audlem.</p>	<p>The evidence was the most up to date evidence available at the time of drafting the initial Publication Draft SADPD. All evidence has been reviewed and updated where appropriate to inform the Revised</p>

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	Publication Draft SADPD, including housing and employment monitoring data at 31/03/2020.
The 2019 Housing Completions and Commitments figures confirm that the overall requirement of 36,000 houses, and the 3,500 houses required in the LSCs are likely to be met without incursions into the Green Belt.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs. [ED 05] has also considered the issue of Green Belt boundary alterations, including consideration of exceptional circumstances; concluding that the exceptional circumstances required to alter Green Belt to accommodate new housing development no longer exist. The 'Local Service Centres .Safeguarded Land Distribution Report' [ED 53] concludes that exceptional circumstances do exist to justify alteration of Green Belt boundaries to accommodate the residual amount of safeguarded land.
The 200 houses planned for the Green Belt in the SADPD can be provided for by windfall sites in the immediate future, and well before 2030.	The 'Provision of Housing and Employment Land and the Approach to Spatial Distribution' report [ED 05] has considered the need to make further site allocations at each tier of the settlement hierarchy; concluding that there is now no need to make site allocations for residential development at the LSC tier of the settlement hierarchy. The residential site allocations in the Green Belt have been removed from the Revised Publication Draft SADPD.
Exceptional circumstances have not been demonstrated for the release of Green Belt in Bollington, Disley and other areas of the Borough.	The 'Provision of Housing and Employment Land and the Approach to Spatial Distribution' report has considered the issue of Green Belt boundary alterations, including consideration of exceptional circumstances; concluding that the exceptional circumstances required to alter Green Belt to accommodate new housing development no longer exist. The 'Local Service Centres .Safeguarded Land Distribution Report' [ED 53] concludes that exceptional circumstances do exist to justify alteration of Green Belt boundaries to accommodate the residual amount of safeguarded land.
The housing figure for Bollington is more than 50% higher than any	As set out in 'The provision of housing and employment land and the

<p>other of the northern LSCs and is not compatible with sustained development.</p>	<p>approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>No account has been taken of the historical rate of development in Bollington in the previous 10-year period 2001-2011.</p>	<p>The Plan period runs from 2010; completions and commitments have been taken account of from 1/4/10 onwards.</p>
<p>Green Belt should be treated as a special case in the options.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>There is no attempt to identify the locally arising needs of Bollington and there is no justification for the figure of 390 dwellings chosen.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>There is no proper strategic approach to linking the proposed spatial distribution of development in the LSCs to the proposed Draft Economic Policy.</p>	<p>A comprehensive evidence base has been published to accompany the 'Revised Publication Draft SADPD' [ED 01]. The evidence used was the most up-to-date evidence available when producing the SADPD. The Economic Strategy is in draft form and was in the early stages of development when the SADPD was being prepared.</p>
<p>The housing figure for Bollington should be reduced to 330 to 350 in accordance with the Bollington Neighbourhood Plan updated Housing Needs Assessment.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to</p>

	disaggregate the overall LSC housing and employment figures to individual LSCs.
The methodology is flawed, there is no logical basis for the distribution figures and they exceed any reasonable interpretation of the Local Plan requirement (Para 8.30) for some modest growth in housing and employment to meet locally arising needs.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
No account has been taken of required links to employment, reducing out-commuting, protecting the environment, or that Bollington has the highest density of housing amongst the LSCs of 5.92dpa.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The SADPD is in conflict with Bollington Neighbourhood Plan Policies HO.P1, HO.P2, HO.P3, HO.P4, V1 and EGB.P1.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
There is no recognition that there are no sewage networks in many rural areas, for example PRE 2 and PRE 3 are not connected to sewage networks.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs. United Utilities ("UU") were consulted during the site selection process and raised no concerns with regards to this issue and Site PRE 2. With respect to Site PRE 3, UU have said there may be potential difficulties trying to obtain a wastewater connection from UU,

	<p>which would result in required lead times that need to be accounted for. There is also no wastewater sewer network in the immediate area of Site PRE 3 according to UU, with the nearest connection point being on Prestbury Road approximately 300m to the north. However, guidance from the Environment Agency states that as a rule of thumb, connection to the public foul sewer should be considered to be potentially feasible where the distance from the development site is less than the number of properties multiplied by 30m. PRE 3 is proposed as safeguarded land and the site would only need 10 dwellings for a connection to the public foul sewer to be potentially feasible at a distance of 300m, and for PRE 2, connection to the public sewer should be feasible up to a distance of 1.05km (30m * 35 dwellings).³⁷</p>
<p>It is not recognised that the National Health GP services in Prestbury are an off-shoot of the Alderley Edge Medical Practice, serviced by the same over-subscribed doctors.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs..</p>
<p>The Local Landscape Areas to the north west, south and south east of the built areas of Prestbury are not flagged up.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Prestbury Parish has two Conservation Areas – one in the village centre and the second at Butley Town.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial</p>

³⁷ http://ecab.planningportal.co.uk/Uploads/EA_LPA_advice_non_major_dev_non_mains_drainage_2019.pdf

	distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The table of services used to determine the Option 3 figure for Prestbury is out of date.	The evidence used was the most up-to-date evidence available when producing the SADPD and was a snapshot in time. It should be borne in mind that there is a significant lead in time for the preparation of a plan. As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The statistics used in the settlement profiles are out of date.	The evidence used was the most up-to-date evidence available when producing the SADPD and it should be borne in mind that there is a significant lead in time for the preparation of a plan. As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The evidence base does not adequately justify why further development is to be limited in locations such as Haslington under the Hybrid Option, rather than planning for higher growth in accordance with the Constraint Led Option.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The preferred approach results in more development in the Green Belt or on sites that have a range of constraining factors; the	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial

<p>approach does not accord with the NPPF which seeks to direct development away from more sensitive areas where possible.</p>	<p>distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Concern regarding the capacity of local services and air quality in Disley, traffic, pollution, access to services in Bollington.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Concern that there is no definition of "in the order of"; some certainty of any additional numbers should be clearly defined and the words amended to read "no more than".</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Major developments in Tytherington generate substantial numbers of children for Bollington schools and associated traffic.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Concern regarding the impact additional housing requirements in Bollington will have on drainage and flood management, taking into account the flooding event in July 2019.</p>	<p>All of the allocations proposed have been reviewed with the Lead Local Flood Authority.</p>
<p>The 1,735 windfall allowance would be better addressed through making specific allocations in the OSRA.</p>	<p>The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other Settlements and Rural Areas' report [ED 46] considers whether it is necessary to allocate</p>

	further sites within this tier of the settlement hierarchy.
The distribution of housing amongst the LSC's will not meet the needs of the individual settlements; there is an unbalanced distribution between the northern and southern settlements.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Mobberley's housing figure should be increased to 200 dwellings, for example.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The LPS and SADPD have not fully addressed the implications of HS2; Crewe's housing figure (7,700 dwgs) is not sufficient to meet the housing needs to fully capitalise on the demand from HS2 investment.	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council is preparing a separate Crewe Hub Area Action Plan, which is setting a policy framework to promote and manage land use change in the area immediately around the Crewe Railway Station. This is subject to its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.
The housing delivery figures identified in the Draft Crewe Hub Area Action Plan Housing Study Report should form the housing growth target for Crewe if the full potential of HS2 is to be realised.	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council is preparing a separate Crewe Hub Area Action Plan, which is setting a policy framework to promote and manage land use change in the area immediately around the Crewe Railway Station. This is subject to its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.

<p>The housing figure for Alderley Edge is disproportionately low and is not commensurate with its scale and function.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The assessment for Alderley Edge under Option 4 is flawed as the settlement is not so environmentally constrained and could deliver development; this skews the Option 7 analysis.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The SADPD should not be constrained by the figure of 3,500 dwellings, which is a minimum figure, and should make sure that each of the LSCs receives sufficient development to meet its local needs and priorities.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs. The LPS Policy PG 7 ‘is clear that the 3,500 figure is expressed as ‘in the order of’ and is neither a ceiling nor a target.</p>
<p>Option 7 does not encourage development and growth in some of the most sustainable settlements in the borough or where there is a pressing requirement to deliver new housing to help address a large, and widening, affordability gap</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Concern that the flexibility built into the LPS for the distribution of development at the LSCs is lost through the SADPD.</p>	<p>The approach to housing supply flexibility is addressed in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05].</p>

<p>There is no evidence to support the assertion that housing development in one settlement will benefit another. This is particularly the case in respect of affordability and settlement/service vibrancy and vitality.</p>	<p>The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>The increase in supply necessary to provide flexibility at the LSCs remains insignificant at a Borough-wide level and would not result in unsustainable patterns of development.</p>	<p>The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>A buffer of at least 7.1% should be provided for the LSC's, particularly Holmes Chapel.</p>	<p>The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>Clear and robust justification is needed as to the Council's change of approach to Goostrey and Mobberley.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Constraints identified in Option 4 are unlikely to affect the whole of Alderley Edge and will be site specific – development could be mitigated to avoid having an impact on certain factors.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The housing requirements in each LSC should be expressed as a minimum.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs. The LPS Policy PG 7 'is clear that the 3,500 figures is expressed as 'in the order of' and is neither a ceiling nor a target.</p>

<p>A 10% slippage allowance should be applied to the remaining commitments in Holmes Chapel.</p>	<p>The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>The approach relies on the disaggregation of a potentially ever diminishing residual requirement from the minimum requirement for the LSCs; this could risk the SADPD failing to allocate sufficient development to those Green Belt settlements at the time of adoption.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Development should be apportioned based on a bottom-up assessment of what the LSCs needs are, taking into account demographic changes and their effect on maintaining the population of each LSC as a minimum, outstanding affordable housing needs, and trends of decline of local services or facilities that should be addressed through additional development.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>That Goostrey is now expected to meet its own housing needs is contrary to para 8.34 of the LPS.</p>	<p>¶8.34 of the LPS states that 'In the case of Goostrey ..., it is anticipated that development needs will largely [not all] be provided for in Holmes Chapel' [emphasis added]. As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>Disley's housing requirement should be higher – at least 300 dwgs.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>

<p>There is no justification to reject Options 1 and 2 on Green Belt grounds as it has been established through the LPS that there are exceptional circumstances for Green Belt release.</p>	<p>The 'Provision of Housing and Employment Land and the Approach to Spatial Distribution' report has considered the issue of Green Belt boundary alterations, including consideration of exceptional circumstances; concluding that the exceptional circumstances required to alter Green Belt to accommodate new housing development no longer exist. The 'Local Service Centres .Safeguarded Land Distribution Report' [ED 53] concludes that exceptional circumstances do exist to justify alteration of Green Belt boundaries to accommodate the residual amount of safeguarded land.</p>
<p>It is unclear how the figures for Bollington and Disley have been arrived at.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>A flexibility of 10% should be applied to Disley.</p>	<p>The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].</p>
<p>The figure for Bollington should be higher – at least 500 dwgs.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The contracting working age population and shortage of family-sized accommodation identified in the Housing Topic Paper (2016) for the Bollington Neighbourhood Plan have not been addressed through the SADPD.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>

<p>Goostrey should be allocated a greater level of development.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>There is an absence of evidence on the impact that further development would have on Jodrell Bank Observatory across the whole of the consultation zone</p>	<p>The Council is looking to produce a Supplementary Planning Document that provides further guidance on LPS Policy SE 14 ‘Jodrell Bank’.</p>
<p>The SADPD should allocate land for 3,335 dwgs as per Table 8.2 and para E.6 of the LPS and the expectation of the LPS Inspector to provide flexibility, choice and consistency with the LPS.</p>	<p>The provision of housing and employment land and the approach to spatial distribution report [ED 05] sets out the approach to the need for allocations in the SADPD.</p>
<p>The allocation of only 665 dwgs means that the Local Plan as a whole will not have considered its strategy of only allocating sites of a strategic size against the reasonable alternative of allocating smaller sites instead of or in addition to those strategic sites.</p>	<p>The provision of housing and employment land and the approach to spatial distribution report [ED 05] sets out the approach to the need for allocations in the SADPD.</p>
<p>The overall approach taken in the LSCSDDR [PUB 05] does not reflect the aim of the LPS, which emphasises the importance of making sure that the places where development takes place have good access to jobs, services and facilities.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The figure for Alderley Edge should be increased to 300 dwgs, with a corresponding reduction in Bollington’s figure to 340 dwgs.</p>	<p>As set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The approach taken disaggregates a larger amount of development</p>	<p>As set out in ‘The provision of housing and employment land and the</p>

<p>to settlements which perform less well in terms of access to services and facilities.</p>	<p>approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The housing figure for Alderley Edge should be reviewed in light of the potential impacts upon the Green Belt and the setting of the village</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The reduced requirement for Prestbury for 115 dwellings is not evidenced and will not allow Prestbury to meet its basic housing demands during the Plan period; it should be increased to 130 dwgs, for example/broadly align with Chelford and Disley as a minimum.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>It is not clear why sites are being allocated in the LSCs for 3,500 houses when housing figures show that the authority is on course to deliver its housing numbers without further allocations.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.</p>
<p>The approach of the LPS to deliver development towards the LSCs should not be replaced through an over-delivery in higher order settlements. There is no evidence to say that this approach would support and meet LSC housing needs.</p>	<p>As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to</p>

	individual LSCs.
There is a need to make sure that settlements in the Green Belt have their needs met predominantly through allocations in SADPD, where settlements cannot rely on windfall development to meet their development needs.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
The adoption of the NP should not be used as an opportunity to limit or stifle the growth of Bollington, particularly when the LPS envisages growth to the LSCs in any event.	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
A re-assessment of growth levels across Green Belt villages should be undertaken, and PG 8 updated to apportion specific growth figures to OSRA that have been subject to limited levels of growth (often zero) and where it is not possible to allocate instead to the most appropriate nearby settlement.	The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other Settlements and Rural Areas' report [ED 46] considers the approach to OSRA.
Aircraft noise can represent a constraint to new development, however, it is not as severe the Council or its advisers, Jacobs, have characterised it.	The Council has sought expert advice regarding the approach to be taken towards managing development in the vicinity of Manchester Airport, specifically the effect of noise from aircraft landing and taking off. The justification for the policy is set out in a specific evidence report, 'Aircraft Noise Policy Background Report' [ED 15]. The policy has been amended taking account of a range of available evidence
The OSRA figure should be disaggregated.	The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Other Settlements and Rural Areas' report [ED 46] considers the approach to OSRA.
The sustainability and accessibility credentials of Shavington have been underplayed; the housing figure should be increased to 400 dwgs, and it does not have regard to the close relationship with	As set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] the approach to spatial distribution at LSCs has changed in the Revised Publication Draft

Crewe.	SADPD. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
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Policy PG 9 ‘Settlement boundaries’

Summary of the main issues raised	How the main issues have been taken into account
<p>The settlement boundary should be amended or extended in the following locations:-</p> <ul style="list-style-type: none"> • Macclesfield • Crewe • Alsager • Congleton • Knutsford • Sandbach • Wilmslow • Alderley Edge • Audlem • Bollington • Bunbury • Holmes Chapel • Prestbury • Shavington • Wrenbury 	<p>The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries in the SADPD. This methodology has been applied and the outcomes documented in individual settlement report(s) for Principal Towns, Key Service Centres and Local Service Centres, including as follows:-</p> <ul style="list-style-type: none"> • Macclesfield Settlement Report (ED 35) • Crewe Settlement Report (ED 28) • Alsager Settlement Report (ED 22) • Congleton Settlement Report (ED 27) • Knutsford Settlement Report (ED 34) • Sandbach Settlement Report (ED 41) • Wilmslow Settlement Report (ED 43) • Alderley Edge Settlement Report (ED 21) • Audlem Settlement Report (ED 23) • Bollington Settlement Report (ED 24) • Bunbury Settlement Report (ED 25) • Holmes Chapel Settlement Report (ED 33) • Prestbury Settlement Report (ED 40) • Shavington Settlement Report (ED 42) • Wrenbury Settlement Report (ED 44)
<p>The settlement boundaries should relate to the town / parish boundaries. The precept for these residents goes to the local town and parish council.</p>	<p>The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries in the SADPD. Settlement boundaries relate to the</p>

	implementation of planning policies in the Local Plan. They do not necessarily relate to Town and Parish Council boundaries. Separately to the Local Plan process, the Council is conducting a review of town and parish council governance arrangements across the Borough (Cheshire East Community Governance Review). Further information can be found on the Council's website.
<p>Sites at locations within the 'other settlements and rural areas' tier of the settlement hierarchy, for example:</p> <ul style="list-style-type: none"> • Bucklow Garage • Wybunbury • Church Minshull • Winterley • Hough • Hankelow • Worleston • Higher Hurdsfield • Brereton Green • Cranage <p>Should be recognised as a settlement and identified on the policies map. Not providing settlement boundaries for OSRA is contrary to LPS, in particular paragraph 8.34 and footnote 34 of the LPS.</p>	As set out in the settlement and infill boundaries review document [ED 06] settlements in the 'other settlements and rural areas' tier of the settlement hierarchy are not proposed to have a defined settlement boundary (unless determined through a neighbourhood plan) and would therefore remain in the open countryside. The LPS Open Countryside (PG 6) and Green Belt (PG 3) both allow for 'limited infilling in villages', as does the NPPF. The evidence contained in the settlement and infill boundaries review document has defined villages where infill boundaries and limited infilling would apply (as set out in policy PG 10 (infill villages) in the revised publication draft SADPD).
Representations received in support of the settlement boundary analysis contained in settlement report(s).	Noted.
Representations received in support of the statement 'open countryside is defined as the area outside of any settlement with a defined settlement boundary, where LPS Policy PG 6 Open Countryside will apply' in policy PG 9.	Noted.
Representations received in support of draft Policy PG 9, which confirms that, within the settlement boundaries defined on the adopted Policies Map, 'development proposals (including change of use) will be supported where they are in keeping with the scale, role and function of that settlement and do not conflict with any other relevant	Noted.

policy in the local plan'	
Representations received in support of draft Policy PG 9 ("Settlement boundaries"), the footnote to which states: "where neighbourhood development plans define a settlement boundary, the council will apply the most recent settlement boundary, where relevant."	Noted.
The detailed settlement boundary (including detailed Green belt Boundaries) should be reviewed as part of this SADPD. In Green Belt locations, why is the settlement boundary review limited to stage 1 only.	ED 06 (settlement and infill boundaries review) sets out the Council's approach to detailed Green Belt boundaries. For the settlements inset within the Green Belt, the settlement boundary will continue to be the same as the Green Belt inset boundary (with the exception of safeguarded land).
The settlement boundary for Congleton should be revised to follow the route of the Congleton Link Road.	The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries. The settlement boundary methodology has been implemented in the Congleton Settlement Report (document ED 27).
The settlement boundaries proposed for the LSCs have not been sufficiently adjusted to enable allocations or additional windfall development. Settlement boundaries should be flexible to adapt to rapid change and seek opportunities to meet the development needs of their area. Lack of flexibility / contingency in approach.	The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries. There is a clear monitoring framework as part of a Plan, Monitor and Manage approach to Plan making and implementation [ED 54 - Monitoring Framework]. The Council has also prepared a report [ED 05] which sets out the Council's approach to the provision of housing and employment land and spatial distribution in the revised publication draft SADPD.
Settlement boundary methodology should not limit consideration to sites with commitments / completions adjoining the settlement. The assessment does not allow for sites that have a high level of containment or a strong functional relationship with the existing settlement	The settlement and infill boundaries review [ED 06] sets out a clear methodology and justification for the approach to defining settlement boundaries. It considers a number of relevant factors including:- i) Review of boundary in light of site allocations (in the adopted LPS and made neighbourhood plans or proposed through the SADPD); ii) Consideration of extant planning consents and the relationship of land to the built-up area; and iii) Review of the relationship of settlement boundaries to physical features.
The use of 'out of date' housing figures in respect of commitments and	The base date for the revised publication draft SADPD is the 31 March

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completions makes this policy unsound	2020. This has been used as the base date for the individual settlement reports prepared.
Appendix B in PUB06 details responses to the initial consultation, there does not appear to be any trail to suggest that certain responses have been considered or amendments made to the draft documents.	Alongside the settlement and infill boundaries review [ED 06], this consultation report [ED 56] details responses to the main issues raised during consultation stages on the SADPD to date.
The policy should be amended to be flexible enough to be able to accommodate new development outside of settlement boundaries, to allow the Council to quickly address any issues of shortfall in housing supply against the plan requirement. A criteria based policy can achieve this. Provided Harborough Local Plan policy as an example	The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries. The Council has also prepared a report [ED 05] which sets out the Council's approach to the provision of housing and employment land and spatial distribution in the revised publication draft SADPD [ED 05].
Objection is raised in relation to the draft Policies Map and its failure to identify the Albion Works site and adjoining residential land known as Albion Locks (hereafter referred to as the 'Albion site') as falling within the settlement boundary for Sandbach	The settlement and infill boundaries review [ED 06] sets out the methodology for the consideration of settlement boundaries. This methodology has been applied for Sandbach, in an individual settlement report [ED 41]. The Sandbach Settlement Report [ED 41] concludes that the former Albion Chemical Works site is considered to be physically separate from the main built up area of Sandbach to be included within its settlement boundary.
Edit explanatory paragraphs of Policy PG 9 to better clarify the role of the neighbourhood plan in the interests of effective and consistent plan making	It is considered that the footnote(s) to Policy PG 9 provides sufficient clarity on the relationship between the SADPD and Neighbourhood Plans in the borough.

Policy PG 10 'Infill villages'

Summary of the main issues raised	How the main issues have been taken into account
The approach would unnecessarily restrict any new additional dwellings being built in smaller settlements not identified under this policy and contrary to NPPF ¶78.	The draft policy is considered to be in accordance with the NPPF. It defines where 'limited infilling in villages' will be allowed under the strategic LPS Policy PG 6 'Open countryside' but does not prevent other types of development allowed under PG 6 from occurring outside of the infill boundaries – including the infill of a small gap with one or two dwellings; re-use of existing rural buildings; replacement

	buildings; extensions; development essential for an existing business; or development essential for the conservation of a heritage asset.
The approach is contrary to the NPPG (009 ID:67-009-20190722) “The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness...”	The draft policy is considered to be in accordance with the NPPG and does not impose blanket restrictions on housing development. . It defines where ‘limited infilling in villages’ will be allowed under the strategic LPS Policy PG 6 ‘Open countryside’ but does not prevent other types of development allowed under PG 6 from occurring outside of the infill boundaries – including the infill of a small gap with one or two dwellings; re-use of existing rural buildings; replacement buildings; extensions; development essential for an existing business; or development essential for the conservation of a heritage asset.
It is considered that Little Bollington should be identified as an infill village.	The status of Little Bollington under this policy has been fully considered through the Settlement and Infill Boundaries Review [ED 06], which concludes that under the methodology set out, Little Bollington should not be designated as an infill village.
The policy states that infill villages do not have a settlement boundary but the Settlement and Infill Boundaries Review sets out proposed new boundaries for these villages.	The Settlement and Infill Boundaries Review [ED 06] proposes infill boundaries for the infill villages, within which limited infilling would be permitted in accordance with draft SAPPD Policy PG 10 ‘Infill villages’. Higher-order settlements are proposed to have settlement boundaries, within which development proposals would be supported in accordance with draft SADPD Policy PG 9 ‘Settlement boundaries’.
The defined infill boundaries include land with planning consents but do not account for future growth. The boundaries are drawn tightly, allowing very few (if any) opportunities for infill development, restricting windfall development in locations that the council is reliant on to meet the requirements. The boundaries do not include the sites submitted as part of the call for sites exercise.	The methodology for defining boundaries is set out in the Settlement and Infill Boundaries Review [ED 06]. The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas report [ED 46] consider whether it is necessary to allocate further sites within this tier of the settlement hierarchy.
The policy is considered too restrictive and will act to prevent otherwise sustainable development coming forward.	The policy allows for small scale growth where appropriate within the existing built envelope of settlements. It defines where ‘limited infilling in villages’ will be allowed under the strategic LPS Policy PG 6 ‘Open countryside’ but does not prevent other types of development allowed under PG 6 from occurring outside of the infill boundaries – including

	the infill of a small gap with one or two dwellings; re-use of existing rural buildings; replacement buildings; extensions; development essential for an existing business; or development essential for the conservation of a heritage asset.
The policy should apply equally to considered growth of small Traveller sites in these areas and consideration for Traveller site development should not be constrained by Green Belt policy. Gypsy and Traveller sites should be considered a 'use appropriate to a rural area' under LPS Policy PG 6.	The approach to Gypsy and Traveller sites has been considered and is set out in LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople' and draft SADPD Policy HOU 5a 'Gypsy and Traveller site provision'. The definition of limited infilling under this draft policy is "the development of a relatively small gap between existing buildings". This is not restricted to conventional housing only and could apply to all forms of development where they comply with the policy requirements.
NPPF ¶145e allows for limited infilling in villages on the basis that this type of development does not harm the purpose of Green Belt. The methodology to select the infill villages is mainly based upon the sustainability of the location which has no direct relevance to Green Belt policy. The suitability of a site for limited infilling should not be prescribed through the local plan and infill proposals should be assessed on a site by site basis.	The NPPF advises that plans should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"; and that "non-strategic policies should be used... to set out more detailed policies for specific areas, neighbourhoods or types of development" (¶28). Defining villages and infill development within the SADPD is consistent with these principles.
The policy does not allow the plan to be sufficiently flexible to adapt to rapid change as required by the NPPF (¶11a) and settlement boundaries should be extended to include additional deliverable sites.	The approach to flexibility is considered and set out in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Case law has established that whether a settlement is a 'village' for the purposes of NPPF ¶145 is a matter of planning judgement dependent on a range of factors and can only properly be made on a case by case basis.	The NPPF advises that plans should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"; and that "non-strategic policies should be used... to set out more detailed policies for specific areas, neighbourhoods or types of development" (¶28). Defining villages and infill development within the SADPD is consistent with these principles.
The draft policy seeks to downgrade established settlement boundaries around existing settlements to allow infill only development or in some case deleting the settlement boundaries altogether –	The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06].

<p>claiming that the built form of these settlements is now open countryside, which is surprising given that existing settlement boundaries were defined when development needs were much lower.</p>	
<p>There is no justification for limiting development to infilling; other forms of development such as rounding off may be acceptable.</p>	<p>The draft policy is in accordance with the strategic LPS policies PG 3 'Green Belt' and PG 6 'Open countryside'; both of which allow for 'limited infilling in villages' but do not seek to permit 'rounding off'.</p>
<p>An assessment as to whether a development constitutes infill development should not be prescribed by the local plan process and can only be made 'on the ground' with due regard for site specific circumstances.</p>	<p>The NPPF advises that plans should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"; and that "non-strategic policies should be used... to set out more detailed policies for specific areas, neighbourhoods or types of development" (¶28). Defining villages and infill development within the SADPD is consistent with these principles.</p>
<p>The strategy for development in the other settlements and rural areas is inconsistent with LPS Policy PG 2 which allows for "proportionate development" in the other settlements and rural areas.</p>	<p>The draft policy has been reviewed against the requirements of LPS PG 2. It allows for small scale growth where appropriate within the existing built envelope of settlements and is considered to be in accordance with LPS PG 2.</p>
<p>LPS Policy PG 2 supporting information states that site allocations in the other settlements and rural areas will be brought forwards through the SADPD and/or neighbourhood plans. The council is relying solely on neighbourhood plans to deliver any future housing growth in this tier of the hierarchy.</p>	<p>The Other Settlements and Rural Areas report [ED 46] considers how to meet the housing requirement in this tier of the settlement hierarchy.</p>
<p>The council is departing from the approach agreed with the LPS inspector to make allocations in rural areas; this is on the basis that they have allocated too many houses in the upper tiers of the settlement hierarchy. This is despite there being a persistent undersupply of new homes.</p>	<p>The LPS makes no commitment to making site allocations in the other settlements and rural areas. The inspector's final report (¶91) concludes that, for the other settlements and rural areas, "since some development has occurred in the recent past, the balance of development (1,250 homes and 4 ha of employment land) would be identified in the SADDPD and forthcoming Neighbourhood Plans". As demonstrated in the Other Settlements and Rural Areas report [ED 46], the number of dwellings already completed or committed in OSRA now significantly exceeds the 2,950 requirement for new dwellings over the plan period.</p>

<p>The removal of the flexibility factor and reliance entirely on windfalls means that it is unlikely that the OSRA requirement will be met during the plan period as it relies on 100% of commitments to be delivered.</p>	<p>As demonstrated in the Other Settlements and Rural Areas report [ED 46], the number of dwellings already completed or committed in OSRA now significantly exceeds the 2,950 requirement for new dwellings over the plan period.</p>
<p>Infilling should also include small groups of buildings and rounding off.</p>	<p>The draft policy defines limited infilling as “the development of a relatively small gap between existing buildings”. The glossary also defines ‘infilling’ and notes that the scale of infill development will depend upon the location of the site.</p>
<p>It is considered that Worleston should have a settlement boundary. Failing that, it should have an infill boundary.</p>	<p>The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06], which has considered the status of Worleston, concluding that under the methodology set out, Worleston should not be designated as an infill village.</p>
<p>Higher Hurdsfield is within the open countryside and the national park fringe. Infill development would be deleterious to the character of the village and concerns arise of the potential to expand beyond the existing boundary of the area.</p>	<p>The draft policy seeks to clarify the area within which infill development may be appropriate. The policy also requires development to be in keeping with the scale, character and appearance of its surroundings and the local area; and does not give rise to unacceptable impacts.</p>
<p>The Styal infill boundary should be extended to include detached outbuildings in the curtilage of 1 Hollin Lane.</p>	<p>This issue has been considered through the Settlement and Infill Boundaries Review [ED 06] and a minor adjustment has been made to the proposed Styal infill boundary.</p>
<p>Winterley should have a settlement boundary rather than an infill boundary.</p>	<p>The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06].</p>
<p>Land off Crewe Road, Winterley should be included in the infill boundary.</p>	<p>The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Winterley infill boundary in line with the methodology set out, concluding that the land in question should not be included within the infill boundary.</p>
<p>Marton should be classed as an infill village.</p>	<p>The status of Marton under this policy has been fully considered through the Settlement and Infill Boundaries Review [ED 06], which</p>

	concludes that under the methodology set out, Marton should not be designated as an infill village.
The Settlement and Infill Boundaries Review [PUB 06] does not provide sufficient reasoning for discarding any settlements with a population of less than 500.	As set out in the methodology, the Settlement and Infill Boundaries Review [ED 06] uses the level of service/facility provision; the availability of public transport; and whether or not the settlement has a coherent spatial form to determine whether a settlement should be classed as a village. Only where this initial assessment provides a borderline result is the population of a settlement taken into account.
Land at the corner of Castle Road and High Street, Mow Cop is significant in terms of the setting of Mow Cop and should be excluded, recognising the setting of Mow Cop both in landscape and heritage terms.	The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Mow Cop infill boundary in line with the methodology set out, concluding that the land in question should be included within the infill boundary. The plan is intended to be read as a whole and policies on landscape and heritage would still apply.
Broomeedge should be considered in the Settlement and Infill Boundaries Review [PUB 06]; whilst the village boundary is within Warrington Borough, it is clear that an integral part of the village is located within Cheshire East.	Broomeedge is identified as a Green Belt village in the Warrington Core Strategy. However, there are significant areas of open space lying between the village boundary and the administrative boundary. There are no areas within Cheshire East that have a relationship with the built form of the village in Warrington Borough.
There is no justification for the change to the Gawsworth infill boundary and it should remain the same as in the Macclesfield Borough Local Plan 2004	The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Gawsworth infill boundary in line with the methodology set out.
Church Minshull should have a settlement boundary and that boundary should include land opposite Weaver View at Over Road.	The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06], which concludes that under the methodology set out, Church Minshull should be designated as an infill village. This document has also considered the proposed Church Minshull infill boundary in line with the methodology set out, concluding that the land in question should not be included within the infill boundary.
Burleydam has a number of services and facilities, public transport, and a coherent spatial form and should be defined as an infill village; its omission implies that no further development will be allowed in	The status of Burleydam under this policy has been fully considered through the Settlement and Infill Boundaries Review [ED 06], which has been updated to reflect the services and facilities present but

Burleydam for the remainder of the plan period to 2030.	concludes that under the methodology set out, Burleydam should not be designated as an infill village.
The infill boundary for Church Minshull should include the whole of the curtilage of Frog Manor.	The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Church Minshull infill boundary in line with the methodology set out, concluding that the curtilage in question beyond Eel Brook should not be included within the infill boundary.
There is no justification to make Wychwood Village an infill village. The original design concept was as open space intertwined with small hamlets of dwellings and should not be altered. The S106 agreement prevents further dwellings. Designation as an infill village invites challenges to develop the land around the settlement.	The draft policy seeks to clarify the area within which infill development may be appropriate. The status of Wychwood Village under this policy has been fully considered through the Settlement and Infill Boundaries Review [ED 06], which concludes that under the methodology set out, Wychwood Village should be designated as an infill village.
Wybunbury and Hough are already included in Table 8.3 of the LPS so do not need to be included in Policy PG 10.	Footnote 34 to LPS Policy PG 6 'Open countryside' confirms that settlement boundaries will be reviewed and defined through the SADPD and neighbourhood plans. The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06].
The approach is similar to the 'sustainable villages' approach in the LPS which was regarded as unsound.	The Settlement and Infill Boundaries Review [ED 06] sets out the justification and evidence for the approach to defining infill villages.
Bucklow Hill should have a defined settlement boundary under Policy PG 9, but if not it should have a defined infill boundary.	The consideration of which settlements should have a defined settlement boundary and which should have a defined infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06], which concludes that under the methodology set out, Bucklow Hill should not be designated as an infill village.
Detailed amendments to the Higher Poynton boundary requested.	The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Higher Poynton infill boundary in line with the methodology set out. However, the recently-made Poynton Neighbourhood Plan defines a different infill boundary for Higher Poynton. In line with the council's supportive approach to Neighbourhood Planning, the draft policies map includes the neighbourhood plan infill boundary instead of the infill boundary

	justified through the council's evidence base.
Concern that the Pickmere boundary covers too large an area and may lead to infill development outside the boundary, in the Green Belt.	The draft policy seeks to clarify the area within which infill development may be appropriate. The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Pickmere infill boundary in line with the methodology set out.
The Wybunbury boundary should include land between Sally Clarke's Lane and the brook.	The Settlement and Infill Boundaries Review [ED 06] has considered the proposed Wybunbury infill boundary in line with the methodology set out, concluding that the land in question should not be included within the infill boundary.

Policy PG 11 'Green Belt boundaries'

This initial Publication Draft SADPD policy has been merged with Policy PG 12 'Safeguarded land boundaries' and titled PG 12 'Green Belt and safeguarded land boundaries' in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the housing requirement for local service centres can be met without amendments to Green Belt boundaries given the high level of completions and commitments to date. The small remaining requirement is likely to be met from small developments coming forward as brownfield, infill or windfall sites. No consideration has been given to development that has taken place in the plan period to date and in the previous 10 year period. There is no requirement to release Green Belt in Bollington.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for housing allocations at LSCs and the previously proposed allocations have been removed from the Revised Publication Draft SADPD. However there is a requirement for safeguarded land. Full consideration has been given to completions to 31 March 2020 plus commitments at that date.
It is considered that spatial distribution of development to local service centres does not adequately consider Green Belt issues. The figure for Bollington is considered to be too high. The exceptional circumstances required to alter Green Belt boundaries have not been demonstrated, given that there are alternative options for accommodating development outside of the Green Belt.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for housing allocations at LSCs and the previously proposed allocations have been removed from the Revised Publication Draft SADPD. However there is a requirement for safeguarded land.

<p>The SADPD proposed to release land from the Green Belt in Bollington that has been assessed as making a 'significant contribution' to the purposes of Green Belt, when alternative non-Green Belt or lower contribution Green Belt sites are available elsewhere.</p>	<p>Green Belt sites are considered in order of their contribution to Green Belt purposes, to prioritise those sites making a lower contribution, as set out in the Site Selection Methodology [ED 07]. However, not all sites making a lower contribution to Green Belt purpose are suitable for allocation or designation as safeguarded land.</p>
<p>It is understood that the 2019 housing figures show that more than sufficient land has already been provided to exceed the overall housing requirement figure in the LPS including an allowance for 10% flexibility; indicating that there is insufficient justification to release further Green Belt land for development or for safeguarded land.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for housing allocations at LSCs and the previously proposed allocations have been removed from the Revised Publication Draft SADPD. However there is a requirement for safeguarded land, as set out in the Local Service Centres Safeguarded Land Distribution Report [ED 53].</p>
<p>It is considered that information on the compensatory improvements to the environmental quality and accessibility of the remaining Green Belt is lacking.</p>	<p>The Revised Publication Draft SADPD Policy PG 12 'Green Belt and safeguarded land boundaries' includes a requirement that of allocated for development in the future, proposals for safeguarded land sites should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of their removal from the Green Belt.</p>
<p>The approach to Green Belt boundaries is considered not to comply with the NPPF (¶140). The current Green Belt boundary for smaller settlements was considered against the guidance set out in PPG (1988) and the NPPF has significantly amended the guidance in respect of villages located within the Green Belt. Previously, the decision to include a village in the Green Belt ('washed-over') or exclude it ('inset') was based on degree of new development that was to be allowed. In contrast, the NPPF requires this decision to be based on whether or not the village has an open character that makes an important contribution to the openness of the Green Belt. Retaining villages within the Green Belt where that are not open in character or the village does not make an important contribution to openness is contrary to NPPF ¶140 as well as ¶139 which confirms that Green Belt boundaries should not include land which it is unnecessary to keep</p>	<p>The NPPF (¶136) requires that "once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..." The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering existing Green Belt boundaries to create new inset boundaries and remove entire settlements from the Green Belt (or to include entire settlements that are currently excluded)..</p>

<p>permanently open. It would also be at odds with NPPF ¶¶83 and 84 which require policies to support a prosperous rural economy. The evidence base should include an assessment to determine the contribution that each village makes to the openness of the Green Belt. In particular, the village of Ashley should be inset from the Green Belt.</p>	
<p>It is suggested that the lack of brownfield land and the development requirements of Knutsford present the exceptional circumstances to justify further Green Belt boundary alterations around Knutsford.</p>	<p>The need for further site allocations in Knutsford is considered through the Knutsford Settlement Report [ED 34]</p>
<p>The SADPD fails to address the Green Belt boundary anomaly that exists around the Parkgate, Knutsford site which is based on the 2004 Macclesfield Local Plan Green Belt boundary. This does not represent a logical boundary, nor does it utilise physical features that are readily recognisable as a defensive and permanent boundary.</p>	<p>The NPPF (¶136) requires that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries...” The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering existing Green Belt boundaries for other reasons.</p>
<p>Further amends to the Green Belt around Wilmslow should be made to allocate non-strategic sites because the LPS states that further non-strategic sites may need to be removed from the Green Belt through the SADPD. The flexibility factor for Wilmslow is considered to be too low and there has been no opportunity to allocate non-strategic sites.</p>	<p>The need for further site allocations in Wilmslow is considered through the Wilmslow Settlement Report [ED 43].</p>
<p>Safeguarded sites should not be included in the list if sites removed from the Green Belt because they are also referred to in Policy PG 12.</p>	<p>The policy has been deleted and merged with PG 12 in the Revised Publication Draft SADPD so there is no repetition.</p>
<p>It is considered that an additional Green Belt site will be required in Prestbury to deliver the housing figures set out in Policy PG 8.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.</p>
<p>The housing figures used to inform the SADPD are considered to be out of date and inaccurate. 2019 figures were released on the date of</p>	<p>The Revised Publication Draft SADPD is based on the most up to date housing and employment land monitoring figures at 31 March 2020.</p>

consultation starting.	
Market signals should be taken into account but no consideration has been given to the Housing Delivery Test 2018 which showed that Cheshire East was delivering twice as many houses as required between 2015/18. The record number of new completions (3,062) in 2018/19 is even more significant. It is reasonable to expect the 200 homes proposed on Green Belt sites to be met from windfall sites in the local service centres.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at LSCs. However there is a requirement for safeguarded land.
Based on 2019 figures, Prestbury has 72 commitments and completions. Adding in the 10 proposed at PRE 1 gives 82. Based on the current run-rate of 8 new houses per year, Prestbury will achieve its total requirement of 115 in 2024 (or 2023 if including PRE 1) and there is no need for Green Belt release.	This calculation double-counts the commitments. In any case, The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
It is considered that the Prestbury settlement boundary should be reviewed to include areas in the Green Belt that make no meaningful contribution to Green Belt purposes.	The Prestbury settlement boundary has been considered in the Prestbury Settlement Report [ED 40] in line the methodology set out in the Settlement and Infill Boundaries Review [ED 06].
Green Bely policy should acknowledge that brownfield sites in the Green Belt can be suitable for development to account for NPPF ¶145g.	LPS Policy PG 3 allows for limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt.
An amend should be made to the Green Belt around Handforth because the NPPF (¶136) allows non-strategic policies to make detailed amendments to Green Belt boundaries.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered the need to allocate further sites in Handforth.
Further Green Belt sites should be allocated around Alderley Edge to account for flexibility.	Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at LSCs. However there is a requirement for safeguarded land.
An area of protected open space to the south of Macclesfield should be included within the Green Belt.	This areas was removed from the Green Belt on adoption of the LPS in 2017 in order to define a new Green Belt boundary using physical features that are readily recognisable and likely to be permanent.

<p>The SADPD is the second part of the Green Belt review and should include a review of smaller Green Belt parcels against the purposes of Green (irrespective of the need for allocations) to determine whether there was land that no longer fulfils the purposes of Green Belt. NPPF (¶139) is clear that plans should not include land which it is unnecessary to keep permanently open.</p>	<p>The NPPF (¶136) requires that “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries...” The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering existing Green Belt boundaries for other reasons</p>
<p>It is considered that sites in Poynton may not deliver as expected and further Green Belt sites are required.</p>	<p>The Poynton Settlement Report considers the need for further site allocations in Poynton. In line with the Site Selection Methodology, it prioritises the suitable non-Green Belt sites over making further Green Belt amendments.</p>
<p>Release of Green Belt is not in accordance with the Bollington Neighbourhood Plan policy HO.P2 ‘Housing location’ which states that development on Green Belt land as designated in 2015 is inappropriate and will only be permitted where covered by very special circumstances of LPS Policy PG 3.</p>	<p>The development plan should be read as a whole. The Bollington Neighbourhood Plan also includes Policy EGB.P1 ‘Development within Released Green Belt Land’ which sets out the considerations to apply to any sites that have been released from the Green Belt for development.</p>
<p>The council has downgraded the Green Belt contribution of a number of sites from that awarded to them in the Green Belt Assessment Update 2015.</p>	<p>All Green Belt sites considered through the respective settlement reports have been subject to a Green Belt Site Assessment carried out in line with the methodology set out in the Green Belt Assessment Update.</p>
<p>Further employment land is required in Alsager and exceptional circumstances exist to justify making Green Belt alterations.</p>	<p>The requirement for further employment land in Alsager is considered through The Provision of Housing and Employment Land and the Approach to Spatial Distribution Report [ED 05] and the Alsager Settlement Report [ED 22], which conclude that no further site allocations are needed in Alsager.</p>
<p>A number of issues were raised in respect of specific Green Belt sites where it is considered either that the site should be released from the Green Belt and allocated for development; or alternatively where the site should remain in the Green Belt.</p>	<p>Specific main issues for specific sites are reported and considered in the section for the relevant settlement later in this report.</p>

Policy PG 12 ‘Safeguarded land boundaries’

This initial Publication Draft SADPD policy has been merged with Policy PG 11 ‘Green Belt boundaries’ and titled PG 12 ‘Green Belt and safeguarded land boundaries’ in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>It is considered that the safeguarded land (and more) is required for development in this plan period. More housing land to meet development needs plus more safeguarded land will provide greater flexibility and secure the longevity of the Green Belt boundary.</p>	<p>Strategic policy PG 4 in the LPS states that “safeguarded land is not allocated for development at the present time”. The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional site allocations in the Revised Publication Draft SADPD. The need for further site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].</p>
<p>The SADPD was prepared using 2018 data and no account was taken of market signals, including the Housing Delivery Test 2018 measurement which showed that Cheshire East was delivering twice as many houses as required between 2015-18. Even more significant was the record number of net house completions in 2018/19 (3,062). It is reasonable to expect that the 200 houses provided by the 8 sites in the Green Belt will be met in the immediate future from windfall sites. Therefore all the safeguarded sites should be deleted.</p>	<p>Safeguarded land is not allocated for development and is intended to meet longer term development needs, stretching well beyond the plan period.</p>
<p>The approach to safeguarded land should be to provide a pool of reserve sites which could come forward should other sites in the supply not be able to deliver. These sites should be distributed to reflect the adopted spatial strategy and not just in the northern part of the borough,</p>	<p>Strategic policy PG 4 in the LPS states that “safeguarded land is not allocated for development at the present time”. Safeguarded land is defined as “land between the urban area and the Green Belt”. Settlements in the southern part of the borough are beyond the Green Belt and therefore do not require safeguarded land.</p>
<p>The emphasis should be on meeting longer term development needs. There are significant growth proposals in Crewe and Alsager falls within the core growth area. The SADPD should prepare for this direction of growth and ensure sufficient land is available to maximise potential.</p>	<p>Safeguarded land is defined as “land between the urban area and the Green Belt”. Crewe and Alsager are located beyond the Green Belt and therefore do not require safeguarded land.</p>

It is considered that aircraft noise should not prevent Mobberley from being recognised as a suitable location for new housing. The level of safeguarded land to be provided in Mobberley is considered to be low due to the low of housing proposed.	The approach to aircraft noise is considered in the Aircraft Noise Policy Background Report [ED 15]; and the approach to sites in Mobberley is considered in the Mobberley Settlement Report [ED 37].
The re-allocation of Bollington’s safeguarded land to Chelford is not justified and provision in Mobberley would be a more sustainable option.	The spatial distribution of safeguarded land has been re-considered in the Revised Publication Draft SADPD, as explained in the Local Service Centres Safeguarded Land Distribution Report [ED 53].
The approach to providing Bollington’s safeguarded land in Chelford does not address the particular issues of Bollington. The settlements share no particular linkages and this would not support Bollington’s role in the settlement hierarchy.	The spatial distribution of safeguarded land has been re-considered in the Revised Publication Draft SADPD, as explained in the Local Service Centres Safeguarded Land Distribution Report [ED 53].
It is considered that the additional safeguarded land in Chelford should be re-allocated to Alderley Edge as it is a more sustainable settlement with three trains per hour to Manchester (instead of one at Chelford).	The spatial distribution of safeguarded land has been re-considered in the Revised Publication Draft SADPD, as explained in the Local Service Centres Safeguarded Land Distribution Report [ED 53].
It is not clear why the 24ha of safeguarded land identified for local service centres in the first instance has been reduced to 13.6 ha.	The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the remaining amount of safeguarded land to be provided in the SADPD.
A number of issues were raised in respect of specific sites.	Specific main issues for specific sites are reported and considered in the section for the relevant settlement later in this report.

Policy PG 13 ‘Strategic green gaps boundaries’

Summary of the main issues raised	How the main issues have been taken into account
The Settlement and Infill Boundaries Review (PUB06) and Strategic Green Gap Boundary Definition Review (PUB08) fail to assess reasonable alternative sites other than those that have been allocated or committed. Therefore, no consideration has been made to existing sites and the relationship to the physical form of the built environment. Policy PG 13 is therefore considered unsound on this basis.	Site Selection Methodology Report[ED 07] August 2020 sets out the Site Selection Methodology (“SSM”) that has been used to identify the sites for development (including safeguarded land) in the revised publication draft Site Allocations and Development Policies Document (“SADPD”) Sites within the Strategic Green Gap have been subject to the same site selection methodology as all other sites. The detailed traffic light

	<p>criteria “4-Strategic Green Gap” attributes a score of GREEN for non Green Gap sites, AMBER for partially Green Gap sites and RED for wholly Green gap sites. This is one of twenty criteria used to thoroughly assess reasonable alternative sites whether within or beyond the Green Gap.</p>
<p>The assessment should be reviewing the Green Gap to enable land which does not contribute to the Gap to be excluded</p>	<p>Strategic Green Gap Boundary Definition Review (ED 08) Table 1 states “The general extent of the Strategic Green Gaps has been considered and settled through the LPS process. The extent of work required to define detailed boundaries should be proportionate to that task. It does not open up an opportunity to review the broad extent of the designated areas or necessitate a comprehensive review to determine whether the land shown generally falling within the Strategic Green Gaps should be re-assessed and rated against Strategic Green Gap purposes. However, in identifying an appropriate boundary, a check has been undertaken to determine whether it has enclosed land that does not contribute to Strategic Green Gap purposes.”</p>
<p>The assessment in FD08 does not robustly assess the Green Gap but rather only takes account of permitted schemes</p>	<p>FD08 (First Draft 08) assessment in the evidence base was superseded by PUB08 (Publication Draft 08) as well as Site Selection Methodology Report[PUB 07] June 2019, which was superseded by ED 08 (Examination Document) August 2020. . These documents together set out the assessment methodology both for the Strategic Green Gap (SGG) boundaries and the sites put forward, within and beyond the SGG</p>
<p>The policy is not considered to be effective, positively prepared, justified or consistent with national policy. To make the policy sound, the proposed policy should also be amended to allow for the alteration of the green gap between Crewe and Haslington where needed, for example, when the supply of houses falls below 5 years.</p>	<p>The LPS Inspector’s final report 2017 paragraph 109 states the SGG policy needed to be robust and defensible “Since sufficient land will be allocated in the CELPS to meet future development needs, the policy should be robust and defensible” The Annual Housing Monitoring Update sets out that Cheshire East has a five year housing land supply. Speculation over the Council’s future five year supply should not influence the position of the SSG boundaries. The Site Selection Methodology Report [PUB 07] June 2019, and latest ED 07 August 2020 assessed all sites within and beyond the</p>

	Strategic Green Gap using twenty criteria, of which Green Gap was only one.
<p>The Council's approach of following, as closely as possible, the extent of the hatched areas (Figure 8.3 LPS) is fundamentally flawed. Those boundaries were not considered or examined by the Inspector in the preparation of the LPS.</p> <p>It is therefore entirely correct that the detailed boundaries must consider whether the detailed boundaries fulfil the objectives of Policy PG 5. The Council's argument against this point is illogical and demonstrates that it has approached the issue incorrectly</p>	<p>As set out in Strategic Green Gap Boundary Definition Review ED 08 Table 1, the general extent of the Strategic Green Gaps was considered and settled through the LPS process. The review did not open up an opportunity to review the broad extent of the designated areas or necessitate a comprehensive review to determine whether the land shown generally falling within the Strategic Green Gaps should be re-assessed and rated against Strategic Green Gap purposes.</p> <p>However, in identifying an appropriate boundary, a check has been undertaken to determine whether it has enclosed land that does not contribute to Strategic Green Gap purposes. This is reflected in the methodology below."</p> <p>The boundaries were considered by the Inspector. As set out in Strategic Green Gap Boundary Definition Review [ED 08] paragraph 2.1 The Inspector confirmed that the general extent of the Strategic Green Gaps has been addressed in the LPS supporting evidence and that the purpose and proposed approach to the designation of Strategic Green Gaps within the area to the south, east and west of Crewe was appropriate, fully justified, effective, positively prepared, soundly based and consistent with national policy. He confirmed that the detailed boundaries would be subsequently addressed through the SADPD. The definition of detailed boundaries is therefore a limited exercise that does not involve a review of whether the land shown as broadly comprising the Strategic Green Gap in the LPS should continue to form part of it.</p>
Any adherence to the boundaries defined in Policy NE4 of the Crewe and Nantwich Local Plan or indicated on Figure 8.3 of the CELPS can only be justified where the objectives of Policy PG 5 are fulfilled.	As set out in Strategic Green Gap Boundary Definition Review [ED 08] in identifying an appropriate boundary, a check has been undertaken to determine whether it has enclosed land that does not contribute to Strategic Green Gap purposes. This is reflected in the methodology
Unclear of the necessity for Policy PG 13 as it appears to just refer to	108 of the CELPS Inspector's report states: "The general extent of the

<p>and repeat the policy contained in the LPS. Policy PG 13 refers to the detailed boundaries of the Strategic Green Gaps in LPS policy PG 5</p>	<p>Strategic Green Gaps policy has been addressed in the supporting evidence [BE/011], and whilst ideally its detailed boundaries should be defined in the CELPS, the revised policy provides sufficient strategic guidance and spatial direction to determine such boundaries in the subsequent SADPPD, when concerns about the detailed boundaries and extent of the gaps can be addressed.) The boundary review is set out in ED 08 Strategic Green Gap Boundary Review 2020.</p>
<p>On the proposals map, it is suggested a different colour is used to identify these gaps. Certainly when viewed on screen, it is difficult to appreciate the subtly various shades of green, especially given that open countryside, green gap, Green Belt and protected open spaces all overlap</p>	<p>Noted The colours used are deemed to be the most appropriate for mapping purposes and have been chosen for their readability.</p>
<p>Recent appeal decisions concluded that harm would be limited, therefore it is justifiable to release further sites from the Strategic Green Gap</p>	<p>The Inspector's final report regarding the LPS 2017 paragraph 107 states that " I realise that the current C&NLP policy has had mixed success at recent planning appeals, but its purposes have been recognised, even though the weight given to it has varied. Some of its policy objectives could be met by the open countryside policy (Policy PG 5) (which also applies within the Strategic Green Gaps) and are similar to Green Belt policy, but it has a clear and relevant planning purpose. It is a restrictive policy and needs to be robust, covering all forms of development, in order to prevent the erosion of physical gaps between settlements and protect the visual and open character of the intervening landscape.</p>
<p>Remove the following sites from the Strategic Green Gap and allocate them as suitable for housing</p> <p>Land off Oakleaf Close, Shavington as it no longer meets the purposes of including land within the strategic gap, Allocate for housing in Shavington</p> <p>Land south of Bradeley Hall Farm which represents a suitable and sustainable location for development and will not result in the coalescence of Crewe and Shavington nor impact on the function of</p>	<p>All the sites proposed for removal from the Strategic Green gap have been considered as part of the detailed boundary review as set out in Strategic Green Gap boundary Review ED 08.</p>

the green gap in this area. To make the policy sound, the proposed policy should also be amended to allow for the alteration of the green gap between Crewe and Haslington where needed, for example, when the supply of houses falls below 5 years.

Land at Hunters Lodge, Crewe represents a suitable and sustainable location for development and will not result in the coalescence of Crewe and Shavington nor impact on the function of the green gap in this area.

Land north of Cheerbrook Road, Willaston (Site 210 in PUB45) east of the Nantwich Bypass

Two adjoining sites west of Crewe Road, north of the settlement of Shavington.

Land south of **LPS 8 South Cheshire Growth Village**

Land at Newcastle Road, Willaston

Land to the north of Sydney Road, Crewe

Land east of Crewe Road and immediately north of the A500 should be allocated

Land associated with **Shukers Farm**, would form a logical extension of Haslington close to the sustainable facilities of the village, such as the school and cricket club.

Land south of Park Road Willaston

Policy PG 14 'Local green gaps'

Summary of the main issues raised	How the main issues have been taken into account
<p>Local green gaps, appear to be local green space (LGS) by another name.</p> <p>Support the principle of neighbourhood plans defining local green gaps; however this must be on the proviso that they meet the stringent tests set out in paragraph 100 of NPPF19. Any local green gap designation would have to be justified by robust evidence and be clearly shown to meet the tests set out in national policy and guidance.</p> <p>Paragraph 100 of the NPPF 19 sets out "The Local Green Space designation should only be used where the green space is: a) In reasonably close proximity to the community it serves; b) Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) Local in character and is not an extensive tract of land. " (emphasis added)</p> <p>Reference paragraph 100 of NPPF19 within Policy PG 14.</p>	<p>Local Green Gaps are not the same as Local Green Spaces as set out in the NPPF. Therefore we would not want to quote the NPPF.</p>
<p>Consider modifications to the following proposed policies: Could the policies PG 13 and PG 14 relating to Green Gaps clarify if they override the provisions of ENV 10 Solar Energy and RUR 6 Outdoor sports facilities, i.e. would an RUR 6 sports facility be prohibited or permitted in an area covered by PG 14 Local Green Gap.</p>	<p>PG 13 and 14 would over ride ENV 10 and RUR 6 as these uses could be compatible with being in either a local or Strategic Green Gap</p>

Chapter 3: General requirements (general issues)

Summary of the main issues raised	How the main issues have been taken into account
No issues raised.	N/a

Policy GEN 1 'Design principles'

Summary of the main issues raised	How the main issues have been taken into account
Site allocations in the SADPD do not comply with this policy.	Site allocations, where identified in the SADPD are justified through individual settlement reports (ED 21- ED 46). The implementation of site allocations should be considered against the requirements of policy GEN 1, where relevant to do so.
There is a potential absence of any detailed design guidance carried forward from legacy local plans following the adoption of the SADPD.	<p>The supporting information to policy GEN 1 notes that proposals should take account of any formally adopted supplementary planning documents (including the Cheshire East Borough Design Guide), area specific design guidance, masterplans, character appraisals or area specific management plans.</p> <p>The supporting information to the policy also makes reference to the role of neighbourhood plans to help identify the special and distinctive qualities of a local area.</p>
Additional references to climate change and arrangements for recycling and waste management including storage and collection are supported.	Noted.
Policy could be further clarified with more made of the adopted Cheshire East Design Guide and 'sense of place'.	The supporting information to policy GEN 1 of the revised publication draft SADPD states that in order to provide clarity about design expectations at an early stage, proposals should take account of any formally adopted supplementary planning documents (including the Cheshire East Borough Design Guide).
United Utilities supports the inclusion of Policy GEN 1 to provide	Point 11 of policy GEN 1 'Design Principles' in the revised publication

<p>guidance for development. However, our preference would be to include the following additional text, which is relevant to the design of all development:</p> <p>'the design of new development should ensure that there is space within the development layout to incorporate sustainable drainage with multi-functional benefits and include water efficiency measures for new buildings and their layouts to reduce the impact of the development as part of a high quality green and blue water environment.'</p>	<p>draft SADPD makes reference to showing resilience to climate change and its impacts within the development layout. The supporting information to policy GEN 1 makes reference to policy ENV 7 'Climate Change' .Point 6 of policy ENV 7 makes reference to water efficiency measures. Policy ENV 16 'surface water management and flood risk' in the revised publication draft SADPD also makes appropriate references to sustainable drainage.</p> <p>Additional text has been added to the supporting information of policy GEN 1 to emphasise the importance of taking opportunities to incorporate sustainable drainage and water efficiency measures within the development layout in line with policy ENV 16 'surface water management and flood risk'.</p>
<p>These criteria 'must' be met - or at least 'these criteria are expected to be met' - rather than 'should' be met</p>	<p>The word 'should' is considered sufficiently robust in relation to the future application of this policy.</p>
<p>Point 11 of the policy is very weak in expressing the need to build long-term sustainability into design. No mention is made of energy conservation, rainwater harvesting, levels insulation, solar gain, energy generation and carbon reduction in construction and in occupation of the properties.</p>	<p>The supporting information to policy GEN 1 makes reference to policy ENV 7 'Climate Change'. Policy ENV 7 includes references to matters such as solar gain etc.</p>
<p>Policy GEN 1 'Design Principles' would overlap with adopted LPS Policy SD 1 'Sustainable Development in Cheshire East' - it's inconsistent with national policy and should be removed from the Plan to ensure the SADPD meets the test of soundness.</p>	<p>Policy GEN 1 builds on policy SD 1 in the Local Plan Strategy and LPS policy SE 1 'Design'. It is not inconsistent with policy SD1 of the LPS or national planning policy.</p>
<p>Add 'Parish Councils' to the bodies with which Developers should consult in para 3.4</p>	<p>The supporting information to policy GEN 1 makes reference to engagement with the local community. Town and Parish Council's are considered to be a key stakeholder in engagement with local communities.</p>
<p>Environment Agency - Policy GEN 1 would be strengthened by ensuring the inclusion of a principle which states development proposals should;</p>	<p>It is considered that policy GEN 1 when read as a whole appropriately requires the consideration of the interaction of development with the natural environment through references to contributing to the borough's quality of place, creating buildings and spaces that function</p>

<p>'Interact positively with the natural environment – incorporating measures to ensure proposals enhance habitats and natural features on and within the vicinity of the development site. Where enhancement cannot be provided, preference should first be given to ensuring that impacts upon the natural environment are avoided. If enhancement or avoidance cannot be achieved then any negative impacts caused by the development to the natural environment should be appropriately mitigated against'.</p>	<p>well are fit for purpose and innovative and respond to changing social, environmental, technological and economic conditions over the lifetime of the development. The supporting information to policy GEN 1 also makes reference to policy ENV 7 'Climate Change'.</p> <p>An additional reference has been included within the policy (point 13) as follows – <i>“Interact positively with the natural environment in line with the mitigation hierarchy set out in point 2 of policy ENV 2 ‘ecological implementation’”</i>.</p>
<p>Policy needs to have a commitment that all new buildings must meet a specified high level of environmental design.</p>	<p>The SADPD is considered to appropriately follow the context set by strategic policies SE8 (renewable and low carbon energy) and SE9 (energy efficient development) of the Local Plan Strategy.</p>
<p>Add to point 5 - with lifelong design for easy adaptation and easy access to local shops with appropriate food outlets.</p>	<p>It is considered that point 5 of policy GEN 1 appropriately supports the consideration of inclusive and accessible development in the borough</p>
<p>Add to point 8 - and provide two car parking places per property along with a prohibition of parking on the pavement. Include provision for adequate spaces for charging plug-in and other ultra-low emission vehicles.</p>	<p>Car Parking standards are included in Appendix C of the Local Plan Strategy. Point 8 of policy GEN 1 notes the importance of the integration of car and cycle parking so that it is safe and does not have a detrimental impact upon the character and appearance of the area. The Cheshire East Residential Design Guide provides further detailed guidance on car parking. Policy INF 3 'Highway Safety and Access' of the revised publication draft SADPD notes that development incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations.</p>
<p>Add to point 10 - including the provision of cycling/pedestrian routes to local town centres, schools and workplaces.</p>	<p>Point 10 of policy GEN 1 notes already how development proposals should <i>“maintain or improve access, connectivity and permeability in and through the development site and wider area including to local services and facilities, particularly for walking and cycling routes”</i></p>
<p>GEN 1 is quite a wide ranging design policy that is a 'catch all' type policy. It is too vague and does not provide a clear, unambiguous approach. It may lead to ambiguous decision making</p>	<p>It is considered that policy GEN 1 is appropriately detailed to build upon the strategic policy SE1 'Design' in the Local Plan Strategy</p>
<p>Unclear how this policy relates to the adopted Cheshire East Design Guide SPD.</p>	<p>The supporting information to policy GEN 1 of the revised publication draft SADPD states that in order to provide clarity about design</p>

	expectations at an early stage, proposals should take account of any formally adopted supplementary planning documents (including the Cheshire East Borough Design Guide).
The wording of the policy does not adequately consider the step change in national guidance (NPPF 2019) to how appropriate densities for new development should be determined.	The revised publication draft SADPD should be read as a whole, alongside the policy requirements of the LPS. Policy HOU 12 'housing density' sets out that residential developments will generally be expected to achieve a net density of 30 dwellings per hectare. Policy HOU 12 also includes a number of relevant factors that are expected to be considered in determining an appropriate density for housing sites in the borough.

Policy GEN 2 'Security at crowded places'

Summary of the main issues raised	How the main issues have been taken into account
No main issues raised.	N/a

Policy GEN 3 'Advertisements'

Summary of the main issues raised	How the main issues have been taken into account
To preserve the character of buildings and the area, hanging shop signs should be installed at a consistent height within the area and are not detrimental to the character of the building.	It is considered that Point 2 of GEN 3 appropriately supports this issue which states: "the proposal is not out of keeping with the style or character of a building or its surroundings." If the hanging sign is at a significant height to other surrounding advertisements in the vicinity then it would be considered to be out of style/character with its surroundings.
Policy fails to tackle a key issue which impacts on highway safety and countryside - local authorities should ensure that distracting advertisement hoardings are not erected alongside major roads. The policy should have a commitment to remove any illegal advertisement that appears along major roads.	Point 1 of GEN 3 seeks to make sure that amenity and public safety are maintained. When considering 'public safety' factors for the advertisement, the planning authority will normally consult other relevant bodies during the application process, for example the highway authority if the advertisement is alongside a major road. Any advertisement that is put up which has not obtained the

	<p>necessary consent, as required under the Town and Country Planning (Control of Advertisements) Regulations 2007, will be dealt with by the enforcement team, as will any other illegal development. The process for taking enforcement action is detailed in the Town and Country Planning Act 1990. It is not considered necessary to insert within planning policy a commitment to remove any illegal advertisement, or any other development that has not obtained the necessary consent.</p>
<p>Para 3.16 should be included as statement within the policy. To do so would strengthen the policy in relation to the Authority's historic town centres, many of which are Conservation Areas and/or contain listed buildings.</p>	<p>Applications for advertisements on listed buildings are subject to listed building consent and separate requirements in terms of safeguarding the significance of the heritage asset and minimising any harm. To ensure certainty for those submitting applications for advertisements, the policy states within the supporting information section that any applications affecting a designated heritage asset will be dealt with using the policies contained in Chapter 5 of the Plan.</p>
<p>In supporting information section there should be cross referencing to Policy RET 4; RET 9 and ENV 14.</p>	<p>The Plan is intended to be read as a whole. However, in the supporting information section there is cross reference to Policy RET 4 (Shop fronts and security) as applications for shop fronts and advertisements are generally submitted together.</p> <p>Point 6 has been amended, to avoid policy being repeated, which now states "Illuminated advertisements should be discreet and not cause visual intrusion by virtue of light pollution into nearby residential properties or wildlife habitats and comply with the requirements of Policy ENV 14 'Light Pollution'."</p>

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

This initial Publication Draft SADPD policy has been split into two separate policies in the Revised Publication Draft SADPD: GEN 4 ‘Recovery of forward funded infrastructure costs’ and GEN 7 ‘Recovery of planning obligations reduced on viability grounds’.

Summary of the main issues raised	How the main issues have been taken into account
<i>Forward funded infrastructure costs</i>	
<p>The funding for key infrastructure projects should be delivered through CIL rather than from developers via a forwarded funding policy mechanism.</p>	<p>Paragraph 003 of the planning practice guidance on planning obligations advises that “Authorities can choose to pool funding from different routes to fund the same infrastructure” (Reference ID: 23b-003-20190901). CIL will not fund all the main infrastructure requirements identified as being necessary to deliver the proposals in the Local Plan Strategy by the Council’s Infrastructure Delivery Plan (IDP). The IDP identifies an infrastructure funding gap of between £373m and £451m, with the highest priority infrastructure schemes alone costing around £68m. The Council estimated for the CIL examination that the levy was expected to generate an income over the plan period to 2030 of some £38.7m. In reality this amount is less as the proposed CIL rates were reduced in one zone following the examination and the Council has to give up to 25% of the CIL money raised to local town and parish councils. This demonstrates that there will be a significant funding gap between the cost of the infrastructure in the IDP and the amount of money that is anticipated will be raised through CIL.</p> <p>It is considered appropriate that developers who require infrastructure to make their development acceptable in planning terms, in line with paragraph 56 of the NPPF and the related CIL regulation tests, should make a suitable contribution towards its provision,. Therefore the policy is not about who should pay for infrastructure or the extent of their contribution. Instead, it is about providing a mechanism which enables key infrastructure, particularly on larger schemes involving</p>

	multiple owners, to be provided at an earlier stage than it would otherwise have happened. This represents a positive approach to achieving sustainable development.
Implementation of the policy is unclear in terms of who will be expected to pay a contribution towards forward funded infrastructure , how this will be calculated and at what point further infrastructure contributions will no longer be required as costs would have already been fully met by other consented development. The lack of a detailed mechanism / basis for calculating contributions means that it is unsound.	The revised Policy GEN 4 outlines the general framework within which the policy will operate and indicates that further details will be provided in a scheme specific SPD. The Council does not consider it is necessary, appropriate or practical for the policy to give a detailed explanation of how it will operate so that all eventualities and circumstances are covered. As the number of cases where forward funded infrastructure is provided by the Council within the remit of this policy is expected to be limited, it is more appropriate that these details are scheme specific and agreed prior to any planning approvals so developers are aware at an early stage of the obligation costs that will apply.
There is insufficient clarity about how the forward funding element of the policy meets the planning obligations test in the Framework and the CIL Regulations.	The Council is satisfied that the policy and supporting information has been written to meet the requirements of the CIL tests and does not consider that a detailed explanation of how it conforms with the tests is required as part of the policy. The principle of forward funding infrastructure is considered to be compatible with Government guidance and is specifically mentioned as an acceptable approach for education infrastructure in paragraph 008 of the planning obligations PPG (Reference ID: 23b-008-20190315).
The infrastructure projects and sites to which the forward funding element of the policy applies are not identified. This information should be available alongside the Publication Draft SADPD with details on what the costs are for each site, together with how they have been calculated and justified.	The proposed policy is seeking to establish the general mechanism for providing forward funded infrastructure in Cheshire East. It is not considered appropriate that it should only identify specific schemes as new schemes may come forward during the plan period.
<i>Planning obligations reduced on viability grounds</i>	
Planning obligations need to be known and agreed at the outset with landowners so that developers can agree an appropriate price for the land. Taking account of additional obligations later is difficult to accommodate within this process both financially and legally.	The main planning obligations are already known and form part of the Cheshire East Local Plan Strategy (LPS), which was recently adopted in July 2017, together with any other relevant elements of the adopted statutory development plan. The LPS policies were viability tested as

	<p>part of the examination process for that Plan and found to be sound. Unfortunately, developers who overpay for land often seek to reduce known planning obligations, such as levels of affordable housing, to make schemes viable so that their required returns can be achieved. However, as paragraph 006 of the Government’s viability guidance states “Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan” (Reference ID: 10-006-20190509).</p> <p>It is entirely appropriate for the planning authority to seek to deliver policy requirements that were previously determined not to be deliverable as this prioritises benefit for the wider community ahead of enhanced developer profit.</p>
<p>The SADPD should be supported by an evidence base which demonstrates that the policies and allocations it contains can be viably delivered.</p>	<p>The Council’s evidence document ED 52 shows that the accumulative costs of the obligations and policies in the LPS and SADPD would not render development unviable in the Borough.</p>
<p>A policy requiring further viability assessments would be costly for the developer, contrary to national planning policy, as well as cause uncertainty and additional risk for developers.</p>	<p>The Council does not agree that the requirement for further viability assessment is contrary to national planning policy and provides additional risk for developers. In fact, paragraph 009 of the Government’s viability guidance allows for the possibility of review mechanisms, as follows:</p> <p>“As the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate further viability assessment or trigger a review mechanism. Review mechanisms are not a tool to protect a return to the developer, but to strengthen local authorities’ ability to seek compliance with relevant policies over the lifetime of the project” (Reference ID: 10-009-20190509).</p>
<p>Some form of review mechanism is only appropriate for a small proportion of development sites (of around 500 units or more) and should not be applied to all developments where reduced planning obligations have been agreed on viability grounds.</p>	<p>It is for the planning authority to determine the appropriateness of recovering reduced planning obligations. Requiring a reduction to known planning obligations in an adopted plan should only be considered exceptionally and in a limited number of instances. It is</p>

	appropriate that each one of these exceptions is individually reviewed should the Council consider this to be appropriate.
Review mechanisms should be limited to pre implementation reviews only for sheltered housing providers where development must be 100% complete before sales are realised, as such providers have other specific circumstances which means this proposal will negatively impact on their operation.	The Council does not consider that the circumstances highlighted justify a special approach for sheltered housing providers within the policy. It is assumed that a development that has received planning permission is viable, particularly where normal planning obligations have been reduced in exceptional circumstances to ensure viability. The provisions of this policy will only apply where development has proved to be more viable than assumed at the time that permission was granted. It is appropriate for the planning authority to seek to deliver policy requirements that were previously determined not to be deliverable as this prioritises benefit for the wider community ahead of enhanced developer profit.
The reduced viability element of the policy is too broad. The policy should establish parameters so that the relevant principles do not have to be established within the context of every affected planning decision. It should include the grounds where a material change in circumstances may be expected such as: The passage of time until a start on site; Whether the development contains separate and distinct phases; and The overall scale of the site and the anticipated delivery period.	It is the responsibility of site promoters to ensure that proposals for development are policy compliant. Seeking a reduction to known planning obligations in an adopted plan should only be considered exceptionally and in a limited number of instances. It is appropriate that each one of these exceptions is individually reviewed in accordance with the general mechanism detailed in the policy should the Council consider this to be appropriate. The Council intends to produce a planning obligations SPD which will provide further information to assist with the implementation of the policy.
A further requirement should be added to paragraph 3.24 to require a viability assessment associated with any land being developed by the Council to be reviewed by an independent expert and made publicly available as part of the planning application assessment.	This is not considered necessary. It is very unlikely that the Council would propose a development that is not policy compliant with its own Local Plan. Nevertheless, Policy SC 5 already requires an independent review of viability studies submitted to justify any alternative affordable housing provision to that required by policy. This requirement applies to everybody including the Council.
If the infrastructure required to support an application is not viable then the application should not proceed. Affordable housing obligations should never be reduced. Omitting important elements of development on viability grounds will not create quality and balanced communities. Public funding must not be used to support failing	Paragraph 38 of the NPPF requires local planning authorities to approach decisions on proposed development in a positive and creative way i.e. they should seek to approve applications for sustainable development where possible. There may be exceptional circumstances where the local planning authority considers that a

<p>developers or unviable applications.</p>	<p>proposal provides net benefits to the community which outweigh the fact that not all policy obligations have been met on viability grounds. As paragraph 010 of the Government’s viability guidance states:</p> <p>“In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission” (Reference ID: 10-010-20180724).</p> <p>The Council considers that this policy helps to best achieve that balance.</p>
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Policy GEN 5 ‘Aerodrome safeguarding’

Summary of the main issues raised	How the main issues have been taken into account
<p>The draft policies map does not show the extent of the Manchester Airport operational area.</p>	<p>The Manchester Airport operational area does not define the spatial extent to which Policy GEN 5 ‘Aerodrome safeguarding’ applies. The interactive online draft adopted policies map correctly showed the extent of the Manchester Airport operational area and it is now also shown on printed version.</p>

Policy GEN 6 ‘Airport public safety zone’

Summary of the main issues raised	How the main issues have been taken into account
<p>The draft policies map does not show the extent of the Manchester Airport operational area.</p>	<p>The Manchester Airport operational area does not define the spatial extent to which Policy GEN 6 ‘Airport public safety zone’ applies. The interactive online draft adopted policies map correctly showed the extent of the Manchester Airport operational area and it is now also shown on the printed version.</p>
<p>The public safety zone should be shown as a designation on the</p>	<p>The Manchester Airport Public Safety Zone is referred to by the plan</p>

policies map	(Policy GEN 6) but not defined by it. It could be shown on the map for information but in order to keep the map readable, it is not possible to show all additional information.
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Chapter 4: Natural environment, climate change and resources (general issues)

Summary of the main issues raised	How the main issues have been taken into account
The proposed site allocations in Bollington will not make best use of natural resources as they will cause significant damage with no significant benefit; no account has been taken of the green environment objectives of the Bollington Neighbourhood Plan	Made Neighbourhood Plans are part of the Development Plan so their policies would be taken into account in any development proposals. The Neighbourhood Plan has been considered in the preparation of the 'Bollington Settlement Report' [ED 24].
Some of the policies duplicate requirements already included in the adopted LPS	The policies cover detailed aspects not covered by the adopted LPS and reflect the NPPF and NPPG.
Concern regarding lack of enabling development criteria in the draft SADPD	Enabling development is often an exception to policy or considered as part of the planning balance. Historic England has published guidance documents including the 'Enabling Development and the Conservation of Significant Places' (revised 2012).
Environment Agency - Satisfied that this draft plan includes an effective list of policies (further comments made under each policy); there has also been comments made and involvement in preparation of Green and Blue Infrastructure Plan	Noted.

Policy ENV 1 'Ecological network'

Summary of the main issues raised	How the main issues have been taken into account
SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data	Interactive map has been updated with 2019 data
Policies ENV 1,2 and 6 do not adequately reflect the NPPF and the Chancellor's 2019 Spring Statement.	The policies do reflect the NPPF and the NPPG. Policy ENV 1 'ecological network' is consistent with the NPPF and NPPG regarding seeking enhancement and net gain for biodiversity. It is considered

	that the policy is sound and does reflect the overarching aims of the Environment Bill.
Policy welcomed and will aid the nature recovery network (NPPF footnote 57 and 25 Year Environment Plan)	Support welcomed
Further guidance needed on how policy will be implemented (probability that mandatory 10% Biodiversity Net Gain will be required for all development) – policy needs to set out how the potential for greater impacts of development within the Ecological Network will be mitigated and measured – suggest the use of a ‘strategic position multiplier’ when undertaking Biodiversity Net Gain calculations.	As set out in ENV 2 Ecological Implementation (Criterion 2iii) the Ecological Network map is used to target areas where the best ecological benefits can be achieved. A mandatory level has been set in the Environment Bill (10%) but there is no need to repeat national policy. The fine detail on ecological implementation and net gain will be set out in an Ecological Supplementary Planning Document.
Regarding local wildlife corridors in Neighbourhood Plans suggest that for clarity the following sentence is added: ‘Development that impacts wildlife corridors identified through the Neighbourhood Planning policies should be avoided provided this doesn’t conflict with the Local Plan Strategic Policies’ (as set out in the guidance in paragraphs 29 and 30 NPPF 2018)	Made Neighbourhood Plans are part of the Development Plan so policies concerning wildlife corridors will be taken into account.
Policies Map does not show regions of high/medium habitat distinctiveness as shown in the Bollington Neighbourhood Plan	
A proper explanation of each aspect of the ecological network needs to be set out with clear expectations of how development can meet the requirements of the policy.	The justification and background evidence for the policy is set out in [ED 09] ‘Ecological Network for Cheshire East’.
Clear explanation should be provided to clarify how parts of the ecological network have been defined	
Policy should provide “ an example site” which shows how the measures of the policy could be incorporated into a typical development	This detail could be covered in an Ecological Supplementary Planning Document.
Concern that policy will stifle development; proposals to be considered on a case by case basis	Policy was amended after the First Draft SADPD consultation to include the word “proportionate” (criterion 4). Proposals are considered on a case by case basis – this is explained in paragraph 4.3 of the supporting information.

Concern that policy is onerous and requiring ecological enhancement above what required by national policy	Policy is consistent with NPPF as seeks to secure net gain for biodiversity (paragraph 174a ecological networks; 174b measurable net gain)
Support for policy for the protection it will give to ecologically important sites	Support noted.
Stronger policy needed to achieve inter-connectivity of sites which are of ecological, landscape or amenity importance (in relation to sites in Congleton)	Policy ENV 1 'ecological network' is consistent with the NPPF and NPPG regarding seeking enhancement and net gain for biodiversity. There are other policies within the Plan that cover landscape and amenity. The whole suite of environment policies would be applied during the consideration of development proposals.
Effective policy but suggest reference in ecology section to threat posed by invasive non-native species and measures that can be used to combat this threat	This is detail more appropriately covered by an Ecological Supplementary Planning Document
Add to Figure 4.1 all meres and mosses within the Borough	There is no more data to add to this network layer at present. The Environment Agency has been contacted regarding the provision of such catchment data but it is not available.
Policy ENV 1 overlaps with LPS policy SE3 Biodiversity and Geodiversity and should be removed from the plan	Policy provides the finer detail required by paragraph 174a of the NPPF: "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks,..."
Support for policy but suggest need reference to major development projects such as HS2a and fracking	As the Ecological Network is shown on the draft adopted policies map (online interactive version) [ED 02] any future projects can be assessed accordingly. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS. A separate Minerals and

	Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.
Incorporation and reference of NIA Meres and Mosses area in south of Borough	This is covered in LPS Policy SE3 Biodiversity and Geodiversity.
Ecological network should be clearly and easily identifiable (problems with viewing interactive map); click on area and policies come up – but difficult to interpret how sites are affected; local plan designations should be shown clearly on the policy maps	Local Plan designations including the ecological network are shown on the Interactive Policies Map [ED 02].
No justification for providing restrictive land designations which assume that land is of ecological value (no detailed site specific assessments and field surveys)	The justification and background evidence for the policy is set out in [ED 09] ‘Ecological Network for Cheshire East’. Site specific assessments are carried out at the planning application stage.

Policy ENV 2 ‘Ecological implementation’

Summary of the main issues raised	How the main issues have been taken into account
SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data	Interactive map has been updated with 2019 data
Policies ENV 1,2 and 6 do not adequately reflect the NPPF and the Chancellor’s 2019 Spring Statement.	Policies do reflect the NPPF and the NPPG. Policy ENV 2 ‘ecological implementation’ is consistent with the NPPF and NPPG regarding seeking enhancement and net gain for biodiversity. It is considered that the policy is sound and does reflect the overarching aims of the Environment Bill. A mandatory level has been set in the Environment Bill (10%) but there is no need to repeat national policy.
Support for policy but consider that the wording of point 1 is outdated – all development will be required to achieve Biodiversity Net Gain (as set out in the Chancellor’s Spring Statement 2019)	Policy does reflect the NPPF and the overarching aims of the Environment Bill. . Policy states that “development proposals must deliver an overall net gain for biodiversity”. Any subsequent mandatory requirement at a national level would still apply when the legislation is passed.
For clarity the policy should state the amount of Biodiversity Net Gain (BNG)required for each development (mandatory BNG may be 10%)	
Spreadsheets referred to in guidance point 4.13 have been superseded by biodiversity calculator spreadsheets produced by Defra	These spreadsheets are being tested at present. Paragraph 4.13 of the policy supporting information does state “or any subsequent

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(Biodiversity metric version 2.0)	publication” The wording could be updated if the ‘beta test’ version of the metric is adopted.
Proposals for development must deliver an overall net gain for biodiversity; the proposed allocated sites in Bollington cannot do this	Noted – biodiversity net gain will be required as part of any development proposals.
Policy premature in advance of legislation setting any specific parameters	Net gain is required in the NPPF – paragraph 174b
Do not consider the requirement to deliver net gains across all developments to be consistent with national policy; may impact on the delivery of sites; policy too onerous (some representations suggest deletion of part 1 and part 3(iv)); alternative wording suggesting encouraging biodiversity improvements in and around development; should clarify whether a separate site in the local area/Borough could be used for biodiversity gains	Need a measurable element. Measurable net gain is required by the NPPF – paragraph 174b A future Ecological/Nature conservation Supplementary Planning Document will deal with the detail around net gain being achieved at a separate ‘off-site’ location.
Support for policy in the protection it gives to ecologically important sites	Support noted
Policy does not define how the management/maintenance of habitats will be monitored to ensure ongoing success	This detail is more appropriately covered in an Ecological Supplementary Planning Document . Some information is included in the ‘Green Space Strategy’ [ED 18].
Stronger policy needed to achieve inter-connectivity of sites which are of ecological, landscape or amenity importance (in relation to sites in Congleton)	Policy ENV 2 ‘ecological implementation’ is consistent with the NPPF and NPPG regarding seeking enhancement and net gain for biodiversity. There are other policies within the Plan that cover landscape and amenity. The whole suite of environment policies would be applied during the consideration of development proposals.
Tree replacement should count towards net environmental benefits	This may form part of a net gain package.
Support for policy – suggested additional wording: Compensation should be delivered on an equivalent (like for like) basis Further detailed wording on ecological assessments suggested as well	Ecological compensation will be achieved through the biodiversity net gain calculation and will achieve more than like for like (in terms of total area of habitat). An Ecological SPD could provide more detail.

Support for policy but suggest need reference to major development projects such as HS2a and fracking	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS. A separate Minerals and Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.
Support for policy but more detailed requirements needed such as Swift bricks, hedgehog highways etc	This is detail more appropriate for an Ecological SPD.
Policy needs to be consistent with delivery of sustainable development and delivery of climate change targets e.g low-carbon generation schemes and other technologies associated with mitigating the effects of climate change should not be restricted by this policy	Noted – this is all part of the planning balance.
Policy could make more use of data from Neighbourhood Plans	Noted - Made Neighbourhood Plans are part of the Development Plan.
Flexible approach to biodiversity gain is welcomed particularly recognition that there will be circumstances where a net gain cannot be achieved on site and therefore off-site provision will be sought	Noted.
Requirements of policy not tested through viability work; net gain costs to be factored into development requirements – significant implications	Viability work was carried out in regard to the policies [ED 52] Cheshire East SADPD Viability Assessment.
Biodiversity metric calculation a subjective tool – should be used side by side with desk based assessments; present as an option rather than a requirement	The biodiversity metric is an objective tool produced by central government to measure biodiversity losses and gains in an objective, consistent and transparent manner. All metric submissions will be checked by the Council's nature conservation officer.
Net gain should be a recommendation rather than an obligation	It is required by NPPF paragraph 174b.

Policy ENV 3 ‘Landscape character’

Summary of the main issues raised	How the main issues have been taken into account
Proposed allocated sites at Bollington are not compatible with this policy and the green environment objectives of the Bollington Neighbourhood Plan; landscape character detail in the Neighbourhood plan ignored in the site allocation proposals; concern regarding potential conflict – policy and site allocations.	Landscape is one of the criteria looked at as part of the ‘Site Selection Methodology’ [ED 07]. The policies of the Local Plan and any Made Neighbourhood Plans would be applied to any development proposals for any Local Plan allocations.
Local Landscape Designation Peak Park Fringe around the Sutton area should be extended up to the A523 London Road as this area between the canal and the main road provides open views of the Peak District and provides a setting for the town	All the areas are evidenced in the LUC Reports [ED10] ‘Cheshire East Landscape Character Assessment’ and [ED11] ‘Cheshire East Local Landscape Designation Review’. This area was carefully considered and the following statement is in the evidence base: “Exclude built up area at Lyme Green and lower lying areas to the west of the settlement, and west of the canal” (page 15 [ED 11]).
Land north and south of Prestbury Lane should be included in the Local Landscape Designation due to the importance of this area to the landscape setting of Prestbury	All the areas are evidenced in the LUC Reports [ED10] ‘Cheshire East Landscape Character Assessment’ and [ED11] ‘Cheshire East Local Landscape Designation Review’.
Concerns regarding conflict between aims of policy and some SADPD allocations (e.g. Bollington, Prestbury, Disley)	Landscape is one of the criteria looked at as part of the ‘Site Selection Methodology’ [ED 07]. The policies of the Local Plan would be applied to any development proposals for any Local Plan allocations.
Policy ENV 3 overlaps with LPS policy SE4 the Landscape and should be removed	Policy ENV 3 builds upon LPS policy SE4 particularly as it draws upon and uses the new robust evidence in the LUC Reports [ED10] ‘Cheshire East Landscape Character Assessment’ and [ED11] ‘Cheshire East Local Landscape Designation Review’.
Peak Park Fringe boundary around Mow Cop should be amended (Odd Rode PC outline detailed amendments to boundary)	Local Landscape Designations robustly produced; All the areas are evidenced in the LUC Reports [ED10] ‘Cheshire East Landscape Character Assessment’ and [ED11] ‘Cheshire East Local Landscape Designation Review’. The Peak Park Fringe LLD was extended to include the steep areas below Congleton Edge – but the built-up areas of Mow Cop, The Bank and Mount Pleasant to the south are excluded.
Need for reference to major development projects such as HS2a and	The SADPD sets out non-strategic planning policies and is being

fracking	prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS. A separate Minerals and Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.
More robust wording needed regarding the importance of Neighbourhood Plan Policies related to Landscape Character and Quality of Place	Made Neighbourhood Plans are part of the Development Plan and so any Landscape Policies within them would apply.
Detailed representations around the application of Local Landscape Designations and adopted LPS Policy SE4 and ENV 3; suggest that each LLD should have its own bespoke policy or LLDs should be removed from the proposals map.	Policies are supposed to be succinct. The Statements of Significance for each Local Landscape Designation in [ED 11] list the special qualities that support each designation. Policy ENV 3, with its robust evidence base, is considered adequate for planning application decision-making, although the council could prepare a supplementary planning document setting out further, more detailed planning guidance if it wished.
Comments regarding Bollin Valley LLD (welcome creation of new LLD for the parkland area); Bollin Valley LLD should be removed (due to absence of designation in Trafford); Yarwood Heath Farm in its entirety should come out of the LLD; detailed comments regarding Rostherne/Tatton Park LLD also	Local Landscape Designations robustly produced; All the areas are evidenced in the LUC Reports [ED10] 'Cheshire East Landscape Character Assessment' and [ED11] 'Cheshire East Local Landscape Designation Review'. All areas worthy of retention documented. For example: Bollin Valley – page 13 of [ED 11]: “Extend western-most extent of ASCV southward to cover more undeveloped, rural floodplain, also resulting in extended coverage of the wider setting of Dunham Massey to the north “.

Policy ENV 4 ‘River corridors’

Summary of the main issues raised	How the main issues have been taken into account
Support for policy but need protection of significant brooks and river tributaries that provide irreplaceable wildlife corridors	This aspect is covered in LPS Policy SE6 Green Infrastructure, Policy ENV 1 Ecological Network and Policy ENV 16 Surface water Management and flood risk (criterion 7).
Support for policy but would welcome additional recognition that many waterbodies in Cheshire East are failing their ecological objectives (water quality and hydromorphological concerns); policy should highlight opportunities as to how riparian developments have the ability to provide improvements – to provide valuable new assets for people and wildlife alike (detailed information provided regarding development guidelines)	Water quality concerns etc discussed under the supporting information to Policy ENV 17 Protecting Watercourses. Improvements to the blue and green infrastructure are covered by LPS Policy SE6 Green Infrastructure and ENV 1 Ecological Network as well as this policy. Detailed development guidelines would more suitably be included in a Supplementary Planning Document.
Policy ENV 4 - Sub Point 3 – this should be altered to read “promoting sustainable access with consideration given to the natural environment and flood risk” - (because of buffer zone constraints).	Note concerns and buffer zone condition that is often applied to planning applications. The first part of the policy does say that “Development proposals must make sure that river corridors are protected” and the words “where appropriate” are also in the policy. The policy is considered sound as the current wording would give sufficient protection where public access could not be achieved.
Need reference to major development projects such as HS2a and fracking	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS. A separate Minerals and Waste DPD is being prepared that will contain policy in relation to hydraulic fracturing.

Policy ENV 5 'Landscaping'

Summary of the main issues raised	How the main issues have been taken into account
All developments should provide a landscaping scheme – words “where appropriate” should be removed from the policy	The policy as worded provides proportionate flexibility.
Add new points regarding mitigating impact on local air quality and inclusion of cycle/pedestrian routes to local town centres, schools and workplaces	Policy ENV 12 Air Quality covers local air quality and Policy INF 1 Cycleways, bridleways and footpaths plus LPS Policy SE6 Green Infrastructure covers green links.
Support for policy but suggest add reference to need for new landscaping to be shaped by the outcomes of ecological assessments	Ecology and landscaping requirements are considered together as part of any assessment of a development proposal. But to increase the link between ecological assessments and soft landscaping the following has been added to the supporting information which also links to soft landscaping discussions below: “Recognising their ecological and amenity value and the role that they can play in climate change mitigation and adaptation, where appropriate, landscaping schemes should incorporate suitable tree planting which takes account of the site’s location and conditions and reflects the function of the new trees e.g. woodland, screen belt, formal avenue, etc.”
Policy ENV 5 Sub Point 6 – should be altered to read “makes satisfactory financial and resource provision for the maintenance and aftercare of the scheme, to ensure it reaches maturity and thereafter”.	It is felt that the current wording secures future maintenance.
Policy ENV 5 overlaps with LPS Policy SE4 The Landscape and should be deleted	Policy ENV 5 is a detailed development management landscaping policy which builds upon the strategic policy SE4 The Landscape.
Suggest addition of following sentence: 'Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge as part of a high quality green and blue water environment. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge.'	LPS Policy SE 13 'Flood Risk and Water Management' refers to SuDS (point 4), which could include permeable paving for example. Revised Publication Draft SADPD Policy ENV 16 'Surface water management and flood risk' seeks to manage and discharge surface water through a sustainable drainage system (bullet 3). Revised Publication Draft SADPD Policy ENV 7 (criterion 3) refers to blue and green infrastructure and trees. However to emphasize the role of trees in

	<p>particular as part of soft landscaping the following paragraph has been added to the supporting information of ENV 5:</p> <p>“Recognising their ecological and amenity value and the role that they can play in climate change mitigation and adaptation, where appropriate, landscaping schemes should incorporate suitable tree planting which takes account of the site’s location and conditions and reflects the function of the new trees e.g. woodland, screen belt, formal avenue, etc.”</p> <p>The above also links with the Council’s Environment Strategy.</p>
Reference to projects that will impact on landscape needed e.g. HS2a plus usefulness of Neighbourhood Plan Data	<p>Made Neighbourhood Plans form part of the Development Plan; policy would apply to projects mentioned. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD. The council has prepared a separate Crewe Hub Area Action Plan, which sets out a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This has had its own plan process including public consultation. The full implications of HS2 on the wider area will be addressed through a review of the LPS.</p>

Policy ENV 6 ‘Trees, hedgerows and woodland implementation’

Summary of the main issues raised	How the main issues have been taken into account
SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data	Interactive map has been updated with 2019 data
Policies ENV 1,2 and 6 do not adequately reflect the NPPF and the Chancellor’s 2019 Spring Statement.	Policies do reflect the NPPF and the NPPG. The policy as written is considered to be sound and reflects the aspirations of the Environment Bill.
Concerned that policy will not adequately protect priority habitat woodland from the effects of adjacent development for example root damage, air pollution etc). Policy should stipulate that a minimum	Current standing advice – minimum 15m buffer. It would appropriate to argue for larger buffers in some circumstances (as suggested in Government Advice) – so policy sound as worded.

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buffer of 15m is required around all areas of priority woodland and ancient woodland. Advice taken from Government website	Paragraph 4.38 of the policy provides cross-reference to standing advice. The Government Standing advice from the Forestry Commission and Natural England can be found in “Ancient woodland, ancient trees and veteran trees: protecting them from development”.
Policy should specify that buffer zones around ancient or veteran trees should be at least 15 times larger than the diameter of the tree and 5m from the edge of the tree’s canopy. Advice taken from Government website	The policy appropriately requires adequate buffer zones and appropriate protection and references relevant guidance so that an acceptable approach can be achieved in relation to each individual case where such issues arise. It is unnecessary for the policy to incorporate detailed aspects of the guidance.
Requirement of three replacement trees for the loss of every tree too onerous and not justified; may limit development potential of sites in the SADPD One for one replacement should be default position	The requirement is three replacement trees for the loss of every significant tree (not every tree) and this is not considered onerous given the importance of significant trees and the fact that the replacement trees will be smaller and take time to become established. One for one replacement would not achieve an ecological net gain. Ecological net gain is promoted by Natural England and the Revised NPPF (2019) Para 170 (a-f).
Policy not considered in Council’s Viability Assessment June 2019	Viability work was carried out in regard to the policies [ED 52] Cheshire East SADPD Viability Assessment.
Reference to CAVAT and DEFRA compensation metrics should be removed	It is important that the Council is transparent regarding the types of tools available to assist the calculation of off-site contributions. This forms part of the supporting information to the policy.
Policy should promote tree replacement planting that is site and project appropriate	Every site is considered on its merits and so tree replacement planting will be project appropriate.
Redraft to state that any loss of protected hedgerows should be offset by mitigation; further guidance needed on balance to achieve re replacement and offsetting and unavoidable hedgerow loss	This part of the policy links with LPS Policy SE5 Trees, Hedgerows and Woodland and applies where hedgerow loss is unavoidable under Policy SE 5 and there are clear overriding reasons for the development.
Policy should be amended to simply state that net environmental gains should be sought; tree planting one of the measures to improve the environment; tree replacement part of overall assessment of	Tree planting may be part of an ecological net gain package but it is important that net gains are achieved if significant trees are lost as part of development proposals. The ‘Green Space Strategy Update’

biodiversity enhancement	[ED18] explores the challenges regarding tree loss and the need to increase the tree canopy. As the Government's 25 Year Environment Plan states: "Planting more trees provides not just new habitats for wildlife – it also helps reduce carbon dioxide levels and can reduce flood risk".
Support for policy – CEC officers or qualified persons appointed by CEC should be involved in the application of the policy	The Council's Forestry and Arboricultural Officers will be involved in the application of the policy.
Add additional criterion: Include provision for the development of "Forests for the Future" at the developer's expense	Support for tree planting and forest initiatives noted.
Point 7 should terminate at "retained" so that there is no scope for removal of important hedgerows	This part of the policy links with LPS Policy SE5 Trees, Hedgerows and Woodland and applies where hedgerow loss is unavoidable under Policy SE 5 and there are clear overriding reasons for the development
AIA not required in all cases so words "where relevant" should be added	AIA's are required as part of Local Validation Requirements and are currently under review in accordance with the NPPF. Meets statutory requirement as trees are a material consideration.
Delete reference to 3 for 1 requirement; policy overlaps with LPS Policy SE5 Trees, Hedgerows and Woodland and should be deleted	The policy builds upon the strategic policy SE5 in providing additional information around implementation when development proposals are assessed.
Need reference to a pro-active strategy for woodland development; need for more woodland planting to improve carbon capture and mitigate the carbon footprints of the developments themselves; more needs to be made of retention and protection of trees and hedgerows	Support noted. The approach to the replacement of significant trees with a three for one replacement ratio will assist the provision of more trees to combat climate change. A woodland strategy is more appropriate in a strategy document or Supplementary Planning Document.
Further detail on replacement trees requested e.g. size etc	This extra detail is unnecessary. It would be more appropriate within a supplementary planning document which the council could prepare if it wishes.
Policy considered too onerous (various wording changes suggested adding words "where appropriate/possible/relevant" or substituting "should" instead of "must")	Policy is considered to be sound and not to be too onerous. Any weakening of the policy wording will not achieve any ecological net gain. Ecological net gain promoted by Natural England and the Revised NPPF (2019) Para 170 (a-f).

Policy ENV 7 'Climate change mitigation and adaptation'

This initial Publication Draft SADPD policy is titled ENV 7 'Climate change' in the Revised Publication Draft SADPD

Summary of the main issues raised	How the main issues have been taken into account
<p>Given the recent declaration by the UK Government of a climate emergency in the UK and also by the local council, all future developments must demonstrate effort to reach zero carbon contribution both during build and subsequent occupation</p> <p>All major housing schemes on former Green Belt should be required to achieve a reduction in energy use compared to standard new build construction. The suggested reduction would be a 19% reduction in target emissions rate as calculated in the Building Regulations Approved Document Part L1A. At least 50% of the reduction should be achieved through building fabric efficiencies and the remainder achieved through renewable energy technologies.</p>	<p>The Council recognises the important role of planning in achieving sustainable development. The Local Plan Strategy (LPS) which sets the strategic planning policy framework for the borough was adopted by the Council in July 2017. The Plan contains a range of policies aimed at protecting and enhancing the environment. Many of these flow from the Plan's overarching vision and strategic objectives which emphasise the need to reduce carbon emissions and tackle climate change.</p> <p>The Site Allocations and Development Policies Document ("SADPD") is a daughter document to the LPS and will add non-strategic policies to the Local Plan. The SADPD contains a range of detailed policies to improve environmental well-being. Amongst other important draft policies it has a specific policy setting out a range of measures that developments should incorporate to demonstrate climate change resilience and mitigation.</p> <p>The content of both the LPS and SADPD has also been informed by a Sustainability Appraisal. This has ensured that policy options have been considered against a range of sustainability objectives including climate change.</p> <p>Policy ENV 7 includes reference to new build 'major' residential development schemes achieving reductions in CO2 emissions of 19% below the target emission rate of the 2013 edition of the 2010 building regulations (part L)</p>
<p>Passivhaus 'eco housing' schemes should be strongly supported.</p>	<p>Policy SE 9 'energy efficient development' notes that the Council will look favourably upon development that follows the principles of the Energy Hierarchy. The SADPD, in policies GEN 1 & ENV 7 as</p>

	examples, set out principles that support natural heating and ventilation etc in developments.
Any new housing developments should make provision for electric vehicles.	Policy CO 2 'enabling business growth through transport infrastructure' (point 2 (vi)) in the Local Plan Strategy notes that development proposals should provide 'recharging points for hybrid or electric vehicles in major developments in order to reduce carbon emissions'. This approach has been further supplemented in the SADPD through policy INF 3 (point vi) which states that development proposals should 'incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations' amongst other things.
New housing development should demonstrate best practice in terms of sustainable design.	Noted. Policies in the SADPD including GEN 1 'Design Principles' and ENV 7 supplement existing policies in the Local Plan Strategy which seek to support sustainability in the design of development proposals.
This policy should be the first policy in the environmental section of the SADPD and all other policies should be linked to it.	The SADPD is expected to be read as a whole, alongside the requirements of the LPS.
It should also start with 'development proposals must incorporate etc'.	Reference to 'should' in the policy is considered to be sufficiently robust in the future application of the policy. The policy lists a range of measures, not all of which will be capable of being incorporated into every development scheme.
United Utilities is supportive of the inclusion of the 10th criteria under Policy ENV 7 (Climate Change Mitigation and Adaptation).	Noted.
Policy ENV 7 should promote and facilitate emerging energy technologies. The site allocations section of the SADPD should consider allocating appropriate areas for strategic renewable energy/storage 'hubs'. Sites promoted for allocation at Warmingham.	The SADPD includes a number of criteria based policies related to the consideration of schemes for renewable energy generation, including policies ENV 9 'wind energy', ENV 10 'solar energy' and ENV 11 'proposals for battery energy storage systems'
Environment Agency - We would recommend inclusion of the following; <i>"there should be the assessment of opportunity to restore or enhance canalised, culverted, heavily modified or previously poorly developed waterbodies, as this will have the ability to create a more climate change resilient waterbody, and greater capability to create a</i>	Policy ENV 16 'surface water management and flood risk' in section 6 notes how culverts should be opened wherever possible. The culverting of existing open watercourses will not be permitted unless it is adequately demonstrated that there is an overriding need to do so.

<i>multifunctional green infrastructure asset”.</i>	
With reference to point 5, further definition is required for sustainable travel following reductions in bus services and the public's lack of desire to use public transport services.	Policy ENV 7 refers to LPS policy CO1 ‘sustainable travel and transport’. Policy CO1 in the LPS appropriately refers to a number of sustainable travel initiatives that development proposals would be expected to consider.
Words 'where appropriate' or 'where possible' must be added to the policy, as not all development is of a nature which could support (or is of a nature where it would be appropriate to consider) the introduction of measures pursuant to climate change resilience. The emerging policy should reflect any potential difficulties in meeting requirements, having regard to the need for project feasibility and viability	As noted in the revised publication draft SADPD, many measures, if considered at an early enough stage can be included at no additional cost in the design and layout of development proposals. The policy does not mandate that every development scheme incorporates every measure listed. The potential for schemes to include these measures would be assessed on a case by case basis with appropriate references made to viability and feasibility where necessary and justified to do so.
The policy is inconsistent with national guidance. The only additional technical requirements exceeding the minimum standards required by Building Regulations that can be sought are the optional technical standards as detailed in the PPG	The policy sets out a number of principles that development proposals should incorporate that can assist in the adaptation to climate change and help mitigate its impact. The policy is consistent with national planning policy and the requirements of the Planning and Energy Act 2008.

Policy ENV 8 ‘District heating network priority areas’

Summary of the main issues raised	How the main issues have been taken into account
The policy should remove the reference to “large scale” to accommodate and encourage schemes on other beneficial sites.	Policy ENV 8 of the SADPD [ED 01] follows the strategic lead set by LPS policy SE 9 ‘energy efficient development’ which refers to development in district heating network priority areas or in large scale development elsewhere. The policy then goes onto note ‘unless it is demonstrated that this is not feasible or viable’.
Make some reference within the policy to ground source heat pumps in the policy or in the explanatory paras following	The policy directly relates to the requirement from policy SE 9 of the Local Plan Strategy regarding identifying district heating network priority areas. The supporting text (para 13.82) to Policy SE 8

	'Renewable and Low Carbon Energy' in the Local Plan Strategy makes reference to ground source heat pumps.
Support the caveat in policy ENV 8 which makes reference to the requirement is not feasible or viable.	Noted.

Policy ENV 9 'Wind energy'

Summary of the main issues raised	How the main issues have been taken into account
Peak District National Park Authority - the re-enforcement of paragraph 4.60 by ENV 9 1 (i) is supported and we consider the policy to be legally compliant, sound and compliant with the duty to co-operate	Noted.
Peak District National Park Authority - welcomes the precautionary approach (in para 4.60) to wind turbine development in the identified Peak District Fringe. This demonstrates that the council takes seriously its duty to have regard to the duty on public bodies enshrined in Section 62 (2) of the Environment Act 1995. The setting of the National Park is an important asset. Whilst 'the fringe' is identified for the purposes of restricting wind turbine development, the Authority would encourage caution for all forms of development in this area and encourage use of the Landscape Strategy to assist in decision making. https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0010/90829/landscape-strategy-south-west-peak.pdf	Noted.
Restriction on wind energy is extreme and inconsistent with CEC declaring a climate emergency. The policy should limit restrictions to those set out in the NPPF.	The policy approach is consistent with that set out in Policy SE 8 'Renewable and Low Carbon Energy' in the Local Plan Strategy and NPPF footnote 49 in identifying areas identified as suitable for wind energy development in the development plan and associated Policies Map. However, to avoid duplication between policy documents and also national guidance, it is proposed to move criteria (2) of the policy to the supporting information of the policy.

<p>Endorse the provision and development of alternative, renewable energy sources, provided they adhere to the criteria and safeguards as outlined in each of these policies</p>	<p>Noted.</p>
<p>Criteria 2 should include clarity on its wording to ensure that it is consistent with national policy aims of sustainable development. The policy should also clarify what is meant by 'local community' in such circumstances outlined in Q2. The policy wording should be relaxed within criterion 2 so that it does not hinder the potential for locally and nationally beneficial schemes in addressing climate impacts from being brought forward during the plan period.</p>	<p>The policy approach is consistent with that set out in Policy SE8 'Renewable and Low Carbon Energy' in the Local Plan Strategy and NPPF footnote 49 in identifying areas as suitable for wind energy development in the Plan and associated Policies Map. However, to avoid duplication between policy documents and also national guidance, it is proposed to move criteria (2) of the policy to the supporting information of the policy.</p>
<p>ENV 9 Policy strongly supported but some strengthening of the wording in para 3 is sought. As currently worded, it encourages the proposer to include meeting the criteria specified instead of making it a necessary condition that they be met or offer the justification for their exclusion. If this was amended para 2 would be redundant. In any case, it is doubtful how 'the agreement of the community' could be established and, even if it was, whether it could be legally binding if all the other criteria are satisfactorily met.</p>	<p>The wording contained in policy ENV 9 'wind energy' is considered to be consistent with footnote 49 of the National Planning Policy Framework.</p> <p>Reference to 'should' in part 2 of the policy is considered to be sufficiently robust in the future application of the policy. Part 2 of the policy sets out the need for further specific assessments / appraisals that should be included with applications for wind energy development in the borough.</p>
<p>Manchester Airport - To strengthen the policy wording, at point 1(iv) please replace the text "... Proposals should not have an impact on aircraft safety ..."</p>	<p>Noted, amendments have been made to part 1 (iv) and the supporting information to policy ENV 9 to refer to air traffic safety rather than aircraft safety.</p>
<p>The policy should make specific reference to visitor accommodation, tourism and visitor attractions.</p>	<p>The policy suitably addresses the impacts identified by national planning policy and builds on the strategic context set by policy SE8 'renewable and low carbon energy' in the LPS.</p>
<p>The policy should state that the visual impact assessment is based on best practice and this will ensure, amongst other aspects, that the impact of the proposals can be properly assessed including the impact on heritage assets, as a key receptor.</p>	<p>The policy appropriately refers to the circumstances where the need for a visual impact assessment, as stated in point 2iii is required.</p>

Policy ENV 10 'Solar energy'

Summary of the main issues raised	How the main issues have been taken into account
Support the provision of alternative sources of energy subject to the safeguards set out in these policies.	Noted.
Object to the reference within criterion 1 that solar farm/arrays should be sited on previously developed land wherever possible. Paragraph 117 of the NPPF states that, in making effective use of land, strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of PDL. However, to require opportunities for solar development to effectively 'rule out' all PDL before looking towards non-PDL imposes a significant risk that opportunities would be missed in attempts to meet our current climate change targets. Higher yielding development can effectively 'squeeze' out any opportunities for development such as a solar farm on PDL.	Policy ENV 10 'solar energy' in the publication draft SADPD states that proposals for solar farms / parks should be located on previously developed land, wherever possible. This appropriately focuses schemes to previously developed land but acknowledges that that is not always possible. This approach is consistent with policy SE 2 'efficient use of land' in the Local Plan Strategy and planning practice guidance (paragraph 013 reference ID 5-013-20150327) which asks that large scale ground mounted solar photovoltaic farms are encouraged to consider previously developed land and non-agricultural land in the first instance.
Paragraph 7 is supported [photovoltaics etc]. The section omits the role of the layout of new developments to take best advantage of orientation of a roof or roofs towards the sun. Evaluation of planning applications should give weight to the alignment of buildings in the proposed layout to take best advantage of solar gain.	Support for point 7 of policy ENV 10 is noted. Additional text has been added to point 7 of policy ENV 10 in the SADPD to encourage schemes to consider how best to maximise solar gain .
Manchester Airport - to strengthen the policy wording and to be consistent with our recommendation for the wording of policy ENV 9, criteria no. 5 should be amended to say, "Proposals should not have a detrimental impact on air traffic safety ...". It should also be noted that this is a requirement for all installations that fall outside of the permitted development regime.	Noted, point 5 of the policy has been amended to read "...Proposals should not have an impact on aircraft <u>air traffic</u> safety".

Policy ENV 11 ‘Proposals for battery energy storage systems’

Summary of the main issues raised	How the main issues have been taken into account
Support the provision of alternative sources of energy subject to the safeguards set out in these policies.	Noted
Regarding the first consideration in Q2 on the policy requiring schemes to be located on previously developed land and/or existing industrial areas, it is recognised that the criterion references "wherever possible", but we suggest that, unless the Council proposes to advance the allocation of appropriate sites for renewable energy hubs and storage facilities (see comments in respect of Policy ENV 7), then criterion 1 should be deleted and left to the application to justify its location. This approach would ensure the plan is justified in adopting the most appropriate strategy when considered against alternatives.	Policy ENV 10 ‘solar energy’ in the SADPD states that proposals for solar farms / parks should be located on previously developed land, wherever possible. This appropriately focuses schemes to previously developed land but acknowledges that that is not always possible. This approach is consistent with policy SE 2 ‘efficient use of land’ in the Local Plan Strategy.
To ensure the plan is considered ‘sound’, the Council should consider the inclusion within the SADPD of an appropriate allocation of sites for the development of renewable energy ‘hubs’ and energy storage facilities. Site(s) promoted at Warmingham.	The SADPD includes a number of criteria based policies related to the consideration of schemes for renewable energy generation including proposals for battery energy storage systems.

Policy ENV 12 ‘Air quality’

Summary of the main issues raised	How the main issues have been taken into account
Policy would overlap with adopted LPS Policy SE12 Pollution Land Contamination and Land Instability.	The Local Plan Strategy (LPS) does not specifically mention the need for an Air Quality Assessment. LPS Policy SE12 states “development should support improvements in air quality, not contradict Air Quality Strategy or Air Quality Action Plan and seek to promote sustainable transport policies.”
Could it be expanded to include a strategy to address existing AQMA’s such as those in Sandbach. Given that any additional development close to an AQMA will add to traffic flows and pollution levels, all development should contribute towards measures in the	The Council are required to undertake a regular review and assessment of the air quality within the borough, and assess levels of air pollution against the air quality objectives. Where levels are found to be in excess of these objectives, the Council must declare an Air

<p>appropriate air quality action plan.</p>	<p>Quality Management Area and through the action plan set out the measures to take to work towards achieving the objectives. The Council have declared 19 AQMAs and developed an Air Quality Strategy and Air Quality Action Plan which details remedial measures to tackle the problem. The supporting information accompanying the policy makes reference to these.</p>
<p>Policy should be amended to:</p> <ul style="list-style-type: none"> • state that the air quality assessments are undertaken by CEC or by appointment of it, funded by the developer. • all air quality assessments are considered for all developments, and not just those on a 'large' scale. 	<p>The developer will be required to submit an air quality assessment with an application to make the development acceptable.</p> <p>The policy is not limited to large scale development and covers all proposals.</p>
<p>Policy is weak because it does not take sufficient account of a major contribution to poor air quality – Manchester International Airport.</p>	<p>Any proposal for development at Manchester airport (within Cheshire East) would be subject to this policy.</p>
<p>The policy only seems to consider the cumulative effects in relation to other developments. It is also unclear what is required for effective mitigation. What is the evidence that Air Action Plans have reduced made any difference to air quality in AQMAs already in existence, other than through external changes in patterns of travel or car use locally?</p>	<p>The policy states “all proposals that are likely to have an impact on local air quality will be required to submit an air quality assessment”. Mitigation measures will be locationally specific, depend on the proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions and obligations can also be used to secure mitigation where the relevant tests are met</p>
<p>It is recognised that rising house numbers, car numbers and congestion will have significant air quality implications especially in more urban areas. However it must also be noted that rural locations are increasingly at risk and this has not been as well recognised. The policy needs to be sufficiently 'flexible' to address new AQMAs as soon as and wherever they arise. Include these additions in section ENV 12: 4.71</p>	<p>It is considered that the policy is sufficiently flexible to address new AQMA's.</p>
<p>Policy is weak, and does not comply with EU air quality legislation which has been reflected in equivalent UK legislation. No proposed development in Cheshire East has been refused on air quality grounds whatever limited mitigation is offered. As a result we have ever more</p>	<p>Separate legislation exists for emissions of air pollutants. The Environment Act 1995 requires local authorities to review and assess the current and future air quality in their areas and designate air quality management areas (AQMA) if improvements are</p>

<p>AQMAs being declared and an air quality action plan which is a byword for inaction and ineffectiveness. No development should be permitted that may cause deterioration in air quality, however small, in any declared AQMAs.</p>	<p>necessary. The Council have declared 19 AQMAs and developed an Air Quality Strategy and Air Quality Action Plan which details remedial measures to tackle the problem. LPS Policy SE12 (Pollution, Land Contamination and Land Instability) supports improvements to air quality, and states that development should not contradict the Air Quality Strategy or Air Quality Action Plan.</p>
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Policy ENV 13 ‘Aircraft noise’

Summary of the main issues raised	How the main issues have been taken into account
<p>The policy as currently drafted is overly restrictive going far beyond the requirements of UK legislation and provides no flexibility for mitigation measures. Recent precedents show that SOAEL for aviation noise should be 63 dB LAeq,16 hrs.</p> <p>A complete restriction on residential development in areas subject to noise contours is inappropriate and would prevent housing in otherwise suitable and sustainable locations. A similar approach elsewhere would restrict all residential development in large areas including south Manchester and west London.</p>	<p>The evidence for this policy has been updated [ED 15] and the policy has been amended in the revised publication draft SADPD including identifying SOAEL at 63 dB LAeq,16 hrs. The revised allows for housing development up to that contour subject to meeting a number of requirements regarding noise levels within internal and external (private amenity) spaces.</p>
<p>Noise risk itself should not determine whether a development is acceptable as consideration should also be given to acoustic design. Therefore, there needs to be greater flexibility in the policy, including flexibility in the application of any thresholds, in order to enable the risk and associated mitigation to be fully considered.</p>	<p>This is reflected in amendments to policy ENV 13 as it now appears in the revised publication draft SADPD.</p>
<p>The policy wrongly sets the levels of SOAEL and UOAEL – the effect of which is to wrongly calibrate the threshold levels in terms of mitigation and compensation. There is no prohibition in relation to residential development above 63 dB LAeq,16hour in national planning policy or guidance. The PPG expressly contemplates mitigation at this level in order to avoid significant effects. The Aviation Policy Framework uses this level as the threshold that airports should</p>	<p>Policy ENV 13 as it now appears in the revised publication draft SADPD does allow residential development to take place up to 63 dB LAeq,16 hrs contour, subject to meeting a number of requirements regarding noise levels within internal and external (private amenity) spaces.</p> <p>Based on the relevant and up to date evidence set out in Aircraft</p>

start to offer noise insulation. and Secretary of State decisions confirm that by using noise insulation the Significant Observed Adverse Effects of noise (SOAEL) can be avoided. Moreover, there is no suggestion in the Jacobs [Aircraft Noise Policy Background Report (2019) Pub15] advice to the Council, which forms a background evidence base document to the SADPD, that 63dB LAeq should represent a cut-off point and above that level development would necessarily be unacceptable (ie equating to an UOAEEL noise level). Such an approach would be inconsistent with the Cranford appeal decision cited earlier. It is of also concern that the Jacobs report makes no reference to the mitigation and compensation requirements in the Aviation Policy Framework; nor does it fully consider the Secretary of State's decision in the Cranford appeal. This element of the draft policy is therefore neither consistent with national policy and guidance, nor justified by the evidence.

1 (ii) of the draft policy effectively creates a presumption against residential development between 60 and 63 dB LAeq. Having regard to the policy framework and decision-making background discussed above and in section 3, noise levels within these bounds would lie between LOAEL (54 dB) and SOAEL (63 dB). NPPF para 170 seeks to prevent new development being adversely affected by "unacceptable" levels of noise pollution. Noise below SOAEL does not come within the "unacceptable" category. Para 180 establishes a policy requirement to seek to "avoid noise giving rise to significant adverse impacts on health and the quality of life". Below SOAEL that impact does not arise. The PPPG indicates that the approach development should take to dealing with noise between these two levels is to "mitigate and reduce to a minimum". It is not suggested that this noise level should be avoided or prevented. Contrary to this policy and guidance, this part of the draft policy seeks to prevent development even when there is no significant observed adverse effect. As with the first part of the draft policy, the approach here is inconsistent as well with the Secretary of State's approach in the Cranford decision. Moreover, it is not justified by the Jacobs report, which treats 63dB LAeq as SOAEL (and does not properly consider

Noise Policy Background Report (2020, Jacobs) [ED 15], the Council considers that there should be a presumption of new residential development should generally be avoided above that contour in order to ensure an acceptable standard of new development.

<p>the Cranford decision). This part of the draft policy is therefore not consistent with national policy or guidance, nor justified by the evidence. The draft policy admits of an exception but only where “external amenity spaces do not form an intrinsic part of the overall design”. It follows from the above that this part of the criterion is similarly not justified or necessary.</p> <p>In terms of 1(iii) of the policy, it is clear from what is said above and in section 3, whilst it would be correct to set the LOAEL at 54 dB LAeq, it would be wrong to set an upper limit of 60 dB LAeq for SOAEL having regard to national policy, the PPG and appeal decisions. Moreover, there is no justification for a SOAEL cut off level at 60 dB LAeq in the Jacobs report. This part of the policy is also too vague as to what would be considered to be “suitable noise control measures”.</p>	
<p>There appears to be no clarity on policy towards aircraft noise at night generated by aircraft movements at Manchester Airport. The policy should be drafted to ensure new development that is prejudicial to the health of future residents (or other people at that location) as a result of aircraft noise are refused planning permission.</p>	<p>The timing and frequency of aircraft movements falls outside the scope of this policy. The policy allows for the acceptability of new development to be judged in relation to aircraft noise. It is justified by up to date and appropriate evidence set out in Aircraft Noise Policy Background Report (2020, Jacobs) [ED 15]</p>
<p>An addition should be made to the wording of the policy related to residential development. Under criteria 1(ii) we recommend specifying that if planning consent is granted then planning conditions will be imposed to ensure a commensurate level of protection against noise within dwellings. Suggested wording is as follows:</p> <p>1(ii) Planning permission for residential development will not normally be granted within areas subject to daytime noise levels between 60 and 63 dB LAeq,16hour (07:00-23:00)(8). If, exceptionally, it is considered that other material considerations outweigh the adverse noise effects, then planning permission should only be granted for developments where the external amenity spaces do not form an intrinsic part of the overall design, for example smaller, non-family one bed and studio housing. If planning consent is granted, then planning conditions will be imposed to ensure a commensurate level of protection against noise within dwellings.</p>	<p>The policy has been significantly amended. The policy in the revised publication draft SADPD allows for housing development up to the 63 dB LAeq,16 hrs contour subject to meeting a number of requirements regarding noise levels within internal and external (private amenity) spaces.</p>

<p>Under criteria 1(ii) we recommend specifying that if planning consent is granted then planning conditions will be imposed to ensure a commensurate level of protection against noise within dwellings. Suggested wording is as follows:</p> <p>1(ii) Planning permission for residential development will not normally be granted within areas subject to daytime noise levels between 60 and 63 dB LAeq,16hour (07:00-23:00)(8). If, exceptionally, it is considered that other material considerations outweigh the adverse noise effects, then planning permission should only be granted for developments where the external amenity spaces do not form an intrinsic part of the overall design, for example smaller, non-family one bed and studio housing. If planning consent is granted, then planning conditions will be imposed to ensure a commensurate level of protection against noise within dwellings.</p>	
<p>The noise policy in relation to outdoor space at educational development has not been restricted and this appears an oversight. Educational development, extension of or entirely new educational space that relies on outdoor amenity space will be refused where the daytime noise levels outdoors are in excess of those outlined for residential development. This is because outdoor space is an integral part of the education and children cannot be expected to be indoors all the time.</p> <p>Hotels and rooms for residential purposes, instead of including student halls of resident and school boarding should EXCLUDE them .</p> <p>Outdoor amenity space for students and boarders should be subject to the residential standards.</p>	<p>Building bulletin 93 Acoustic design of schools: performance standards (V17, February 2015, Department for Education & Education Funding Agency) sets out minimum performance standards for the acoustics of schools.</p> <p>Previous versions of this document included good practice recommendations on noise levels in outdoor teaching and recreational areas associated with schools. Specifically, in respect of outdoor teaching and recreational areas the guidance previously recommended that '<i>60 dB L_{Aeq,30min} should be regarded as an upper limit for external noise at the boundary</i>', that '<i>noise levels in unoccupied playgrounds, playing fields and other outdoor areas should not exceed 55 dB L_{Aeq,30mins}, and there should be at least one area suitable for outdoor teaching activities where noise levels are below 50 dB L_{Aeq,30mins}</i>'. Conversely, it also noted that playgrounds, outdoor recreation areas and playing fields '<i>are generally considered to be of relatively low sensitivity to noise, and indeed playing fields may be used as buffer zones to separate school buildings from busy roads where necessary</i>'.</p> <p>However, the current version (V17) of the Department for Education</p>

	<p>performance standards have removed all recommendations in relation to outdoor spaces, although it does provide extensive requirements in respect of internal noise levels within classrooms and other noise sensitive spaces under a range of ventilation conditions (including with ventilators or windows open). Policy ENV 13 goes back-to-back with the current guidance and requires applicants to demonstrate that educational developments will achieve the minimum indoor acoustic performance standards, but does not set any external noise criteria.</p> <p>The ENV 13 requirement for indoor noise levels within student halls of residence and school boarding houses are the same as for residential dwellings.</p> <p>Outdoor amenity space for students and boarders should be subject to the residential standards.</p>
<p>Strong support for this policy and the reduction of noise pollution. It is crucial that the Authority contributes fully and robustly to the current cycle of consultations on the planned increase in the use of airspace to the south and west of Manchester International Airport. The profits of the airport accrue to Greater Manchester but the harm brought about aircraft noise is borne by CEC residents. The existing S106 agreements are now out of date and agreements on restriction of night flights need to be reviewed, extended and confirmed. Although these strategies cannot be included in this policy, they offer the most effective mitigation of noise. Gardens under flight paths cannot be double-glazed.</p>	<p>As it is acknowledged, the matters raised generally fall outside the scope of the Aircraft Noise policy.</p>

Policy ENV 14 ‘Light pollution’

Summary of the main issues raised	How the main issues have been taken into account
<p>With reference to point 3, the words 'as possible' should be removed to promote the universal use of energy efficient lighting.</p>	<p>To remove the word ‘as possible’ is considered to actually weaken the policy.</p>
<p>The policy contains vague statements that can be improved upon. 1. “minimum required...” who decides?</p>	<p>1. Minimum – any application will be determined by Development Management and, where required, Environmental Health will be</p>

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<p>2. "light spillage will be minimised..." The light fittings should be designed to be shaded to prevent spillage into neighbouring areas.</p> <p>3. The policy should include a requirement that lighting should be sensor controlled where reasonably practical to achieve minimisation of pollution, energy efficiency, loss of amenity etc.</p> <p>4. Floodlighting of buildings and trees, especially in dark rural locations, should be prohibited (excepting 1st Dec to 6th Jan).</p>	<p>consulted upon.</p> <p>2. It is considered that this is covered by Point 2 which states "light spillage and glare will be minimised" and Point 4 states "there will be no significant adverse effect either individually or cumulatively on residential amenity..."</p> <p>3. It is considered that movement sensors, daylight sensors and time controls are covered by Point 3 to be as "energy efficient as possible" and para 4.81 "conditions may be used to mitigate any significant impact such as hours of illumination..."</p> <p>4. It is considered that this is covered by Point 4 which states "there will be no significant adverse effect either individually or cumulatively on the character of the area."</p>
<p>Shows no commitment to a Dark Skies policy'; it does not specify 'full cut-off' street lighting which eradicates virtually all of the light spillage in the sky; nor does it seek to reduce the intrusive 'security' lighting on private residences by insisting on PIR control on new developments.</p>	<p>The commitment to a Dark Skies policy is considered to be covered by Point 4 of ENV 14 which states "there will be no significant adverse effect either individually or cumulatively on the character of the area." Additional information has however been inserted into the Supporting Information section which states the following:</p> <p>"Particular attention should be paid to proposals involving additional lighting in/around conservation areas, or on/in proximity of listed building to prevent any harm arising to these historic assets; <u>and to lighting proposals in rural areas which can significantly affect the character of a dark location.</u>"</p> <p>PIR are not always the answer as some times these can be the cause of the problems as they can lead to the going on and off frequently if they are set up wrong and in a busy area.</p> <p>Under the Supporting Information section, additional wording has been inserted to include:</p> <p>"...where the Council decides to grant permission, conditions may be used to mitigate any significant impacts such as: hours of illumination; light levels; <u>angle of lights</u>; column heights; specification and colour..."</p> <p>Mitigation measures will be locationally specific, depend on the</p>

	proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions can be used to secure mitigation where the relevant tests are met.
The policy does not recognise the fact that in rural areas where there is limited or no street lighting, the impact of light pollution is immediate. It may be that paragraph 4.85 of Policy ENV 15 offers some assurance but a more overt recognition of the material differences between urban and rural light pollution would reduce potential future conflicts.	The issue between rural and urban areas is considered to be covered by Point 4 which states “there will be no significant adverse effect either individually or cumulatively on the character of the area.” Additional information has however been inserted under the Supporting Information section of the Revised Publication Draft SADPD which states the following: “Particular attention should be paid to proposals involving additional lighting in/around conservation areas, or on/in proximity of listed building to prevent any harm arising to these historic assets; <u>and to lighting proposals in rural areas which can significantly affect the character of a dark location.</u> ”

Policy ENV 15 ‘New development and existing uses’

Summary of the main issues raised	How the main issues have been taken into account
Whilst the policy is justified and consistent with national policy, further clarification on how this policy could be applied and enforced would be welcome. It is unclear how this would be achieved on third party land, presumably through legal agreements but clarification would be welcomed to ascertain how this impact on the delivery of sites (particularly in terms of elongated timescales).	The onus would be on the applicant to demonstrate how the significant adverse effect can be avoided. Applications will be determined by Development Management and enforced by the Enforcement team at Cheshire East Council.
The supporting text makes reference to the NPPF’s Agent of Change Principle however it is considered that this principle should be explicitly referenced within the policy itself.	The policy as written is considered legally compliant and sound.
Request that the wording of Policy ENV 15 is revised by including the following: “.....submit appropriate information to demonstrate that the proposed development will be acceptable and, if necessary, provide	The policy has been amended to state the following: Proposals for any New development (new-build, extensions and conversions) must effectively integrate with existing uses <u>and existing businesses and community facilities must not have</u>

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<p>suitable mitigation measures, without any change or impact on the existing business/ facility. Development proposals...”</p>	<p><u>unreasonable restrictions placed on them as a result of it.</u> Where the operation of an existing <u>business or</u> facility could have a significant adverse effect on the a proposed new development in its vicinity, the applicants shall <u>must</u> submit appropriate information to demonstrate that <u>such impacts will not arise or can be prevented through</u> the proposed development will be acceptable and, if necessary, provide suitable mitigation measures. Development proposals that do not clearly demonstrate how potential nuisances can be mitigated and managed will not be permitted. <u>Where such impacts will arise and cannot be avoided through mitigation, planning permission will be refused.</u></p>
<p>The policy is unclear because it does not adequately define "existing facilities", and does not indicate how proposals will be dealt with when the effect of mitigation would be to create conflict with other policies and human rights. Policy needs to make clear: That it applies to new development likely to be a receptor for pollution from nearby road traffic particularly in AQMAs (i.e. that roads are "existing facilities"). That mitigation will not result in undue loss of amenity for future occupants by explicit cross reference to HOU 10 and by making clear that mitigation involving an absence of natural ventilation in habitable rooms is unacceptable.</p>	<p>The Plan should be read as a whole. In the supporting text additional information has been inserted to clarify what business and community facilities include, which are: employment uses, places of worship, pubs, music venues and sports clubs. Mitigation measures will be locationally specific, depend on the proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions and obligations can also be used to secure mitigation where the relevant tests are met.</p>

Policy ENV 16 ‘Surface water management and flood risk’

Summary of the main issues raised	How the main issues have been taken into account
<p>Add additional flexible wording into the policy, including ‘where possible and viable’ to provide further clarity that surface water management schemes are very much tailored to meet the specific constraints of individual sites.</p>	<p>The policy is clear in its requirements to manage surface water runoff and reduce the risk of flooding.</p>
<p>Point 2i - remove 'where possible' to make sure every effort is made by the developer to manage and reduce run off.</p>	<p>The policy acknowledges that, on greenfield sites, it may not always be possible to reduce runoff rates. The policy requires ‘at least no</p>

	increase in runoff rates'. ¶4.88 requires 'clear evidence of existing positive operational connections from the site with associated calculations on rates of discharge ... to make sure that development does not increase flood risk'.
Point 5 - remove 'where relevant and appropriate' to safeguard risk mitigation.	The policy recognises that it may not always be relevant or appropriate to address and mitigate known risks in relation to critical drainage areas. As acknowledged in ¶4.94 'the Environment Agency has not identified or allocated any critical drainage areas in Cheshire East'.
Point 6 - amend wording to reflect that Cheshire East Council or specialists appointed by it will provide guidance on whether culverting open watercourses is necessary.	The policy's stance is clear in relation to the culverting of open watercourses in that this '...will not be permitted unless it is adequately demonstrated that there is an overriding need to do so.'
Paragraph 4.91- the first sentence should be altered to state "... to the environment prior to <u>sufficient</u> levels of treatment".	Amend ¶4.91 to read: '...prior to <u>sufficient</u> levels of treatment.'
Waterbodies face environmental pressures (reduced ability to cope with increasing climate change threats, or diffuse urban or rural pollution issues) and new development provides opportunity to further improve policy for water management. Support for an additional/amended policy that could help make a step improvement in any currently failing waterbody, through a more environmentally and multifunctional design approach.	'Revised Publication Draft SADPD' [ED 01] Policy ENV 17 'Protecting water resources' seeks to protect the quality of groundwater and surface water.
Further detail is required in the supporting evidence to robustly protect rare and fragile ecological sites; their vulnerability is acknowledged by Natural England and the Environment Agency with particular regard to 'Diffuse Water Pollution'.	The impacts of development on ecologically sensitive and designated sites are covered in LPS Policy SE 3 'Biodiversity and Geodiversity', and Policies ENV 1 'Ecological network' and ENV 2 'Ecological implementation'.

Policy ENV 17 'Protecting water resources'

Summary of the main issues raised	How the main issues have been taken into account
The Environment Agency request the following modifications and additional changes	This has been amended to the Environment Agency guidance and position statements as set out in its document entitled 'The

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<p>ENV 17, Sub Point – The reference to GP3 should be updated to “the Environment Agency guidance and position statements as set out in its document entitled ‘The Environment Agency’s approach to groundwater protection’. This reference should also be included within the related documents section for consistency.</p>	<p>Environment Agency’s approach to groundwater protection’ February 2018 Version 1.2</p>
<p>ENV 17 specific protection of ground water sources are not mentioned for those areas where licences have been granted for shale gas [fracking] exploration. Given the confirmed pollution of some water sources from this source, this would seem to be a sensible inclusion.</p> <p>Reference inserted to protect water resources in areas of shale gas exploration or extraction.</p>	<p>There is now a moratorium on fracking and therefore the suggested amendment is deemed unnecessary.</p>

Chapter 5: The historic environment (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Historic England suggests some textual amendments to the policies to strengthen their robustness and to ensure that they reflect the requirements of the NPPF.</p> <p>The Councils assessment of the site allocations is considered suitable, in terms of the historic environment. However, reference to the Council’s two Heritage Impact Assessments is advised within individual site policies to ensure mitigation/enhancement measures.</p>	<p>Accept the textual amendments suggested to ensure that policies reflect the NPPF.</p> <p>Individual site allocations will be reviewed to determine if the inclusion of the HIA would be appropriate.</p>

Policy HER 1 ‘Heritage assets’

Summary of the main issues raised	How the main issues have been taken into account
<p>Confusing terminology. Key descriptions should be defined in the glossary. Defined terms should be in inverted commas or in capital letters consistently.</p> <p>“Listed buildings” is in the glossary but also used as common English.</p>	<p>Point 1 “historic asset” has been changed to “<u>heritage asset</u>” in order that the policy wording is consistent and unambiguous .</p>

<p>“Heritage assets” and “Historic assets” are used interchangeably. Do they have the same defined meaning? Only ‘Heritage Asset’ and ‘Designated Heritage Asset’ are defined in the glossary. Heritage assets are described in paragraph 5.2, but a different, albeit compatible, description is used in the glossary. This lack of consistency could lead to difficulties in enforcing the policy in contentious cases.</p>	
<p>Historic England comments Para 1 Proposals can affect more than one heritage asset and or affect the setting. Amendment suggested to ensure the soundness of the policy in line with the requirements of the NPPF and the 1990 Act.</p> <p>Amend " "All proposals affecting historic assets and/or their setting must be....."</p>	<p>The policy is considered sound as written but in order ensure the soundness of the policy in line with the requirements of the NPPF and the 1990 Act. “ the following change will be made</p> <p>Amend " Point 1 "All proposals affecting a historic asset or its setting “ Will be changed to “All proposals affecting historic assets and their settings”</p>
<p>Historic England suggests some textual amendments to the policies HER 1 Para 2: Sound (subject to text amendment) The policy is titled ‘Heritage Assets’ to cover all types. Para 2 of the policy refers to ‘listed building’. This should be amended to include ‘heritage asset’ for consistency.</p>	<p>Amend HER 1, Policy point 2 in line with Historic England’s comment to “Where works of a structural alteration to a listed building heritage asset are proposed....”</p>

Policy HER 2 ‘Heritage at risk’

Summary of the main issues raised	How the main issues have been taken into account
<p>Policy HER 2 must include, (or make reference to), appropriate and robust guidelines to act as informed 'checks and balances' to ensure that the benefits of any proposed development intended to secure the future of a heritage asset are not outweighed by the disbenefits. It needs strengthening by the inclusion of the 8 criteria in the guidance published by English Heritage</p>	<p>Amend text at point 2 "Applications that enable the positive reuse of heritage assets will be supported To Applications that enable <u>for</u> the positive reuse of heritage assets will be supported</p> <p>This is not a policy about enabling development so for the avoidance of doubt the word “enable” has been removed and the suggested reference to the English Heritage published Guidance <i>Enabling development and the conservation of significant places</i>’ (Revised 2012)” is not required</p>

<p>Para 5.8 Neglect may not be 'deliberate'?</p> <p>Suggest either remove 'deliberate' or add a statement that indicates, whatever the cause, an investigation or enforcement action will be taken to prevent further deterioration.</p>	<p>The word “deliberate” is required in the policy wording HER 2 point 3 in order to highlight that letting a building deteriorate will not diminish its heritage value when considering development proposals .</p>
<p>Paragraph 5.9 would like to see a commitment to an urgent review of all of Crewe’s heritage and a strategy for its future interpretation and conservation. The town has a rich industrial and architectural heritage which is rapidly vanishing, and has received little protection through the planning system to date, save for the recent Crewe Hub Area Action Plan.</p>	<p>There is no scope with the current format of the plan to include town specific heritage policies for Crewe. The suite of heritage policies, included in the SADPD, apply equally to all settlements in Cheshire East.</p> <p>Specific policies for Crewe would need to be in the form of addition policies such as an Action Plan or Neighbourhood Plan.</p>

Policy HER 3 ‘Conservation areas’

Summary of the main issues raised	How the main issues have been taken into account
<p>No justification for arbitrarily requiring the retention of all buildings that make a positive contribution; there may be circumstances for such buildings to be demolished or substantially altered.</p> <p>the reference to certain conditions prior to any demolition of a building would be subject to the planning application, or conservation area consent, process and there is no requirement for such detail to be prescribed through the local plan.</p>	<p>The policy states that the demolition of buildings making a positive contribution in Conservation Areas will not be supported unless... It then sets out the broad circumstances in which demolition might be supported. This is deemed to be sound as written</p>
<p>HER 3 , Para 2 speaks of 'a building or group of buildings'. Therefore in ii and iii there should be consistency by amending the text to read “the building/s is/are structurally unsound and its/their repair is not.....” and “alternative uses for the buildings have been investigated”</p>	<p>This is deemed to be sound as written.</p>

Policy HER 4 ‘Listed buildings’

Summary of the main issues raised	How the main issues have been taken into account
<p>Subsection i: “building’s architectural features”. It is recommended that the word ‘special’ or ‘significant’ be inserted to read “building’s special or significant architectural features”. Otherwise, the Policy does not reflect the NPPF and the need to identify and understand significance.</p> <p>Subsection ii: Same as above – clarification that only the special interest/significance should be preserved.</p>	<p>The word significance appears at the end of the sentence. The policy is considered sound as written</p>
<p>Development proposals affecting a listed building must be considered in the context of the legal duty conferred by s16 (2) and s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 16 (2) relates to the grant of listed building consent and section 66(1) relates to the grant of planning permission. Section 66 (1) states: “In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”</p> <p>There is no mention in statute of enhancement of the building or its setting. The policy seeks to apply a higher test than is required in law, which is simply one of preservation.</p> <p>In summary, Policy HER 4 as currently drafted is unsound. It is not positively prepared, justified, effective or consistent with the Planning (Listed Buildings and Conservation Areas) Act and therefore fails to meet the tests set out in paragraph 35 of the Framework.</p> <p>Modifications necessary to the policy</p> <p>The policy should be amended as follows:</p> <ol style="list-style-type: none"> 1. Development proposals affecting a listed building or its setting will be expected to preserve the asset and its setting wherever possible. 5. New development affecting the setting of listed buildings should preserve the setting, taking into account all relevant issues, including (but not limited to):....etc 	<p>The policy is considered sound as written. At point 1 it contains the words “ where ever possible”</p>

<p>Paragraph 4, part (iii) explains that in relation to change of use or conversion of a listed building, this will be supported where 'the proposed use is necessary to ensure the long-term preservation of the building'.</p> <p>This is far too prescriptive as a simple change of use of a building, in part or whole, should not have to prove that it is necessary to ensure the long-term preservation of the building.</p> <p>This is without justification, particularly when no external changes are required, and should be deleted.</p> <p>Delete paragraph 4, part (iii).</p>	<p>This policy is deemed unnecessarily prescriptive. Paragraph 4, part (iii). 'the proposed use is necessary to ensure the long-term preservation of the building'. Will be deleted.</p>
<p>Macclesfield Borough Plan policy B19 is clear that change of use of listed building will be permitted if 'the use would not lead to a demand for large scale extensions or for additional buildings in the grounds'.</p> <p>Reinstate B19 policy from Macclesfield Borough Plan</p>	<p>The plan is intended to be read as a whole. This point is covered by 4 IV with a change to the word "setting" to "significance"</p> <p>Iv the intended use (or associated development) of the building does not detract from its significance"</p>

Policy HER 5 'Historic parks and gardens'

This initial Publication Draft SADPD policy is titled HER 5 'Registered parks and gardens' in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>Historic England Para 1. Bullet I Sound (subject to a textual amendment) The significance of an asset can be made up of a wide variety of different elements. To ensure that non are excluded, it is suggested that 'including' is inserted into the sentence. Amend to read "Cause no unacceptable harm to the asset's significance, including taking into account...."</p>	<p>HER 1 point 1 Amend to read "cause no unacceptable harm to the asset's significance, taking into account matters including, the character, setting and appearance of those features....."</p> <p>This is to highlight that it is not to be considered a definitive list.</p>
<p>HE suggested amendment The title of the policy refers to 'Historic' parks and gardens and yet the policy only covers 'registered'. The supporting text (Para 5.24) mentions that there are a number of non-designated heritage assets</p>	<p>This policy deals only with registered parks and gardens. Therefore the word "registered" will be inserted at the beginning of the title of the Policy HER 5 Registered Parks and Gardens .</p>

as well. So, is the intention of the policy to cover both designated and non-designated or just the former?	
If it is only designated, then the title should be amended to reflect this.	

Policy HER 6 ‘Historic battlefields’

Summary of the main issues raised	How the main issues have been taken into account
No comments	

Policy HER 7 ‘Non-designated heritage assets’

Summary of the main issues raised	How the main issues have been taken into account
The SADPD should include an appendix with detailed addresses of all Locally Listed Buildings, so that these can be readily identified.	Supporting paragraph 5.26 <i>“It should be recognised that not all buildings, structures or landscapes that may be of local significance are currently documented or captured on a local list”</i> There is also reference to a supplementary planning document (2010, Local List of Historic Buildings Cheshire East Council). These lists remain separate to this plan as they can be updated more regularly.
The revised policy wording within HER 7 better aligns with this policy test but would recommend including the term ‘balanced judgement’ within this policy to ensure clear consistency with national policy.	Policy SE 7 “The Historic Environment” in the LPS already contains the wording “balanced consideration” in relation to the potential loss of non designated heritage assets.
The increased emphasis on avoiding, minimising or mitigating the impact of development on non-designated heritage assets is welcomed. However, the policy should still make clear that where a heritage asset cannot be saved, it should be replaced by a building of equal or greater architectural quality.	Paragraph 5.27 <i>“The presumption is for the retention of non-designated assets”</i> Not all non-designated assets are buildings, they include archaeological sites or landscapes therefore they could not be replaced once lost. Paragraph 13.70 of the LPS <i>“Securing high quality design is very important to conserving, enhancing and enriching the unique heritage and local identity of the borough. With respect to setting, and wider context, new developments should respect the local character, massing, and scale of the area.”</i>

Policy HER 8 ‘Archaeology’

Summary of the main issues raised	How the main issues have been taken into account
<p>Clause 1 could be strengthened by substituting 'must for 'should'. Clause 3 is often not triggered either because the developer does not realise or has not investigated whether the site has archaeological significance and/ or the case officer is similarly unaware of archaeological potential in the area. Some mechanism needs to be put in place to ensure these omissions do not occur.</p> <p>Substitute 'must for 'should' in Clause 1.</p>	<p>“Should” offers some flexibility however the policy point 3 says applications “Must be accompanied by an appropriate archaeological assessment”</p>

Policy HER 9 ‘World heritage site’

Summary of the main issues raised	How the main issues have been taken into account
<p>Policy SE14 ‘Jodrell Bank’ of the LPS is a restrictive policy and, consequently, object to the inclusion of a further restrictive policy in relation to proposals in this location. This additional level of protection is not necessary and is not appropriate.</p>	<p>Jodrell Bank now has UNESCO World Heritage Status and needs to be afforded appropriate protection.</p> <p>The revised publication draft SADPD Policy HER 9 contains more detail on the types of development that are likely to be supported with in the Jodrell Bank consultation zone. Policy HER 9 in the revised publication draft SADPD will be supported by a forthcoming Supplementary Planning Document for Jodrell Bank</p>
<p>Part 1, omitted the phrase “outstanding universal value” from the policy as it replicates national guidance. Include it in the explanatory text.</p> <p>Part 2. There is nothing in the policy wording, supporting text or draft proposals maps explicitly confirming the extent of the “buffer zone”. It is assumed that the buffer zone boundary is intended to replicate the JBO consultation zone boundary as set out on the UNESCO Designation Map.</p> <p>JBO consultation zone deals with radio interference. It does not deal with the setting of the WHS which is a separate matter. Therefore the</p>	<p>For a world heritage site, the cultural value is described within its statement of outstanding universal value. The inclusion of this phrase in the policy wording is appropriate.</p> <p>The buffer zone will be set out on the policies map and supported by a forthcoming Supplementary Planning Document</p> <p>The adopted policies map (the World Heritage Site Buffer Zone), will cover both Local Plan Policies (LPS Policy SE14 (Jodrell Bank) and revised Draft SADPD Policy HER 9 (World heritage site).</p>

impact on the setting should not automatically follow the same boundary as the JBO consultation zone, which has been set for technical purposes, not heritage purposes.

Usually Local Plan policies relating to World Heritage Sites would be supported by an evidence base (usually a Conservation Management Plan) which would assess the extent of the setting of the heritage asset. Jodrell Bank does not currently have a Conservation Management Plan which is to take the form of an SPD.

Paragraph: 033 Reference ID: 18a-033-20190723 of the PPG states: *“The UNESCO Operational Guidelines seek protection of “the immediate setting” of each World Heritage Site, of “important views and other areas or attributes that are functionally important as a support to the Property” and suggest designation of a buffer zone wherever this may be necessary. A buffer zone is defined as an area surrounding the World Heritage Site which has complementary legal restrictions placed on its use and development to give an added layer of protection to the World Heritage Site. The buffer zone forms part of the setting of the World Heritage Site”.*

The policy wording should be revised to confirm that an assessment of the immediate setting of the WHS is separate to the UNESCO buffer zone which is based on the JBO consultation zone for radio interference. Part 2 of the policy does allow for development within the setting and buffer zone provided two criteria are met, these being:

- there is a clear and convincing justification; and, an appropriate heritage impact assessment has evaluated the likely impact of the proposals upon the significance of the asset and the attributes that contribute to its outstanding universal value.

The policy needs to be more prescriptive as to the requirements for an applicant within the buffer zone producing a heritage impact assessment. For example is the heritage impact assessment expected to include a section relating to whether or not there is technical interference? If it is, the policy must set out a methodology for the

assessment, to ensure that each application is assessed on a like-for-like basis using a consistent approach and applicants have access to that methodology when assessing development proposals. This applies even if the technical impact is covered by Policy SE14.

At present there is no transparent process as to how the impact on JBO is assessed by the University and applied by the LPA. This must be rectified through this plan due to its inclusion in Policy HER 9.

11.10 We also question why a heritage impact assessment is required for all proposals in the buffer zone. The PPG (Paragraph: 035 Reference ID: 18a-035-20190723) allows applicants to “*submit sufficient information with their applications to enable assessment of the potential impact on Outstanding Universal Value. This may include visual impact assessments, archaeological data and/or historical information*”. This is particularly the case if the buffer zone remains when assessing setting and it is apparent that there would be no impact of the WHS from an initial visual assessment.

we propose the following changes.

1. Proposals that conserve or enhance ~~the outstanding universal value~~ of the World Heritage Site at Jodrell Bank will be supported.

2. Development proposals within the World Heritage Site at Jodrell Bank ~~(or within its buffer zone)~~ or its immediate setting that would cause harm to the significance of the heritage asset (including elements that contribute to its outstanding universal value) will not be supported unless there is a clear and convincing justification; and an appropriate heritage impact assessment has evaluated the likely impact of the proposals upon the significance of the asset and the attributes that contribute to its outstanding universal value.

3. Where development has a demonstrable public benefit, ~~and harm to the outstanding universal value~~ is unavoidable and has been minimised, this benefit will be weighed against the level of harm to the World Heritage Site.”

<p>As a designated heritage asset of the outstanding universal value, there is a strong presumption against development that would result in harm to the World Heritage Site, its authenticity or integrity. This presumption applies equally to development in the setting of a World Heritage Site, where key views should also be protected.</p>	
<p>There remains a need for an updated and more detailed policy in relation to Jodrell Bank to be included within the SADPD to help overcome this “moratorium” and inconsistency with the development plan, focusing specifically on the scientific impacts of development (Policy HER 9 deals with Heritage considerations). Such a Policy should establish a certain threshold of impact where adverse effects on the operation of Jodrell Bank would be acceptable to a defined level (to be agreed by the Council and Jodrell Bank) subject to the social, economic and environmental effects of the development. This approach will ensure that sustainable development can come forward within the Consultation Zone, but at the same time will protect the operations of the Observatory to an acceptable limit. Much greater consideration should also be given to the potential to mitigate against any adverse impact on the Radio Telescope through the layout, design and build of a site and new dwellings, which to date has been afforded limited consideration and weight by the Council and the University of Manchester.</p>	<p>Policy HER 9 will be supported by a forthcoming Supplementary Planning Document for Jodrell Bank</p>
<p>There is still no detailed policy advice and guidance contained within the Publication Draft SADPD on Jodrell Bank (in relation to scientific impacts), contrary to paragraph 13.163 of the LPS. This needs to be included within the next version of the SADPD as it has implications for growth across a number of LSCs and Other Settlements and Rural Areas.</p>	<p>Policy HER 9 will be supported by a forthcoming Supplementary Planning Document for Jodrell Bank</p>
<p>In order to be found sound, the SADPD should allocate land for housing in the MRA (Macclesfield Regeneration Area) supported by a strong evidence base on JBO. Additionally, the SADPD could include form of criteria-based policy that is supported by the strong JBO</p>	<p>LPS Policy PG 7 ‘Spatial distribution of development’ determines the overall level of development to be provided in each tier of the settlement hierarchy. The need for site allocations at each tier of the settlement hierarchy is considered in the ‘Provision of Housing and</p>

<p>evidence base. That would provide much needed clarity on what development may be considered appropriate within the consultation zone</p> <p>Make allocations that are based on a strong evidence base with regard JBO and take the opportunity to provide specific guidance on development within the JBO Consultation Zone.</p>	<p>Employment Land and the Approach to Spatial Distribution' report [ED 05]. There is no need to allocate any additional land for housing in Macclesfield regardless.</p> <p>Policy HER 9 will be supported by a forthcoming Supplementary Planning Document for Jodrell Bank</p>
<p>HE proposed amendment Proposals that conserve, or <u>enhance, promote</u> and interpret the outstanding universal value of the <u>World Heritage Site at Jodrell Bank including its authenticity and integrity of the world heritage site at Jodrell Bank</u> will be supported</p> <p>HE proposed amendment 2. Proposals that enhance or better reveals its significance and which accords with the approved World Heritage Site Management Plan will be supported.</p> <p>3. Development proposals within the world heritage site at Jodrell Bank (or within its buffer zone) that would cause harm to the significance of the heritage asset (including elements that contribute to its outstanding universal value) will not be supported. Unless there is a clear and convincing justification; and an appropriate heritage impact assessment has evaluated the likely impact of the proposals upon the significance of the asset and the attributes that contribute to the outstanding universal value.</p> <p>4. Development proposals with the potential to affect the World Heritage Site should be accompanied by a Heritage Impact Assessment which should clearly demonstrate the impact that the proposal has on the Outstanding Universal Value including the authenticity, integrity and significance of its attribute including how it supports its management and protection. Where development has a demonstrable public benefit and harm to the outstanding</p>	<p>The proposed amendments have been interpreted into the revised publication draft SADPD Policy HER 9</p>

<p>universal value is unavoidable and has been minimised, this benefit will be weighed against the level of harm to the outstanding universal value of the world heritage site</p>	
<p>Paragraph 5.32 Policy SE14 LPS (July 2017) Jodrell Bank. Para 13.163 of the LPS (July 2017) states that: The Council will provide further detailed policy and advice within the SADPD. Under Key evidence 4, it is stated that Jodrell Bank Management Policies are under preparation. The Jodrell Bank Consultation Zone has been unchanged for 45 years, and the importance and standing of the Radio Telescope at Jodrell Bank has changed over that period. Policy SE14 has recently been used by the Council to establish an embargo on housing development within the zone, except where there are Strategic Site allocations. The Consultation Zone is very extensive, and more detailed guidance is needed in relation to how development proposals will be looked at, and if there is any mitigation works or materials which could help to reduce any potential interference in terms of its operation. In addition, Jodrell Bank has been acknowledged as a World Heritage Site, and how this will be reflected in detailed policy is another reason for requesting the Council to meet its statement in the LPS (July 2016) that it: Will provide further detailed policy and advice within the SADPD.</p>	<p>The revised publication draft SADPD Policy HER 9 contains more detail on the types of development that are likely to be supported with in the Jodrell Bank consultation zone. Policy HER 9 in the revised publication draft SADPD will be supported by a forthcoming Supplementary Planning Document for Jodrell Bank</p>
<p>Paragraph 5.33 A detailed policy approach for proposals located within the Jodrell Bank Consultation Zone is not included within the SADPD. This is despite the supporting text to Policy SE14 of the LPS clearly stating that this will be provided through the SADPD. This is a significant omission. there is an urgent need for more detailed and transparent guidance to be provided by the Council in relation to Jodrell Bank which is clearly</p>	<p>The revised publication draft SADPD Policy HER 9 contains more detail on the types of development that are likely to be supported with in the Jodrell Bank consultation zone. Policy HER 9 in the revised publication draft SADPD will be supported by a forthcoming Supplementary Planning Document for Jodrell</p>

<p>evidenced based, and which can be more easily interpreted by developers and the community alike to deliver sustainable development. This goes beyond the guidance set out under proposed Policy HER 9.</p> <p>there remains a need for an updated and more detailed policy in relation to Jodrell Bank to be included within the SADPD to help overcome this “moratorium” and inconsistency with the development plan, focusing specifically on the scientific impacts of development (Policy HER 9 deals with Heritage considerations). Such a Policy should establish a certain threshold of impact where adverse effects on the operation of Jodrell Bank would be acceptable to a defined level (to be agreed by the Council and Jodrell Bank) subject to the social, economic and environmental effects of the development. This approach will ensure that sustainable development can come forward within the Consultation Zone, but at the same time will protect the operations of the Observatory to an acceptable limit. Much greater consideration should also be given to the potential to mitigate against any adverse impact on the Radio Telescope through the layout, design and build of a site and new dwellings, which to date has been afforded limited consideration and weight by the Council and the University of Manchester.</p> <p>As drafted, we object to the absence of any specific policy on Jodrell Bank supplementary to Policy SE14 of the LPS.</p>	
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Chapter 6: Rural issues (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>The SADPD should be adapted to take into account the impacts of the LPS’s high growth strategy on the character of local areas, on wider landscapes and vistas or on environmental capacity. The rural policies focus primarily on buildings and businesses and there is no recognition of the need to retain sufficient agricultural land (including lower quality land).</p>	<p>The LPS and SADPD contain a variety of policies that address issues around local character, landscapes and environmental issues. The NPPF (¶170b) recognise the economic and other benefits of the best and most versatile agricultural land. LPS policies SD 1 ‘Sustainable development in Cheshire East’, SD 2 ‘Sustainable development principles’; SE 2 ‘Efficient use of land’; and SADPD Policy RUR 5</p>

	'Best and most versatile agricultural land' seek to protect the best and most versatile agricultural land.
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Policy RUR 1 'New buildings for agriculture and forestry'

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the policy will hamper and unnecessarily constrain the growth of rural businesses. It is a 'do minimum' approach and does not accord with NPPF para 83 which seeks to support a prosperous rural economy. The emphasis should be on enhancement and reasonable expansion.	The policy allows for development to support the existing or planned operation of an enterprise. It is considered appropriate that the policy seeks to prevent new buildings in the open countryside that are not required for an existing or planned business operation.
The overly-restrictive approach means that permitted development rights will be utilised by agricultural businesses instead, to deliver the new buildings and floorspace they need. This will lead to a series of smaller, uncontrolled development that cause greater harm than a single development.	New buildings are considered acceptable under this policy where they are required for the existing or planned operation of an enterprise. It is considered appropriate that the policy seeks to prevent new buildings in the open countryside that are not required for an existing or planned business operation.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
The policy should be amended to require that new agricultural and forestry buildings remain in that use in perpetuity and changes of use should only be approved in exceptional circumstances.	It would not be a sound approach to restrict all changes of use of agricultural and forestry buildings, particularly when extensive permitted development rights exist. The approach to re-use of rural buildings is set out in a number of SADPD rural issues policies (including RUR 6, RUR 7, RUR 8, RUR 9, RUR 10 and RUR 14).
It is considered that the wording of the policy restricts the opportunities for new entrants into agriculture where no buildings or enterprise currently exists.	The policy is not intended to apply only to established agricultural or forestry enterprises and refers to existing or planned operations.

Policy RUR 2 'Farm diversification'

Summary of the main issues raised	How the main issues have been taken into account
<p>Increasing pressures on farmers and the rural economy has increased the need for farm diversification. Diversified activities provide a significant proportion of income for many farms. The policy is considered to be too restrictive and will hinder the agricultural industry's ability to diversify. Requiring development to be necessary to support the continued viability of the existing agricultural business allows only for the minimum level of diversification which will not secure the long-term future of the agricultural business and will lead to further diversification later.</p>	<p>The farm diversification policy is intended to support the continued operation of agricultural businesses. The plan is intended to be read as a whole and where development is proposed over and above that necessary to support the continued viability of an existing agricultural business, there are a number of other policies that are supportive of appropriate development in rural areas, including LPS Policy EG 2 'Rural economy'; and SADPD policies RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries'; RUR 7 'Equestrian development outside of settlement boundaries'; RUR 8 'Visitor accommodation outside of settlement boundaries'; RUR 9 'Caravan and camping sites'; and RUR 10 'Employment development in the open countryside'.</p>
<p>The policy fails to recognise instances where an existing agricultural business has already ceased operations and therefore a new use for the farmstead / farm buildings needs to be found.</p>	<p>The farm diversification policy is intended to support the continued operation of agricultural businesses. Where a business has already ceased operations, there are other policies to guide proposals for various alternative uses, including LPS Policy EG 2 'Rural economy'; and SADPD policies RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries'; RUR 7 'Equestrian development outside of settlement boundaries'; RUR 8 'Visitor accommodation outside of settlement boundaries'; RUR 9 'Caravan and camping sites'; RUR 10 'Employment development in the open countryside'; and RUR 14 'Re-use of rural buildings for residential use'.</p>
<p>For farm shops, it is considered that restricting goods to be mainly produced on site does not account for the wider supply chains often at work for farm shops, the wider economic benefits to the rural economy, or the potential to attract visitors as a leisure/tourism destination.</p>	<p>The farm diversification policy is intended to support the continued operation of agricultural businesses and requires that for farm shops, the majority of goods sold should be produced on site. The dictionary definition of "majority" is "the greater number or the greater part". Therefore, as written, the policy allows for almost 50% of goods sold to be sourced from the wider supply chain, provided they relate to the land-based business. The plan is intended to be read as a whole and where proposals form an important component of a leisure or tourism</p>

	development, there are other policies that are supportive of appropriate development in rural areas, including LPS policies EG 2 'Rural economy' and EG 4 'Tourism'.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 3 'Agricultural and forestry workers dwellings'

Summary of the main issues raised	How the main issues have been taken into account
The policy is considered to be in conflict with the NPPF (¶79) which is permissive of rural workers dwellings, including those taking majority control of a farm business.	The NPPF (¶79) requires planning policies to avoid the development of isolated homes in the countryside unless particular circumstances apply, including where there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside. The policy is considered to be in accordance with this requirement.
The policy should have regard to the factors in the NPPG (paragraph 10 reference ID: 67-010-20190722), particularly whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process.	Where a dwelling is essential for the continued viability of a farming business through the farm succession process, it is considered that this would provide the justification that there is an existing functional need for an additional worker to live permanently at the site under criterion 1(i) of the policy.
The NPPF does not suggest that size restrictions should be imposed. The size of dwelling can also be related to what the enterprise can sustain, rather than an individual's income. It is considered unfairly prescriptive over the size of accommodation and does not account for the range of people who may comply with the need for on-site accommodation. Dwellings need to be of a size and scale to attract and retain labour.	The supporting information explains the why it is necessary to limit the size of dwellings allowed under this exceptions policy.
The figures in the nationally described space standard are minimum figures but are being used as maximum figures for the purposes of the	The gross internal floorspace figures set out in Table 6.1 are not absolute maximum figures, but the policy does require that dwellings

<p>policy. These do not take into account non-standard accommodation required by rural workers, such as ground floor decontamination room, boot room and farm office. Rural workers dwellings also need to accommodate relief worker(s) during absences. The table does not take into account a larger number of bedrooms required within the dwelling commensurate with the existing functional need.</p>	<p>allowed under this exceptions policy do not <u>significantly exceed</u> the figures in the table. This allows for additional non-standard accommodation or additional bedrooms where justified. The figures are also expressed as a range to allow for a degree of flexibility.</p>
<p>Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.</p>	<p>These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.</p>

Policy RUR 4 'Essential rural worker occupancy conditions'

Summary of the main issues raised	How the main issues have been taken into account
<p>The policy is considered to be unlawful as it applies unreasonable burdens on owners of properties with occupancy restrictions as compared to owners of other types of rural buildings originally permitted in exceptional circumstances that now wish to convert them to residential use.</p>	<p>This issue has been taken into account and the supporting information explains why re-use as affordable housing is preferable to open market housing.</p>
<p>The term 'in the surrounding area' is vague and should be replaced with 'in the locality' which is the phrase used in model condition (no. 45) for agricultural occupancy conditions set out in the Annex to former Circular 11/95 (the Annex remains extant even though the Circular has been withdrawn).</p>	<p>The policy is considered to be sound as written.</p>
<p>The owner of a dwelling subject to an occupancy condition cannot be forced to dispose of that property as a result of making a planning application. The policy requires a marketing exercise to be undertaken. However, it is unlawful under the Consumer Protection from Unfair Trading Regulations, 2008, to offer for sale (or rental) a property that is not, in fact, available to purchase or rent, but is being advertised as an "exercise" to test the market. Therefore, evidence of a marketing exercise cannot be a requirement in all circumstances.</p>	<p>The policy is not asking for the market to simply be "tested". Its underlying purpose is to require genuine attempts to sell before planning permission can be granted without the occupancy condition. The marketing exercise it requires would have to relate to a property that is properly available to buy or rent subject to the occupancy condition. That is the purpose of the policy. Further, the policy does not actually force a disposal. It simply provides that the property be made available to buy or rent and then takes into account the results</p>

	of that exercise in deciding whether to grant permission.
The imposition of additional restrictions in cases where rural worker occupancy restrictions are lifted is considered to be unreasonable. National policy and the LPS allow for conversion of rural buildings to dwellings without such restrictions and permitted development rights allow for the change of use of former agricultural buildings to open market dwellings. It would be perverse if a building no longer required as a dwellings for a rural worker could not be re-used for an unrestricted dwelling when another rural building (such as a cowshed or haystore) could.	This issue has been taken into account and the supporting information explains why re-use as affordable housing is preferable to open market housing.

Policy RUR 5 ‘Best and most versatile agricultural land’

Summary of the main issues raised	How the main issues have been taken into account
It is considered that it may be difficult to mitigate the overall impact of development on best and most versatile land (under criterion 2ii), which may prevent development coming forward even where the benefits clearly outweigh the loss of the agricultural land (under criterion 2i).	The policy requires that ‘every effort’ is made to mitigate the overall impact of the development on best and most versatile land, which allows for circumstances where it can be demonstrated that mitigation cannot be achieved. Some potential forms of mitigation are set out in the supporting information.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 ‘Flood risk and water management’; and SADPD policies ENV 16 ‘Surface water management and flood risk’ and ENV 17 ‘Protecting water resources’.
It is considered that a requirement “to demonstrate that no suitable alternative suitable site is available that would have a lesser impact on best and most versatile farmland” should be added to the policy.	Given the limited data available on land quality, it is likely to be difficult for applicants to demonstrate that there are no suitable alternative sites available that would have a lesser impact on best and most versatile land. To do so is likely to require extensive investigations and surveys on third party land.
It is considered that outside of sites specifically allocated for development, proposals must avoid the loss of best and most versatile land.	The policy requires that outside of sites allocated for development, proposals should avoid the loss of best and most versatile land.

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

Summary of the main issues raised	How the main issues have been taken into account
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 ‘Flood risk and water management’; and SADPD policies ENV 16 ‘Surface water management and flood risk’ and ENV 17 ‘Protecting water resources’.

Policy RUR 7 ‘Equestrian development outside of settlement boundaries’

Summary of the main issues raised	How the main issues have been taken into account
The requirement to make best use of existing buildings is unjustified and would not enable the development and diversification of agricultural and other land-based rural businesses; or sustainable rural tourism and leisure developments which respect the character of the countryside – as required by NPPF ¶83.	The policy is considered sound as drafted. The policy allows for new buildings for equestrian purposes, but it is considered entirely appropriate to give first consideration to existing infrastructure. Where existing infrastructure is not suitable for the proposals then new infrastructure (including buildings) can be allowed under the policy.
The requirement for ancillary development to be well-related to existing buildings is unjustified as there may not be any existing buildings.	The word “any” has been added to confirm that ancillary development should be well-related to any existing buildings. This accounts for circumstances where there are no existing buildings.
NPPF ¶¶83 & 84 are supportive of the development of rural businesses. Equestrian facilities require a countryside location and criterion 2 of the policy would prevent new equestrian businesses of any scale. There should be no requirement to assess the potential for conversion of existing buildings in the first instance.	The policy allows for the sustainable growth and expansion of businesses in rural area as required by the NPPF. It allows additional buildings and structures for existing businesses where no suitable existing buildings or structure exist. The policy does not allow for new buildings to be constructed for a new business; however this does not prevent new businesses. New commercial enterprises are able to utilise existing buildings and structures under this policy. This is consistent with the NPPF and LPS Policy PG 6 ‘Open countryside’ which allows “for development that is essential for the expansion or redevelopment of an <u>existing</u> business”.
The requirement for buildings to be constructed of temporary materials such as timber is unjustified. Accommodation requirements will	Temporary materials such as timber are appropriate for equestrian uses to meet the requirements set out in the Code of Practice for the

depend on the type and number of horses; welfare of the animal should be determined on a case by case basis and the policy would prohibit the provision of essential stables to the detriment of the rural economy.	Welfare of Horses, Ponies, Donkeys and their Hybrids (2017, DEFRA) and the policy is considered to be sound as written.
The policy should be strengthened to prevent equestrian buildings being converted to residential use only to be replaced a short time later.	The policy requires new equestrian buildings to be appropriate to their intended equestrian use and to be constructed of temporary materials such as timber. Any proposals to convert rural buildings for residential use would be considered against the requirements of SADPD Policy RUR 14 'Re-use of rural buildings for residential use'.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 8 'Visitor accommodation outside of settlement boundaries'

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the policy should allow for new-build hotels and guest houses as there may be a number of instances where these could meet specific localised needs (not related to links with the countryside) in locations outside of settlement boundaries. Examples include hotels on out of centre business parks, demand arising from key transport infrastructure such as airports or HS2, or as part of roadside facilities to serve motorists. Hotels are already subject to a sequential test which sees them directed to town centres where possible.	New hotels and guest houses are not considered to be uses appropriate to a rural area and the policy is considered sound as drafted.
The policy should be less prescriptive, using terms such as 'appropriate scale'; 'cannot best be met'; and 'not generally'.	As required by the NPPF (¶16d), policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
It is not clear why proposals should be restricted to small scale and larger facilities may be appropriate. 'Development appropriate to the	The policy has been amended to refer to 'development of a scale appropriate to the location and setting'.

location and setting' would be more appropriate.	
There should not be a test requiring existing buildings to be considered in the first instance as this is contrary to the NPPF and LPS Policy PG 6.	The policy is considered sound as drafted. The policy allows for new buildings, but it is considered entirely appropriate to give first consideration to existing buildings. Where existing buildings are not suitable for the proposals then new buildings can be allowed under the policy.
The restriction for development to be limited to the minimum level required for the operation of the accommodation is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.	The policy has been amended to confirm that additional buildings, structures and ancillary development are restricted to the minimum level reasonably required for existing or planned operation of the accommodation. This clarifies that development to support growth plans can be allowed. In the open countryside, it is considered appropriate for the policy to restrict development that is not required for the existing or planned operation of the accommodation.
The policy makes no reference to supporting existing visitor accommodation.	The policy is supportive of new facilities as well as new development related to existing facilities.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 9 'Caravan and camping sites'

Summary of the main issues raised	How the main issues have been taken into account
It is not clear why proposals should be restricted to small scale and larger facilities may be needed and acceptable, subject to the location and details of the site. Only allowing for small scale facilities may undermine the council's objective to establish Macclesfield as the gateway to the peak.	The policy has been amended to refer to 'development of a scale appropriate to the location and setting' instead of 'small scale development'.
There should not be a test requiring existing buildings to be considered in the first instance, as this is contrary to the Framework and LPS Policy PG 6.	The policy is considered sound as drafted. The policy allows for new buildings, but it is considered entirely appropriate to give first consideration to existing buildings. Where existing buildings are not

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	suitable for the proposals then new buildings can be allowed under the policy.
The restriction for development to be limited to the minimum level required for the operation of the facility is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.	The policy is has been amended to confirm that additional buildings, structures and ancillary development are restricted to the minimum level reasonably required for the existing or planned operation of the facility. This clarifies that development to support growth plans can be allowed. In the open countryside, it is considered appropriate for the policy to restrict development that is not required for the existing or planned operation of the facility.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 10 'Employment development in the open countryside'

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the policy should refer to a wider range of employment uses in open countryside locations. Under the NPPF, all types of businesses in rural areas should be encouraged, some of which may not be small scale. Business and logistics parks are often located near road infrastructure in the open countryside, providing significant local employment opportunities. Similarly, emerging technologies to tackle climate change (e.g. energy storage and other battery storage opportunities within existing and new cavities following salt extraction) should not be prevented by a restrictive policy.	The policy is relevant to employment uses (defined as B1, B2 and B8 uses in the LPS). There are other policies relevant to proposals for other types of businesses in the open countryside, including LPS Policy EG 2 'Rural economy' and SADPD policies RUR 2 'Farm diversification'; RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries'; RUR 7 'Equestrian development outside of settlement boundaries'; and RUR 8 'Visitor accommodation outside of settlement boundaries'. There are also policies related to energy and climate change including LPD Policy SE 8 'Renewable and low carbon energy' and SADPD policies ENV 7 'Climate change'; ENV 9 'Wind energy'; ENV 10 'Solar energy'; and ENV 11 'Proposals for battery energy storage systems'.
By limiting the scale and types of employment development allowed, the policy is inconsistent with the framework, which clearly sets out that planning policies should enable the sustainable growth and	The NPPF (¶83a) requires planning policies to enable the sustainable growth and expansion of businesses in rural areas. It is clear that the terms 'growth' and 'expansion' refer to existing businesses and LPS

<p>expansion of all types of business in rural areas. It is also inconsistent with LPS Policy PG 6 which allows for development that is essential for the expansion or redevelopment of an existing business – not requiring it to be small scale or appropriate to a rural area.</p>	<p>Policy PG 6 ‘Open countryside’ allows for expansion or redevelopment of existing businesses (with no restriction on scale) as an exception to the usual restrictions in the open countryside. This is in line with the NPPF. LPS Policy PG 6 also allows for ‘other uses appropriate to a rural area’ and SADPD Policy RUR 10 gives further detail by confirming that small scale employment development (not restricted to existing businesses) can be considered to be appropriate to a rural area. LPS Policy PG 6 satisfies the NPPF requirement and places no restriction on scale for development associated with an existing business. SADPD Policy RUR 10 gives further flexibility by allowing small scale employment development for new enterprises.</p>
<p>There should not be a test requiring existing buildings to be considered in the first instance, as this is contrary to the Framework and LPS Policy PG 6.</p>	<p>The policy is considered sound as drafted. The policy allows for new buildings, but it is considered entirely appropriate to give first consideration to existing buildings. Where existing buildings are not suitable for the proposals then new buildings can be allowed under the policy.</p>
<p>The restriction for development to be limited to the minimum level required for the operation of the business is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.</p>	<p>The policy is has been amended to confirm that additional buildings, structures and ancillary development should be restricted to the minimum level reasonably required for the existing or planned operation of the business. This clarifies that development to support growth plans can be allowed. In the open countryside, it is considered appropriate for the policy to restrict development that is not required for the existing or planned operation of the business.</p>
<p>The requirement for new buildings to be appropriate to their intended function and not designed to be easily converted to residential use in the future should not rule out the development of buildings that are of permanent and substantial construction. The wording is unjustified and subjective, meaning that any proposal would be subject to an arbitrary and unnecessary judgement over whether it might at some point potentially be converted to residential use. The issues should be dealt with by removing specific development rights through an Article 4 Direction.</p>	<p>The policy seeks to allow small scale employment premises where a countryside location is essential and they provide local employment opportunities to support the vitality of rural settlements. It is important that the policy is not a ‘back-door’ to allow residential development that would not otherwise be allowed under local plan policies. It is not unreasonable that the design of new buildings should be appropriate to their intended function and the policy does not prevent buildings of permanent and substantial construction (unless such construction is not appropriate to the intended function).</p>
<p>Waterbodies in rural areas are affected by water quality issues and</p>	<p>These issues are addressed through LPS Policy SE 13 ‘Flood risk and</p>

the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
Historic uses of a site should not be used as justification for new and fundamentally different businesses moving in that are not appropriate to a rural area.	The policy sets out the circumstances in which new employment development can be considered appropriate to a rural area, where the nature of the business means that a countryside location is essential and the proposals provide local employment opportunities that support the vitality of rural settlements. The plan is intended to be read as a whole, and other policies will also apply to prevent unsuitable proposals, including SADPD policies GEN 1 'Design principles' and ENV 15 'New development and existing uses'.

Policy RUR 11 'Extensions and alterations to buildings outside of settlement boundaries'

Summary of the main issues raised	How the main issues have been taken into account
Inappropriate development is, by definition, harmful to the Green Belt but the same presumption against development does not apply in the open countryside and the two policy designations should be separated in this regard.	In accordance with the NPPF, LPS Policy PG 3 'Green Belt' allows for the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building. LPS Policy PG 6 'Open countryside' allows for extensions to existing dwellings where the extension is not disproportionate to the original dwelling. SADPD Policy RUR 11 gives further guidance on the circumstances under which extensions may be considered to be disproportionate.
The test of openness is not included in the NPPF ¶145c and should be removed from the policy.	The policy has been amended to remove the reference to the openness of the Green Belt.
It is considered that an increase in buildings height is part of the consideration of bulk, mass and prominence and essentially the visual dimension as referenced in case law. To usually consider increases in height as disproportionate is not justified.	The word 'usually' allows the decision-maker to exercise professional judgement in cases where an overall increase in height is not disproportionate given the site context and comparison of existing and proposed built form.
The restriction that means any extension greater than 30% of original floorspace comprises inappropriate development in the Green Belt is	The policy states that proposals will 'usually' be disproportionate where they exceed those thresholds. This allows the decision maker

considered to be unjustified and whilst 30% has historically been used by a number of councils, the NPPF includes no such threshold and the assessment of whether an extension is disproportionate requires consideration on a case by case basis.	to exercise professional judgement considering the merits of each case having regard to the context of the site.
Case law has established that an assessment of the openness of the Green Belt should not be confined to quantitative impacts and the NPPG confirms that openness is capable of having both spatial and visual aspects. Therefore it is wrong to specify certain percentage uplifts to define what is disproportionate and an assessment of what is disproportionate should be carried out on a case by case basis.	The initial Publication Draft SADPD policy was clear that the assessment of whether something is disproportionate is a separate test to whether it harms the openness of the Green Belt. There were no quantitative considerations set out to determine whether a proposal would harm the openness of the Green Belt. However, the reference to openness of the Green Belt has been deleted,
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 12 'Residential curtilages outside of settlement boundaries'

Summary of the main issues raised	How the main issues have been taken into account
The curtilage of a property can only relate to an area in residential land use. It is a factual determination which can change in an instant, for example by the removal of a fence. This policy should only concern garden extensions which represent a change of use of land.	The policy confirms that it applies to residential garden or curtilage extensions involving a material change of use of the land. Extensions to curtilages that do not involve a material change of use of land would not require planning permission.
A 'reasonable sitting out area' should be defined in terms of size, orientation and impact on wider character and amenity of the area. It should not be left to subjective determination.	Professional judgement will need to be applied to a reasonable sitting out area but criterion 2 limits this to the minimum amount of land reasonably required.

Policy RUR 13 'Replacement buildings outside of settlement boundaries'

Summary of the main issues raised	How the main issues have been taken into account
The term 'materially larger' only applies to Green Belt and is not a	In accordance with the NPPF, LPS Policy PG 3 'Green Belt' allows for

relevant concept in the open countryside.	the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces. LPS Policy PG 6 'Open countryside' allows for the replacement of existing buildings (including dwellings) by new buildings not materially larger than the buildings they replace. SADPD Policy RUR 13 gives further guidance on the circumstances under which replacement buildings may be considered to be materially larger.
Under criterion 1(ii), it is considered that the tests of impact on the rural character of the countryside duplicate the assessment of 'materially larger' and should be deleted.	The policy is considered to be sound as written. Whilst there may be some similarities in the issues to be considered, the tests are different.
Under criterion 2, all factors may affect whether a building is materially larger; therefore it is not appropriate to say that increases in height or footprint will usually be considered to be materially larger.	The policy gives guidance in that increases in overall building height and extending notably beyond the existing footprint will usually be considered materially larger. But the word 'usually' allows the decision maker to exercise professional judgment where appropriate, considering the circumstances of each case.
The NPPF provides no prescriptive threshold of what is materially larger and the policy should allow for planning judgement on a case by case basis.	The policy gives guidance that proposals in excess of the percentage size increase will usually be considered to be materially larger. However, it does not place an absolute limit on the percentage increase that would be permissible before a proposal is considered to be materially larger and the word 'usually' allows the decision maker to exercise professional judgment where appropriate, considering the circumstances of each case.
The percentage increase in size for replacement properties in the Green Belt should be amended to reflect NPPF ¶145g to allow for development where there is not a substantial impact on openness where there is affordable housing provision to meet local needs included on site. A greater percentage increase should be allowed where affordable housing is provided.	This policy is specifically related to replacement buildings (for all uses) and is in line with NPPF ¶145d, which involves no test related to openness. The provisions under NPPF ¶145g(ii) relates to the limited infilling or the partial or complete redevelopment of previously-developed land, whether redundant or in continuing use for affordable housing, and does involve a test related to openness. Whilst this policy does not refer to affordable housing on previously-developed land it does not preclude it.
Case law establishes that materially larger cannot be defined by a simple consideration of an increase in floorspace. It hinges on factors	The policy does not define 'materially larger' by a simple consideration of an increase in floorspace. Under criterion 2, matters including

<p>that go beyond size alone and in addition to spatial considerations, perceptual considerations also form part of the assessment.</p>	<p>height, bulk, form, siting, design, floorspace and footprint will be taken into account. Following those considerations, criterion 3 gives further guidance on the percentage thresholds above which proposals will usually be considered to be materially larger. These are not absolute limits and the word 'usually' allows the decision maker to exercise professional judgement considering the merits of each case having regard to the context of the site.</p>
<p>The percentage ceilings are not justified or supported by evidence. If a figure is considered necessary, then it should be no less than 30% to be consistent with the policy for extensions.</p>	<p>There are a number of examples where local plans use percentage figures significantly lower than 30% to define what is materially larger. The policy does not place an absolute limit on the percentage increase and the word 'usually' allows the decision maker to exercise professional judgement considering the merits of each case having regard to the context of the site. The guidance percentage figures for replacement dwellings cannot be compared to the guidance percentage figures for extensions under SADPD Policy RUR 11 'Extensions and alterations to buildings outside of settlement boundaries'. The test under this policy is whether the replacement building is materially larger than the building it replaces (at the time of making the application). The test for extensions under Policy RUR 11 is whether the extension would result in disproportionate additions over and above the size of the original dwelling (or as it existed on 01 July 1948 if constructed prior to this date).</p>
<p>Case law has established that an assessment of the openness of the Green Belt should not be confined to quantitative impacts and the NPPG confirms that openness is capable of having both spatial and visual aspects. Therefore it is wrong to specify certain percentage uplifts to define what is materially larger and assessments should be carried out on a case by case basis.</p>	<p>The policy requires no consideration of the openness of the Green Belt.</p>
<p>By using floorspace to determine the increase in size ignores other dimensions of size such as height, volume, footprint, width and depth.</p>	<p>The policy confirms that usually, the increase in size will be determined by assessing the next increase in floorspace because, usually this is the most appropriate and straightforward method. The word 'usually' means that the decision-maker can exercise professional judgement and consider other dimensions of size</p>

	considering the merits of each case.
Case law has established that the term 'building' in NPPF 2012 ¶89 (now ¶145) can also include 'buildings' and should not mean only a singular building. Case law has established that outbuildings may be incorporated into such calculations subject to site specific circumstances.	<u>The policy has been amended to allow floorspace from detached outbuildings to be taken into account in certain circumstances.</u>
The statement that the existing building is as it exists when making a planning application implies that any fall back position will not be taken into account. This is a material consideration that should be taken into account and the policy should not pre-determine what matters are material considerations.	The policy is that the existing building is as it exists when making a planning application. Planning decisions should be made in accordance with the development plan, unless material considerations (potentially including any fall back position) indicate otherwise. There could be any number of material considerations but the policy does not seek to define what those may or may not be.
Not all householders wish to have a garage and where there is no such existing provision, it is unreasonable for an applicant to trade living space for a garage in a replacement dwelling.	The policy requires appropriate provision for domestic storage and garaging. Where it is appropriate not to include garaging (such as where there is no existing provision), the policy does not require such provision.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 14 'Re-use of rural buildings for residential use'

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the policy is inconsistent with the NPPF as it only allows for the re-use of rural buildings for residential uses when no such restrictions apply in the NPPF.	The policy gives guidance on the residential re-use of rural buildings but does not restrict their re-use to residential only. The re-use of rural buildings for other uses is covered by a number of other policies, including LPS policies PG 6 'Open countryside' and EG 2 'Rural economy'; and SADPD policies 'Outdoor sport, leisure and recreation outside of settlement boundaries'; RUR 7 'Equestrian development outside of settlement boundaries'; RUR 8 'Visitor accommodation

	outside of settlement boundaries’; and RUR 10 ‘Employment development in the open countryside’.
It is not clear what purpose is served by restricting the conversion of outbuildings as such development may comprise sustainable development and contribute to housing supply.	The policy does not restrict the conversion of outbuildings.
The statement that modern agricultural buildings are generally not capable of conversion to residential use is not supported by evidence and inconsistent with national policy. There are a number of planning appeals where the conversion of modern agricultural buildings has been allowed.	The supporting information has been amended to note that modern agricultural buildings are often not capable of conversion for residential re-use because the nature of their construction means they would require extensive alteration, rebuilding or extension. However, this may not apply in every case and the policy allows for conversion of modern agricultural buildings where they are capable of conversion without extensive alteration, rebuilding or extension.
It is considered that the policy should be strengthened to only allow conversion of agricultural or equestrian buildings where there is no realistic other use.	It is considered that such a requirement would be overly-restrictive, particularly given the extension permitted development rights that exist for the conversion of rural buildings.
Where an agricultural or equestrian building is converted to residential use, the policy should confirm that a replacement of the converted building will not be allowed for a minimum period of 10 years.	It is considered that such a requirement would be overly-restrictive, particularly given the extension permitted development rights that exist for the conversion of rural buildings.

Chapter 7: Employment and economy (general issues)

Summary of the main issues raised	How the main issues have been taken into account
The SADPD should include exceptions policies for proposals relating to the television and film industry.	LPS Policy EG 1 is supportive of employment proposals within settlement boundaries. LPS Policy EG 2 ‘Rural economy’ sets the approach to proposals that support the rural economy. SADPD Policy RUR 10 adds detail to LPS Policy EG 2 regarding employment development in the open countryside.
Fast and reliable digital infrastructure should be a priority to support home based businesses.	This issue is addressed through LPS Policy CO 3 ‘Digital connections’ and SADPD Policy INF 8 ‘Telecommunications infrastructure’.
Quality public realm improvements are important to support local	This issue is addressed through LPS Policy SE 1 ‘Design’ and SADPD

businesses.	policies GEN 1 'Design principles' and RET 9 'Environmental improvements, public realm and design in town centres'.
Visitor accommodation in Alderley Edge should be maintained as there is an unmet need.	LPS Policy EG 4 'Tourism' is supportive of appropriate facilities in local service centres.
It is considered that the SADPD takes no account of the need to support employment in LSCs.	The approach towards site allocations in Local Service Centres is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. LPS Policy EG 1 'Economic prosperity' is supportive of proposals for employment development in local service centres.
The SADPD is not aligned with the draft economic policy, which seeks to build on opportunities arising from HS2, the M6 corridor and links to Manchester Airport. Therefore, it is considered that only modest housing development should be provided in LSCs in the northeast of the borough.	LPS Policy PG 7 'Spatial distribution of development' determines the overall level of development to be provided in local service centres. The approach towards site allocations in Local Service Centres is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].

Policy EMP 1 'Strategic employment areas'

Summary of the main issues raised	How the main issues have been taken into account
Radbroke Hall is listed as a strategic employment area in the policy but is not shown as such on the policies map.	The policies map has been amended to correctly reflect the strategic employment areas designated in the policy.
It is considered that the British Salt factory in Middlewich should be included in the list of strategic employment sites listed.	The sites included in the policy are those listed as key employment area in the justification to the LPS Policy EG 3 'Existing and allocation employment sites'. Existing employment sites not covered by the 'strategic employment areas' designation are still protected for employment use under LPS Policy EG 3.

Policy EMP 2 'Employment allocations'

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the policy should require any application for non-	Allocated employment sites are protected for employment use under

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compliant non-employment use to be accompanied by detailed evidence.	LPS Policy EG 3 'Existing and allocated employment sites'. Applications for non-employment proposals would need to provide a clear and convincing justification for departing from policy.
The policy should require clear evidence that ancillary (non-employment) uses are essential for the delivery of a wider employment scheme.	The policy allows for ancillary uses, where they are compatible with the employment use of the site and are delivered as part of a comprehensive employment scheme.
It is considered that there is a need for further employment sites in Knutsford, which will necessitate a further review of Green Belt boundaries around the town.	The requirement for further employment sites in Knutsford is considered through the Knutsford Settlement Report [ED 34] which demonstrates that there is no requirement to allocate further employment sites in the town.
Site EMP 2.1 conflicts with one of the proposed Southern Link Road Bridge route options suggested within the Crewe Hub AAP Development Strategy and Further Options document.	Part of the site is identified for the preferred route of the Southern Link Road bridge as set out in the Publication Draft Crewe Hub Area Action Plan. This issue is considered in the Employment Allocations Review [ED 12].
As required by the LPS and NPPF, the employment land supply must consist of viable sites. If a site is not viable then it should not form part of the employment land supply. Detailed viability assessments show that site EMP 2.5 cannot be viably developed for employment uses; a view endorsed by the inspector and Secretary of State at the public inquiry held into the proposals for retail development at the site. It is considered that the evidence does not fully consider contamination issues; overestimates the market interest in the site; and does not properly consider the viability issues.	As set out in the Local Plan SADPD Policies Viability Assessment [ED 52] (¶¶11.5-11.9 and 12.93-12.97), office and industrial development in general is not shown as viable. This is reflective of the wider area and development is only being brought forward to a limited extent on a speculative basis. Where development is coming forward, it tends to be from existing businesses for operational reasons, rather than to make a return through property investment. It is also notable that agents operating in the local market have reported that over the past 2 years or so, that there has been a change in sentiment and an improvement in the market and that this is expected to continue.
Land at Radway Green Alsager should be allocated for B1, B2 and B8 uses under this policy.	The land at Radway Green is an existing, operational employment site and is already protected for employment use under LPS Policy EG 3 'Existing and allocated employment sites'. LPS Policy EG 1 'Economic prosperity' is supportive of proposals for employment development in key service centres (including Alsager).
Land adjacent to the Highways England M6 Smart Motorways Programme Junction 16-19 Site Compound should be allocated for employment use.	No plan is provided and it is not clear as to which specific site this representation relates. However, the former Saxon Cross Hotel site to the south of the compound has consent for B1/B8 uses and is

	currently under construction. As an existing employment site, it is protected for employment use under LPS Policy EG 3 'Existing and allocated employment sites'.
There are questions as to whether the employment land supply in Crewe is genuinely available, viable, attractive to the market and ultimately capable of delivering the required quantum of employment land over the plan period. The SADPD should allocate further sites in Crewe including land at Newcastle Road, Willaston.	There is no requirement for further employment land in Crewe, as set out in the Crewe Settlement Report [ED 28].
The employment development site on London Road, Holmes Chapel at the old Bengers / Fisons site should be allocated as employment land as it has an extant permission for commercial / industrial use.	The site has consent for A1 retail uses.
The former Manchester Metropolitan University campus in Crewe should be allocated for higher educational uses or B1 (office) and ancillary facilities such as a conference centre and hotel.	The site remains in higher education use as the Apollo Buckingham Health Science Campus.
Additional employment land is required in Alsager and the land at Fanny's Croft should be allocated for employment (B1) purposes.	As set out in the Alsager settlement report [ED 22], it is reasonable to conclude there is no need for further employment allocations in Alsager.
The policy should cross-refer to policies ENV 1 and ENV 2 and confirm that substantial areas of habitat creation will be required for site EMP 2.6.	The plan is intended to be read as a whole and SADPD policies ENV 1 'Ecological network' and ENV 2 'Ecological implementation' will apply to all proposals where relevant.

Chapter 8: Housing (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<ul style="list-style-type: none"> The objectively assessed need for Cheshire East includes an element of C2 bedspace provision. From 2010-2018, there has been a total of 303 C2 completions against a requirement over the same period of 872, a shortfall of 569. Only one of the strategic sites allocated in the LPS includes a specific requirement for the delivery of C2 bedspaces - The North Cheshire Growth Village at Handforth East (LPS33) 	<p>Policy HOU 2 'Specialist Housing Provision' sets out a criterion based approach for the consideration of specialist accommodation, including accommodation for older persons across the borough.</p> <p>As set out in the supporting text to policy HOU 2 in the revised publication draft SADPD The Cheshire East Residential Mix Assessment (2019) (ED 49) considers the need for specialist older</p>

<ul style="list-style-type: none"> • The population in older age groups is projected to increase substantially between 2018 and 2030. There is a significant identified need for C2 accommodation, and also a significant need for specialist housing for older persons. • Specific sites for C2 accommodation should be allocated in the SADPD. 	<p>person housing across the borough up to 2030. The report identifies that it is unlikely that all of the identified needs for older people will be delivered by specialist accommodation alone. Many householders identified as needing specialist accommodation will choose to remain in their own homes with appropriate assistance from social care providers, assistive technology and appropriate adaptations or downsize to more suitable accommodation. Furthermore, the health, longevity and aspirations of older people mean that they will often live increasingly healthier lifestyles and therefore future housing needs may be different from current identified needs.</p> <p>The Council, through policy HOU 6 ‘accessibility, space and wheelchair housing standards’ is seeking to apply additional wheelchair and accessibility standards in line with the thresholds set out in that policy.</p>
<p>SADPD should allocate more housing to:</p> <ul style="list-style-type: none"> • Provide a realistic prospect of meeting the overall housing requirement. Many sites, including the strategic sites allocated within the CELPS have not come forward as they were expected to in the LPS housing trajectory. • The SADPD should provide a housing trajectory. 	<p>As noted in ¶ 73 of the NPPF, it is for strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period. This exercise was undertaken in the LPS. The SADPD, sets non-strategic and detailed planning policies to guide planning decisions and allocate additional sites for development to assist in meeting the overall development requirements set out in the LPS.</p>
<p>SADPD should allocate more housing to:</p> <ul style="list-style-type: none"> • Ensure that the Council can demonstrate and then maintain a deliverable five year supply of housing land on adoption and throughout the plan period 	<p>The Council is not seeking to “confirm” its five year housing land supply in accordance with paragraph 74a) of the Framework through the examination of the SADPD.</p> <p>Separately, the Council has produced a housing monitoring update. As at the 31 March 2019 the housing monitoring update indicates a 7.5 years supply of housing land in the borough.</p> <p>The findings of the HMU have been subject to recent consideration in the recovered appeal ‘Land off Audlem Road/ Broad Lane, Stapeley, Nantwich’5. In his decision letter dated the 15th July 2020, the Secretary of State confirmed that the council can demonstrate a deliverable housing land supply in excess of 5 years. The annual five</p>

	<p>year housing land supply assessment will be updated to a 31 March 2020 base date in due course.</p> <p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the 'provision of housing and employment land and the approach to spatial distribution' [ED 05] report.</p>
<p>SADPD should allocate more housing to:</p> <ul style="list-style-type: none"> • Ensure that the SADPD is consistent with the CELPS, including the evidence upon which the CELPS Inspector based his conclusions. • There is a commitment in the LPS to allocate land for 3,335 dwellings. Table 8.2 of the LPS (page 55) states that the: "contribution to be made through the Site Allocations and Development Policies Document" is 3,335 dwellings. Paragraph E.6 of the LPS (page 445) also explains that the SADPD "will allocate a further 3,335 [dwellings] over the plan period. • The LPS only considered the allocation of sites which were 5ha or 150 dwellings or more. Smaller sites were automatically discounted on the basis of their size as they did not meet the threshold (stage 3 of the site selection methodology). Smaller sites are to be assessed and allocated through the SADPD. The Inspector examining the LPS accepted the Council's approach on the basis that smaller sites would be considered through the SADPD. Paragraph 162 of the Inspector's report states: "Developers and landowners will have the opportunity to put forward smaller "non-strategic" sites when the SADPD is prepared. • The Local Plan as a whole will not have considered its strategy of only allocating sites of a strategic size against the reasonable alternative of allocating smaller sites instead of or in addition to those strategic sites. 	<p>The development of the SADPD has been supported by opportunities for developers / landowners to submit sites (including smaller sites) to the Council for consideration.</p> <p>Sites submitted to the Council have been considered in line with the stated site selection methodology (ED 07) through the preparation of individual settlement reports (ED 21 – ED 46). Each settlement report has appropriately considered the role of commitments and completions.</p> <p>The Council has set out its approach to the provision of housing and employment land and the approach to spatial distribution in report reference [ED 05].</p> <p>Finally, the SADPD includes a clear monitoring and implementation framework [ED 54] to monitor the effectiveness of the plan in terms of a plan, monitor and manage approach.</p>
<p>SADPD should allocate more housing to:</p>	<p>The Council has prepared a short note (ED 58) on the approach of the</p>

<ul style="list-style-type: none"> To meet the requirement in national policy to identify 10% of the housing requirement on sites of 1 ha or less 	<p>SADPD to small sites.</p>
<p>SADPD should allocate more housing to:</p> <ul style="list-style-type: none"> To acknowledge the continuing need to boost the supply of housing generally and because the requirement should be regarded as a minimum 	<p>Local Plan Strategy (LPS) Policy PG 1 (Overall development strategy) sets out the housing requirement in the borough of 36,000 homes between 2010 and 2030, which is sufficient to meet the full objectively-assessed needs for the housing market area. This level of development is expected to be delivered at an average of 1,800 net additional dwellings per year.</p> <p>The Council has set out its approach to the provision of housing and employment land and the approach to spatial distribution in report reference [ED 05].</p> <p>Finally, the SADPD includes a clear monitoring and implementation framework [ED 54] to monitor the effectiveness of the plan in terms of a plan, monitor and manage approach to housing and subsequent updates to the HMU will continue to inform the council's position as the SADPD process progresses.</p>
<p>SADPD should allocate more housing to:</p> <ul style="list-style-type: none"> To provide flexibility in the event that HS2 is committed to come to Crewe. The implication of High Speed 2 is that the housing requirement set out in the Local Plan Strategy would be increased to support the economic growth the High Speed 2 would generate in Cheshire East. As well as Crewe, there would likely be significant implications for surrounding settlements. 	<p>The SADPD is being prepared as a 'daughter' document to the LPS. While the LPS contain strategic planning policies and allocations, it is a 'pre-HS2 plan' and therefore does not address the full implications of HS2. The LPS does however recognise the importance of Crewe Station as a communications hub and envisages that a more detailed Area Action Plan may be necessary to address HS2 related development in Crewe (Local Plan Strategy See Strategic Priority 1, p.44 and p.179 in particular). The Council is preparing an Area Action Plan for a focused area around Crewe Railway Station and its immediate environs.</p> <p>Allocating additional sites within the town via the SADPD would significantly exceed the expected levels of development envisaged in the LPS. The full implications of HS2 should be addressed through a future local plan update, where the implications and proposals of HS2 may be understood.</p>

<p>The SADPD should:</p> <ul style="list-style-type: none"> disaggregate the housing requirement figure – at least for the designated neighbourhood areas in accordance with paragraph 65 of the NPPF 	<p>As set out in paragraph 1.2(2) of the revised publication draft SADPD, the role of the document is to set non-strategic and detailed planning policies to guide planning decisions and allocate additional sites for development where necessary to do so. It has been prepared to support the policies and proposals of the LPS by providing additional policy detail. Paragraph 65 of the NPPF notes that it is the role of strategic policies to consider the housing requirement for individual neighbourhood areas. The SADPD is a non-strategic document.</p>
<p>The SADPD should</p> <ul style="list-style-type: none"> apply the flexibility factor to the OSRAs as set out in the CELPS; and consider allocating land to meet housing need. The SADPD should allocate housing in LSC as no flexibility is being provided for the 3,500 figure. This is contrary to the approach set out in the Local Plan Strategy. 	<p>The Council has set out its approach to the provision of housing and employment land and the approach to spatial distribution in report reference [ED 05]..</p>
<p>There is a need to provide housing for first time buyers and the SADPD should include an entry-level exception site policy, as required by NPPF ¶71.</p>	<p>The criteria based approach to entry-level exception sites is set out in NPPF ¶71. Planning applications submitted as entry-level exceptions sites would have to address the criteria set out in the NPPF and will be considered on a case by case basis and on their own merits.</p>

Policy HOU 1 ‘Housing mix’

Summary of the main issues raised	How the main issues have been taken into account
<p>This policy is too restrictive.</p>	<p>Policy HOU 1 ‘housing mix’ provides a ‘starting point’ for the consideration of an appropriate housing mix for schemes in the borough and sets out additional criteria that should be considered including, for example, the character and design of the site and local area. The supporting information to policy HOU 1 notes that the housing mix statement should be a proportionate and up to date assessment.</p>
<p>Reference should be made in this policy to the requirements of</p>	<p>Point 1 of policy HOU 1 ‘housing mix’ notes that the housing mix</p>

Neighbourhood Plans.	statement should take account of neighbourhood plan policies, where relevant to do so.
The policy needs to be applied flexibly and the role of other indicators including market indicators, density, viability and other site specific matters recognised.	The SADPD is supported by a plan viability assessment [ED 52] which has taken account of the indicative housing mix set out in table 8.1 which supports policy HOU 1 'housing mix'. The policy itself includes references to a number of considerations including an assessment of the local housing market and its characteristics (point 1ii) and considerations of the character and design of the site (point 1(iii)) as examples.
The evidence required to support the housing mix should be proportionate to the development. Current requirements of the policy (i.e. housing mix statement) appear onerous. Collection of evidence required likely to be time consuming and require different specialists.	The supporting information to policy HOU 1 notes that the housing mix statement should be a proportionate and up to date assessment. The policy is also clear that it relates to 'major' housing schemes at detailed planning / reserved matters stage.
Objections to part 3 of the policy. Wording may need to be revised if changes are made to policy HOU 6 'accessibility, space and wheelchair standards'	Policy HOU 6 is supported by evidence base documents including the Residential Mix Assessment [ED 49] & Nationally Described Space Standards paper [ED 57].
The word 'demand' should be added to the second sentence of the point 1 of the policy for consistency.	Noted, the word 'demand' has been added to the second sentence of point 1 of HOU 1 for consistency.
We note that Criterion 1 Sub Paragraph (i) is to be treated as a starting point. This is essential because the Cheshire East Residential Mix Assessment 2019 is in any event a Borough wide snapshot of need over the period 2018 – 2030.	Policy HOU 1 (1i) makes clear that Table 8.1 is a starting point for analysis. The policy, when read as a whole, provides a number of other relevant factors that might influence the overall mix of housing provided on a site.
Reference to Table 8.1 should be removed from the policy wording and placed in the 'supporting information'.	Policy HOU 1 (1i) makes clear that Table 8.1 is a starting point for analysis. The policy, when read as a whole, provides a number of other relevant factors that might influence the overall mix of housing provided on a site.
In respect of Criterion 1 Sub Paragraph (ii), it is unclear if the words 'local housing market' are referring to the Borough wide market or the settlement or location in which the site is located. The wording should be amended accordingly as Criterion 1 Sub Paragraph (i) deals with the Borough wide picture.	The reference in policy (1ii) is designed to reflect the local housing market and complements policy (1i) which provides for a borough wide picture.

Reference to self and custom build provision should be deleted from the policy.	It is considered that policy HOU 1 'housing mix' point 1 (iv) makes an appropriate link to the requirements set out in policy HOU 3 'self and custom build dwellings' in the revised publication draft SADPD.
The duration of the planning process from preparation of a bid price for a site by a purchaser, to grant of consent and purchase of the site and selling houses can be 2-3 plus years. The prescriptiveness of this policy stifles the developer's ability to alter the mix to meet market demand through the process.	Point 1 of policy HOU 1 'housing mix' refers to taking account of the most up to date information available at detailed planning / reserved matters stage to assist the determination of schemes.
What is the definition of 'major' to which this policy would be applied?	The definition of a 'major' housing scheme is taken from the NPPF, For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. This is consistent with the definition of 'major' in the Glossary to the LPS.
The Tarporley Neighbourhood Plan and Poynton Neighbourhood Plan sought to introduce a housing mix policy and the Inspectors at both examinations removed the policies.	Policy HOU 1 is supported by appropriate and proportionate evidence base, set out in the related documents section of the policy. It is also considered to be consistent with policy SC4 'residential mix' in the LPS.
To be effective, there is a need for the evidence regarding housing need is kept up to date, both at borough wide and local level. The onus should not be on the developer to ensure that this evidence is collated.	The supporting information to policy HOU 1 'housing mix' notes how the housing mix statement should be a proportionate and up to date assessment of local circumstances. The Cheshire East Residential Mix Study (2019) provides a starting point for the analysis and the policy includes a reference to a number of factors which might influence an appropriate housing mix on a site by site basis.
A large proportion of its supply is already fixed in that it benefits from planning permission. The Council's powers to meet diverse housing needs are limited. The Council should consider allocating specific sites through the SADPD for specialist housing needs not already being met by the existing committed supply.	Policy HOU 1 'housing mix' in the revised publication draft SADPD builds on the strategic context set by LPS policy SC4 'residential mix'. Its intention is to support the delivery of an appropriate housing mix for those schemes brought forward in the borough over the remaining Plan period. Policy HOU 2 'specialist housing provision' sets out criteria for the consideration of specialist housing schemes, including those for C2 uses.
The indicative mix for market housing set out at Table 8.1, and referred to within the policy, is not justified by the evidence base	Policy HOU 1 'housing mix' and the content of table 8.1 is supported by the analysis set out in the Cheshire East Residential Mix

<p>Table 8.1 – no indication of how the figures for market housing have been arrived at other than reference to the ORS housing model. It is not clear whether this is a demographic assessment only, or whether it factors in key issues that affect the market such as demand and trends.</p>	<p>Assessment (ED 49).</p>
<p>An expectation that the mix in Table 8.1 is followed suggests a ‘one size fits’ all approach, whereas the wording should also refer to the importance of the local housing market and the physical context of the site.</p>	<p>Policy HOU 1 ‘housing mix’ is clear that table 8.1 is a starting point for analysis. Points 1(ii) and 1(iii) of HOU 1 ‘housing mix’ refers to the importance of the local housing market, characteristics and the character and design of the site and local area.</p>
<p>The Council’s approach also ignores the business models of the developers which it relies upon to deliver its housing land supply</p>	<p>Policy HOU 1 ‘housing mix’ in the revised publication draft SADPD builds on the strategic context set by LPS policy SC4 ‘residential mix’. Its intention is to support the delivery of an appropriate housing mix for those schemes brought forward in the borough over the remaining Plan period. Point 1 of policy HOU 1 ‘housing mix’ refers to taking account of the most up to date information available at detailed planning / reserved matters stage to assist the determination of schemes.</p>
<p>Lack of clarity in the wording of the policy – does not indicate the weighting to be applied to different factors in the policy.</p>	<p>Policy HOU 1 ‘housing mix’ in the revised publication draft SADPD builds on the strategic context set by LPS policy SC4 ‘residential mix’. Its intention is to support the delivery of an appropriate housing mix for those schemes brought forward in the borough over the remaining Plan period. It includes a number of relevant factors that might influence an appropriate housing mix on the site.</p>
<p>Object to the wording of the explanatory text [§8.5] that precedes Table 8.1, which states: “It is expected that development achieves in the order of the housing mix, type and tenures set out in Table 8.1 Indicative house type tenures and sizes”. The wording does not reflect the wording of Policy HOU 1 which identifies Table 8.1 as “a starting point for analysis”.</p>	<p>The supporting text to policy HOU 1 has been amended to reflect the policy intention that Table 8.1 is a starting point for analysis.</p>
<p>This policy is not consistent with NPPF paragraphs 31 / 35(b) and therefore is not sound.</p>	<p>The policy is supported by relevant, proportionate and up to date evidence in the form of the residential mix assessment (ED 49).</p>
<p>The proposed private housing mix in Policy HOU 1 negatively impacts</p>	<p>The outcomes of policy HOU 1 have been considered through the</p>

<p>on overall developable area, therefore reducing the achievable value and resultant land value on a site. The mix reduces the average private unit size from 103.9 sq m (1,118 sq ft) based on a market facing mix, to 87.8 sq m (945 sq ft) based on the prescriptive policy mix.</p> <p>This has not been tested by the Viability Appraisal, which adopts an average unit size of 102.9 sq m (1,108 sq ft). We have reviewed the impact of the proposed private housing mix, and concluded that this threatens the viability of sites across all of the market locations as detailed in Figures 12 and 13 in Section 8.</p>	<p>Local Plan Site Allocations and Development Policies Viability Assessment [ED 52].</p>
<p>Such applications must already be accompanied by a Design & Access Statement which should explore the character and design of the site and the local area and their influence on the development proposed. Applications must also currently include an Affordable Housing Statement. There is thus clear scope for overlap in the information to be provided. Having regard to Planning Practice Guidance, we do not agree that this would be a proportionate approach to the information requested in support of planning applications (ID: 14-038-20140306).</p>	<p>The policy provides clarity on the expectations of information required for major housing schemes in the borough in respect of housing mix. The supporting information to policy HOU 1 'housing mix' notes how the housing mix statement should be a proportionate and up to date assessment of local circumstances.</p>

Policy HOU 2 'Specialist housing provision'

Summary of the main issues raised	How the main issues have been taken into account
The wording should give emphasis to the role of neighbourhood plans and local market signals in provision of this type of housing.	Neighbourhood Plans are able to provide additional policy guidance on this issue, where relevant and justified.
A market for smaller properties could enable elderly residents to downsize and allow larger family homes to return to the market.	Noted.
A cluster of dwellings to enable mutual contact and support e.g. Dixon Drive in Chelford - appeals to their current and potential residents.	Noted.
Specialist provision is essential in order to meet identified local need.	Policy HOU 2 'specialist housing provision' sets out a clear and

	specific policy approach to the consideration of schemes for specialist housing provision in the borough.
The SADPD document does not allocate land for specific categories of residential development. Policy and guidance at a national, and local, level has identified the significant need for retirement living housing; and the previous under supply of suitable sites and dwellings. It has therefore ignored the NPPF (February 2019) and updated PPG (July 2019). The Cheshire East Local Plan acknowledges (para 4.15 and strategic priority 2) that it needs to prepare for an increasingly older population. The provision of homes for older people is part of housing requirement. The current draft plan does not appear to address this.	Policy HOU 2 'specialist housing provision' sets out a clear and specific policy approach to the consideration of specialist housing schemes in the borough. As set out in the supporting information to policy HOU 2, the Cheshire East Residential Mix Assessment (2019) (ED 49) considers the need for specialist older person housing across the borough up to 2030. The report identifies that it is unlikely that all of the identified needs for older people will be delivered by specialist accommodation alone. Many householders identified as needing specialist accommodation will choose to remain in their own homes with appropriate assistance from social care providers, assistive technology and appropriate adaptations or downsize to more suitable accommodation. Furthermore, the health, longevity and aspirations of older people mean that they will often live increasingly healthier lifestyles and therefore future housing needs may be different from current identified needs.
The policy should be reworded to specifically encourage such housing. We would suggest that the Policy is either replaced or prefaced as follows: <i>"The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.</i> <i>The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities."</i>	Policy HOU 2 'specialist housing provision' sets out a clear and specific policy approach to the consideration of specialist housing schemes in the borough supported by evidence included in the Residential Mix Assessment report [ED 49].
Cheshire East has strategies and programmes that acknowledge a significant need to provide housing:- 'Ambition for All' - the Sustainable Community Strategy 2010	Policy HOU 2 'specialist housing provision' sets out a clear and specific policy approach to the consideration of specialist housing schemes in the borough. The policy sets out the considerations, relevant to the provision of specialist and supported housing in the

<p>Ageing Well in Cheshire East Programme Cheshire East Housing Strategy 2018-2023 (2018, Cheshire East Council)</p> <p>In consideration of the documents above and the conclusions they have reached, it is not considered sufficient to simply request that specialist accommodation be adaptable; and therefore capable of catering for older persons to remain at home. This fundamentally misses a large section of the community who want, or need, to live with other people of a similar profile with on call services.</p>	<p>borough. This includes reference to the need for accessibility, space and wheelchair housing standards in line with the requirements of policy HOU 6.</p>
<p>The nature of the 'site selection process' in the SADPD needs to be considered as locations for retirement living are different to that for general needs housing</p>	<p>The site selection methodology (ED 07) is considered to be a proportionate and justified way of considering housing sites for allocation in the Local Plan. The approach set out in the site selection methodology is largely consistent with the approach utilised in the Local Plan Strategy. The provision of housing and employment land and the approach to spatial distribution [ED 05] considers the approach of the SADPD to such matters.</p>
<p>Part 1 of HOU 2 is misconceived and will undermine the main objective of this policy which is to support the provision of supported and specialist housing. The type of specialist accommodation traditionally delivered is 'specialist' and secured by condition or S106 agreement to be retained for the use of those 50/60 years of age or above. It would be inappropriate for the accommodation to be designed to be readily adaptable back to family housing, for example which would have different amenity space requirements and would not require the same level of communal facilities, service charges or house managers to maintain the development.</p>	<p>As noted in the supporting information to the policy, the term 'older people' covers a range of people with differing needs which can be addressed through a number of housing options. Therefore, it is important that specialised housing is able to satisfy the needs of a number of groups. A minor amendment to the policy wording has been made to refer to specialist housing being adaptable and responsive to changing needs over the lifetime of the development and meet the requirements of other relevant local plan policies.</p>
<p>Part vii of the policy states the following: "Affordable housing provision will be required in line with the thresholds set out in LPS Policy SC 5 'Affordable homes' for elements of a proposal for supported and specialist housing that would create use class C3 self-contained dwellings."</p>	<p>The thresholds set out in LPS strategic policy SC5 'affordable homes' would apply. Point 7 of policy SC5 notes that where scheme viability may be affected, developers will be expected to provide viability assessments to demonstrate affordable housing provision.</p> <p>The revised publication draft SADPD has been supported by a plan</p>

<p>We have undertaken viability testing which shows that the currently adopted thresholds for affordable housing would be unviable for specialist accommodation for older people.</p> <p>The development of retirement housing is a specialist and the assessment of viability has to take into account the particular costs associated with it.</p> <p>Considered the financial modelling undertaken by HDH in order to assess whether the target percentage for retirement housing are realistic and deliverable in line with the requirements of NPPG (Viability paragraph 002). There are a number of issues we have with the modelling undertaken which shows that there should be a separate affordable housing target for retirement housing.</p>	<p>wide viability assessment [ED 52].</p>
<p>Object to the criteria required in HOU 2 (3). It would appear to suggest that anything that is self-contained is counted as a dwelling. This is incorrect. For clarity this criterion should be amended to state that any use class C3 proposal for specialist, elderly persons accommodation should provide affordable housing, while any C2 proposal should not.</p>	<p>Policy HOU 2 point 3 (vii) is considered to be consistent with policy SC5 'affordable homes' in the LPS.</p>
<p>Where will the need for specialist accommodation be identified and will it be the applicant who will have to demonstrate this need or whether the Council intend to identify a need for each settlement. The supporting text to this policy, whilst referencing the Cheshire East Residential Mix Assessment (2019), does not provide any clarity on this matter.</p>	<p>It will be for the applicant to demonstrate need for specialist accommodation assisted by the Council's evidence as set out in the related documents section of policy HOU 2.</p>
<p>Para 61 of the NPPF - The revised NPPF continues to identify older people as a specific group whose housing needs should be assessed and reflected in planning policies . It recognises the breadth of housing which may be required to meet the diverse needs of older people. Following the publication of the revised NPPF, the PPG section on older persons housing was updated to reflect the importance that the government attaches to providing housing for older people. The updated PPG describes 'the need to provide housing for older people'</p>	<p>Policy HOU 2 'specialist housing provision' sets out a clear and specific policy approach to the consideration of specialist housing schemes in the borough. The policy sets out the policy areas relevant to the provision of specialist and supported housing in the borough.</p>

<p>as ‘critical’, and recognises that: “Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”</p> <p>Allocations should be made for suitable sites for older persons accommodation.</p>	
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Policy HOU 3 ‘Self and custom build dwellings’

Summary of the main issues raised	How the main issues have been taken into account
<p>The principle of delivering more self and custom build housing (SACBH) is supported as this is in line with national planning policy.</p>	<p>Agreed.</p>
<p>Reference should be made to the legal definition of SACBH.</p>	<p>Definitions for the main terms defined in legislation required to interpret the policy are summarised in para 8.15. Reference has been made to the Housing and Planning Act, Self-build and Custom Housebuilding Act and associated regulations.</p>
<p>The policy will not ensure that the price of sites is kept low enough so that they can be delivered by Community-led housing schemes.</p>	<p>The council has no control over land values. This comment therefore falls outside the scope of what could be achieved through planning policy.</p>
<p>Objections were made to Criteria 2 (developments of 30+ homes should provide a proportion of serviced plots, consistent with the latest available evidence of demand) for the following reasons:</p> <ol style="list-style-type: none"> 1. Provision of SACBH can/should only be ‘encouraged’. See NPPG Para: 025 Reference ID: 57-025-201760728 (bullet 3). 2. Current demand is unknown as the council has not published its register or performance. 3. The council should not rely on this policy to fulfil its demand for 	<p>In response:</p> <ol style="list-style-type: none"> 1. Bullet 1 of this NPPG paragraph also promotes developing local plan policies promoting SACBH such as HOU 3. Given the Government’s aim deliver more self-build housing, it is considered that requiring self-build (as opposed to simply ‘encouraging’ it) is consistent with Government policy. 2. The lack of transparency in terms of the extent to which the

<p>serviced plots.</p> <ol style="list-style-type: none"> 4. It could cause delays if plots are marketed and delivered individually. 5. It would result in lower densities. 6. Likely to create numerous practical/management issues (e.g. quality, insurance, maintenance, construction logistics). 7. It would make schemes unviable. 8. Overall housing delivery will not be boosted; it simply replaces one form of housing for another. 	<p>council is meeting its self-build duty is noted. The council will publish the number of registrations and performance against this requirement in its annual Authority Monitoring Report. Further information will also be published on the council's webpages if necessary.</p> <ol style="list-style-type: none"> 3. Concerns regarding on over-reliance on the policy to meet council's self-build duty are noted. Demand is however being comfortably met via windfall alone. The initial (slightly shorter) base period ran from January 2016 to October 2016. During this period, the council registered 34 people on its Part 1 Register. This required planning permission to be granted for 34 serviced plots by 30 October 2019. The council however met this requirement by permitting at least 75 serviced plots. The policy was therefore amended so that the council's performance is also considered within criteria 2 – which only applies in instances where demand is not being met. 4. Plots set aside for self-build can be parcelled and/or located in less prominent areas of large sites while the remainder of the site is delivered in the operator's usual way. 5. SACBH (particularly custom-build) is a varied form of housing that can deliver at higher densities if needed. 6. Para 8.20 is included which states conditions and S106 will be used to help deliver SACBH, which will include many of the practical/management issues identified. It is not considered necessary to consider each scenario within the policy text. 7. An indicative 5% requirement on sites of 30 or larger has been considered viable in the council's Viability Assessment (ED 52). Viability concerns are noted however and therefore these can be raised with the council via a viability statement as per
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	<p>para 8.19 in the Revised Publication Draft SADPD.</p> <p>8. The council is not reliant upon this policy to meet its strategic housing target. Its primary purpose is to help ensure the council's legal duties in terms of self-build are met.</p>
The policy is weak and likely to be ineffectual. As it is a legal requirement to deliver plots, SACBH should be considered as an exception to usual policy requirements.	The policy is considered to be a proportional response to the council's legal duty (to grant sufficient development permissions to meet the demand of its register), which it is currently meeting via windfall.
Criteria 2 should specify that if plots are not sold within a 12 month period, they can be reverted back to control of the developer and sold as regular market housing.	This is a technical detail likely to be controlled via condition or legal agreement on a site-by-site basis and therefore covered by Para 8.20.
<p>Demand should be met through site allocations. The following sites should be allocated for SACBH:</p> <ul style="list-style-type: none"> • Whitchurch Road – Bunbury Heath • Withinlee Road - Prestbury • Belmont Avenue – Sandbach • Hind Heath Road – Sandbach 	<p>Site allocations are considered against the housing requirements of local service centres and considered in accordance with the Site Selection Methodology [ED 07]. See:</p> <p>ED 25 – Bunbury Settlement Report</p> <p>ED 40 – Prestbury Settlement Report</p> <p>ED 41 – Sandbach Settlement report</p>

Policy HOU 4 'Houses in multiple occupation'

Summary of the main issues raised	How the main issues have been taken into account
The policy should state that if there is clear evidence of HMO concentrations that Article 4 Directions will be used.	This is noted in the supporting text.

Policy HOU 5 'Gypsy, Traveller and Travelling Showpersons provision'

This initial Publication Draft SADPD policy has been split into three separate policies in the Revised Publication Draft SADPD: HOU 5a 'Gypsy and Traveller site provision'; HOU 5b 'Travelling Showperson site provision'; and HOU 5c 'Gypsy and Traveller and Travelling Showperson site principles'.

Summary of the main issues raised	How the main issues have been taken into account
Welcome the attention given in the SADPD to Gypsy, Traveller and Travelling Showperson provision.	Noted
This policy should relate only to those sites identified in the Gypsy and Traveller Accommodation Assessment 2018 and Policy SC7 of CELPS and should clearly state that applications for sites elsewhere in the Borough will be resisted.	Policies HOU 5a (Gypsy and Traveller Site Provision) & HOU 5b (Travelling Showpeople) in the revised publication draft SADPD and policy SC7 (Gypsies and Travellers and Travelling Showpeople) of the Local Plan Strategy note that sites for Gypsies, Travellers and Travelling Showpeople will be allocated or approved to meet the needs of the most recent Gypsy and Traveller Accommodation Assessment. Planning applications will be considered on their own merits in line with the policy requirements of the development plan and any other relevant material considerations.
The policy should also include additional criteria relating to local amenity, screening, numbers of units on site and occupancy conditions	<p>The supporting information to policies HOU 5a (Gypsy and Traveller Site Provision) & HOU 5b (Travelling Showpeople) in the revised publication draft SADPD include appropriate references to the use of occupancy conditions.</p> <p>Policy HOU 5c (Gypsy and Traveller and Travelling Showperson Site Principles) alongside LPS policy SC7(Gypsies and Travellers and Travelling Showpeople) include appropriate references to design and amenity considerations relevant to site provision in the borough</p>
<p>Site selection report (PUB 14) comments: In section 6.3 says recommendations provide sufficient pitches only to 2023 not to the end of the planned period.</p> <p>Ensure that the search for potential new sites continues after this phase of the SADPD process is complete to provide the required number of pitches for the period 2023 - 2030.</p>	<p>The site selection report [ED 14] has been updated to take account of commitments and completions as at the 31 March 2020 and also to take account of any other relevant evidence. It sets out a clear approach to the consideration of sites to meet projected needs over the Plan period.</p>
<p>Site selection report (PUB 14) comments: Many of the potential sites in the East of the borough are screened out before any site selection methodology is applied. Most are on the basis of having been screened out in the previous Macclesfield</p>	<p>The site selection process is clearly set out in figure 1 of the site selection report [ED 14]. Stage 1 of the site selection process establishes a pool of sites from a number of sources including a review of Council owned sites considered 'available' for consideration</p>

<p>Borough or Congleton Borough local plans assembled some twenty years ago. This is not appropriate.</p>	<p>in the study. Stage 2 applies a site sift on the basis of a number of stated criteria. The sites being considered through the stage 1 / stage 2 processes are documented in Appendix 3 of [ED 14] with comments provided as to whether sites are sifted out or taken forward for further consideration through the remaining stages of the site selection process.</p>
<p>Site selection report (PUB 14) comments: Most of the 'red' assignments to criteria are not 'deal breakers' and so should really be considered as 'deep orange'.</p>	<p>Appendix 2 of the site selection report sets out the detailed criteria for the red, amber, green suitability assessment of sites. These form part of the suitability assessment documented in the report. The site selection report documents that the suitability criteria used in the traffic light forms are not weighted. They provide a way of presenting information about the characteristics, constraints, capacities and circumstances of sites in a consistent way that enables this, along with other factors, to form part of the overall site selection process, and ultimately the recommendation of whether or not a site should be included in the SADPD. The outcomes and conclusions of the site selection process are clearly documented in the analysis presented for each individual site.</p>
<p>Site selection report (PUB 14) comments: Different criteria or at least different weighting should apply dependent on whether the site is being considered as a transit site or a permanent site. A specific site selection process should be carried out for a transit site.</p>	<p>The site selection process, as documented in [ED 14], is considered to be equally applicable to both transit and permanent site provision in the borough.</p>
<p>Site selection report (PUB 14) comments: It is unclear when assessments of accessibility are made whether road schemes such as the Middlewich Eastern bypass are taken into account.</p>	<p>The site selection report has considered the Middlewich Eastern Bypass and its implications, where necessary to do so.</p>
<p>Objections received to site G&T 5 'Cledford Hall' and TS 1 'Lorry Park'.</p>	<p>A summary of the main objections received will be considered under the respective site headings in the consultation report.</p>
<p>Support for the provision of a transit site in the borough</p>	<p>Noted.</p>
<p>Objection to Policy HOU 5</p>	<p>The policy approach has been further refined in the revised publication draft SADPD. Policy HOU 5 has been amended into 3 distinct policies</p>

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<p>• Policy HOU 5 refers only to the “known” need for 32 pitches between 2017 and 2032. As such it does not take into account of any of the additional need of up to 22 pitches which the most recent GTAA identifies may arise from Gypsy and Traveller households whose status is currently “unknown”. In our view this approach is unsound.</p> <p>Whilst the GTAA advises that the ORS 10% national average be used to guide the likely number of ‘unknown’ households which meet the definition, we would note that this statistic is unsound, and ORS have in fact since acknowledged that the 10% figure is no longer being used and that the current ORS statistic is 25% (Havering Council approach given as an example). Furthermore, as noted at paragraph 7.28 of the GTAA, the proportion of households that meet the definition in Cheshire East is 67%, significantly higher than the ORS national average. As such, in our view, not taking account of any of the need arising from “unknown” households will clearly result in a significant underestimate of need in the area, and a consequent lack of 5 year supply.</p>	<p>in the SADPD:-</p> <ul style="list-style-type: none"> • Policy HOU 5a – Gypsy and Traveller Site Provision • Policy HOU 5b – Travelling Showpeople • Policy HOU 5c – Gypsy and Traveller and Travelling Showpeople site principles <p>Policy HOU 5a sets out the Council’s approach to Gypsy and Traveller site provision, making appropriate reference to:</p> <ul style="list-style-type: none"> - the outcomes of the GTAA (2018); - the approach to proposed site allocations; and - the policy considerations where it was not possible to determine the travelling status of a Gypsy and Traveller household and / or for ethnic Gypsies and Travellers who fall outside the planning definition but nevertheless still require culturally appropriate accommodation.
<p>Objection to Policy HOU 5</p> <p>• The draft SADPD does not set out how the need arising from Gypsies and Travellers who do not met the PPTS definition will be met.</p> <p>The GTAA correctly states, at paragraph 1.11 that:</p> <p>In general terms, the need for those households who do not meet the planning definition will be addressed as part of general housing need and through separate Local Plan Policies (including those authorities that have adopted plans, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN).</p> <p>However, to the best of our knowledge, no specific reference is given in the SADPD as to how this need will be addressed. Given the legal</p>	<p>The policy approach has been further refined in the revised publication draft SADPD. Policy HOU 5 has been amended into 3 distinct policies in the SADPD:-</p> <ul style="list-style-type: none"> • Policy HOU 5a – Gypsy and Traveller Site Provision • Policy HOU 5b – Travelling Showpeople • Policy HOU 5c – Gypsy and Traveller and Travelling Showpeople site principles <p>Policy HOU 5a sets out the Council’s approach to Gypsy and Traveller site provision, making appropriate reference to:</p> <ul style="list-style-type: none"> - the outcomes of the GTAA (2018); - the approach to proposed site allocations; and - the policy considerations where it was not possible to determine the travelling status of a Gypsy and Traveller household and / or for ethnic Gypsies and Travellers who fall

<p>requirement to provide culturally appropriate accommodation for those ethnic Gypsies and Travellers who no longer meet the PPTS definition, the difficulties in so doing and the significant differences from providing bricks and mortar accommodation, we would suggest that the SADPD should include some reference to the approach the LPA is intending to adopt to meet this need</p>	<p>outside the planning definition but nevertheless still require culturally appropriate accommodation.</p>
<p>Objection to Policy HOU 5</p> <ul style="list-style-type: none"> • The evidence on which the policy is based is not robust. In our view the figures arrived at in the GTAA are likely to underestimate need in the area for the following reasons: <p>Unsatisfactory survey pool</p> <p>Unclear approach to waiting lists</p> <p>Inconsistent and unsound approach to household formation rates</p> <p>10% national average of unknown households</p>	<p>Policy HOU 5a sets out the Council's approach to Gypsy and Traveller site provision, making appropriate reference to</p> <ul style="list-style-type: none"> - the outcomes of the GTAA (2018) which are considered to be robust and prepared in line with national planning guidance on this issue; - the approach to proposed site allocations; and - the policy considerations where it was not possible to determine the travelling status of a Gypsy and Traveller household and / or for ethnic Gypsies and Travellers who fall outside the planning definition but nevertheless still require culturally appropriate accommodation.

Policy HOU 6 'Accessibility, space and wheelchair housing standards'

Summary of the main issues raised	How the main issues have been taken into account
<p>Insufficient justification to introduce wheelchair adaptability standards</p>	<p>The justification for the introduction of the wheelchair accessibility standards is included within the Cheshire East Residential Mix Assessment [ED 49]. The standards proposed in policy HOU 6 have been considered and reflected in the Site Allocations and Development Policies Viability Assessment [ED 52].</p>
<p>The 2018 Housing Optional Technical Standards Report (FD 49), at Table 4, indicates that the Cheshire East rate of ill health benefit claimants is below the national average. Census long term illness data also indicates that Cheshire East has lower than the national average</p>	<p>The 2018 Housing Optional Technical Standards Report [FD49] has been superseded. The differences in approach between FD49 and the Cheshire East Residential Mix Assessment [ED 49] are set out in paragraphs 3.2 – 3.14 of the residential mix assessment [ED 49].</p>

<p>requirements. This evidence does not point towards a clear justification to introduce higher accessibility standards in the Cheshire East context.</p>	
<p>The Goostrey Neighbourhood Plan already requires 100% (rather than SADPD 30%) of new dwellings to be built to Lifetime Homes Design Guide (which is equivalent to M4 (2)) Change Policy HOU 6 to say that "100% of housing developments should comply with "requirement M4 (2) Category 2 of the Building Regulations regarding accessible and adaptable dwellings.</p>	<p>The standards set out in policy HOU 6 have been justified on the basis of a borough wide analysis undertaken in the Cheshire East Residential Mix Assessment [ED 49] evidence based document. The standards have also been considered and reflected in the Site Allocations and Development Policies Viability Assessment [ED 52].</p>
<p>Reword the policy to set these levels as minima and encourage the construction of a higher proportion of buildings to meet the criteria.</p>	<p>The wording of the policy refers to 'at least' before the standards are referenced. Therefore, the standards presented are not considered to be a maximum and can be exceeded.</p>
<p>The Planning Practice Guidance ('PPG') sets out the circumstances in which LPAs may set policy standards for accessible dwellings. It also identifies other requirements for policy including the need to consider site specific factors such as vulnerability to flooding and site topography.</p>	<p>Point 2 of the policy notes that the standards will apply unless site specific factors indicate that step-free access cannot be achieved or is not viable.</p>
<p>The Cheshire East Residential Mix Assessment 2019 uses proportions taken from the English Housing Survey to estimate that there were around 1,280 households needing to move to a more suitable home due to a disability or another long term health problem in 2018. Figures 25 then goes onto identify the existing household that are likely to develop health problems that affect their housing need and additional households likely to develop problems. However, these households do not appear to have been considered against the same proportional considerations as the current households, to determine if their current home would be suitable for their needs or whether it could be adapted. Consideration should also be given to the increased proportion of homes built to the M4(1) standards and the contribution of other forms of specialist accommodation.</p>	<p>The standards set out in policy HOU 6 'accessibility, space and wheelchair housing standards' have been justified on the basis of a borough wide analysis undertaken in the Cheshire East Residential Mix Assessment [ED 49] and the Nationally Described Space Standards paper [ED 57].</p>
<p>The evidence base document PUB52 Local Plan Site Allocations and Development Policies Viability Assessment raises concerns about the</p>	<p>The Local Plan Site Allocations Development Policies Viability Assessment [ED 52] has appropriately considered the effect of</p>

<p>impact of the combined effect of the proposed policy requirements on residential viability, for certain development categories. This would apply to the lower value areas of Crewe and Middlewich, which are nevertheless expected to contribute a significant proportion of the housing requirement, together with brownfield and mixed-use sites. We note that the Council will consider relaxing the standards for accessibility and wheelchair adaptability where step free access cannot be achieved or is not viable. However, the emphasis in national guidance is now on ensuring that policies are viable at the plan-making stage rather than in the course of individual applications.</p> <p>The Council's viability evidence refers to the cost of a wheelchair adaptable dwelling based on the Wheelchair Housing Design Guide for a 3-bed house as £10,111 per dwelling. Given that the adaptations involved are costly and will make market housing less affordable, it would be disproportionate to impose a standardised requirement. With as many as 36% of homes within residential developments affected by these requirements, there can be no assumption that the dwellings affected will be those occupied by those who may develop future needs, thus making some of the costs abortive.</p>	<p>accessibility and wheelchair accessible dwellings.</p>
<p>Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. However, the PPG also makes clear that: Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (Paragraph: 009 Reference ID: 56-009-20150327) The policy proposes blanket provision of M4(3) over all forms of development without recognition of this guidance. It therefore runs directly contrary to the PPG.</p>	<p>References to M4 (3) in parts 1 (ib) and 1 (iib) of the policy are followed by references to 'regarding wheelchair adaptable dwellings'. The policy is applicable to wheelchair adaptable dwellings only and not wheelchair accessible homes.</p>
<p>The most effective way to provide sufficient housing to meet M4(3) category requirements in the correct locations would be to increase the proportion of this type of accommodation in specialist housing for</p>	<p>Policy HOU 2 'specialist housing provision' sets out the approach to the provision of specialist accommodation for older people in the borough. This policy is supported by HOU 6 'accessibility, space and</p>

older people.	wheelchair housing standards’.
NDSS - The Nationally Described Space Standards (‘NDSS’) as introduced by Government are intended to be optional and can only be introduced where there is a clear need and they retain development viability. CEC has not provided the robust justifiable evidence necessary to introduce the NDSS as a policy requirement in line with the PPG.	The justification for the introduction of national space standards in the borough is included in the Nationally Described Space Standards (‘NDSS’) Report [ED 57]. The implementation of NDSS has been built into the viability work undertaken to support the SADPD [ED 52].
NDSS - The Nationally Described Space Standards Justification Paper (June 2019) has considered 110 applications submitted between 2015 and 2018, totalling 694 homes. It suggests that the majority of dwellings measured met at least some of the assessed NDSS standards but that only 17% of dwellings were compliant with the NDSS in terms of meeting the GIA, bedroom width and floorspace requirements. It is not evident from the information provided what ‘need’ there actually is for properties built to the standards there is no evidence that smaller properties are not selling, there is no evidence provided that customers are not satisfied with these properties or that these properties are not comparable to other properties available in the market area.	As noted in the NDSS Report [ED 57], the Council considers there is sufficient justification to support the introduction of the NDSS in the borough. The work undertaken provides a broad guide or illustration as to how new build properties in the borough compare to NDSS standards and to how compliance with these standards vary by dwelling size across the borough.
NDSS - The NDSS can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice.	The implementation of NDSS has been built into the viability work undertaken to support the SADPD [ED 52].
NDSS - Recommend that the a transitional period is included within the policy, whilst some developers will be aware of the introduction of NDSS, this may not apply to all and consideration will need to be given to the lead in times particularly between land value negotiations and an application being submitted.	The NDSS report [ED 57] has considered the need for a transitional period concluding that there are no issues of timing that affect whether the council should adopt internal space standards through the SADPD.
NDSS - The suitability of existing housing stock has not been properly assessed against the future requirements identified.	As set out in the NDSS report [ED 57] the work undertaken does give a broad guide or illustration as to how new build properties in the borough compare to NDSS standards and to how compliance with these standards vary by dwelling size across the borough.

<p>NDSS - there is a discrepancy between the evidence provided in the Justification Paper and the Council's Viability Report which states that an analysis of the sizes of units currently for sale in the CEC area indicates that most units are currently above these sizes. The Justification Report suggests that the opposite is the case and the sizes of unit assessed in the viability report may not therefore provide a true reflection of house sizes across the borough. It is not therefore clear whether the impact of potentially larger dwellings on affordability and land supply have been properly considered</p>	<p>The nationally described space standards have been appropriately included and reflected in the local plan site allocations and development policies viability assessment [ED 52]. This has therefore considered the impact of potentially larger dwellings on viability.</p>
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Policy HOU 7 'Subdivision of dwellings'

Summary of the main issues raised	How the main issues have been taken into account
The policy should reference sustainability policies	The plan is intended to be read as a whole and sustainability policies will apply.
There should be additional policy on aggregation of two or more properties into a single dwelling.	The aggregation of two or more properties into a single dwelling is not considered to be a significant issue in Cheshire East.
Cycle storage could be made a requirement.	This issue is addressed by LPS Policy CO 1 'Sustainable travel and transport' and SADPD Policy GEN 1 'Design principles'.

Policy HOU 8 'Backland development'

Summary of the main issues raised	How the main issues have been taken into account
The housing density on a backland site should not be higher than in the surrounding area.	Issues around housing density are addressed by SADPD Policy HOU 12 'Housing density'.
The policy should reference sustainability policies.	The plan is intended to be read as a whole and sustainability policies will apply.
The policy should contain firmer commitments. It is not clear what is meant by some of the wording or who will judge whether proposals are in accordance with the criteria. The policy should state that	The policy is considered to be clear and sound as written. The council is duty bound to consider all applications submitted and decisions are made in accordance with the development plan, unless material

applications will only be considered where public benefit outweighs harm.	considerations indicate otherwise.
Backland development leads to overdevelopment of sites, urban cramming, overlooking and loss of amenity.	In addition to this policy, these issues are addressed through other policies including SADPD policies HOU 10 'Amenity'; HOU 11 'Residential standards' and HOU 12 'Housing density'.

Policy HOU 9 'Extensions and alterations'

Summary of the main issues raised	How the main issues have been taken into account
Amend policy wording to say that '...extensions and alterations will be supported only when they meet the following requirements....:'	The word 'should' is considered sufficiently robust in relation to the future application of this policy.
Add a fourth criterion: '4. The space between neighbours must not only meet the Authority's standards but be sufficient to avoid a 'terracing effect' when seen in relation to its neighbours.	It is considered that this is addressed in point 1. of the Policy where reference is made to the scale, character and appearance of surroundings and the local area.

Policy HOU 10 'Amenity'

Summary of the main issues raised	How the main issues have been taken into account
Add new point 6. proposals must provide two car parking spaces per property,	Table C.1 'Car Parking Standards' of the Local Plan Strategy (LPS) sets out the recommended car parking standards for homes.
Add new point 7. proposals must include provision for adequate spaces for charging plug-in and other ultra low emission vehicles.	'Revised Publication Draft SADPD' [ED 01] Policy INF 3 'Highways safety and access' requires development proposals to incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations. LPS Policy CO 2 'Enabling Business Growth Through Transport Infrastructure' supports new major developments that provide recharging points for hybrid or electric vehicles.
The explanatory paras should draw attention to neighbourhood plan policies that specifically identify and protect open spaces.	When determining planning applications, the Development Plan should be read as whole; this includes Neighbourhood Development Plans.

Policy HOU 11 'Residential standards'

Summary of the main issues raised	How the main issues have been taken into account
The policy is too prescriptive; there should be a more localised, site by site approach to design and residential standards	The Policy uses the caveats 'generally', and 'normally', which provides an element of flexibility that could allow developments to be tailored to their circumstances.
Amend 1(i) to read "unless the <u>nature</u> , design and layout of the scheme and its relationship ...", as different types of housing can influence the impact of relationships to adjoining properties.	This is considered to be covered under 'design and layout'.
One set of residential standards should be set for the whole Borough and be in line with those in the Cheshire East Design Guide.	The standards are considered to be in line with those used in the Design Guide.
Outline in further detail how the standards are to be implemented alongside the Cheshire East Residential Design Guide, particularly in the instance where alternative standards may be deemed more appropriate on a site by site basis.	The Policy uses the caveats 'generally', and 'normally', which provides an element of flexibility that could allow developments to be tailored to their circumstances. The standards are considered to be in line with those used in the Design Guide.
Insert the requirement for 'generally' in part (2) as with part (1);	Part 2 (i) of the Policy uses the caveat 'normally' to provide an element of flexibility.
New point (3): Explicitly cross-reference the Design Guide SPD and support for innovative design led approaches that may justify reduced distance standards.	This is considered to be covered by ¶8.46 of the 'Revised Publication Draft SADPD' [ED 01].
Paragraph 8.46 - remove the minimum requirements to existing properties.	The Policy uses the caveats 'generally', and 'normally', which provides an element of flexibility that could allow developments to be tailored to their circumstances.
Point 1 - remove 'generally' so the standards apply to all developments.	The Policy uses the caveats 'generally', and 'normally', which provides an element of flexibility that could allow developments to be tailored to their circumstances.
14m of separation between habitable and non-habitable rooms between dwellings is too great as it hinders designers with the efficient use of sites; 12m is a generally accepted industry standard.	The standards are considered to be in line with those used in the Design Guide. The policy uses the caveats 'generally', and 'normally', which provides an element of flexibility.

The policy should specify if the separation distance between habitable and non-habitable rooms applies to a blank gable.	¶8.48 of the supporting information states that the space criteria apply where the sole of principal window in the habitable room faces, in the case of a habitable room facing a non-habitable room, a blank wall.
18m separation distance between front elevations does not allow for variation in streets widths as set out in Manual for Streets.	The Policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility that could allow developments to be tailored to their circumstances. ¶8.46 refers to the Cheshire East Borough Design Guide supplementary planning document (2017), which supports an innovative design led approach and promotes opportunities for reduced distance standards through good design.
The increased levels of car ownership in the rural areas and the demand for car parking over and above the Council’s outdated standards has not been addressed.	Table C.1 ‘Car Parking Standards’ of the Local Plan Strategy (LPS) sets out the recommended car parking standards for homes. It is not the role of the SADPD to revisit these standards; this is something that could be considered as part of a plan review.
The construction of garages and car parking spaces on new housing developments that do not accommodate the average family car has not been addressed.	Table C.1 ‘Car Parking Standards’ of the LPS sets out the recommended car parking standards for homes. It is not the role of the SADPD to revisit these standards; this is something that could be considered as part of a plan review.
The requirement to place new houses side by side, front to front, or rear to rear with existing properties is not mentioned.	The Cheshire East Borough Design Guide supplementary planning document (2017) considers the design of residential developments.
The differences in land levels should be on a sliding scale, on a pro rata basis from the figures given, otherwise developers can circumvent the requirements by proposing a 1.9m land level difference.	The policy is on a sliding scale, but the intervals are set at a workable, practical and effective level of 1 metre intervals.

Policy HOU 12 ‘Housing density’

Summary of the main issues raised	How the main issues have been taken into account
The target of at least 30 dwellings per hectare will provide for the efficient use of land and is consistent with the guidance contained in paragraph 123 of the NPPF.	Noted.

<p>Supportive of policy HOU 12 as drafted, which does not seek to introduce maximum density requirements on all developments without significant flexibility.</p>	<p>Noted.</p>
<p>The Council needs to ensure the policy remains flexible enough for instances where it is not appropriate for development schemes to meet this minimum density requirement. The Policy should be amended to allow for flexibility and include additional factors such as market aspirations and viability considerations.</p>	<p>Policy HOU 12 'housing density' sets out the council's expectations on the net density of sites in the borough whilst recognising (in section 3 of the policy) that there may be sites where higher or lower densities will be more appropriate and sets out the factors that should be taken into account in determining an appropriate density.</p>
<p>The Macclesfield Borough Local Plan (Jan 2004) recognised the diversity of the character an appearance of its residential areas by identifying those which needed particular protection because they were under threat from housing development which would radically change their character. Policy H12 identified Low Density Housing Areas in Alderley Edge, Knutsford, Poynton, Prestbury and Wilmslow, and set out a policy which has been successful in retaining their character and appearance. Policy H12 and the relevant boundaries to which the policy relates should be carried forward, and extended to cover other Low Density Housing areas in other towns and villages in Cheshire East.</p> <p>Remove 'local service centre' from Policy HOU 12 para 2i or change it to exclude the smaller rural LSC's</p>	<p>Policy HOU 12 is considered to be consistent with paragraph 123 of the NPPF. The policy includes reference to sites 'generally' being expected to achieve a net density of at least 30 dwellings per hectare. It also recognises that there are a number of different factors that will also be taken into account in determining an appropriate density, including (amongst others) the mix and type of housing proposed, the nature, setting and scale of the proposal including site constraints and local context, and also local market conditions and viability. The approach set out in policy HOU 12 would encourage the efficient use of land within the authority area, whilst also allowing for appropriate consideration of factors including the nature, setting and scale of the proposal, site specific constraints and market conditions.</p> <p>Additional text has been added to policy (3ii) to note that there are some areas of the borough with an established low density character that should be protected</p>
<p>The policy is too prescriptive for sites within the existing settlement boundaries or close to existing or proposed transport nodes as it may not be possible to achieve higher densities in these locations due to design or site specific issues. Housing density should be considered on a site by site basis.</p>	<p>In line with paragraph 123 of the NPPF, policy HOU 12 recognises that there may be opportunities for higher density development in settlement boundaries and / or close to existing or proposed transport routes. Part 3 of the policy lists a number of considerations that will influence and determine an appropriate density on the site.</p>
<p>The policy attempts to set an average density for housing across the entire local authority area. It is therefore in contravention of Policy GEN 1 in the SADPD which promotes "appropriate character, appearance and form in terms of scale, height, density, layout</p>	<p>Policy HOU 12 appropriately recognises (in section 3 of the policy) a number of relevant factors that should be taken into account in determining an appropriate housing density on sites. This includes factors such as the mix of housing proposed and appropriate</p>

grouping..." etc.	considerations on landscape / townscape character and the nature setting and scale of the proposal being considered.
It is our experience that the application of the Cheshire East Design Guide, which we objected to on the basis of it being land hungry, restricts the ability to achieve housing density in line with Policy HOU 12 and restricts the ability to make the best use of land	The supporting information to Policy HOU 12, notes that that the appreciation of landscape and townscape character, alongside well thought out and designed housing schemes can assist in the efficient use of land when balanced with other design considerations.
With reference to point 1, we seek that the word 'generally' is removed to preclude the density of 30 dwellings per hectare from being exceeded.	It is considered that the word 'generally' in point 1 of the policy appropriately recognises that there are a number of factors expressed in point 3 of the policy which may determine the appropriate density of the site but expresses an intention that residential development proposals are generally expected to achieve a net density of at least 30 dwellings per hectare.
The current site allocations for Crewe are delivering an average density of 20.9 dwellings per ha. Therefore a proposed density of 30 dwellings per hectare does not correspond with the current site allocations.	Policy HOU 12 appropriately recognises (in section 3 of the policy) a number of relevant factors that should be taken into account in determining an appropriate housing density on sites. The intention of this policy is to ensure that development of land uses land efficiently but recognises that there will be sites where higher or lower densities are more appropriate.
Additional evidence should be supplied to justify the proposed net density, and without this the policy should not be proposed further	In line with paragraph 123 of the NPPF, policy HOU 12 recognises that there may be opportunities for higher density development in settlement boundaries and / or close to existing or proposed transport routes. Part 3 of the policy lists a number of considerations that will influence and determine an appropriate density on the site.
To impose a net density of at least 30 dwellings per hectare across a borough the size of Cheshire East, that varies from compact, industrial terraces to highly rural locations, is inappropriate	Policy HOU 12 appropriately recognises (in section 3 of the policy) a number of relevant factors that should be taken into account in determining an appropriate housing density on sites. The intention of this policy is to ensure that development of land uses land efficiently but recognises that there will be sites where higher or lower densities are more appropriate.
The role of neighbourhood plans should be recognised in the policy wording	Neighbourhood Plans, when made, form part of the development plan and are used alongside the policies in the local plan to decide planning applications.

Policy HOU 13 'Housing delivery'

Summary of the main issues raised	How the main issues have been taken into account
<p>We are supportive of measures to increase the efficiency of completing S106 Agreements. However, this is a two-way process. A significant amount of time would be saved if obligations were evidenced and clearly set out in response to the tests set out under Regulation 122 of the Community Infrastructure Levy Regulations (2010).</p>	<p>The justification text to LPS policy IN 2 'Developer Contributions' (paragraph 10.11) notes that S.106 planning obligations must meet the tests set out from Regulation 122 of the Community Infrastructure Levy Regulations. Point 4 of policy HOU 13 has been revised. It states that that the council will consider imposing planning conditions where this would expedite the development without threatening its deliverability of viability.</p>
<p>Stretched resources of the Council which, from experience, can result in considerable delay to the completion and execution of S106 agreements.</p>	<p>The Council makes all reasonable endeavours to complete and execute S.106 agreements in a timely fashion. Point 4 of policy HOU 13 has been revised. It states that the council will consider imposing planning conditions where this would expedite the development without threatening its deliverability of viability. The supporting information to policy HOU 13 'housing delivery' of the revised publication draft SADPD notes that the council will work with key partners to expedite the delivery of housing and maintain at least a five year deliverable supply of housing land.</p>
<p>Given the provisions of paragraph 76 of the NPPF, Part 4 (i) of the policy is not considered necessary. It is therefore considered that if the LPA are to pursue such a policy, that the policy is expanded or clarified and evidence based to take account of local or site specific circumstances.</p>	<p>The supporting information to policy HOU 13 'housing delivery' of the revised publication draft SADPD notes that the council will work with key partners to expedite the delivery of housing and maintain at least a five year deliverable supply of housing land and meet the overall development requirements of the Local Plan. It is considered that point 4 is an important part of the Council's ability to maintain supply and delivery of housing in the borough.</p>
<p>Welcome the support for the sub-division of large sites acknowledging the complexities of delivering new homes on large strategic sites and the ability of this to help bring forward sites in a timely manner.</p>	<p>Noted.</p>
<p>The imposition of shorter time limits for sites (including strategic sites) could hamper the delivery of new homes. Larger scale strategic sites give rise to a much more complex and range of issues which need to</p>	<p>Point 4 of policy HOU 13 notes that the council will 'consider' imposing planning conditions only where this would expedite the development without threatening its deliverability or viability. The</p>

be dealt with through conditions, or through future reserved matters submissions. Work can take time and can be affected by changes to the economy, site conditions, planning conditions / obligations or changes to funding.	supporting information to policy HOU 13 'housing delivery' of the revised publication draft SADPD notes that the council will work with key partners to expedite the delivery of housing and maintain at least a five year deliverable supply of housing land and meet the overall development requirements of the Local Plan.
Delay in the determination of applications can be as a result of factors outside of control of applicant and LPA such as failure of statutory consultees to provide a response within the required timescales,	Point 4 of policy HOU 13 notes that the council will 'consider' imposing planning conditions only where this would expedite the development without threatening its deliverability or viability.
This policy should be tailored to state that if shorter time periods are to be imposed, they will need to be agreed with the applicant in writing; prior to the issue of a decision.	Point 4 notes that the Council will consider imposing planning conditions shorter than the relevant default period only where this would expedite the development without threatening its deliverability or viability. It is considered that the mechanism for setting out the planning condition is a matter for policy implementation rather than the policy wording itself.
No explanation is provided in the Policy as to how such an approach would be enforced and monitored.	The objectives of the policy are to expedite the delivery of housing to maintain at least a five year supply of housing land and meet the overall development requirements of the Local Plan. The achievement of a five year supply of housing is included in the monitoring framework (indicator SC2) [ED 54]. Point 4 of the policy refers to the use of planning conditions to support the delivery of housing in a timely fashion.
The SADPD should also state that neighbourhood plans are an appropriate means of co-ordinating delivery.	Completed neighbourhood Plans are part of the statutory development plan and are used alongside the policies in the local plan to consider planning applications.
The wording should proactively commit the Council to working in partnership with developers to support housing delivery in fulfilling its own responsibilities. The policy might also recognise the effectiveness of efficient pre-application engagement, and putting in place a Planning Performance Agreement where this would help with managing the process and agreeing any dedicated resources for progressing the application.	Planning performance agreements and pre-application services are offered as standard by the Council's Development Management team as mechanisms to better understand the planning issues and requirements of individual planning applications and assist in speeding up of the development process.
Policy should be refocused to :	Pre-commencement planning conditions are agreed in advance with

<ul style="list-style-type: none"> Avoid onerous pre-commencement planning conditions and agreeing this in advance of granting planning permission with the Applicant/Agent (as now required by the Town and Country Planning (Pre-Commencement Conditions) Regulations 2018); 	the applicant in line with the Town and Country Planning (Pre-Commencement Conditions) Regulations 2018.
<p>Policy should be refocused to :</p> <ul style="list-style-type: none"> Promote flexibility in the application of planning policy requirements, including the Cheshire East Design Guide, enabling renegotiation, where it is evidenced that policy requirements are not deliverable or viable; 	As noted in the Cheshire East SADPD Viability Assessment [ED 52] the Cheshire East Design Guide SPD sets out principles for achieving high quality design. It does not seek requirements over the costs set out in BCIS building cost assumptions [ED 52].
<p>Policy should be refocused to :</p> <ul style="list-style-type: none"> Offsetting infrastructure/policy requirements until later in a development, where appropriate; and 	The approach to infrastructure and development contributions is set out in policy IN 1 (infrastructure) and IN 2 (developer contributions) in the Local Plan Strategy. .
<p>Recommends that the plan allocates more sites than required to meet the housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites.</p> <p>It is requested that HOU 13 is modified once it has been informed by detailed and robust evidence, to provide at least 10% flexibility for the plan overall, and to ensure sufficient contingency for each settlement in line with the requirements of the LPS.</p>	The ‘provision of housing and employment land and the approach to spatial distribution’ report [ED 05] has been prepared to detail the approach of the revised draft of the SADPD on ‘flexibility’ and other relevant matters
Proposed that a site at Cledford Lane, Middlewich should be safeguarded for housing development during the later stages of the plan period.	The need for allocations has been considered in the Middlewich Settlement Report [ED 36].
It is also requested that the policy should be modified in order to allocate Land off Fanny’s Croft, Alsager as a sustainable and well-located, mixed use site to include residential and employment use.	The need for allocations has been considered in the Alsager Settlement Report [ED 22].

Policy HOU 14 ‘Small and medium-sized sites’

Summary of the main issues raised	How the main issues have been taken into account
Necessity of the policy is questioned as it does not set out any policy	It is a positively worded policy that allows decision makers to give

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requirements.	positive weight to qualifying applications.
The policy should reflect NPPF ¶145(g) which allows for redevelopment of brownfield sites within the Green Belt which do not have a greater impact on openness.	LPS Policy PG 3 'Green Belt' sets the approach to development in the Green Belt.
The policy should be more flexible and not limited to sites of up to 30 dwellings.	The identification of a figure in the policy has the benefit of giving a clear direction to decision makers. This benefit is lost in the absence of specifying a figure. Leaving this judgement to individual applications would be difficult and could result in protracted discussions on this point, potentially delaying application decision making. Whilst accepting that there is no universally accepted definition of what constitutes a small site, the figure that the council has identified is based on a report prepared by the Local Government Information Unit and the Federation of Master Builders published in 2016 as noted in the supporting information to the policy.
The policy should clarify that it does not apply to subdivisions of larger sites.	It is a positively worded policy that allows decision makers to give positive weight to qualifying applications, but all other development plan policies will still apply.
The policy does little to actively encourage smaller sites.	It is a positively worded policy that allows decision makers to give positive weight to qualifying applications.

Chapter 9: Town centres and retail (general issues)

Summary of the main issues raised	How the main issues have been taken into account
It is claimed that the plan seeks to support the role and function of town centres through this period of change, particularly by concentrating on core areas and activities. It does absolutely nothing sensible to support the retail sector in Bollington. Reference to a specific planning application made.	The SADPD includes a number of retail policies to assist in the consideration of retail schemes in the borough. The approach to retail boundaries, in Bollington, is considered within the Bollington Settlement Report [ED 24].

Policy RET 1 'Retail hierarchy'

Summary of the main issues raised	How the main issues have been taken into account
<p>Object to the identification of neighbourhood parades within the defined hierarchy as such facilities do not accord with the NPPF and its definition of 'town centres'</p>	<p>The supporting information to Policy RET 1 'retail hierarchy' in the revised publication draft SADPD notes that neighbourhood parades of shops do not fall within the definition of town centres in the NPPF Glossary. They are included in the retail hierarchy as they have an important localised role retail and the policies outlined in table 9.1 (retail policies) apply.</p>
<p>Dean Row Road (Summerfields Centre, Wilmslow) should be included within the schedule of Local Service Centres. It better reflects its offering and role.</p>	<p>The approach to the retail hierarchy in the revised publication draft SADPD is consistent with the hierarchy of retail centres identified in policy EG5 'promoting a town centre first approach to retail and commerce' in the Local Plan Strategy. The consideration of Dean Row Road as a retail centre is included in the Wilmslow Settlement Report [ED 43].</p>
<p>Support for the role of Sandbach and Knutsford as Key Service Centres in the retail hierarchy.</p>	<p>Noted.</p>
<p>The Local Planning Authority's decision to amend the boundary of the designated Employment Site: Hurdsfield Industrial Estate. This amendment is supported, where it de-allocates the area of land to the south as this is now coming forward for retail development under the outline planning permission 15/5676M and current reserved matters submission 19/3439M. It would be appropriate and proper to allocate this area of land, alongside the adjacent Tesco superstore, as a Local Centre</p>	<p>The remaining land which acts as a small retail park is not a local urban centre or neighbourhood parade as such. The Black Lane site lies outside the town centre and once developed would be regarded as an out of centre retail park. The approach to designating neighbourhood parades of shops and local urban centres in Macclesfield is set out in the 'Macclesfield Settlement Report' [ED 35].</p>
<p>Reference to the North Cheshire Garden Village and the South Macclesfield Development Area should be added to the Local Centre tier of the retail hierarchy.</p> <p>¶85 (a) and (c) of the NPPF - planning policies should define and create a network of centres, including the creation of new centres.</p>	<p>The approach to the retail hierarchy in the revised publication draft SADPD is consistent with the hierarchy of retail centres identified in policy EG5 'promoting a town centre first approach to retail and commerce' in the Local Plan Strategy. The policies contained in the Local Plan Strategy for the North Cheshire Garden Village (LPS 33) and the South Macclesfield Development Area (LPS 13) set out an appropriate planning context for the sites and includes references to</p>

	the scale of retail uses expected on those sites.
Requested boundary amendments to Poynton town centre to align with those in the Poynton Neighbourhood Plan.	The approach to establishing town centre boundaries in Poynton is set out in the Poynton Settlement Report [ED 39].

Policy RET 2 'Planning for retail needs'

Summary of the main issues raised	How the main issues have been taken into account
The SADPD as currently proposed fails to ensure that the retailing needs of Cheshire East will be met. This is especially the case in Knutsford, which is earmarked as a Key Service Centre within which there is very significant overtrading and an identified need for additional retail floorspace as recognised in the Cheshire East Retail Study Update. The failure to allocate any sites for retail development within or around Knutsford leads to grave concerns that emerging development requirements will not be met, which may render the emerging SADPD as unsound. Alternative sites outside of the defined retail centre must therefore be explored and assessed for retailing purposes.	Policy 'RET 2' planning for retail needs sets out that the anticipated retail convenience and comparison floorspace arising in the borough will be met principally through the delivery of sites allocated in the LPS that include an element of retailing to meet local needs; further retail development in Crewe and Macclesfield town centre(s) and the delivery of site LPS 47 'Snow Hill, Nantwich'. The supporting information to the policy recognises that expenditure growth forecasts in the longer term (and certainly beyond ten years) should be treated with caution given the inherent uncertainties in predicting the economy's future performance and the pattern of future trading.
The policy should be amended to specifically refer to the North Cheshire Garden Village and South Macclesfield Development Area and the delivery of future local centres in those locations.	Policy RET 2 (point 2) specially refers to 'the delivery of sites allocated in the Local Plan Strategy that include an element of retailing to meet local needs'. Such a reference in the policy would apply to the North Cheshire Garden Village and the South Macclesfield Development Area allocations in the Local Plan Strategy.
The Cheshire East Retail Study Update (2018) is not a secure basis on which to plan retail provision. Its original database 2015 is dated, its sample is small, and it fails to take account of the recent collapse of many high streets that previously seemed to be doing well. The conclusions which it reaches may be accurate but they now need to be tested as a matter of urgency in each of the segments of the retail hierarchy. Local knowledge and the monitoring of the retail scene by working groups of completed or 'in-progress' neighbourhood plans will	The Council's retail evidence is considered to be a suitable basis to consider retail matters against. It is relevant, proportionate and up-to-date evidence. It takes into account relevant market signals and also acknowledges that expenditure growth forecasts in the longer term should be treated with caution given the inherent uncertainties in predicting the economy's performance over time and the pattern of future trading. It acknowledges that retail assessments should be reviewed on a regular basis in order to make sure that forecasts over

be able to adjust the planned outcomes for individual towns and villages.	the medium and long term are reflective of any changes to relevant available data.
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Policy RET 3 ‘Sequential and impact tests’

Summary of the main issues raised	How the main issues have been taken into account
We suggest that the wording ‘where the closest centre to development proposals’ is added to all categories in the table included in policy RET 3: Sequential and Impact tests.	The table presented in RET 3 ‘sequential and impact tests’ is considered to clearly present where the impact test will apply for the consideration of retail development proposals in the borough.
With reference to point 2 of the policy, we seek that Cheshire East Council as opposed to the developers are able to demonstrate that out of town retail developments do not have an adverse impact on town centres.	The wording in policy RET 3 ‘sequential and impact tests’ is considered to be consistent with the requirements of national planning guidance. It is for development proposal(s) for retail and leisure uses that are located on the edge or outside of a defined centre and that exceed the relevant floorspace thresholds that will have to demonstrate that they would not have a significant adverse impact on the considerations set out in point 2 of policy RET 3.
Policy RET 3 does not adequately reflect the approach required by Paragraph 87 of the National Planning Policy Framework (“NPPF”) (February 2019) which states that “applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.” To be in accordance with national planning policy, and therefore found sound, it is strongly recommended that this sentence be added to the end of Part 1 of Policy RET 3.	The requirements of paragraph 87 of the NPPF are reflected in the supporting information to RET 3 ‘sequential and impact tests’ in the revised publication draft SADPD.
Part 3 of Policy RET 3 needs to be amended to require an impact assessment where a proposal increases the size of an existing store to a floorspace that is over the thresholds set	Point 3 of policy RET 3 ‘sequential and impact tests’, as written, is considered to be consistent with paragraph 89 of the NPPF.

Policy RET 4 'Shops fronts and security'

Summary of the main issues raised	How the main issues have been taken into account
<p>Para 1 ii. reads "proposals should reflect the traditional character of shop fronts and include historically accurate detailing." It is recommended that 'existing features of historical or architectural significance are to be retained' is added as well as reference to policies in neighbourhood plans and design guides on shop fronts.</p>	<p>Additional wording has been inserted into Policy RET 4: <u>"Existing features of historical or architectural significance are to be retained"</u></p> <p>Neighbourhood Plans are part of the adopted development plan and therefore policy does not need to be repeated in the SADPD.</p>

Policy RET 5 'Restaurants, cafés, pubs and hot food takeaways'

Summary of the main issues raised	How the main issues have been taken into account
<p>KFC considers the policy (Point 3) to be unsound.</p> <ul style="list-style-type: none"> • 400m - does this without any reference to how many may already be present, the effect of those or of any reduction. No evidence of a distance (if any) at which effects may occur is provided. • No assessment has been made on the number of hot food takeaway that might be refused as a result of this or what social, economic or environmental impacts might be. • Policy is negative in its assumptions, using the concept of 'unhealthy food'. It assumes all hot food takeaways offer little choice and serve the same type and standard of food. • No evidence for a causal link between incidence of obesity and proximity of hot food takeaways to secondary schools and sixth form colleges. • Not all hot food takeaways, restaurants, pubs and shops provide a source of cheap, energy dense and nutrient poor foods, and the planning system is ineffective in distinguishing between those that are and those that are not. • It would be better to rely on objective evidence in a retail study 	<p>Cheshire East Council acknowledges that hot food takeaway purchases are only one of many contributory factors to childhood obesity. Although unhealthy food is purchased from other A class uses, a significant amount is still purchased from A5 use classes. Further detail of how this is a contributing factor can be seen in the background report entitled 'Hot Food Takeaways Background Report' [ED 50]</p> <p>The information provided in the background report [ED 50] sets out facts and figures on the impacts of obesity; the food environment contribution to obesity; the local context and how obesity and the number of hot food takeaways have been on the rise recently. The report also provides a list of other Councils that have recently adopted similar policy either in their Local Plans or through the adoption of their Supplementary Planning Document.</p>

<p>to set maximum proportions of hot food takeaways (and other main town centre uses) in order to ensure a healthy retail balance, but also any concomitant public health benefits. Such an approach could be extended beyond centres.</p> <ul style="list-style-type: none"> • There is significant difficulty in using distance radii in that it takes account of no real barriers, physical or perceptual. It is better to use real walk isochrones. • Policy is inconsistent with NPPF. No policies refer to dietary issues. It seeks to enable people to live healthier lifestyles but seeks to do so by creating rather than restricting choice. • PPG53 (part 52 para 6) has suggested planning authorities might consider policies which limit the proliferation of certain use classes in identified areas. It focuses on proliferation, does not specify which use classes and is intended to be area-based. Whilst it suggests that regard could be had to proximity of schools, it omits of what. 	
<p>McDonalds Restaurant considers the policy (Point 3) to be unsound:</p> <ul style="list-style-type: none"> • London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity. • Inconsistent with national planning policy – contradicts paragraph 11, 80 and 81. There is also no basis for a blanket ban approach in Planning Practice Guidance. • Policy fails to acknowledge the wider benefits that restaurants can have including the benefits relevant to community health and wellbeing. • McDonalds offers a wide range of different foods at its restaurants displaying calorie content and key nutritional aspects. The menu includes a range of lower calorie options and in recent years McDonalds have made great efforts to reduce fat, salt and sugar content across their menu. • Policy is inconsistent, discriminatory and disproportionate. A1 	

retail outlets and A3 food and drink uses can also sell food that is high in calories, fat, salt and sugar. Hot food from an A3 unit can be delivered to a wide range of locations, including schools.

- The ban is disproportionate to the circumstances when the concern underlying the policy may arise – schools are not open for the majority of days in the year and many schools prevent children from leaving the school grounds. Attendees of sixth form colleges are between 17-18 years of age and are old enough to drive making the 400m exclusion worthless
- Consideration should be given to the practicalities of restricting opening hours of such uses during the day. McDonalds, for example, have a wider range of customers, predominantly adults. To enforce closures at lunchtimes would have significant negative implications on proposed development and would make such ventures unviable.
- Not justified by any evidence. Supporting text fails to provide a link to any evidence as to how a hot food takeaway in proximity to a secondary school, can be an obstacle to its pupils eating healthily. Para 9.19 again fails to provide evidence to support the claim that the most popular time for purchasing food from takeaways is after school.
- Examination of other plans have found similar approaches to be unsound.
- There needs to be some exploration into policies that are more positive, have a reputable evidence base and that comply with the framework.
- Would welcome and support proposals for a wider study of the causes of obesity and their relationship with development proposals including examination of how new development can best support healthy lifestyles and tackling obesity. When a

cogent evidence base has been assembled, this can then inform any appropriate policy response.

Policy RET 6 ‘Neighbourhood parades of shops’

Summary of the main issues raised	How the main issues have been taken into account
<p>At a time when there is clear need for the 'high street' to diversify, the notion of restricting/limiting the ability to diversify in neighbourhood parades runs contrary to future requirements/need and also paragraph 85 of the NPPF. Delete paragraph '2' of Policy RET 6.</p>	<p>The policy approach set out in RET 6 ‘neighbourhood parade of shops’ builds upon the strategic approach set out in LPS policy EG 5 ‘promoting a town centre first approach to retail and commerce’. The policy seeks to protect small parades of shops where they are important to the day to day needs of local communities. Local facilities, located within neighbourhood parades of shops, continue to play an important role for day-to-day convenience and for those residents who have difficulty accessing superstores or the town centre.</p>

Policy RET 7 ‘Supporting the vitality of town and retail centres’

Summary of the main issues raised	How the main issues have been taken into account
<p>Knutsford Town Centre - recommend that the proposed Town Centre boundary be amended to include the OKA building, its associated car park and the Bowling Green to the rear (as per the currently adopted position). This allows for further land and flexibility to meet Knutsford’s retailing requirements.</p>	<p>The analysis of the town centre boundaries for Knutsford is presented within the Knutsford Settlement Report [ED 34].</p>
<p>A new point should be added to section 3 of the policy, as follows:- c. development proposals involving residential development will only be supported where an appropriate residential environment can be achieved for future occupiers.</p>	<p>RET 7 relates to the retail approach for town centres, primary shopping area, local and urban centres. Point 2 of Policy RET 8 ‘residential accommodation in the town centre’ considers the relationship between residential development proposed in town centre locations and existing uses, making an appropriate cross reference to policy ENV 15 ‘new development and existing uses’ in the SADPD. The SADPD is intended to be read as a whole alongside the relevant</p>

	provisions set out in the LPS.
<p>Policy RET 7 should be reworded to be more flexible, in order that it is supportive of changes in town centre composition that are a reasonable response to market conditions. It is considered this is particularly relevant to (and important for) centres that are at the lower levels of the proposed retail hierarchy.</p> <p>Delete 3 (ii a+b). Replace with a new 3(ii) stating 'development proposals that allow a centre to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries will be supported in principle.</p> <p>In paragraph 4, remove the words 'in addition to criteria (3.ii.a) above'.</p>	<p>Part 3 of policy RET 7 is seeking to support and retain town centre uses, as defined by the NPPF, and is appropriately focused in primary shopping area, local centre or local urban centres locations in the borough.</p> <p>The policy is considered to be reasonably responsive to market conditions in making reference to testing market demand in the policy</p>
<p>Sandbach Town Centre - Objection to the extent of the primary shopping area as defined for Sandbach. Also, question why the retail allocation at Brookhouse Road, Sandbach under Policy DP4 of the Congleton Local Plan has not been carried forward.</p>	<p>The analysis of the proposed primary shopping area for Sandbach is presented within the Sandbach Settlement Report [ED 41]. Policy RET 2 'planning for retail needs' sets out how convenience and comparison floorspace need arising in the borough over the plan period will be met – principally through the delivery of sites allocated in the Local Plan Strategy that include an element of retailing to meet local needs, further retail development in Central Crewe and Central Macclesfield and the delivery of allocated site LPS 47 'Snow Hill' Nantwich.</p>
<p>Policy does not mention that the direction in which prospering town centres are moving is to combine retail provision (which clearly meets demands) with other 'experiences' (food and drink, heritage and other attractions eg a street or craft market, and leisure activities). Nor does the policy mention the evening economy. Ideally, establishments contributing to the evening economy need an active daytime frontage to assert the vitality of the town centre. A degree of flexibility therefore needs to be retained in creating a balance of provision within a town centre - a balance that may change to meet new market demands. It would be helpful if the policy or its explanatory paras drew attention to these aspects.</p>	<p>Policy EG 5 (point 6) in the Local Plan Strategy makes reference to the evening and night time economy in the borough.</p> <p>Policy RET 7 in the SADPD makes reference to main town centre uses, recognising that this definition includes a number of different town centre related uses. The supporting information to policy RET 7 in the SADPD notes the changing retail market, recognising that the focus of town centres may change but also the importance of retaining a retail function in town centres.</p> <p>An additional reference has been added to refer to the night / time and evening economy as follows:-</p>

	<p>The primary shopping areas remain the focus of retail uses in town centres and the policy seeks to support their vitality and viability. The retail market is continuously changing and responding to societal change, particularly around internet shopping and changing technology. Therefore, it is recognised that the focus of town centres may change over time towards the introduction of leisure uses, <u>the emphasis on the evening / night time economy</u> and increased flexibility in the wider town centre boundary. However, it will be important to retain a retail function in town centres, particularly in the primary shopping area where retail uses are concentrated, to support a diverse range of main town centres uses and enhance the overall attractiveness of centres in the borough.</p>
<p>Alsager Town Centre boundaries should be kept as currently defined, and as set out in Map Alsager 9 of the Alsager Settlement Report.</p>	<p>The analysis of the proposed town centre boundary for Alsager is presented within the Alsager Settlement Report [ED 22].</p>

Policy RET 8 ‘Residential accommodation in the town centre’

Summary of the main issues raised	How the main issues have been taken into account
<p>The inclusion of the redevelopment of car parks is especially welcome.</p>	<p>Noted.</p>
<p>The Knutsford Neighbourhood Plan envisages a Town Centre Master Plan which includes the creation of additional parking built within new housing/retail development to increase vitality and viability in the town centre.</p>	<p>Noted.</p>
<p>An extra line should be added to Policy RET 8 which makes reference to Policy RET 7 in the same way that it makes reference to Policy ENV 15.</p>	<p>A new paragraph has been added to the supporting information to the policy to make an appropriate cross reference from policy RET 8 to policy RET 7</p>

Policy RET 9 'Environmental improvements, public realm and design in town centres'

Summary of the main issues raised	How the main issues have been taken into account
<p>Each section is expressed as a desirable but optional outcome rather than planning requirements to be met. It needs strengthening.</p>	<p>The introduction to Policy RET 9 notes that in line with LPS Policy SE 1 'Design', development proposals in principal town centres and town centres, as defined on the adopted policies map, will be permitted provided they make a positive contribution to their surroundings and reflect the following design principles....</p>
<p>Proposals should include evidence of a maintenance regime in order to maintain a high quality public realm. However, no reference is made to the provision of built-in servicing infrastructure (would include such items as litter bins). Therefore, recommend including a statement: 'appropriate infrastructure which supports the maintenance and servicing of installations in the public realm'</p>	<p>Additional text has been added to Point 2(viii) of policy RET 9 to note that development proposals relating to the high quality public realm should 'evidence clear management <u>and servicing</u> regimes to maintain the quality of the public realm'.</p>
<p>RET 9 and PUB 22 - request for the Alsager Town Centre Boundary not to be changed from the old Congleton Borough Local Plan map. Position backed up from a report by the House of Commons Housing, Communities and Local Government Committee "High Streets and Town Centres 2030" published on 21st February 2019, page 6.</p> <p>This position is also backed up by the NPPF, Chapter 7, Section 85.</p> <p>Specifically,</p> <p>AREA 2 this area includes</p> <p>a) Wesley Place Church. The church not only involved in religious activities but is a venue for activities of many other groups. It adds to the social side of Alsager life. In a modern Town Centre, expanding from the retail base, this area should not be excluded.</p> <p>AREA 3. This area includes</p>	<p>The analysis of the proposed town centre boundary for Alsager is presented within the Alsager Settlement Report [ED 22].</p> <p>Paragraph 4.25 of the Inspector's Report for the Alsager Neighbourhood Plan notes the following:- <i>"The final point concerns the town centre boundary as shown on Map TC1 of the Plan and which is the boundary defined in the Alsager Supplementary Planning Document (SPD) 2010. The Alsager Settlement Report [PUB 22], part of the evidence base for the Publication Draft of the SADPD, has proposed adjusting the boundary by the deletion of three areas of the town centre leaving the main eastern part and the western part linked by Crewe Road. The resulting new town centre boundary is mirrored in the Submission Draft of the SADPD. Having read the justification for the new boundary in PUB 22 and walked around the town centre on my inspection, I agree with its conclusions that the eastern and western extremities of the centre do not function as part of the main retail core of the town and the central part which is excluded is predominantly residential. Therefore, I agree that the town centre boundary in the Neighbourhood Plan should be modified to that shown</i></p>

<p>a) Milton Park - The park fulfils the role set out in RET 9. It is an attractive, vibrant area which is well used socially, daily, by a large section of Alsager people. Events are held during the year which attracts large numbers of people to Alsager.</p> <p>b) United Reform Church is more than just a church but a meeting place for several other organisations.</p> <p>c) Alsager Fire Station provides a meeting room for groups as well as holding their own events and being the home of the Fire station Cadet.</p> <p>d) Public toilets – a free to use community asset for visitors and residents.</p> <p>e) Northolme Gardens – a Cheshire East Council owned garden offering seating and views to the Mere.</p> <p>The surrounding streets contribute to the overall townscape characteristics if Alsager. 63 to 91 Station Road and the Avenue are in conservation areas. Cross Street contains some original terraces.</p> <p>This area should not be removed from the Town centre as it fulfils an important role in a modern Town Centre.</p> <p>Alsager Town Council accept the need to review Town Centre Boundaries. We believe that this consultation has reviewed the boundary in an inclusive and thorough manner.</p> <p>To conclude the Alsager Town Council ask for the retention of Areas 2, 3 and 4 in the Town Centre we end up with retaining our original boundary. The literature talks of the need to review the boundary not to change it.</p>	<p><i>in the SADPD. (PM7)”. The examiners report can be viewed here:-</i> https://www.cheshireeast.gov.uk/planning/neighbourhood-plans/neighbourhood-plans-a-f/alsager-neighbourhood-plan.aspx</p>
<p>Full account should be taken of the recommendations of the Bollington Neighbourhood Plan and discussions held about providing finance to</p>	<p>The analysis of the retail boundaries proposed for Bollington is presented within the Bollington Settlement Report [ED 24].</p>

implement them.	
Sufficient encouragement for good quality design is contained within Policy GEN 1 (Design Principles) and even Policy SE1 (Design) of the Cheshire East Local Plan Strategy and, hence, this policy appears superfluous and should be removed	Policy RET 9 builds on LPS Policy SE 1 'Design' and SADPD policy GEN 1 'design principles' in setting out a number of key, specific principles for town centre developments.

Policy RET 10 'Crewe town centre'

Summary of the main issues raised	How the main issues have been taken into account
The policy should include specific reference and commitment to both a public realm strategy and a heritage strategy for Crewe Town Centre.	Paragraph 9.41 of the SADPD notes how a number of complementary strategies have been prepared (or are in preparation) for Crewe, including the Town Centre Regeneration Delivery Framework and the Crewe Hub Area Action Plan. The council will give consideration as to how proposed developments relate to these strategies and contribute towards a strategic approach for public realm improvements across the town centre. The need for a heritage strategy is outside of the scope and function of the SADPD.
An additional sentence should be added to Para 6(i) to make it clearer that additional green spaces, and the use of features such as green walls will be supported	Point 6 of policy RET 10 'Crewe town centre' refers to improving the quality of public spaces, including green spaces in the town centre.

Policy RET 11 'Macclesfield town centre and environs'

Summary of the main issues raised	How the main issues have been taken into account
The policy reflects the zones and aims of the Macclesfield Town Centre Strategic Regeneration Framework – the SRF provides more detail; suggest that if the SRF becomes an SPD that the inclusion of this policy in the PDSADPD is superfluous and should be removed from the Plan	Comments noted; The SRF has been approved but was not specifically developed as an SPD. SRF likely to remain a supporting document in the context of the Local Plan.
Would welcome as part of the regeneration in the Sunderland Street	The River Bollin as a key green infrastructure asset is covered by LPS

<p>Areas that more attention is paid to the River Bollin as a key green infrastructure asset (at the moment in a poor environmental state in this area) (A range of measures suggested)</p>	<p>Policy SE6 Green Infrastructure plus other policies in Part II of the plan covering ecology and water quality. The Macclesfield Town Centre SRF states: “There is an opportunity to open up and enhance the appearance of the River Bollin in this area to provide a waterside aspect to new residential development and conversions, and to enhance the area for the benefit of the general public.”</p>
<p>Objection is raised to the omission of the Christ Church area from the list of Macclesfield town centre character areas and the text of RET 11 and therefore from the list of priority areas for regeneration. The existing boundary to the west of Churchill Way (as shown on the Saved Town Centre Proposals Map in the Macclesfield Borough Local Plan 2004) should be retained so as to include the whole of the Christ Church Conservation Area. (July 2019 NPPG references included in justification for Christ Church Residential Area to remain in Town Centre – residential can add to the vitality of town centres)(Roe-naissance Project Macclesfield’s Representation also calls for the need for a new Conservation Appraisal, discusses regeneration, the HARP project, the role of housing and compares Christ Church in Crewe with Christ Church in Macclesfield.)</p>	<p>As stated in the’ Macclesfield Settlement Report’ [ED 35] this area consists predominantly of residential properties which are not main town centre uses and do not function as part of the centre’s shopping and service offering. Whilst appreciating that residential uses within a town centre do add to the function of the town centre; large residential areas should not be included within the town centre boundary. Christ Church is referenced in the policy (criterion 7) and in the supporting document – the Macclesfield Town Centre Strategic Regeneration Framework.</p>
<p>A new title headed Christ Church area should be added to the list of Macclesfield town centre character areas and the following text added: “The revitalisation of the area for town centre housing will be encouraged. Redevelopment of existing non-residential uses for new housing will be permitted. The re-use of Christ Church and its grounds for a range of uses (to include cultural, leisure, entertainment , community or other town centre uses) and which respect its Grade II* listed building status will be encouraged. The church is an imposing townscape and heritage feature and forms an essential part of this part of the town centre.”</p>	<p>Christ Church and its associated conservation area are covered by LPS Policy SE7 The Historic Environment and Policies HER 3 Conservation Areas and HER 4 Listed Buildings. For the reasons stated above this area is not considered to fall within the definition of a town centre as set out in national guidance. The detail required is probably outside the remit of a specific local plan policy.</p>
<p>Comments made to the Macclesfield TC Strategic Regeneration framework must be taken into consideration</p>	<p>Noted. There has been continued liaison over the preparation of the SRF and Part II of the Local Plan. Proposed policy RET 11 aligns with the Macclesfield TC Strategic Regeneration Framework as approved.</p>

<p>Concern about any possible residential proposals and relationship to Royal Mail landholding (criterion 8 –Jordangate east); suggest alternative wording: “ In Jordangate east, redevelopment proposals for residential development will be supported to take advantage of the central location and rural views to the east, provided it can be demonstrated how it integrates effectively with existing businesses and an appropriate residential environment can be achieved.”</p>	<p>Concerns noted. Any policy has to be read in conjunction with other policies in the Local Plan. For example policy ENV 15 New Development and Existing Uses would make sure that effective integration with adjacent uses is achieved with any development proposals.</p> <p>The policy also reflects the Macclesfield Town Centre SRF: “To the east of Jordangate in the area between Jordangate and the rail line a number of large employment uses dominate including BT, a Royal Mail Delivery Office and the Police Station. Should any of these buildings become surplus to requirements, this area would make an attractive ‘town and country’ residential area, benefiting from its historic setting and elevated position providing rural views.”</p> <p>(Paragraph 5.6 Page 25)</p>
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Chapter 10: Transport and infrastructure (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>The transport and infrastructure policies do not consider key supporting infrastructure such as airport, park-and-ride and motorway service facilities and are not in accordance with the NPPF, e.g. ¶ 104e and footnote 42. Need to consider the important role that Manchester Airport, the Mid Cheshire Rail Line, Motorway Service Areas and other large-scale projects such as new infrastructure have to play in the development context of Cheshire East and look to allocate sites for these purposes.</p>	<p>There is no evidence pointing to the need for new motorway service facilities. There are two existing motorway service areas within the borough (Sandbach Services M6 between Junctions 16 and 17 operated by Roadchef; and Knutsford Services M6 between Junctions 18 and 19 operated by Moto) and one adjacent to the borough boundary (Lymm Poplar 2000 Services located at M6 Junction 20 and M56 Junction 9 and operated by Moto). Policy INF 4 protects land at Manchester Airport and is supportive of development within the operational area. Policy INF 6 seeks to protect land required to deliver particular infrastructure schemes.</p>
<p>The SADPD needs a replacement policy for Crewe & Nantwich policy TRAN12 in respect of roadside facilities. The development of roadside facilities must be properly planned for in accordance with NPPF ¶11, including roadside facilities serving the A500.</p>	<p>There are existing roadside facilities on the A500 at its junction with the M6. LPS Policy CO 2 ‘Enabling business growth through transport infrastructure’ is supportive of the provision of transport infrastructure.</p>
<p>No account is taken of proposals in the Bollington Neighbourhood</p>	<p>The SADPD does not need to repeat existing development plan policy</p>

Plan for improvements to transport and infrastructure.	contained in made neighbourhood plans.
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Policy INF 1 ‘Cycleways, bridleways and footpaths’

Summary of the main issues raised	How the main issues have been taken into account
<p>Policy INF 1 Part 2 is too onerous and may unduly constrain the delivery of development land by requiring diversions to provide clear and demonstrable benefits for the wider community. As such, it is unsound as it is not effective.</p> <p>The wording of Policy INF 1 Part 2 should be revisited and amended to support diversions that are necessary to facilitate development and/or where public benefits are delivered if feasible and viable. This change will assist the delivery of development land making the SADPD effective.</p>	<p>The wording is considered sound as written</p>
<p>In the application of Part 2 of this Policy, the Council should be mindful that the diversion or stopping up of a public footpath, bridleway or other public road is subject to a separate process to planning. As such, given the associated risk of the planning application process, it will often be the case that this process is not entered into by an Applicant until after a planning application has been granted or there is a resolution to grant planning permission.</p>	<p>Supporting information paragraph 10.3 says “The diversion or stopping up of a public footpath, bridleway or other public road in association with a planning application must be considered before the granting of planning permission”.</p>
<p>The reference to the diversion of canal towpaths should be removed from criterion 2 as diversion of a canal towpath would not be acceptable in any circumstance.</p>	<p>The reference to the diversion of canal towpaths has been removed from criterion 2 as diversion of a canal towpath would not be acceptable in any circumstance</p>
<p>Under criterion 4, development proposals should also provide links to canal towpaths where feasible.</p>	<p>Criterion 4, now includes wording that development proposals should also provide links to canal towpaths where feasible.</p>

Policy INF 2 'Public car parks'

Summary of the main issues raised	How the main issues have been taken into account
The whole issue of traffic safety and parking in Bollington requires serious attention	The Revised Publication Draft SADPD includes Policy INF 2 'Public car parks' and INF 3 'Highway safety and access'.

Policy INF 3 'Highway safety and access'

Summary of the main issues raised	How the main issues have been taken into account
Add the following requirement: .. not significantly reduce the safety of road users or pedestrians in the vicinity of and approaches to the development and, wherever possible, they should increase safety. The likely effects on highways and pedestrian safety should be analysed in a report produced by CEC, or where they have a pecuniary interest, by an independent assessor.	The policy as written is considered legally compliant and sound.
With reference to point 1. vi., add the need for charging points in the town centre locations where residents do not have off-street parking. Add new point 3 - provide two car parking spaces per property along with a prohibition of parking on the pavement.	Policy INF 3 (point vi) covers charging points. Charging points are also mentioned in LPS Policy CO2 (Enabling Business Growth Through Transport Infrastructure). Charging points will also be covered by new Building Regulation requirements https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings <u>SADPD reflected in – policy sound as written</u> LPS policy SD1 (Sustainable Development in Cheshire East) states development should wherever possible “7. Provide safe access and sufficient car parking in accordance with adopted highway standards.” Provision should be based on the car parking standards set out in Appendix C of the Local Plan Strategy (LPS). It is not the role of the SADPD to revisit these standards; this is something that could be considered as part of a plan review.
The whole issue of traffic safety and parking in Bollington requires	Bollington Neighbourhood Plan is part of adopted development plan

<p>serious attention. The SADP needs to be seen to be taking account of the recommendations of the Bollington NP as described in policies MA.P1 and MA.P2 with respect to traffic safety and parking.</p>	<p>and therefore policy does not need to be repeated in the SADPD.</p>
<p>INF 3 requires strengthening. The planning criteria cited must be mandatory. These are not options. Travel Plans must also be mandatory as part of the justification for development. If they are ineffective permission should be refused. Policy should be amended to spell out what is expected of Travel Plans and reject those that do not show the efficacy of the public transport services.</p>	<p>The word ‘should’ is considered sufficiently robust in relation to the future application of this policy. The Department for Transport has produced guidance on Travel Plans – ‘Good Practice Guidance: Delivering Travel Plans through the Planning Process.’ http://www.greensuffolk.org/assets/Travel-Plans/Documents/Travel-Planning/Good-Practice-Guidelines-travel-plans-and-planning.pdf.</p>
<p>The plan contains no policies regarding the provision of electric car charging points on every new development notwithstanding the Governments stated objective to support a shift to electric vehicles over the next 20 years.</p>	<p>Charging points are mentioned in LPS Policy CO2 (Enabling Business Growth Through Transport Infrastructure). The installation of electrical charging outlets are also covered under Schedule 2, Part 2, Class D of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).</p> <p>Additional wording has however been inserted under Criterion 1 (vi) of INF 3 which now states: (vi) incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations. <u>For major developments, the following specific standards will apply:</u> <u>a) a chargepoint for every new dwelling (whether new build) or change of use) with an associated car parking space, unless this is not feasible because of excessively high grid connection costs; and</u> <u>b) one chargepoint for every five car parking spaces in the case of new, non-residential buildings.</u></p> <p>Additional wording has been inserted under the Supporting Information section: <u>“Residential chargepoints must have a minimum power rating output of 7kW and be fitted with a universal socket that can charge all types of electric vehicle.”</u></p>

	<p>Charging points will also be covered by new Building Regulation requirements</p> <p>https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings</p> <p>SADPD reflected in – policy sound as written</p>
<p>No action has generally been forthcoming for improvements to local traffic routes, If some action is not done congestion and road accidents will ensue and cause social problems in the near future.</p>	<p>The policy (criterion 2) states that all development proposals that generate a significant amount of movement should be supported by a travel plan and either a transport statement or transport assessment.</p> <p>Section 106 agreements help secure infrastructure required to mitigate site-specific impacts arising from development. S106 agreement(s) include three key tests in that it must be (a) necessary, (b) directly related, and (c) related in scale and kind to the proposed development.</p> <p>The CIL Regulation 123 List sets out infrastructure projects that Cheshire East Council currently intends may be wholly or partly funded by CIL.</p>

Policy INF 4 ‘Manchester Airport’

Summary of the main issues raised	How the main issues have been taken into account
<p>Development proposals at Manchester Airport should be critically considered instead of ‘usually permitted’.</p>	<p>Within the defined airport operational area, the policy is supportive of development that is necessary for the operational efficiency and amenity of the airport. The plan is intended to be read as a whole and all relevant policies will still apply.</p>
<p>The policy does not mention the control of drone activity adjacent to the airport or under the flight paths.</p>	<p>Unless the flying of drones is dependent on development, it is outside of the scope of the planning system; however draft Policy GEN 5 seeks to prevent development that would adversely affect the operational safety of the airport.</p>

Policy INF 5 ‘Off-airport car parking’

Summary of the main issues raised	How the main issues have been taken into account
<p>A table of the airport car parks and the lawful off-site car parks should be included in the plan with their approved capacity. In the absence of such, it will not be possible for potential future operators to be able to determine whether demand is met. No evidence is provided to justify the requirement to demonstrate that demand regularly exceeds supply. It is not clear whether monitoring is carried out to be able to assess the position.</p>	<p>The policy does not intend that applicants provide a numerical calculation of the capacity / occupancy of existing car parks but some evidence that car parks are regularly at or near capacity would be required, e.g. a parking survey. The inclusion of a table of existing car parks would be difficult as they have a wide geographical spread in a number of different authorities and some only operate during irregular periods. In addition, such a table would inevitably become out of date very quickly.</p>
<p>The current Manchester Airport surface access plan aims to provide car parking on site, therefore the delivery of off-airport car parking cannot be in accordance with criterion 2.</p>	<p>Criterion 2 does not rule out locations not identified in the surface access plan. If there is a need for new car parking but the Sustainable Access plan does not identify off-airport locations then preference cannot be given to those locations and effectively criterion 2 would not apply.</p>
<p>The policy should identify locations / areas of search considered suitable for off-airport car parking.</p>	<p>There is no identified requirement for off-airport car parking that would necessitate allocations or areas of search being included in the plan.</p>
<p>The requirements in terms of Green Belt effectively introduce a sequential approach and it is not clear how the council would assess proposals in terms of openness.</p>	<p>The Green Belt requirements are in line with the NPPF and LPS Policy PG 3 ‘Green Belt’ in respect of local transport infrastructure. These policies require such infrastructure to demonstrate a requirement for a Green Belt location. If the proposal could be accommodated outside of the Green Belt, then it cannot demonstrate a requirement for a Green Belt location. These policies also require proposals to preserve openness and not conflict with the purposes of including land within the Green Belt.</p>
<p>There should be a clear definition of what “forecast to do so in the near future” means.</p>	<p>The policy is considered to be clear and sound as written.</p>

Policy INF 6 'Protection of existing and proposed infrastructure'

Summary of the main issues raised	How the main issues have been taken into account
Making provision to connect the Poynton Relief Road to safeguarded land LPS 52 and the Woodford Garden Village in Stockport will allow for comprehensive site delivery, help boost economic growth and reduce impact on local communities.	The Poynton Relief Road has been removed from the list of schemes specifically included in this policy, given its advanced stage towards construction.
The Wilmslow – Manchester Airport Bus Rapid Transit Scheme should be added to the list of protected infrastructure – improved connectivity to the airport should be supported to facilitate economic growth and development. Further opportunities should also be explored, such as tram-train links to the airport.	The schemes listed under criterion 2 of the policy are those where there is a specific identified area of land that needs to be protected in order to facilitate delivery of the infrastructure.
Manchester Airport should be recognised under this policy as key infrastructure whose operation should not be impaired.	The operational area at Manchester Airport is protected under policy INF 4 'Manchester Airport'.
Without improved infrastructure, any future development in Bollington will damage the health of Bollington residents.	Policy INF 6 seeks to protect existing and proposed infrastructure. The provision of new infrastructure is also considered in LPS Policy IN 1 'Infrastructure' and IN 2 'Developer contributions'.
The proposed site allocations in Bollington will adversely affect the existing infrastructure.	As set out in 'The Provision of Housing and Employment Land at The Approach to Spatial Distribution' report [ED 05], it is no longer proposed to allocate sites for housing at the LSC tier of the settlement hierarchy.

Policy INF 7 'Hazardous installations'

Summary of the main issues raised	How the main issues have been taken into account
No comments	N/A

Policy INF 8 ‘Telecommunications infrastructure’

Summary of the main issues raised	How the main issues have been taken into account
<p>Cheshire East Council, in consultation with Parish Councils and telecoms operators should develop a strategic plan for the siting of infrastructure for future infrastructure requirements.</p> <p>Significant planning problems have been caused by the apparent lack of advice from Cheshire East Council to telecoms developers on where they might best place their future infrastructure needs. Developers seem to be left to make planning proposals without any helpful guidance. This is very wasteful of resources. A strategic plan for future telecoms infrastructure is particularly important given the imminent roll out of 5G communications.</p>	<p>The government has recently consulted on proposals to simplify planning rules to improve rural mobile coverage.</p> <p>This consultation seeks views on the principle of amending permitted development rights to support deployment of 5G and extend mobile coverage.</p> <p>The results are not yet known therefore a prescriptive policy would be premature</p>
<p>We welcome the reference to aviation safety within policy INF 8 but require an amendment to the policy wording at 1(iv) as follows –</p> <p>replace current text “there will be no interference with air traffic services” with “there will be no detrimental impact on air traffic safety”.</p> <p>The text that we previously provided for the supporting information has not been included so we repeat the need for this. The following paragraph should be inserted here:</p> <p>"The Safeguarding Authority for Manchester Airport will assess Telecommunications Infrastructure planning applications and Prior Notification Permitted Development proposals to consider their impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a visual hazard; interference with communication systems including RADAR systems and ground to air communication by its radio frequency or microwave link path and whether its construction will present any hazard to flight safety."</p>	<p>The reference to there being no detrimental impact on air traffic safety has been included in the Revised Publication Draft SADPD.</p> <p>The plan should be read as a whole. These points are already covered by Policy GEN 5 Aerodrome Safeguarding.</p>
<p>INF 8 This policy is cited as a supplement to LPS Policy CO3. Neither policy contains specific guidelines with respect to the impact of</p>	<p>The plan should be read as a whole, the suite of Heritage policies already cover all forms of potentially harmful development on heritage</p>

<p>telecommunications infrastructure upon heritage assets. This is in contrast to the Saved Policy DC60 of Macclesfield Borough Council Policy Local Plan. The recommendation is to add 'particularly in relation to the impact on heritage assets' to section iii of Policy INF 8</p>	<p>assets and their settings. This would include telecommunications infrastructure</p>
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Policy INF 9 'Utilities'

Summary of the main issues raised	How the main issues have been taken into account
<p>Draft Policy INF 9 seeks to establish that all development proposals will be required to demonstrate that the utilities infrastructure capacity would be sufficient to meet forecast demands arising from the proposed development and that appropriate connections to utilities infrastructure can be made. The policy fails to differentiate between types of development. Policy INF 9 is unsound on this basis. Logically, only major development proposals should be required to demonstrate that infrastructure capacity will be sufficient to meet forecast demands and the policy text should reflect this. The word 'major' should be added in paragraph 1 as the second word of the paragraph.</p>	<p>To differentiate between the types of development and use a term that is defined in the glossary of the Local Plan Strategy.</p> <p>The word '<u>major</u>' will be added to the second sentence in place of large</p>
<p>With reference to point 2, remove the word 'generally' to prevent existing utilities from being impacted.</p>	<p>The word "generally" has been removed to prevent existing utilities from being impacted.</p>
<p>utility companies have a statutory duty to provide these services, there are often significant distances between the road infrastructure and homes may significantly compromise fiscal viability. Utility companies comment only on reserved matters applications. There is a cogent argument for developers seeking to build in rural areas to submit reserved matters applications from the outset in order that fiscal viability can be ascertained BEFORE approval is given (which better adheres to the NPPF 2019). This situation also applies to broad band 'black spots' and the fact that very little of the NP Area is linked to a gas supply. Consider the introduction of 'reserved matters only' applications in</p>	<p>The supporting information is considered sufficient to cover this point</p> <p><i>"10.24 Utilities provision and connections on large sites, which will take several years to build out, should be planned in a comprehensive way between phases and developers. For example, developers should have a comprehensive and joined up approach towards foul and surface water drainage on both early and later phases across a larger site, and aim to avoid a proliferation of pumping stations."</i></p>

<p>rural areas where Utilities provision is a significant risk to the fiscal viability of the development.</p>	
<p>sites are crossed or in close proximity to National Grid infrastructure, including some LPS sites Site EMP1 Strategic Employment Areas; YV Route - 400Kv two circuit route from Macclesfield substation in Cheshire East to ZZC040R Tower in Stockport.; ET261 Site LPS 15 Housing and Employment Site; ZE Route – 400kv two circuit route from Cellarhead substation in Staffordshire Moorlands to ZEA020 in Cheshire East; ET262 Site LPS 19 Safeguarded Land; ZE Route – 400kv two circuit route from Cellarhead substation in Staffordshire Moorlands to ZEA020 in Cheshire East; ET262 Gas Transmission: Middlewich EMP1 Strategic Employment Site; FM21 – Warburton to Audley; GT88 EMP 2.7 New Farm, Middlewich; FM21 – Warburton to Audley; GT88 LPS Midpoint 18 Middlewich; FM21 – Warburton to Audley; GT88 Please see enclosed plan referenced ET261, ET262, & GT88 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line and a National Grid underground high pressure gas pipeline.</p>	<p>LPS sites are not the subject of this document.</p>

Policy INF 10 ‘Canals and mooring facilities’

Summary of the main issues raised	How the main issues have been taken into account
<p>The promotion of a mooring facility serving the Shropshire Union Canal and its associated branches is not possible within the settlement boundaries. It is requested that criteria (i) is removed which requires proposals for permanent moorings to be located in a settlement boundary, or the criteria is amended to allow mooring facilities in the open countryside, where other criteria in the policy are met and there is a need for such facilities.</p>	<p>Policy is proposed to be amended as follows: Delete criterion 2(i): “(i) are located in a settlement boundary” Insert new criterion 3: <u>“3. Where a mooring is for permanent residential it will only be permitted within settlement boundaries and infill boundaries.”</u></p>

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	<p>A new paragraph has been inserted into the Supporting Information text to state: <u>“Proposals for tourist accommodation will also be subject to Policy RU8 (Visitor accommodation outside of settlement boundaries).”</u></p>
<p>Even if there was a suitable location along the Shropshire Union Canal and its associated branches, it is unlikely that a mooring/marina use (requiring a large footprint) would be viable within the settlement boundary as higher land value uses such as residential development would be favoured especially along canal frontages. Furthermore, the policy conflicts with emerging Policy PG 9 which states that “within settlement boundaries, development proposals (including change of use) will be supported where they are in keeping with the scale...of that settlement.” An Infrastructure development (such as a permanent mooring facility) is unlikely to be in accordance with PG 9 and may not be suitable within the settlement boundary.</p>	<p>Additional wording has been inserted under the supporting text to state: “Proposals for tourist accommodation will also be subject to Policy RU8 (Visitor accommodation outside of settlement boundaries).”</p>
<p>It would not be practical for development of Site MID 2 to comply with Criterion 1 vi or vii of Policy INF 10 and Criterion 3 of Policy MID 2 which requires the preservation of hedgerows around the site. Criterion i, vi and vii of the policy should be amended as follows: “i where possible, seek to provide an active frontage.... vi where possible, integrate the waterway, towpath and vii where possible, optimise views to and from the waterway</p> <p>It would be helpful if a further clarification paragraph could be added to the Supporting Information text: “Where a site is allocated for development adjacent to the canal network the site specific requirements set out within the relevant policy for that site will take preference over the generic requirements set out in Policy INF 10”.</p>	<p>Policy (i) was amended after the first draft SADPD to state the word ‘seek.’ This has the same meaning as ‘where possible’. The wording ‘integrate’ and ‘optimise’ is considered to allow flexibility, rather than using words such as ‘connect’ to the waterway, towpath and canal environment to the public realm; and ‘provide’ views to and from the waterway. To insert ‘where possible’ in other parts of this policy would not help encourage active use of the waterway.</p> <p>With regard to inserting additional information in the supporting paragraph, it should be noted that the Plan is intended to be read as a whole.</p>

Chapter 11: Recreation and community facilities (general)

Summary of the main issues raised	How the main issues have been taken into account
Need reference in policies that Neighbourhood Plans may contain sports facility needs and opportunity assessments	Made Neighbourhood Plans are part of the Development Plan.

Policy REC 1 'Green/open space protection'

Summary of the main issues raised	How the main issues have been taken into account
Strong support for policy	Support noted.
Support for policy – suggest addition of explanation regarding the definition of open space – “ please see glossary for definition of green and open space”	Support noted. The glossary is listed in the contents page if people want to check definitions.
Policy should be amended to refer to open space only - not green/open space	The reference to green/open space links with the term green infrastructure. Definitions are in the glossary.
Policy positively written as broadly conforms with objectives within NPPF paragraph 97	Support noted.
Requested that the open space status of land to the rear of 43 London Road, Poynton is removed as the site has no recreational value, no amenity value and is surplus to open space requirements in Poynton. The site is wholly in private ownership and is not accessible to the general public plus there is sufficient publicly accessible open space within the immediate locality.	<p>The general approach is to change policy designations on the interactive map once developments have taken place.</p> <p>The two parcels that make up this open space are high quality garden areas that are part of the wider green infrastructure. They do perform a visual amenity function (for surrounding houses) and numerous other green infrastructure functions. These local green areas make such a contribution to urban heat island effects, air pollution absorption, ecology, absorption to combat localised flooding etc. The presence of green space within the urban area is so important for health and well-being.</p> <p>There would be the usual strong policy presumption against the</p>

	development of the open space. Redevelopment of the frontage area would also produce the need to provide additional open space for those new residents in line with LPS Policy SE6 Green Infrastructure.
Objection to the designation of land bound by Brook Street, Hollow Lane and Mobberley Road as green/open space – site not designated as Local Green Space; no public views; TPO and conservation area status provide sufficient protection	<p>Application for development 19/0225M 4, Mobberley Road (objections to loss of historic green space from surrounding residents); 1926 restrictive covenant preventing future development within the woodland mentioned in objection letter.)</p> <p>It is an important open space both in terms of its visual amenity value, historic value and as part of the wider green infrastructure for the following reasons:</p> <p>Visual amenity open space – both for surrounding residents and as an attractive green area adjoining the southern and north eastern routes into Knutsford</p> <p>Wooded nature and open nature of open space – both important for ecology, air pollution absorption (at junction of busy roads plus under flight path) and screening</p> <p>Important stepping stone open space linking with Sanctuary Moor to the south</p> <p>Within Cross Town Conservation Area – important green area within the CA forming a backdrop to houses on Mobberley Road (mentioned in Conservation Appraisal 2006)</p> <p>Adjoins Legh Road Conservation Area</p> <p>Any development would affect the integrity of the open space</p>
First part of policy should be deleted; second part of policy additional criterion recommended regarding community benefits of development (representation made in regard to Dyers Mill pond, Bollington and development proposals)	Policy reflects the NPPF and paragraph 97 regarding proposals affecting open space.
Seek amendment to boundary of an open space where part of it is now a car park – area therefore needs to be reduced in size (Barclay's Bank plc ownership)	Site boundary has been amended on the interactive policies map.
The sports courts at Total Fitness within the LPS33 Allocation should not be shown as protected open space as they are private sports	Green/open space designations do include private sports facilities such as tennis courts, bowling greens, sport pitches etc.

courts	
The Kings School Cricket Pitch at Cumberland Street Macclesfield should remain as a designated open space – considerable information presented concerning the development pressures affecting this site – historic open space in the centre of Macclesfield	Noted and support for open space designation welcomed.
Request for amendment of open space designation at land at Waterworks House, Dingle Lane, Sandbach – extant permission for 12 houses (16/3924C); request that proposals map is amended to exclude the proportion of the site proposed for development	The general approach is to change policy designations on the interactive map once developments have taken place.
Suggestion that policy is weak as fails to recognise the identification of green spaces in neighbourhood plans	Noted. Made Neighbourhood Plans are part of the Development Plan. They are referenced in Paragraph 11.3.
Current reference to neighbourhood plans needs further clarification: “Neighbourhood plans will have most likely a greater level of detail on green/open space and designated local green spaces in their area”. (e.g. 2 lapsed football sites mentioned and Knutsford Sport Vision Action Plan)	Noted. Made Neighbourhood Plans are part of the Development Plan. They are referenced in Paragraph 11.3.
Policy should state that where an area of open space has been shown to offer limited or no public benefit, development should be supported subject to compliance with the other policies of the plan	The policy reflects the wording in the NPPF paragraph 97 as stated in the supporting information to the policy.
Land at Goddard Street, Crewe should no longer be designated as open space – proposals for around 74 dwellings being progressed for site (was a sports an social club – closed in 2007) (detail in representation around history of site and development proposals)	PPS 2019 Update [ED 19]: A lapsed site that fell out of use in 2005. Formerly provided an adult pitch that is being considered for a housing development Future priority order of options: 1) Retain/allocate site as strategic reserve. 2) Explore feasibility to bring back into use. 3) Use as open space to meet local needs. 4) Redevelop site and use developer contributions to improve other playing pitch sites (quantity and/or quality). (page 115 [ED19] Cheshire East PPS Strategy) Change designation once scheme for site sorted.
Policy should request more green space	LPS Policy SE6 Green Infrastructure and ENV 3 Green Space

	Implementation deals with this issue.
Open space designation should be removed from two parcels of land at Pownall Park, North of Gorsey Road , Wilmslow (recent permission for 4 dwellings May 2019 LPA ref 19/1067M) (Detail in representation regarding history of two plots)	The general approach is to change policy designations on the interactive map once developments have taken place.
No further comments (Sport England)	Noted.

Policy REC 2 ‘Indoor sport and recreation implementation’

Summary of the main issues raised	How the main issues have been taken into account
The policy needs to be amended to clearly distinguish between the types of housing development to which the policy requirements would apply	The policy needs to apply to all types of housing development as indoor sport and recreation facilities are attended by an increasing range of users to improve their health outcomes irrespective of the type of accommodation they live in.
Policy should be modified so that a contribution is only required if there is an identified deficiency or where development would lead to a deficiency	Contributions are sought in line with the requirements set out in the adopted Indoor Built Facilities Strategy [ED 20]. This Strategy has been based on the numbers generated per dwelling. All developments generate additional demand.
Contributions should not be required simply for upkeep/maintenance	Contributions will only be sought in line with the requirements set out in both the Indoor Built Facility Strategy Assessment and Strategy [ED 20]. They will be based on the requirement for a contribution to a facility nearest to the development. Requests are made for improved facilities based on the increased demand from a development and not to maintain an existing facility.
Further clarification is required on the policy’s relationship with CIL payments	Contributions for sport and recreation are based on the adopted Indoor Built Facilities Strategy [ED 20] and the majority of requests are made as part of a Section 106 Agreement as appropriate.
Applicants should be directed to read the sports assessments in the Council Local Plan and where applicable Neighbourhood plans to demonstrate that they are providing the necessary facilities to make	Noted. The relevant documents are referenced in the Policy under Related Documents. Made Neighbourhood Plans are part of the Development Plan.

their development sustainable.	
Suggested amended wording for 11.7: Where development proposals are of a particularly large scale, or where they would involve the loss of existing indoor sports and recreation facilities, applicants are required to demonstrate how they are providing the required new and or replacement sports and recreation facilities.	The current wording reflects Sport England Guidance and links with LPS Policies SC1 Leisure and Recreation and SC2 Indoor and Outdoor Sport Provision.
Neighbourhood plans should be referenced for any sports facility assessment evidence	Made Neighbourhood Plans are part of the Development Plan. The adopted IBFS [ED 20] assessment of need was prepared independently for the council by Knight, Kavannah & Page, in line with Sport England guidelines. This remains the central evidence document used by the policy as required by Sport England.
Particular support for part 2 of the policy regarding contributions and their relationship to nearby facilities	Support noted.
Include reference to the consideration of the pooling of contributions	This has been added to the policy after the First Draft SADPD consultation– in paragraph 11.8.

Policy REC 3 ‘Green space implementation’

Summary of the main issues raised	How the main issues have been taken into account
Policy should be amended to refer to open space rather than green space	The reference to green/open space links with the term green infrastructure. Definitions are in the glossary.
The policy needs to be amended to clearly distinguish between the types of housing development to which the policy requirements would apply	The policy needs to apply to all types of housing development as green/open space facilities are used by a range of users to improve their health outcomes irrespective of the type of accommodation they live in.
Clarification on what has informed the 20 year term on strategic open space to be transferred to the Council. Typically the maintenance of open space will be undertaken by the developer during the construction phase, with management responsibilities subsequently transferred to a Management Company to maintain the open space for	This requirement regarding the transfer of some strategic areas of green space to the Council is referred to in paragraph 11.12 of the supporting information and is expanded upon in the ‘Green Space Strategy Update 2020’ [ED 18] (Section 12 Maintenance of Green Space). There are various options available for the maintenance of

the lifetime of a development. Important that the policy is written in this context.	green space (including transfer to a Management Company) but in terms of achieving strategic additions to the network and safeguarding key sections for the community and its users there will be instances where the transfer of a piece of green space to the Council together with a minimum 20 year commuted sum may be the optimum way/solution.
Support for clarification of contributions regarding outdoors sport (part 4 of policy)	Support noted.
Object to requirement that major employment and other non-residential developments provide green space – overly restrictive	This aspect of the policy reflects the fact that there is the need for green space associated with major commercial and other non-residential developments as stated in paragraph 10.19 of the ‘Green Space Strategy Update 2020’ [ED 18].
Consider policy to be too inflexible regarding off-site provision	The policy as worded does allow for on-site and off-site provision. This flexible approach is explored in more detail in Section 11 (Implementation/Funding) of the ‘Green Space Strategy Update 2020’ [ED 18].
Wording has failed to adequately draw attention to Neighbourhood plan policies and evidence in relation to sports.	Made Neighbourhood Plans are part of the Development Plan. Sport England requires that the policy be built around the adopted evidence in the Playing Pitch Strategy [ED 19 & 19a].
Support for policy but could be expanded to include the provision of more local green space together with improvement of links	This aspect is already covered in LPS Policy SE6 Green Infrastructure
Support for flexibility of policy particularly in regard to off-site provision	Support noted.

Policy REC 4 ‘Day nurseries’

Summary of the main issues raised	How the main issues have been taken into account
Reference to outdoor space – proposals will be subject to the environment noise and air pollution polices.	The Local Plan, including the SADPD, should be read as a whole. Development proposals will be considered against the relevant local plan policies as they apply with each application considered on its own merits.

Policy REC 5 'Community facilities'

Summary of the main issues raised	How the main issues have been taken into account
The policy should include reference to the support for continued growth and development of educational facilities within the Green Belt.	LPS Policy PG 3 'Green Belt' is relevant to proposals for development in the Green Belt.
On the whole, every community facility makes a positive contribution. All community facilities should be retained whether they make a positive contribution or not.	Community facilities overwhelmingly make a positive contribution to the social or cultural life of a community but in the rare instance where this is not the case, it would not be desirable to require proposals to retain facilities that have a negative effect on the social or cultural life of a community.

Chapter 12: Site allocations (general issues)

Summary of the main issues raised	How the main issues have been taken into account
A number of sites were submitted. These are reported in the proformas for each settlement (principal towns, key service centres and local service centres) and for the other settlements and rural areas.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the individual settlement reports and the Other Settlements and Rural Areas report [ED 46].
Maximising the housing supply requires the widest possible range of sites by size and market location; a sufficient range of sites is needed to provide enough sales outlets to enable delivery to be maintained. Further allocations are needed so that the council can demonstrated and then maintain a deliverable five-year supply of housing land.	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. The council is able to demonstrate a five-year supply of deliverable housing land as demonstrated in the latest Housing Monitoring Update.
The plan should over-allocate sites to provide flexibility and contingency for instances where sites do not come forward as envisaged.	Housing supply flexibility is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Additional smaller sites should be allocated in the principal towns and key service centres to enable different scale and type of housebuilders to develop in these locations and increase the ability to deliver much needed housing. It is considered that the supply is overly-reliant on	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. The requirement for small sites is considered in The Approach to Small Sites report [ED

large sites, which poses delivery risks in the short term. The NPPF requires 10% of housing allocations to be on small sites.	58].
Smaller sites were not considered through the LPS and therefore further allocations of smaller sites should be made in principal towns and key service centres.	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Further site allocations are required to provide flexibility in the event that HS2 is committed to come to Crewe by 2027.	Housing flexibility and the need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Where site allocations require a buffer to a watercourse, this should be clarified to state that it is a minimum 8 metre buffer zone measured from bank top. The buffer zone should preferably be free of all forms of development and function as a beneficial green infrastructure asset (site conditions permitting). Where developments propose the inclusion of built development within an 8-metre buffer zone e.g. a footway, consideration will need to be given to whether the inclusion is appropriate and / or acceptable on a case by case basis.	These requirements have been incorporated into site policies where appropriate.
Where ground investigations are stated as a requirement reference should be made that the appropriate level of ground investigation must be undertaken and where required that a remediation strategy is devised and implemented.	These requirements have been incorporated into site policies where appropriate.
Developers of greenfield sites should contact United Utilities at the earliest opportunity to discuss options regarding water supply and sewerage infrastructure networks.	Noted
Development on brownfield sites should reduce surface water flow to the combined sewer network by discharging surface water to more sustainable options, such as a watercourse.	This issue is addressed in Policy ENV 16 'Surface water management and flood risk'.
Additional site allocations should be made to support the delivery of self-build and custom-build housing.	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. Policy HOU 3 'Self and custom build dwellings' supports the delivery of these types of

	proposals.
Site allocations for C2 older persons accommodation are required.	Policy HOU 2 'Specialist Housing Provision' sets out a criterion based approach for the consideration of specialist accommodation, including accommodation for older persons across the borough.
The LPS committed the SADPD to making site allocations in the other settlements and rural areas but not allocations are proposed.	The LPS does not require the SADPD to make site allocations in the other settlements and rural areas. The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Site allocations are required in the other settlements and rural areas to enable the delivery of affordable housing.	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
The council must be more ambitious about brownfield land regeneration to prevent unnecessary greenfield development.	As set out in the Site Selection Methodology [ED 07], brownfield sites are considered ahead of greenfield sites.
Each site allocation policy should require that development proposals 'Include surface level sustainable drainage for the management of surface water which has multifunctional benefits. The expectation will be that only foul flows communicate with the public sewerage system'.	This issue is addressed in Policy ENV 16 'Surface water management and flood risk'.
New proposed development site allocations are not considered to be of a significant scale at an individual level and the geographic location of these sites throughout the authority area is unlikely to have the potential to generate noticeable increase in traffic impacts at the Strategic Road Network. However, there is a need for growth proposals set out within the LPS and SADPD to be understood at a cumulative level to establish associated highway impacts at the Strategic Road Network.	In accordance with the Site Selection Methodology [ED 07], Highways England have been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6. This is set out in each of the relevant settlement reports.

Crewe (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land at Newcastle Road, Willaston (roadside uses) (CFS 200, FDR 2404, PBD 1308) • Land E of Nantwich Bypass, Willaston (housing) (CFS 210, FDR 1752, PBD 1641, PBD 1077) • Land at Sydney Road (housing) (CFS 314, FDR 2259, PBD 1136) • Land south of Bradeley Hall Farm (housing) (includes parts of CFS 320, 360, 367, 369, 392. FDR2722, PBD 2519) • Land to the rear of Hunters Lodge Hotel (housing) (CFS 360, FDR 2728, PBD 2476, PBD 2478) • Land at Flowers Lane/ Moss Lane, Bradfield Green (housing) (CFS 591, PBD 22) • Land west of Middlewich Road (West Crewe Sustainable Urban Extension) (housing, school and local centre, open space) (CFS 593, FDR 2791, PBD 2259) • Land to the south of Park Road, Willaston (housing) (CFS 599, FDR 1320, PBD 861) • Land off Sydney Road (housing) (FDR 1412, PBD 992) • Land at Goddard Street (housing) (PBD 613) 	<p>All sites submitted for consideration have been added or amended in the pool of sites considered in the Crewe Settlement Report (Stages 1 and 2 of the Site Selection Methodology). As set out in the Crewe Settlement Report [ED 28] there are no remaining housing or employment requirements for the town.</p>
<p>Housing supply in Crewe is reliant on large scale sites allocated in the Local Plan Strategy. The SADPD does not allocate any further sites within the town. There is a risk that these sites will not come forward in the short term. Greater choice and flexibility is required in terms of size and location to provide certainty that the housing requirement will be met.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe. As such, there is no requirement to identify additional sites for housing or employment over the remaining plan period.</p>

<p>Insufficient land has been allocated around Crewe to reflect settlement's position at the top of the settlement hierarchy.</p>	<p>The non- strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe. As such, there is no requirement to identify additional sites for housing or employment over the remaining plan period.</p>
<p>The housing figures set out within the adopted and emerging policies are a minimum.</p>	<p>Together the LPS and SADPD ensure that housing needs are met in full.</p>
<p>The identification of further land for new homes will help to support the Councils economic growth and regeneration aspirations for the settlement – including the 'All Change for Crewe' and High Growth City regeneration initiatives. Crewe town centre has been identified as a focus for regeneration.</p>	<p>The LPS is the strategic plan for the borough. The non- strategic policies in the SADPD have been prepared to be consistent with the strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy.</p> <p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe. As such, there is no requirement to identify additional sites for housing or employment over the remaining plan period.</p>
<p>Benefits from HS2 should be maximised.</p>	<p>The LPS is the strategic plan for the borough. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the Local Plan Strategy (LPS).</p> <p>While the LPS contain strategic planning policies and allocations, it is a 'pre-HS2 plan' and therefore does not address the full implications of HS2. The LPS does however recognise the importance of Crewe Station as a communications hub and envisages that a more detailed Area Action Plan may be necessary to address HS2 related development in Crewe (Local Plan Strategy See Strategic Priority 1,</p>

	<p>p.44 and p.179 in particular). The Council is preparing an Area Action Plan for a focused area around Crewe Railway Station and its immediate environs.</p> <p>Allocating additional sites within the town via the SADPD would significantly exceed the expected levels of development envisaged in the LPS. The full implications of HS2 should be addressed through a future local plan update, where the implications and proposals of HS2 may be understood.</p>
<p>Homes provided within the Crewe Hub Area Action Plan Area would not meet the needs of all of the existing population of Crewe and those who will be attracted to the area, as a result of the HS2 station development. The Council will need to consider other options to ensure that enough land is made available around Crewe to support its sustainable growth and to meet development requirements.</p>	<p>While the LPS contain strategic planning policies and allocations, it is a 'pre-HS2 plan' and therefore does not address the full implications of HS2. The LPS does however recognise the importance of Crewe Station as a communications hub and envisages that a more detailed Area Action Plan may be necessary to address HS2 related development in Crewe (Local Plan Strategy See Strategic Priority 1, p.44 and p.179 in particular). The Council is preparing an Area Action Plan for a focused area around Crewe Railway Station and its immediate environs.</p> <p>Allocating additional sites within the town via the SADPD would significantly exceed the expected levels of development envisaged in the LPS. The full implications of HS2 should be addressed through a future local plan update, where the implications and proposals of HS2 may be understood.</p>
<p>While there is no need for the allocation of additional employment sites, two further employment sites are proposed in the SADPD. The allocation of additional housing sites would help to support this local investment by providing new homes for the additional workforce generated by these proposals</p>	<p>The Crewe Settlement Report [ED 28] identifies that housing and employment commitments, completions and allocations at the 31 March 2020 exceed the LPS expected level of development for Crewe.. As such, there is no requirement to identify additional sites for housing over the remaining plan period.</p>
<p>The Council will be required to undertake a review of the LPS by 2022 to consider whether it needs to be updated. In advance of the Local Plan review, the Council should be identifying opportunities for development around Crewe so that it can take full advantage of</p>	<p>These are matters to be considered through a review of strategic policies.</p>

capturing growth around the town. These can then be factored into a review of the Plan and can start coming forward in time for the arrival of HS2 services.	
An assessment should be carried out of the need for roadside facilities.	Footnote 42 of the NPPF states that policies for facilities such as roadside services should be developed through collaboration between strategic policy making authorities and other relevant bodies. The non-strategic policies in the SADPD have been prepared to be consistent with strategic policies set out in the LPS, including the overall level of development set out in LPS Policy PG 1 'Overall development strategy. It is not the role of the SADPD to revisit strategic policy matters.
The proposed settlement boundary does not utilise existing physical features to form logical rounding.	The Crewe Settlement Report [ED 28] details the implementation of the settlement boundary review methodology for Crewe.

Site CRE 1 'Land at Bentley Motors'

Summary of the main issues raised	How the main issues have been taken into account
The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	<p>The policy is considered sound as written.</p> <p>Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process and the wording of the policy.</p> <p>The extra criterion is unnecessary. The LPS and SADPD include heritage policies which be considered through the assessment of any future planning application.</p>

Site CRE 2 'Land off Gresty Road'

Summary of the main issues raised	How the main issues have been taken into account
The Gresty Brook corridor is an important ecological network known to	The policy is considered sound as written. The LPS (Policy SE 3

<p>support protected species. Any new development should be supported by an ecological assessment, which complies with industry good practice/guidance, and ensure key ecological receptor and current WFD failing waterbody (Wistaston Brook) is positively integrated into any future riparian development.</p>	<p>Biodiversity) and SADPD (Policy ENV 1,2 & 4) include policies relating the natural environment which would be considered through the assessment of any future planning application.</p>
<p>The site promoter has raised a number of issues with regards to the wording of the policy. These include:</p> <ul style="list-style-type: none"> • The only route for foul drainage route is through the area of woodland which the policy seeks to maintain. The criteria should be revised to allow for additional flexibility to ensure that drainage can be delivered; • The policy requirement to have regard to the setting of Yew Tree Farm, a non-designated heritage asset is not required and should be deleted; • The area of the 8 metre undeveloped buffer zone adjacent to Gresty Brook may be required for a SUDS scheme so additional flexibility is requested in the policy wording; • There are limited opportunities to improve walking and cycling routes. Gresty Road is narrow and includes a footway on the opposite side of the road to the proposed site access. <p>Alternative wording is suggested.</p>	<p>The policy is considered sound as written. There is sufficient flexibility for these issues to be considered at the detailed planning application stage.</p>
<p>The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.</p>	<p>The policy is considered sound as written.</p> <p>Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process and the wording of the policy.</p> <p>The extra criterion is unnecessary. The LPS and SADPD contain a number of heritage policies which be considered through the assessment of any future planning application.</p>

Macclesfield (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Promotion of 2.2ha of land (in the green belt) at the Tytherington Club for residential development – land could be allocated in preference to the proposed housing sites identified in the Draft Plan; or some or all of it could be allocated if upon examination not all the committed, allocated or proposed sites come forward</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met. Further information about the process is contained in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Churchill Way car park in Macclesfield Town Centre should be allocated for mixed use development (if not site will remain as previously developed land within Macclesfield Town Centre but outside the Primary Shopping Area and without any formal allocation).</p>	<p>The approach to the Town Centre is discussed in the 'Macclesfield Settlement Report' [ED 35]. Policy RET 11 in the Publication Draft SADPD covers Macclesfield town centre and environs.</p>
<p>Welcome amended boundary for the designated employment site: Hurdsfield Industrial estate; this area (land north of Black Lane, Macclesfield) that is no longer part of the employment area should be designated as a local centre along with the adjacent Tesco site – due to the forthcoming retail plans for the Black Lane site (LPS ref 19/3439M)</p>	<p>Support noted. The remaining land which acts as a small retail park is not a local centre or neighbourhood parade as such. The Black Lane site lies outside the town centre and once developed would be regarded as an out of centre retail park. The approach to designating neighbourhood parades of shops is set out in the 'Macclesfield Settlement Report' [ED 35].</p>
<p>Land at Lark Hall, Macclesfield should be released from the Green Belt to deliver a small development of up to 50 homes (detailed reports attached supporting green belt release in addition to sites proposed in the SADPD)</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met. Further information about the process is contained in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Land at Macclesfield Rugby Club, Priory Lane, Macclesfield should be allocated for development (previous application refused Feb 2018 for 76 dwellings to fund replacement facilities – LPS ref 16/6237M) (detailed supporting information regarding housing supply and site specific details regarding the Rugby Club); allocate whole site –</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met. Further</p>

residential development at frontage and rugby club at rear or just the areas proposed for residential development; site could be removed from the Green Belt	information about the process is contained in the 'Site Selection Methodology Report' [ED 07].
Land to east of Pexhill Road, Macclesfield (3Ha) part of safeguarded land LPS19 – additional land needed so this site could be brought forward now within the plan period – could deliver 70 dwellings (detailed information regarding housing supply and details of site)	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met. Further information about the process is contained in the 'Site Selection Methodology Report' [ED 07].
Large strategic sites in Macclesfield could have delivery issues; land at Gawsorth Road, Macclesfield within LPS19 Safeguarded Land could be brought forward now for delivery to assist with housing numbers	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the housing requirements in Macclesfield have already been met. Further information about the process is contained in the 'Site Selection Methodology Report' [ED 07].
Removal of new Kings School Site at Fallibroome Farm and Derby Fields Facilities from the Green belt or inclusion of a specific site policy to allow the school to undertake work relating to its specific operation as a school without having to demonstrate special circumstances for each proposal	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the provision of housing and employment land and the approach to spatial distribution [ED 05] report.
Land south of Blakelow Road – amended green belt boundary proposed in this area (raised under PG 9)	The 'Settlement and infill boundaries review' note [ED 06] sets out the methodology to reviewing settlement boundaries in each of the Principal Towns, KSCs and LSCs. The approach to the settlement boundary for Macclesfield is set out in the 'Macclesfield Settlement report' [ED 35].
The area of Protected Open Space between LPS17 and the Macclesfield Canal should be covered by the Green Belt notation, and the Green Belt boundary be realigned to the boundary built up section of LPS17, the Gaw End Lane Strategic Housing Site. (Logged under PG 11)	The 'Settlement and infill boundaries review' note [ED 06] sets out the methodology to reviewing settlement boundaries in each of the Principal Towns, KSCs and LSCs. The approach to the settlement boundary for Macclesfield is set out in the 'Macclesfield Settlement report'[ED 35].

	The Green belt boundary in this area follows the defensible and recognisable boundary of the Macclesfield Canal.
Support Lyme Green Settlement being shown as outside the settlement boundary. (Logged under PG 11)	Support noted.

Alsager (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Heath End Farm, Alsager (CFS 380, FDR 2737, PBD2412), greenfield, 300 dwgs. • Linley Lane, Alsager (CFS 218, PBD1639), greenfield, Green Belt • Land off Linley Lane, Alsager (CFS 295,PBD1478), greenfield, Green Belt, 230 dwgs • Land at Close Lane, Alsager (PBD1144), 34ha, greenfield (new site for residential), 1,020 dwellings at 30 dph • Land to the east of The Plough, Alsager (CFS 408/PBD1253), greenfield, 50 dwgs • Land at Manor Farm, off Dunnocksfold Rd, Alsager (FDR 1338, PBD886), greenfield, 40ha • Land off Fanny's Croft, Alsager (CFS 406, FDR2800, PBD250), greenfield, Green Belt • Land at Radway Green (PBD1109), existing employment land, 10.4ha 	<p>All Alsager sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>The housing supply, alongside proposed allocations, is not considered to meet Objectively Assessed Needs.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>The supply is too reliant on the delivery of large scale housing sites which poses deliverability risks particularly in the short term; there is insufficient flexibility.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>

<p>The balance of 0 dwellings gives little leeway in making sure that housing needs are met in the short term; some of the commitments or allocations may not come forward as expected.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>The plan does not accord with Paragraph 68 of the NPPF, which stipulates that small and medium sized sites make an important contribution to meeting the housing requirements of an area.</p>	<p>¶68 a) of the NPPF requires at least 10% of a LPA's housing requirement to be identified on sites no larger than 1ha through the development plan and brownfield land registers. It does not say that every settlement in the Borough must have this proportion. Alsager is a KSC and therefore it is reasonable to expect that the site allocated there are strategic in nature.</p>
<p>There is a heavy reliance on existing planning permissions for housing in Alsager and for these to be implemented and brought forward.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>The Alsager Settlement Report [PUB 22] does not explain why it has not brought forward the only site being proposed for employment allocation, which was not sifted out, which is counter to Paragraph 5 of the Site Selection Methodology Report [PUB 07].</p>	<p>All Alsager sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>The employment land requirements for Alsager have not been met.</p>	<p>As highlighted in the 'Alsager Settlement Report' [ED 22] the residual of 2.26ha should be considered in the context of the overall requirement for Alsager of 40ha; this is 6%. LPS Policy PG 7 'Spatial Distribution of Development' expects Alsager to accommodate 'in the order of 40 ha'; it is reasonable to conclude that the provision of 37.74ha of employment land would fall under this expectation, being 94% of the total. Consideration has also been given to the fact that that the overall employment requirement includes 20% flexibility, which is built into the employment land requirement for Alsager.</p>
<p>The site size for the employment land for CFS 406/FDR2800 in Table Alsager 8 of [PUB 22] is incorrect - it should be 2.38 hectares (net: the wider site is 5.65 hectares).</p>	<p>Table Alsager 8 of the 'Alsager Settlement Report' [ED 22] amended.</p>

Congleton (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Changes are requested to the development guidelines for sites LPS27 and LPS29 in the Local Plan Strategy including</p> <ol style="list-style-type: none"> 1. regard to the inter-connectivity of sites which are of ecological, landscape or amenity importance. 2. That the strategic proposals should clearly state the importance of an integrated network of footpaths, cycle ways and bridleways. <p>The SADPD should:</p> <ol style="list-style-type: none"> a) Facilitate far stronger links between identified areas of ecological and wildlife importance, for the Dane Valley and Westlow Mere b) Identify a clear desire to promote a comprehensive and integrated network of rights or way and public access areas c) Promote the concept of protective 'buffers' of land between key areas d) Expectation that any link between Sites LPS27 and LPS29 should be made explicit in the SADPD proposals. e) Pedestrian / cycleway linkage rather than vehicular access onto Giantswood Lane f) Provide guidance for community uses on LPS 29 including - the provision of the new school and associated localised retailing should be made in an accessible location capable of serving adjacent developments. Contributions should be made to health infrastructure. 	<p>The matter of the allocation of LPS sites and detailed policy wording for site policies LPS 26 – LPS 30 was settled during the examination and adoption of the Local Plan Strategy. The Local Plan Strategy was adopted in July 2017. The allocations are supported by a number of site principles that seek to support the delivery of the sites. The site principles include connectivity between sites and appropriate reference to environmental assets including the River Dane Local Wildlife Site and Ancient Woodland.</p>
<p>The Council is dependent on several large-scale sites and the delivery of the Congleton Link Road to deliver the majority of housing in Congleton which poses deliverability risks particularly in the short term.</p> <p>As set out within National Planning Policy (NPPF), plans should be sufficiently flexible to adapt to rapid change (paragraph 11a). As drafted, the Plan does not provide this flexibility through limiting</p>	<p>The Congleton Link Road is currently under construction. The Congleton Settlement Report [ED 27] identifies that housing commitments, completions and allocations at the 31 March 2020 exceed the LPS indicative expected level of housing development for Congleton, including an additional level of flexibility. As such, there is no requirement to identify additional sites for housing over the remaining plan period in Congleton.</p>

<p>housing numbers within Congleton. Planned housing trajectories should be realistic, accounting for and responding to lapse rates, lead-in times and sensible build rates. To enable this, the approach of allocating more sites rather than less should be taken.</p> <p>Site promoted at:-</p> <ul style="list-style-type: none"> • Belbro Farm, Congleton • Macclesfield Road, Congleton • Sandbach Road, Congleton • Waggs Road, Congleton • Land off Chelford Road, Somerford 	<p>The provision of housing and employment land and the approach to spatial distribution [ED 05] document has considered the approach to housing land flexibility in the SADPD.</p>
<p>Site promoted at:-</p> <ul style="list-style-type: none"> • Land at Viking Way / Barn Road (3 separate site submissions) 	<p>The need for further site allocations and the assessment of sites (where necessary) has been considered through the preparation of an individual settlement report for Congleton (reference ED 27). The Congleton settlement report concludes that no further site allocations for housing land is required in the SADPD but the need to allocate additional land for employment development is considered further through the settlement report. The site submission(s) at land at Viking Way / Barn Road were considered in the Congleton Settlement Report (reference ED 27) for employment uses. An allocation for employment uses is included in the SADPD – policy reference CNG 1 ‘land off Alexandria Way’</p>
<p>Not enough employment land being directed to Congleton</p>	<p>The LPS established the overall amount of employment land to be provided for in the borough and indicated that in the order of 24 hectares is to be provided at Congleton over the Plan period. An allocation for employment uses is included in the SADPD – policy reference CNG 1 ‘land off Alexandria Way’.</p>
<p>Concerned over the perceived shortfall in playing field provision within the town to cater for its existing and future population</p>	<p>Policies included in the Local Plan support the appropriate provision of formal / informal space in the borough supported by the playing pitch strategy and other pieces of evidence.</p>

Site CNG 1 'Land off Alexandria Way'

Summary of the main issues raised	How the main issues have been taken into account
<p>The SADPD is unsound because the supporting policy map does not contain 2019 Local Wildlife Site spatial data and is therefore out of date.</p>	<p>The draft adopted policies map [ED 02] reflects the policies and proposals in the plan. As noted in the introduction to the SADPD [ED 01], the policies map [ED 02] shows a number of other designations, including Local Wildlife Sites that may alter over time periodically to reflect the latest position. The online adopted policies map will be updated periodically to reflect the latest position.</p>
<p>The following spatial environmental policies will apply: Ecological network (core area, restoration zone) ENV 1. To ensure that the plan is sound it is essential policies ENV 1 and ENV 2 are implemented together, therefore the following should be acknowledged:</p> <p><i>“Development at this site will require increasing the size of core areas and the quality and quantity of existing or new priority habitat. Impacts to any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric”</i></p>	<p>Once adopted, policies in the SADPD should be read as a whole alongside the relevant policies contained in the LPS. Policies ENV 1 and ENV 2 of the SADPD will be applied to development proposals as they come forward and where relevant to do so.</p>

Handforth (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Two sites were submitted (references refer to the site's reference in the Handforth Settlement Report [PUB 31]):</p> <ul style="list-style-type: none"> • Knowle House (CFS349); and • Dean Dale Farm (CFS395). 	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered all the sites put forward in Handforth and the need for further allocations, concluding that no further site allocations in the SADPD for Handforth are required.</p>
<p>There is a remaining requirement of 63 dwellings in Handforth, which is calculated on the basis of the needs of that settlement and should be met despite over-delivery on other areas. The North Cheshire Growth Village will not deliver quickly and housing delivery may be</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered the need for further allocations, concluding that no further site allocations in the SADPD for Handforth</p>

less than 1,500 units as the proposed densities are high. Handforth should not be reliant on neighbouring settlements to deliver its housing needs.	are required.
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Knutsford (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Express a number of concerns most notably, the failure to allocate any additional sites within and around Knutsford to meet employment, housing, retail and other land use requirements leads to the possibility of the SADPD being rendered unsound, as the development requirements of Knutsford will not be sufficiently met. We urge the Council to re-look at this as a matter of urgency as part of the next stage of the SADPD, where there will also be a need to re-assess the green belt boundaries around Knutsford given insufficient brownfield land being available.</p> <p>We also raise concerns with the suggested residual employment requirement of 0.14ha in Knutsford and should be corrected to at least 2.04 hectares and additional land should also be made available for retail purposes to accommodate at least 7,000+ sq m. We consider that this is an underestimation of the remaining employment land and retail land requirement in the town and ask for further clarity to be provided by the Council to explain why this figure has reduced from the previous draft of the SADPD.</p>	<p>The approach to Knutsford has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Knutsford Settlement Report [ED 34].</p>
<p>we are putting forward the land to the west of Toft Road, Knutsford for residential and/or C2 development.</p> <p>Our client's site should have been considered as a separate parcel to KN01. It is surprising that the Green Belt Assessment Update did not seek to do so. In our view, had it been considered separately, it would not have been identified as having a 'major contribution'. We request that this is addressed as part of the further Green Belt Assessment through the SADPD process.</p>	<p>Knutsford does not require further development therefore there is no need to revisit Green Belt sites. The approach to Knutsford has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Knutsford Settlement Report [ED 34].</p>

Land at Moorside Car Park.

The site is around 0.27ha in area and is being promoted for employment use. we put the site forward for consideration through the CELPS process. However, the site was not considered at that stage because the Council introduced a threshold where sites below 150 dwellings or 5ha would not be considered through the CELPS either as an allocation for development to 2030 or as safeguarded land to meet development needs beyond 2030. Instead, the Council confirmed that it would consider sites of less than 5ha at the SADPD stage.

6.3 Despite this, the SADPD does not propose any allocations for employment land in Knutsford. We consider additional employment allocations should be made to ensure that the 15 ha requirement for Knutsford is met. Smaller sites should also be safeguarded for development beyond 2030 as this was not looked at in the CELPS.

6.4 Within this context, we propose that our client's site is allocated for employment land to assist Knutsford in meeting its needs. Without prejudice to this, the site should also be considered as safeguarded land to meet development needs beyond 2030.

6.5 The Framework is clear that where there is a need to release Green Belt, previously developed land in accessible locations should be considered first. This would apply to our client's site, which is previously developed land located within close proximity to the Town Centre, a short walk from all services and amenities and Knutsford Train Station.

6.6 Notwithstanding our representations which seek the allocation of the site for employment development, we consider that the site should be removed from the Green Belt in any event. The site comprises previously developed land which is contained by permanent transport infrastructure (the road and the railway line) on all sides. The site does not serve any Green Belt purpose and should be released from the Green Belt.

The approach to Knutsford has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Knutsford Settlement Report [ED 34].

Middlewich (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Several sites submitted for consideration :</p> <ul style="list-style-type: none"> • Cledford Lagoon (mixed use development/ safeguarded land) (CFS 164, FDR 838, PBD 637) • British Salt site, Booth Lane/ Faulkner Drive (employment) (CFS 165, CFS 166, PBD 629) • Land at Tetton Lane (housing) (CFS 387, FDR 2730, PBD 2542) • Land to the east and west of Croxton Lane (CFS 600, FDR 1280, PBD 547) • Centurion Way (housing) (CFS 635, CFS 635A, FDR 286, PBD 1100) • Land adjacent to Watersmeet, Nantwich Road, (housing) (FDR 860, PBD 2542) 	<p>All sites submitted for consideration have been added or amended in the pool of sites considered in the Middlewich Settlement Report [ED 36] (Stages 1 and 2 of the Site Selection Methodology). Middlewich has met its requirement for employment land and therefore there is only a need to assess sites put forward for housing. All sites involving the proposed provision of housing have been assessed in accordance with the site selection methodology for their suitability for allocation.</p>
<p>The Middlewich Settlement Report [PUB 36] acknowledges that there is a remaining requirement for the provision of 300 dwellings over the remaining Plan period.</p> <p>The SADPD only allocates three small/medium sized sites to deliver 210 homes and as such, there is a shortfall in provision.</p>	<p>LPS Policy PG 7: Spatial Distribution of Development provides indicative levels of development by settlement. All figures are given as a guide and are neither a ceiling or a target.</p> <p>The Middlewich Settlement Report [ED 36] states that taking into account completions, commitments and sites proposed for allocation in the SADPD, this would result in the provision of 1,922 dwellings in Middlewich. This very close to the LPS expected level of development of 'in the order of' 1,950 homes.</p> <p>In the absence of there being other site options that perform well in the site selection methodology and given that a number of settlements, including Sandbach, (which is very close to Middlewich) have significantly exceeded their expected level of development, it is considered reasonable not to include further sites for allocation in the town.</p>

<p>There is a shortfall of housing sites and this will impact on five-year deliverable housing land supply in Middlewich.</p>	<p>There is no requirement through plan making or decision taking to demonstrate a five year supply of deliverable housing sites at the individual settlement level.</p> <p>Five year housing land supply is assessed against the strategic housing requirements established by LPS Policy PG 1: Overall Development Strategy, namely 36,000 new homes over the plan period or an average of 1,800 dwellings per annum.</p> <p>The council's five year housing land supply position can be found in the Cheshire East Annual Housing Monitoring Update Report. At the 31 March 2019, deliverable housing land supply was assessed at 7.5 years.</p>
<p>Housing supply is reliant on the delivery of two large scale housing sites which will not be delivered in the short term.</p>	<p>The LPS is the strategic plan for the borough and allocates 2 strategic sites and 1 strategic location for residential development in Middlewich providing around 960 new homes.</p> <p>As set out in the Cheshire East Annual Housing Monitoring Report (base date 31 March 2019) all three sites are expected to deliver first completions within the next five years and over the remaining plan period.</p>
<p>Greater choice and flexibility is required in terms of size and location of housing sites to provide sufficient certainty that the housing requirement will be met.</p>	<p>The LPS and SADPD provide a range of sites for housing development of different sizes. Sites proposed in Middlewich in the Revised Publication Draft SADPD range from 50 dwellings to 75 dwellings.</p>
<p>Additional sites are proposed within the open countryside, above and beyond sites allocated in the LPS.</p>	<p>The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing</p> <p>The council's approach to the assessing the suitability of sites for</p>

	<p>allocation is set out in the Middlewich Settlement Report' [ED 36]. All sites are assessed consistently using the site selection methodology. While some sites are located in the open countryside, there are no sites assessed as being suitable, available and achievable that perform better instead (other than those already proposed for allocation).</p>
<p>Concerns raised over the site assessment for 'Land adjacent to Watersmeet, Nantwich Road' (FDR860) including:</p> <ul style="list-style-type: none"> • Evidence submitted shows that the site access is suitable for up to 4 dwellings. The site has been inaccurately appraised; • The net developable area lies within Flood Zone 1 only; • Ecology is identified as a potential constraint; however the area is an unused area of open grassland that is not suitable for agricultural purposes and it is divorced from the network of fields to the west by the River Wheelock; • The site is assessed as being on the edge of the settlement but this does not acknowledge Watersmeet and the presence of residential housing estates to the north, east and south. The site has a strong western and northern boundary with a bank of mature trees. The River Wheelock beyond that makes for a more defined and permanent settlement boundary. • Heritage concerns are raised in relation to Grade II Aqueducts over the River Wheelock and Nantwich Road but this fails to consider that there are residential properties closer to both listed structures and the Canal than new residential houses would be on the site. Additional landscaping buffers could be provided around the periphery and new housing would not have any greater impact upon the Listed assets than existing residential built form. The Council has identified harm could be substantial but they have not produced a credible assessment of the harm they have identified despite undertaking a Heritage Impact Assessment of other sites within their supporting reports (PUB 48a & 48b). 	<p>All sites have been assessed for their suitability for allocation in accordance with the published Site Selection Methodology [ED 36].</p> <p>The site selection assessment findings for this site can be found in the Middlewich Settlement Report' [ED 36]. Only those sites that are recommended to be included in the SADPD (Stage 5 of the Site Selection Methodology [ED 07] were consequently sent to infrastructure providers and statutory consultees for comment. If findings from the consultation exercise meant that further information was required, such as a Heritage Impact Assessment, this was actioned and fed into the assessment.</p>

Land at 'Watersmeet, Nantwich Road' could be delivered as self-build plots to assist Cheshire East Council in addressing their recognised issues with housing delivery in Middlewich in the short term.	Noted. All sites submitted have been assessed for their suitability for allocation in accordance with the published Site Selection Methodology [ED 36]. The site selection assessment findings for this site (FDR860) can be found in the Middlewich Settlement Report' [ED 36].
Land at Tetton Lane, Middlewich is a suitable, sustainable and deliverable site that can come forwards for housing in the short term.	All sites submitted have been assessed for their suitability for allocation in accordance with the published Site Selection Methodology [ED36]. The site selection assessment findings for this (CFS 387) site can be found in the Middlewich Settlement Report' [ED 36].
Land at Cledford Lagoon should be allocated for residential led- mixed use development or safeguarded land during the later stages of the plan period.	All sites submitted have been assessed for their suitability for allocation in accordance with the published Site Selection Methodology [ED 36]. The site selection assessment findings for this (CFS 164) site can be found in the Middlewich Settlement Report' [ED 36].

Site MID 1 'Land off St. Ann's Road'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
Site MID 1 is in a sustainable central location, but the development would result in the loss of some older properties. The mature trees on site are of character and environmental value and should be protected. Planning permission had been obtained for this site.	This allocation has been deleted.
The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	

Site MID 2 'East and west of Croxton Lane'

Summary of the main issues raised	How the main issues have been taken into account
<p>Loss of high grade agricultural land (Best and Most Versatile, Grade 1).</p>	<p>The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing.</p> <p>The council's approach to the assessing the suitability of sites for allocation is set out in the Middlewich Settlement Report' [ED 36]. The agricultural quality of the site is grade 3 but it is not known whether this is classed as best and most versatile agricultural land (grade 3a). While the site will result in the loss of greenfield land, there are no sites assessed as being suitable, available and achievable that perform better instead (other than those already proposed for allocation).</p>
<p>The site is bounded by an existing housing development and by the canal so there is a logical boundary.</p>	<p>Noted.</p>
<p>Development of the site should also embody the requirements of policy INF 10 and the policy should be expanded to include this reference.</p> <p>The site is on the towpath side of the canal and this should be considered as part of the public realm for the development with pedestrian access provided to the towpath. The development of the site should consider opportunities for surface water drainage to the canal.</p> <p>Paragraph 12.46 should be expanded so that the canal is considered as a receptor for contamination.</p>	<p>The policy is considered sound as written. Any planning application submitted for residential development would be considered against the policies in the development plan as a whole. In addition to SADPD Policy INF 10: Canals and Mooring Facilities, there are a suite of policies in the LPS and SADPD that address contamination and drainage issues, for example LPS Policies SE 12: Pollution, Land Contamination and Land Instability & SE13: Flood Risk and Water Management together with SADPD Policies ENV 7: Climate Change & ENV 16: Surface water management and flood risk.</p>

<p>Paragraph 12.47 should be expanded to consider. opportunities for surface water drainage to the canal.</p>	
<p>The site promoter confirms the intention to lodge a detailed planning application with the Council for this site and that if allocated, the site will be delivered in full within 5 years.</p> <p>Concerns are raised in relation to the soundness of criteria 4 of the policy which requires improvements to the surface of canal towpath to encourage its use as a traffic-free route for pedestrians and cyclists between the site and town centre.</p> <p>There is no direct access to the canal from either parcel of land. The towpath is accessible from Croxton Lane (by the side of Bridge Number 172) and it runs a short distance from the northern boundary of both parcels of land.</p> <p>There is no evidence regarding what is wrong with the existing towpath, nor the stretch of towpath being referred to, what works are required and what are the associated costs and what proportion of the costs the proposed development is expected to fund. Any requirements set out in the Council's Infrastructure Delivery Plan (IDP) (July 2016 Up-Date) do not relate to an improvement between Site MID 2 (which lies at the northern point of the settlement) and the town centre.</p> <p>Towpath improvements are covered by Column 1 of the Council's adopted CIL Charging Schedule (Regulation 123 list).</p> <p>A financial contribution via a S106 agreement would not meet the various tests, namely that it is not necessary to make the development acceptable in planning terms, it is not directly related to the development and it would not be fairly and reasonably related in scale and kind.</p>	<p>The policy is considered sound as written and is in accordance with the objectives of national and local planning policies. Paragraphs 102 & 108 of the NPPF states that opportunities to promote sustainable transport including walking and cycling should be identified and pursued.</p> <p>LPS Policy CO 1: Sustainable travel and transport also seeks the improvement of pedestrian facilities as part of development proposals so that walking is attractive for shorter journeys. This includes supporting work to improve canal towpaths and rights of way where they can provide key linkages from developments to local facilities.</p> <p>The Council's adopted CIL Charging Schedule and the Regulation 123 list does not cover 'towpath works that are necessary to mitigate the direct impact of new development in proximity to canals'.</p>
<p>The policy should be amended to require that development proposals</p>	<p>The policy is considered sound as written.</p>

<p>are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.</p>	<p>Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process and the wording of the policy.</p> <p>The extra criterion is considered to be unnecessary. The LPS and SADPD contain a number of heritage policies which be considered through the assessment of any future planning application.</p>
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Site MID 3 'Centurion Way'

Summary of the main issues raised	How the main issues have been taken into account
<p>The site promoter confirms that the site is suitable, available and achievable for housing development. The site has potential to form part of wider residential or mixed-use development in the future should housing requirements change.</p> <p>Any comprehensive landscaping required by the policy should not have the effect of preventing the effective integration of the site with any future adjacent development, which would be contrary to the achievement of a sustainable urban form. Policy wording changes are requested.</p>	<p>The policy is considered sound as written. The Middlewich Settlement Report [ED 36] identifies the reasons why a larger site is not considered to be suitable for allocation through the SADPD. Comprehensive landscaping will be required to ensure that the landscape impacts of this site are minimised.</p>
<p>Encroachment into the open countryside. Lack of defensible boundaries which could lead to further speculative housing on adjacent land in the future.</p>	<p>The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing.</p> <p>The council's approach to the assessing the suitability of sites for allocation is set out in the Middlewich Settlement Report' [ED 36].</p>

	<p>While the site will result in the loss of greenfield land, there are no sites assessed as being suitable, available and achievable that perform better instead (other than those already proposed for allocation).</p> <p>Draft Policy MID 2 requires a comprehensive landscaping scheme in order to mitigate any impact upon the wider landscape and once established will provide a boundary to the development site.</p>
<p>Pedestrian access to the town centre is along a very busy road (main road to the M6). Extra traffic on this road is not desirable as the situation is already grave.</p>	<p>No issues have been identified through the Site Selection Methodology in terms of highway safety or impact.</p>
<p>The policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.</p>	<p>The policy is considered to be sound as written.</p> <p>As set out in the Middlewich Settlement Report [ED 36], there will be no built heritage impacts arising from the development of this site.</p> <p>A HIA was carried out in terms of the much larger site: CFS 635 but this larger site was discounted for a number of reasons as set out in the Settlement Report.</p>

Nantwich (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>As the Local Plan Part Two does not allocate any small sites for development they cannot contribute to meeting and exceeding housing delivery within Nantwich. This policy is therefore not consistent with NPPF or positively prepared to boost housing.</p> <p>Broad Lane, Nantwich can greatly assist with the delivery of housing numbers within the first 5 years of the adopted Plan.</p> <p>The only allocated site within the settlement is a large strategic site which raises deliverability issues which could significantly impede housing delivery over the short to medium term.</p>	<p>The approach to Nantwich has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Nantwich Settlement Report [ED 38].</p>

<p>Therefore, the overall scale of housing growth particularly on smaller sites, should be increased so an adequate degree of flexibility can be applied to ensure the SADPD plans positively for growth.</p>	
<p>Broad Lane, Nantwich represents a suitable and sustainable site which can be delivered in the short term and should therefore be allocated for housing.</p>	<p>The approach to Nantwich has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Nantwich Settlement Report [ED 38].</p>
<p>Land at Audlem Road, Nantwich (Sites 204 PUB45) The reserved matters application for 33 dwellings was approved in February 2015 (LPA ref: 14/4588N). A further outline application to the south, 15/3868N for up to 104 dwellings (Use Class C3) and land for the expansion of Brine Leas School (Use Class D1) was dismissed at appeal in 2016 on access grounds . The site promoter considers that this can be overcome through the approved access or via an alternative as the junction for the approved development is operational and site 204 is an appropriate site for allocation to address the shortfall in the Nantwich area due to the lack of delivery on Kingsley Fields. A second parcel of land off Audlem Road (Ref 207) is also submitted for consideration which when combined with the above site would form a logical extension to Nantwich. It is noted that both Sites 204 and 207 were not sifted out at the Stages 1 and 2 and therefore are ideally placed to meet development needs.</p>	<p>Land at the rear of 144 Audlem Road (14/4588N) has now been constructed. Halfpenny Close is now included with the Nantwich Settlement Boundary following the settlement boundary review . (ED 38) The approach to Nantwich has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Nantwich Settlement Report [ED 38].</p>
<p>Concern that the plan needs to provide sufficient land and flexibility to meet the identified development needs of the borough. The proposed settlement boundaries (PG 9) and Chapter 12 require amendment due to housing land supply issues.</p>	<p>The approach to Nantwich has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Nantwich Settlement Report [ED 38].</p>
<p>The additional land to the south of Nantwich between Peter Destaplegh Way and Broad Lane is available, suitable and achievable</p>	<p>Noted The approach to Nantwich has been considered through the provision of housing and employment land and the approach to spatial</p>

should the Council need to look again at any of its proposed allocations as a result of the discussion at the Examination.	distribution [ED 05] report, the site selection methodology report [ED 07] and the Nantwich Settlement Report [ED 38].
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Poynton (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> Land at Lower Park, Poynton (CFS 639, PBD2548) (2.99ha), greenfield, Green Belt, 10-50 dwgs Land east of Waterloo Road, Poynton (CFS 418, PBD2250), greenfield, Green Belt, 150 dwgs and country park Land at Towers Road, Poynton (CFS 51, PBD1192), greenfield, Green Belt, 30 dwgs 	<p>All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>The LPS sites in Poynton are not delivering the scale of housing they were allocated for.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>There is reference to, and reliance on the delivery of significant number of dwellings in Poynton on windfall sites; this approach has not been sufficiently justified.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p>
<p>The SADPD sites are unlikely to deliver the scale of housing suggested.</p>	<p>The precise number of dwellings would be considered through the planning application process. The site policies have been worded with the use of the word 'around' to allow for some flexibility.</p>
<p>The need for an additional 200 dwgs has not been proven.</p>	<p>It is not the role of the SADPD to revisit strategic policy. The overall development figures that Poynton is expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the LPS. This has been considered at length through the LPS examination process and was found to be sound. Figure Poynton 1 of the 'Poynton Settlement Report' [ED 39] shows the amount of development land required over the plan period for Poynton, including the balance needed.</p>

All development sites identified in Poynton need to be held back and re-assessed against the Section 19 Flood Investigation Report.	All of the allocations proposed in Poynton and across the whole of the SADPD have been reviewed with the Lead Local Flood Authority.
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Site PYT 1 'Poynton Sports Club'

Summary of the main issues raised	How the main issues have been taken into account
Delivery of the site for housing and a replacement site in the Green Belt carries risk. There is no guarantee that the replacement site would be able to provide the type and scale of facilities needed.	Point 3 of the policy for PYT 1 requires the sports facilities at the relocation site to be enhanced facilities in line with the recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy and Action plan. NPPF ¶145 states: 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:... b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.' This is taken into account in ¶12.59 of the supporting information to Site PYT 2. As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.
Recreational and amenity space would be lost.	PSC is a private facility, and a suitable site for its relocation has been identified at Site PYT 2 'Land north of Glastonbury Drive' (Revised Publication Draft SADPD [ED 01] ¶12.53).
There is insufficient justification that replacement playing fields or recreational facilities will be delivered.	The policy is clear (point 4.) 'that the relocated facility is and fully brought into use in advance of the loss of any existing facilities to ensure continuity of provision'.
There is insufficient supporting evidence to demonstrate that the proposed allocation will be delivered.	The Delivery Statement submitted by the site promoter as part of their representation to the Initial Publication Draft SADPD (Comment ID: PBD1322) includes an indicative plan showing a proposed layout for

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	the site, with 92 dwgs. However, the housing figs in the delivery statement range between 80 and 90. The precise number of dwellings would be considered through the planning application process.
The 10m buffer does not take into account site specifics and does not make best use of the land.	The requirement for the buffer is for nature conservation purposes. Priority Habitats such as the woodlands on the northern and eastern boundary of the sports club are a material consideration for planning. The intention of the buffer is to retain and encourage the development of woodland edge habitats and avoid and indirect impacts on the woodland from the proposed housing (issues with gardens backing onto woodland are a frequent issue). The buffer can be used as part of the open space design for the scheme, and it is considered that it would not prevent the best use being made of the allocation.
The site should be extended to include the woodland belt on the north and eastern boundary to enable that area to be subject to overdue management and future maintenance.	The woodland is protected open space (Revised Publication Draft SADPD [ED 01] Policy REC 1) and an ecological corridor (Revised Publication Draft SADPD [ED 01] Policy ENV 1) and therefore it is not considered necessary to include it in the allocation as it is not proposed to be developed.
Alter the policy criterion to: 'An Arboricultural Implications Report is required to be submitted with a planning application to demonstrate minimise and mitigate impact on the trees to the north and eastern boundary'.	The requirement for an arboricultural impact assessment is considered through Revised Publication Draft SADPD Policy ENV 6 'Trees, hedgerows and woodland implementation'.
In Policy PYT 1, point 3, the relocation site at PYT 2 should be identified as the relocation site.	A relocation site has been identified in ¶12.53 of the 'Revised Publication Draft SADPD' [ED 01].
This site was affected by fluvial flooding (from non-main ordinary watercourse) during the summer floods. It's shown on the Environment Agency's Flood Maps however, as being within Flood Zone 1.	Noted. The Lead Local Flood Authority has been consulted throughout the site selection process and discussions continue to be held with them.
Concern regarding pollution, traffic and its cumulative impact.	Cheshire East Highways and Environment Protection have been consulted throughout the site selection process. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 'Travel Plans and Transport Assessments', SE 12 'Pollution, Land Contamination and Land Instability' and Revised

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	Publication Draft SADPD Policy INF 3 'Highway safety and access'.
The site is a heritage asset and a restrictive covenant is in place.	As stated in the traffic light assessment for the site ('Poynton Settlement Report' [ED 39], p49) there are no known heritage assets on or adjacent to the site. The Council do not understand there to be any covenants issues.
Any decision about this site should be curtailed until the results of the Flood Investigation Report have been published and any necessary remedial action carried out.	Noted. The Lead Local Flood Authority has been consulted throughout the site selection process and discussions continue to be held with them.
The number of dwellings on the site should be restricted to a minimum.	The number of dwellings is neither a ceiling nor a target. The precise number of dwellings would be considered through the planning application process.
A Flood Risk assessment with necessary resolution should be added to the proposal.	LPS Policy SE 13 'Flood Risk and Water Management' requires planning applications for development at risk of flooding to be supported by an appropriate flood risk assessment.
A condition should be added to the proposal to ensure that the development does not give rise to increased delays and added congestion at the centre of Poynton. A traffic impact assessment needs to be added to the proposal.	Cheshire East Highways has been consulted throughout the site selection process. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 'Travel Plans and Transport Assessments' and Revised Publication Draft SADPD Policy INF 3 'Highway safety and access'.
Condition 5 is unclear and requires clarification with regards to meaning and implication	Condition 5 was developed in consultation with the Council's Environmental Protection team.
Mention or provision for residents living nearby on noise and other effects of ongoing construction on the site should be added to the proposal.	Impacts on local residents would be considered through the planning application process.
The development proposal should require that existing woodland and hedges are to be retained as part of the site development.	This would be considered through the planning application process.
The development proposal should require replacement greenspace/open space to be made available for the benefit of Poynton residents to replace that lost to the development.	Poynton Sports Club is a private facility. Site PYT 1 'Poynton Sports Club' requires development proposals to demonstrate how the sports facilities will be replaced locally.
The necessity to relocate Poynton Sports club has not been	The Delivery Statement submitted by the site promoter as part of their

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demonstrated or proven.	representation to the Initial Publication Draft SADPD (Comment ID: PBD1322) demonstrates why the Club would like to relocate.
The SADPD should evidence prior to the adoption of the site the brownfield sites that have been considered and the reasons why they have not been deemed suitable for development.	All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].

Site PYT 2 'Land north of Glastonbury Drive'

Summary of the main issues raised	How the main issues have been taken into account
Delivery of the site for housing and a replacement site in the Green Belt carries risk. There is no guarantee that the replacement site would be able to provide the type and scale of facilities needed.	Point 3 of the policy for PYT 1 requires the sports facilities at the relocation site to be enhanced facilities in line with the recommendations made in the Cheshire East Indoor Built Facilities Strategy and the Cheshire East Playing Pitch Strategy and Action plan. NPPF ¶145 states: 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:... b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.' This is taken into account in ¶12.59 of the supporting information to Site PYT 2. As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.
There is insufficient supporting evidence to demonstrate that the proposed allocation will be delivered.	The Delivery Statement submitted by the site promoter as part of their representation to the Initial Publication Draft SADPD (Comment ID: PBD1325) seeks to demonstrate that the proposed allocation will be delivered.

Exceptional circumstances to release Green Belt land for sport and recreation have not been demonstrated.	As stated in ¶12.57 of the Revised Publication Draft SADPD 'For the avoidance of doubt, this site remains in the Green Belt'.
CEC have not demonstrated or evidenced that it has examined fully all other options for the provision of outdoor sport and recreation. It has not evidenced its methodology for selection.	All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Specifically ¶4.75 of [ED 39] considers other sites put forward through the call for sites for sports and leisure uses.
The need for a flood assessment must be added to the proposal.	LPS Policy SE 13 'Flood Risk and Water Management' requires planning applications for development at risk of flooding to be supported by an appropriate flood risk assessment.
Reference to a Grampian condition should be added to the policy wording covering the relocation and redevelopment of the sports facilities.	It is not considered necessary to include a Grampian condition in the policy - the mechanism of how to achieve policy is down to the decision maker. Planning application approval could include a Grampian condition.
The 8m wide buffer should be measured from bank top and be increased to 15m to protect the wildlife corridor	Amend bullet 1 to read: '...an undeveloped 8 15 metres wide buffer to either side of the bank tops ...'
Any new riparian development adjoining Poynton Brook needs to ensure main ecological network and ecological receptor of site is actively protected and where feasible enhanced.	The policy highlights the requirement for protected species, Poynton Brook, its wet ditches and woodland to be retained and protected through buffering. In addition policies in the LPS and Revised Publication Draft SADPD [ED 01], for example LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'Ecological implementation' will help to mitigate any negative effects arising from the proposed development.
There has been flooding off Glastonbury Drive where the Poynton Sports Club is proposing to move to.	Noted. The Lead Local Flood Authority has been consulted throughout the site selection process and discussions continue to be held with them.
Impacts to the riparian zone and any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric in	The policy highlights the requirement for protected species, Poynton Brook, its wet ditches and woodland to be retained and protected

order to achieve biodiversity Net Gain.	through buffering. In addition policies in the LPS and Revised Publication Draft SADPD [ED 01], for example LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'Ecological implementation' will help to mitigate any negative effects arising from the proposed development.
A number of policies and conditions would need to be met to allow sport and recreation on this site and this must be made clear.	The Development Plan is read as a whole.
It should be explained why the site will remain in the Green Belt.	As stated in NPPF ¶133, 'the Government attaches great importance to Green Belts', with ¶135 going on to say that 'new Green Belts should only be established in exceptional circumstances'. ¶12.59 of the supporting information to Site PYT 2 considers the Green Belt designation.
It needs to be clarified whether PYT 2 will be made available for sport and recreation development anyway and independent of being linked to site PYT 1.	As stated in ¶12.58 'the two allocations are ... linked and a planning obligation will be required to govern the mutual development of each site...'
The building cannot be treated in isolation in the open countryside and cannot fulfil LPS Policy PG 3, criteria 3 ii.	The policy allocates the site for sports and leisure development and acknowledges that there may be a requirement for a building. Both the LPS and the SADPD (once adopted) form part of the Development Plan.
Any structure should be limited to a single storey with turf roofs and any entrance is as close to London Road North as possible.	The detailed design and layout of any proposed development would be considered through the planning application process.
The statement that the area is vulnerable to erosion of its open character is not justified and must be removed.	¶12.66 highlights that the 'area has already been affected by the building of the A6 – Manchester Airport Relief Road', hence it is vulnerable to further erosion of its open character.

Site PYT 3 'Land at Poynton High School'

Summary of the main issues raised	How the main issues have been taken into account
The delivery of a housing site that involves a strip of land from the	3G pitches can be set up and used for different sports (multi-use

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<p>playing field carries risk; whilst a 3G pitch is identified it may not deliver the needs for a range of sports, solely football.</p>	<p>pitches). The detailed design of the pitch would be considered through the planning application process. The new 3G pitch is new playing field provision, that is, it is not being located on an existing playing field.</p> <p>Amend ¶12.68 to read: ‘existing leisure centre <u>on land that is not classed as an existing playing field.</u>’</p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council’s response and there are no outstanding issues that need further discussion.</p>
<p>Allocation of the site amounts to the loss of a strip of functional playing field land giving rise to a statutory objection to dispose of for non-sport uses, unless the playing field lost is replaced or otherwise justified against sport England policy and NPPF para 97.</p>	<p>¶12.68 of the ‘Revised Publication Draft SADPD’ [ED 01] sets out the proposed location for a new 3G pitch. ¶4.61 of the ‘Poynton Settlement Report’ [ED 39] sets out how the loss of part of the playing field would be addressed. The new 3G pitch is new playing field provision, that is, it is not being located on an existing playing field.</p> <p>Amend ¶12.68 to read: ‘existing leisure centre <u>on land that is not classed as an existing playing field.</u>’</p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council’s response and there are no outstanding issues that need further discussion.</p>
<p>It impacts on several existing pitches and would cause a net loss of pitches on this site, possibly greater in number than the strip taken for development.</p>	<p>¶12.68 of the ‘Revised Publication Draft SADPD’ [ED 01] sets out the proposed location for a new 3G pitch. 3G pitches can be set up and used for different sports (multi-use pitches). The detailed design of the pitch would be considered through the planning application process. The new 3G pitch is new playing field provision, that is, it is not being located on an existing playing field. The cricket pitch could be reconfigured through the planning application process.</p> <p>Amend ¶12.68 to read: ‘existing leisure centre <u>on land that is not classed as an existing playing field.</u>’</p>

	<p>Amend ¶12.70 to read: fencing or netting <u>and reconfiguration of the cricket pitch.</u></p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.</p>
<p>No justification has been given that these pitches are surplus to requirements and no details have been provided of where this lost playing field could be replaced.</p>	<p>¶12.68 of the 'Revised Publication Draft SADPD' [ED 01] sets out the proposed location for a new 3G pitch. The new 3G pitch is new playing field provision, that is, it is not being located on an existing playing field. ¶4.61 of the 'Poynton Settlement Report' [ED 39] sets out how the loss of part of the playing field would be addressed.</p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.</p>
<p>It is assumed that any replacement would be likely to be divorced from the school site.</p>	<p>¶12.68 of the 'Revised Publication Draft SADPD' [ED 01] sets out the proposed location for a new 3G pitch, which is at Poynton High School (adjacent to the Leisure Centre).</p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.</p>
<p>Recreational and amenity space would be lost and there is insufficient justification that replacement playing fields or recreational facilities will be delivered.</p>	<p>The policy (Point 1) requires replacement of the lost playing field, with ¶12.68 of the 'Revised Publication Draft SADPD' [ED 01] setting out how the loss would be mitigated. ¶4.61 of the 'Poynton Settlement Report' [ED 39] sets out how the loss of part of the playing field would be addressed.</p>
<p>The water main easement and gravity sewer will affect the deliverability of the site, and it is unclear if development of this scale would be viable.</p>	<p>These would need to be taken into account as part of any detailed planning application.</p>
<p>Further evidence is required to demonstrate that a suitable access can be achieved.</p>	<p>Cheshire East Highways has been consulted throughout the site selection process. As stated in the traffic light assessment for the site</p>

	<p>(‘Poynton Settlement Report’ [ED 39], p61) there is frontage access onto Dickens Lane to serve the units.</p>
<p>It has not been demonstrated 25 units can be achieved with on site open space/affordable housing policy requirements on the land.</p>	<p>The precise number of dwellings would be considered through the planning application process. The policy has been worded through the use of the word ‘around’ to allow for some flexibility. The design and layout of the proposed development would also be considered through the planning application process.</p>
<p>It has not been demonstrated that the sale would fund the 3G pitch or that it is viable.</p>	<p>Provision of a 3G pitch at Poynton High School is dependent on a number of factors, which include planning permission, section 77 approval and availability of sufficient funding. Housing land is identified at Poynton High School (Site PYT 3), which will generate a capital receipt and facilitate the provision of a 3G pitch.</p>
<p>It has not been demonstrated that the loss of the playing fields can be adequately compensated for to meet national, local and Sport England’s policy requirements in relation to the loss of playing fields.</p>	<p>¶12.68 of the ‘Revised Publication Draft SADPD’ [ED 01] sets out the proposed location for a new 3G pitch. ¶4.59 of the ‘Poynton Settlement Report’ [ED 39] sets out how the loss of part of the playing field would be addressed.</p> <p>Amend ¶12.68 to read: ‘existing leisure centre <u>on land that is not classed as an existing playing field.</u>’</p>
<p>25 dwellings would only be achievable in a high-density development which may be seen to be out of character with the local area.</p>	<p>The precise number of dwellings would be considered through the planning application process. The policy has been worded through the use of the word ‘around’ to allow for some flexibility. The design and layout of the proposed development would also be considered through the planning application process.</p>
<p>Vehicular access to and from the site and impact on Dickens Lane traffic flows has not been considered; a traffic impact assessment needs to be added.</p>	<p>Cheshire East Highways has been consulted throughout the site selection process. As stated in the traffic light assessment for the site (‘Poynton Settlement Report’ [ED 39], p61) there is frontage access onto Dickens Lane to serve the units and there is a limited highways impact. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 ‘Travel Plans and Transport Assessments’ and SADPD Policy INF 3 ‘Highway safety and access’.</p>
<p>The site needs to be assessed for possible flooding as part of the</p>	<p>Noted. The Lead Local Flood Authority has been consulted</p>

wider Flood Risk Investigation.	throughout the site selection process and discussions continue to be held with them.
The allocation is not consistent with a strategy to address the shortfall of sports facilities.	The policy (Point 1) requires replacement of the lost playing field, with ¶12.68 of the 'Revised Publication Draft SADPD' [ED 01] setting out how the loss would be mitigated. ¶4.59 of the 'Poynton Settlement Report' [ED 39] sets out how the loss of part of the playing field would be addressed.
If the school expands, it might not be able to properly meet the future sports needs of its pupils.	Cheshire East Education has been consulted during the site selection process for both the LPS and the SADPD.
The field is heavily used, including a children's football camp through the Leisure Centre, where direct access is crucial.	Cheshire East Highways has been consulted throughout the site selection process. As stated in the traffic light assessment for the site ('Poynton Settlement Report' [ED 39], p61) there is frontage access onto Dickens Lane to serve the units.
The existing access point off Dickens Lane is far superior for emergency access for the playing fields, being directly off a main road.	Cheshire East Highways has been consulted throughout the site selection process. As stated in the traffic light assessment for the site ('Poynton Settlement Report' [ED 39], p61) there is frontage access onto Dickens Lane to serve the units.
Concern with regards to the increased risk of road traffic collisions along Dickens Lane.	Cheshire East Highways has been consulted throughout the site selection process. As stated in the traffic light assessment for the site ('Poynton Settlement Report' [ED 39], p61) there is a limited highways impact. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 'Travel Plans and Transport Assessments' and SADPD Policy INF 3 'Highway safety and access'.

Site PYT 4 'Former Vernon Infants School'

Summary of the main issues raised	How the main issues have been taken into account
Developing the site of the former school buildings along with a strip of playing field could have a prejudicial impact on the playing field; replacing such a strip of playing field elsewhere may not be sufficient on its own	As set out in ¶4.27 of the 'Poynton Settlement Report' [ED 39] it is intended that three pitches will remain, however an adjustment may be required to one or two of the pitches as a result of development. The improvements to the pitches are highlighted in ¶12.74 of the

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	<p>'Revised Publication Draft SADPD' [ED 01] where it states that the intention is to reconfigure and improve the drainage of the playing field and provide a changing room. It is not considered that there would be a prejudicial impact.</p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.</p>
<p>There is no certainty of any likely lack of direct or prejudicial impact on the playing field and therefore developing this site is likely to carry a potential objection from Sport England.</p>	<p>As set out in ¶4.28 of the 'Poynton Settlement Report' [ED 39] it is intended that three pitches will remain, however an adjustment may be required to one or two of the pitches as a result of development. The improvements to the pitches are highlighted in ¶12.74 of the 'Revised Publication Draft SADPD' [ED 01] where it states that the intention is to reconfigure and improve the drainage of the playing field and provide a changing room. It is not considered that there would be a prejudicial impact.</p> <p>As a result of further discussion and correspondence with Sport England, they are satisfied with the Council's response and there are no outstanding issues that need further discussion.</p>
<p>The proposal requires playing fields to be lost, with no proposal to deal with the planning policy and Sport England's requirement that must be met to allow such loss of playing facilities on land in the owner's control.</p>	<p>As set out in ¶4.28 of the 'Poynton Settlement Report' [ED 39] it is intended that three pitches will remain, however an adjustment may be required to one or two of the pitches as a result of development. The improvements to the pitches are highlighted in ¶12.74 of the 'Revised Publication Draft SADPD' [ED 01] where it states that the intention is to reconfigure and improve the drainage of the playing field and provide a changing room.</p>
<p>The impact of the culvert on the development of the site requires investigation, particularly as to whether the target of 50 units on the site would be achievable.</p>	<p>The precise number of dwellings would be considered through the planning application process. The policy has been worded through the use of the word 'around' to allow for some flexibility. The design and layout of the proposed development would also be considered through the planning application process. Further investigation has found that the culvert appears to be outside of the development site and of the</p>

	8m buffer required by the Cheshire East Land Drainage Byelaws. Delete points 5 and 6 of the policy and ¶12.76.
Concerns over the delivery of the site regarding replacement provision and no details are provided as to whether an alternative location has been found or if Sport England have agreed to the proposals.	As set out in ¶4.28 of the 'Poynton Settlement Report' [ED 39] it is intended that three pitches will remain, however an adjustment may be required to one or two of the pitches as a result of development. The improvements to the pitches are highlighted in ¶12.74 of the 'Revised Publication Draft SADPD' [ED 01] where it states that the intention is to reconfigure and improve the drainage of the playing field and provide a changing room.
Redevelopment of this site would result in a very high-density scheme, which is not in keeping with the surrounding area.	The design and layout of the proposed development would be considered through the planning application process.
The policy should make reference to the delivery of retirement homes, if this is the intention.	The policy is considered to be sound as written. ¶12.72 highlights that the site is particularly suitable for retirement homes, but this does not preclude other types of housing.
The loss of playing field from the site has not been justified; the impact of this loss has not been quantified.	As set out in ¶4.28 of the 'Poynton Settlement Report' [ED 39] it is intended that three pitches will remain, however an adjustment may be required to one or two of the pitches as a result of development. The improvements to the pitches are highlighted in ¶12.74 of the 'Revised Publication Draft SADPD' [ED 01] where it states that the intention is to reconfigure and improve the drainage of the playing field and provide a changing room.
The site needs to be assessed for possible flooding as part of the wider Flood Risk Investigation that is taking place.	Noted. The Lead Local Flood Authority has been consulted throughout the site selection process and discussions continue to be held with them.

Sandbach (general issues)

Summary of the main issues raised	How the main issues have been taken into account
There does not appear to be any trail to suggest that these responses have been considered or amendments made in relation to the settlement boundary/open countryside around the Zan Industrial Park	The 'Settlement and infill boundaries review' note [ED 06] sets out the methodology to reviewing settlement boundaries in each of the Principal Towns, KSCs and LSCs. . This area of land is not

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<p>in Wheelock. (FDR2935)</p>	<p>considered to form part of the settlement boundary. The approach to the settlement boundary for Sandbach is set out in the 'Sandbach Settlement report' [ED 41].</p>
<p>The housing supply, alongside proposed allocations, is not considered to meet Objectively Assessed Needs. The supply is too reliant on the delivery of large scale housing sites which poses deliverability risks particularly in the short term. LPS53 is unable to deliver the full 450 dwellings to meet Sandbach requirements. Therefore the overall scale of housing growth particularly on small sites should be increased so an adequate degree of flexibility can be applied. Land north of Wright Lane, Sandbach forms part of LPS53 and can deliver housing in two phases with phase 1 delivering circa 25 units with the remainder of the site delivering additional units as part of the second phase. Alternatively the site could be included as an individual housing allocation given that it can be delivered independently of the wider Strategic Site LPS53.</p>	<p>An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound.</p> <p>The 'Sandbach Settlement Report' [ED 41] has considered all the sites put forward in Sandbach and the need for further allocations, concluding that no further site allocations in the SADPD for Sandbach are required.</p> <p>It is not the role of the SADPD to review sites allocated in the LPS.</p>
<p>Additional sites are needed to meet the overall housing requirement; ensure the Council can demonstrate and maintain a deliverable five year supply of housing land; to ensure the SADPD is consistent with the LPS; and to provide flexibility in the event that HS2 is committed to come to Crewe by 2030.</p>	<p>As set out in the 'Sandbach Settlement Report' [ED 41], the housing requirements in Sandbach have already been met.</p> <p>The Local Plan Strategy (LPS) is the strategic plan for the borough. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS.</p> <p>The LPS does not address the full land use implications of HS2. Policies addressing HS2 cannot be included in the SADPD. They would be strategic policies that departed from the LPS and fall outside the scope of the SADPD.</p> <p>The council is preparing a separate Crewe Hub Area Action Plan which is setting a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This is subject to its own plan process including public consultation.</p>

	The full implications of HS2 on the wider area are a strategic matter to be addressed through a review of the LPS.
<p>Several sites put forward for consideration in Sandbach:</p> <ul style="list-style-type: none"> • Land to the rear of Twemlow Avenue and Marlborough Drive (FDR2097, CFS129) for residential development • Land south of Old Mill Road, Sandbach (FDR2262, CFS305) for mixed use development • Land at the Hill, Sandbach (FDR2183A, FDR2183A, FDR2183B, FDR2183C, FDR2183D, CFS304) for residential development • Land to the rear of Park Lane and Crewe Road, Sandbach (FDR 2835, CFS 537) for residential and/or C2 development • Land at Hind Road, Sandbach for self and custom build housing (new site) • Land off Belmont Avenue, Sandbach for self and custom build housing (new site) 	As set out in the 'Sandbach Settlement Report' [ED 41], the housing requirements in Sandbach have already been met. It is therefore not considered necessary to allocate these sites.
The Albion works should be included within the settlement boundary for Sandbach (CFS419)	The 'Settlement and infill boundaries review' note [ED 06] sets out the methodology to reviewing settlement boundaries in each of the Principal Towns, KSCs and LSCs. The approach to the settlement boundary for Sandbach is set out in the 'Sandbach Settlement report' [ED 41]. The settlement report concludes that the former Albion Chemical Works site is considered to be physically separate from the main built up area of Sandbach to be included within its settlement boundary.

Wilmslow (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Three sites were submitted (references refer to the site's reference in the Wilmslow Settlement Report [PUB 43]):</p> <ul style="list-style-type: none"> • Land west of Rotherwood Road (CFS194); • Land east of Rotherwood Road (CFS87); and 	The Wilmslow Settlement Report [ED 43] has considered all the sites put forward in Wilmslow and the need for further allocations, concluding that no further site allocations in the SADPD for Wilmslow are required.

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<ul style="list-style-type: none"> Land at Mobberley Road and Sandy Lane (CFS49). 	
<p>The forecasted and completed allocations may not fulfil the required need in Wilmslow and further sites should be allocated.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Wilmslow Settlement Report [ED 43] have considered the need for further allocations, concluding that no further site allocations in the SADPD for Wilmslow are required.</p>

Alderley Edge (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Six sites were submitted (references refer to the site's reference in the Alderley Edge Settlement Report [PUB 21]):</p> <ul style="list-style-type: none"> Land to the west of Heyes Lane (CFS366); Land to the east of Heyes Lane (CFS370); Whitehall Meadow (CFS405); Land to the west of Congleton Road (CFS359/400); Land at Mayfield (FDR2831); and Land at Ryleys Farm, north of Chelford Road (CFS404 Plot 1) 	<p>All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].</p>
<p>Further site allocations are required in Alderley Edge to make sure its development requirement will be delivered, to account for the shortfall in dwellings and for flexibility.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.</p>
<p>It is considered doubtful that the delivery of the County Hotel site is viable over the plan period.</p>	<p>The County Hotel site has full permission for 26 dwellings (18/4867M).</p>
<p>There are no exceptional circumstances for the release of Green Belt land.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land. Exceptional circumstances to designate safeguarded land are considered in the Local Service</p>

	Centres Safeguarded Land Distribution Report.
No sites should be built on as Alderley Edge is unusual in having in-commuting for work.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.
The site promoter of land at Whitehall Meadow considers the site to be more suitable than the proposed allocations for Alderley Edge and considers the site should be allocated for up to 50 dwellings and a local car park.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
The site promoter of land at Mayfield considers that it is no longer necessary to keep this land permanently open and the site should be removed from the Green Belt and included within the settlement boundary.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
The site promoter of land to the west of Congleton Road considers that the council's Green Belt Assessment overstates the contribution that the land makes to the purposes of Green Belt; and considers that development of the site would only have a negligible impact on the adjacent conservation area. The site should be allocated for residential development.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
The site promoter of land to the west of Heyes Lane considers that the council's Green Belt Assessment overstates the contribution that the land makes to the purposes of Green Belt. It is suitable for development and should be allocated for housing.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
The site promoter of land to the east of Heyes Lane considers that the council's Green Belt Assessment overstates the contribution that the land makes to the purposes of Green Belt. The traffic light assessment should reflect that an access point could be created; landscape impacts could be mitigated. The site should be allocated for residential development.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].

Site ALD 1 'Land adjacent to Jenny Heyes'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the site is remote from existing transport and social infrastructure	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The site has potential flood risk constraints which means there may be viability issues; reduced quantum of development. Insufficient evidence on flooding issues is presented.	Flood risk issues are taken into account in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
There is little or no opportunity to deliver affordable housing.	This site has been removed from the Revised Publication Draft SADPD.
There is no certainty that a suitable access with appropriate visibility could be provided.	The Alderley Edge Settlement Report [ED 21] acknowledges that very careful consideration would need to be given to visibility and this site is not proposed for inclusion in the Revised Publication Draft SADPD.
It is doubtful that suitable pedestrian access or safe crossing point could be provided.	Pedestrian access is considered in the Alderley Edge Settlement Report [ED 21] but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
Mature tree planting would need to be removed and the opportunity to provide replacement planting is limited.	This site has been removed from the Revised Publication Draft SADPD.
The size of the site limits the opportunity to provide complementary open space.	This site has been removed from the Revised Publication Draft SADPD.
The site is considered to be an illogical extension to the settlement boundary as it only adjoins the existing settlement on one side.	This site has been removed from the Revised Publication Draft SADPD.
The site is outside of Alderley Edge parish and the Alderley Edge Neighbourhood Plan area.	This site has been removed from the Revised Publication Draft SADPD.
The site makes a 'major contribution' to Green Belt purposes in the Green Belt Assessment Update but the council has now re-classified it	The Alderley Edge Settlement Report [ED 21] includes a Green Belt Site Assessment, which demonstrates that the site makes a

as only making a 'contribution'.	'contribution' to Green Belt purposes.
The site should provide minimum 8m undeveloped semi-natural buffer to Whitehall Brook, but preferably larger where feasible. Development should positively integrate with the watercourse.	This site has been removed from the Revised Publication Draft SADPD.
The site promoter has confirmed that initial highways and flood risk work demonstrates that there are no technical constraints to development and the site could accommodate around 10 dwellings as envisaged.	Following consideration of all the issues as set out in the Alderley Edge Settlement Report [ED 21], this site has been removed from the Revised Publication Draft SADPD.

Site ALD 2 'Ryleys Farm, north of Chelford Road'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.	This site allocation has been removed from the Revised Publication Draft SADPD.
The boundaries are not well-contained leading to further potential encroachment into the open countryside.	This site allocation has been removed from the Revised Publication Draft SADPD.
There are no proposals to provide any public car parking within the site.	This site allocation has been removed from the Revised Publication Draft SADPD.
The site promoter considers that additional land should be released from the Green Belt because the current proposed boundaries are not robust and a larger site would allow delivery of 75 dwellings alongside other benefits. Alternatively, even more land could be allocated to enable delivery of up to 100 dwellings to help meet any identified shortfall within Alderley Edge.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.
The site policy should require proposals to include additional compensatory measures to offset the impacts of removing land from the Green Belt.	This site allocation has been removed from the Revised Publication Draft SADPD.

Given the current Green Belt designation, development should be required to achieve a reduction in energy use compared to standard new build construction.	This site allocation has been removed from the Revised Publication Draft SADPD.
Development should provide for a minimum of 30% affordable dwellings.	Affordable housing would be required in accordance with LPS Policy SC 5 'Affordable homes'. However, this site allocation has been removed from the Revised Publication Draft SADPD.
The site should be required to accommodate a sports pitch and a car park to support the village's needs and community benefits.	This site allocation has been removed from the Revised Publication Draft SADPD.
The site should provide a cycle access to the bypass and screening / landscaping from existing dwellings and infrastructure.	This site allocation has been removed from the Revised Publication Draft SADPD.
An additional policy requirement should be added to require development to be in accordance with the Cheshire East heritage impact assessment document including the specific mitigation/enhancement measures for the site.	This site allocation has been removed from the Revised Publication Draft SADPD.

Safeguarded land ALD 3 'Ryleys Farm (safeguarded)'

This initial Publication Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.	The site's relationship with the urban area is considered in the Alderley Edge Settlement Report [ED 21].
The boundaries are not well-contained leading to further potential encroachment into the open countryside.	The boundaries are considered in the Alderley Edge Settlement Report [ED 21].
There are no proposals to provide any public car parking within the site.	The site is proposed as safeguarded land and is not allocated for development.
The site promoter considers that the boundaries of the safeguarded land should be amended to allow the provision of a larger allocation	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for

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on the adjacent site ALD 2 and to ensure that a strong permanent defensible boundary defines the northern boundary of the safeguarded land.	additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However there is a requirement for safeguarded land.
The site should be required to deliver cycle access to the bypass and protective green screening and landscaping between it and existing housing and infrastructure when it is developed.	The site is proposed as safeguarded land and is not allocated for development. However, Policy PG 12 'Green Belt and safeguarded land boundaries' highlights the need for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land if allocated for development in the future.

Site ALD 4 'Land north of Beech Road'

This initial Publication Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
It is considered that the site is remote from existing transport and social infrastructure.	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location but this site is not proposed for inclusion in the Revised Publication Draft SADPD.
The site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.	This site has been removed from the Revised Publication Draft SADPD.
The boundaries are not well-contained leading to further potential encroachment into the open countryside. The policy requirement to create a physical feature is not adequate given the important role of Green Belt in this location.	This site has been removed from the Revised Publication Draft SADPD.
The site is located in much closer proximity to Wilmslow, with a separation distance of only 380m. The Green Belt gap has already been reduced following removal of the Royal London site to the south of Wilmslow and removal of this site would narrow the gap further.	This site has been removed from the Revised Publication Draft SADPD.
There are no proposals to provide any public car parking within the site.	This site has been removed from the Revised Publication Draft SADPD.
The Green Belt Assessment Update considers the area to make a	The Alderley Edge Settlement Report [ED 21] includes a Green Belt

<p>'major contribution' to the purposes of Green Belt but this has now been downgraded to 'significant contribution'. It is considered that the site makes a 'major contribution' to the purposes of Green Belt.</p>	<p>Site Assessment, which demonstrates that the site makes a 'significant contribution' to Green Belt purposes.</p>
<p>No evidence is provided to demonstrate how the appropriate flood risk mitigation and compensation could be provided and no Environment Agency response is provided to indicate that the use of the site for residential development would be acceptable.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>
<p>The site is 2.9 ha and could accommodate 35 dwellings; therefore development density is 12 dwellings per hectare. Development should make efficient use of land and release of the land from the Green Belt cannot be justified when its development potential is so poor.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>
<p>It is not clear how appropriate design and landscaping could mitigate the impact on settlement character and urban form when the site only adjoins the settlement on one side.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>
<p>The site policy should require proposals to include additional compensatory measures to offset the impacts of removing land from the Green Belt.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>
<p>Given the current Green Belt designation, development should be required to achieve a reduction in energy use compared to standard new build construction.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>
<p>Development should provide for a minimum of 30% affordable dwellings.</p>	<p>Affordable housing would be required in accordance with LPS Policy SC 5 'Affordable homes'. However, this site allocation has been removed from the Revised Publication Draft SADPD.</p>
<p>Pedestrian route improvements would be required along Davey Lane to support the additional residents in the area.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>
<p>The access roads are small, narrow and already unfit for purpose; this proposal will put too many cars on the roads and extra traffic will be a danger to children.</p>	<p>This site has been removed from the Revised Publication Draft SADPD.</p>

Audlem (general issues)

Summary of the main issues raised	How the main issues have been taken into account
Audlem Parish Council broadly supports the proposals and welcomes the withdrawal of the proposed footpath along Little Heath Green towards Audlem.	Support noted.

Site AUD 1 'Land South of Birds Nest'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
Support the proposed housing allocation. The site is suitable, deliverable, achievable and available for development. Criterion 2 requires a 'suitable pedestrian and vehicular access in to the site from Audlem Road'. A new pedestrian route has already been provided on the other side of the road, running alongside the Anwyl development. It is therefore suggested that the policy wording be amended to <u>'a new pedestrian crossing to be provided to the site'</u> .	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. As set out in the 'Audlem Settlement Report' [ED 23] there is no requirement for housing or employment in Audlem.
Site south of AUD 1 (East View CFS 570) should also be considered for residential allocation.	Please see comment above.

Bollington (general issues)

Summary of the main issues raised	How the main issues have been taken into account
Exceptional circumstances to release green belt have not been demonstrated (and do not exist); Cheshire East's approach unsound and in legal error (view supported by legal opinion obtained by Bollington Town Council)	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for allocations for housing or employment allocations at Bollington. However there is a requirement
Contrary to NPPF and paras 136/137 – failure to demonstrate that all	

reasonable alternatives have been examined; not considered alternative options	for safeguarded land. The approach to identifying safeguarded land is set out in the LSCs safeguarded land distribution report [ED 53]. The revised publication draft SADPD is supported by a detailed site selection methodology including the consideration of Green Belt matters [ED 07].
LSC housing target can be met without releasing green belt land; 92% of the target requirement of 3,500 houses has been met	
The green belt release should be expressed as a strategic policy	
There are other suitable sites with lower green belt status	
Failure to observe Bollington Neighbourhood Plan: The proposals to release green belt land goes against the Bollington Neighbourhood Plan (policies HO.P1 - 4, V1, GE.01, EGB.P1)	Made Neighbourhood Plans form part of the Development Plan for Cheshire East. The Neighbourhood Plan is referenced in the 'Bollington Settlement Report' [ED 24]. See also PG 8 proforma - Spatial Distribution of Development Local Service Centres.
The proposed target of 390 houses for Bollington is inappropriate – flawed methodology (seventh “hybrid” method – illogical); takes no account of the previous large increase in housing (2001 -2011); target higher than other LSCs; Bollington already has highest housing density of all 13 LSCs; target not compatible with sustainable development; Bollington and Prestbury figures compared (several of the standard letters contain a short critique of the various options considered in the disaggregation report)	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24]. The approach to the identification of safeguarded land is set out in document [ED 53].
There are brownfield sites, windfall and infill sites available in alternative places (other LSCs); the residual target can be achieved by small developments removing need for green belt release (Some reps refer to a figure of 5,500 potential non-green belt sites)	
Just because Bollington may not reach target of 390 houses in 10 years time does not justify releasing green belt land now	
East Tytherington housing should count	
Traffic concerns with the extra housing proposed; pressure on transport infrastructure; increase in out commuting; pollution	Traffic concerns have been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Concern regarding destruction of local wildlife habitats	Ecology concerns have been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report'

	[ED 24].
No account taken of large response to Draft SADPD consultation; no effective engagement with the Bollington Community	Account has been taken of the First Draft SADPD Consultation (see Appendix C of this report). A number of meetings have been held with town and parish councils, as set out in table 1 of the above consultation report.
Taking green belt land for housing does not fit in with vision for local service centres; not modest growth	The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Bollington Settlement Report [ED 24].
New housing and housing extensions leading to feeling of continual pressure of increased population in a very confined space	
Releasing green belt for housing will not meet local needs	
Concerns regarding pressure on infrastructure – use of medical and dentist services, parking, overloaded drains and sewage systems etc	Infrastructure concerns are considered as part of the site selection methodology and are considered in the ‘Bollington Settlement Report’ [ED 24].
Reduction in green belt – reduction in open space	
No complimentary increase in employment, infrastructure, compensatory green belt and open space improvements	
Concern regarding effect on Bollington’s historic assets	Historic concerns are considered as part of the site selection methodology and are considered in the ‘Bollington Settlement Report’ [ED 24].
The SADPD proposals fail to maintain the integrity of the Bollington Community including the distinctiveness of Bollington, Bollington Cross, Lowerhouse and Kerridge.	
Concern that structured response form provided by Cheshire East restricts the development of a discussion (Bollington Civic Society expand on points above including giving detail on history of Bollington)	The Council aims to make the process as user friendly as possible whilst still meeting the statutory regulations.
Clear summaries of the relevant arguments would have made it easier for residents to comment	
Local bus service not viable for residents to work in Stockport	Transport concerns are considered as part of the site selection methodology and are considered in the ‘Bollington Settlement Report’ [ED 24].
Local service centres in the west should have more development to reflect west v east traffic movements	
Bollington a commuter town – poor infrastructure links	

<p>Bollington NP Made May 2018; updated Bollington Housing Needs Assessment Oct 2018 concluded figure should be 330-350</p>	<p>There is no reference to this later document on the Bollington Town Council web-site/Neighbourhood Plan. A Housing Needs Assessment for the parish of Bollington dated October 2018 has been submitted by a member of the public but does not form part of the SADPD evidence base. The approach to Bollington has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report.</p>
<p>Suggest land to east of 41a Shrigley Road should be allocated for development and removed from green belt (was previously allocated in Draft SADPD); access to site can be gained by the demolition of the existing dwelling which is in the same ownership – detailed response regarding why the site should be allocated – covers boundary treatments, green belt issues and impact on heritage assets etc) Object to site remaining in green belt – should be included in built –up area and thus become available as a site allocation within the local plan. (Site CFS79/80)</p>	<p>Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the ‘Bollington Settlement Report’ [ED 24] using the methodology set out in the ‘Site Selection Methodology Report’ [ED 07].</p>
<p>Land off Shrigley Road Bollington should be allocated for development to provide affordable housing, community uses and employment floorspace – logical and small-scale urban extension (detailed representation giving information regarding proposals for site and reasons why it is suitable for removal from the green belt) (Site CFS 277/FDR1768)</p>	
<p>Land to south of Grimshaw Lane Bollington should be removed from the green belt and included in built-up area of Bollington – could therefore become a windfall site or be allocated (detailed reasons why green belt boundary should be changed)(Site FDR855a)</p>	
<p>Land at Albert Road, Bollington (Hillcrest Homes) – legal agreement being finalised for application for 34 houses LPA ref 18/3938M; support that site is counted as a “commitment” in terms of meeting the housing needs of Bollington; support removal of employment land designation and the fact that site shown as “white land” within the urban settlement though could comprise an allocated site for circa 34</p>	<p>Support and information noted (now included in 31 March 2020 housing figures)</p>

<p>dwelling.</p> <p>Land at Hall Hill (site CFS 352 and 352a); information on why site/sites could be allocated for housing or as safeguarded land; access rights from Ashbrook Drive and Greg Avenue confirmed (logged under PG 11 and PG 12)</p>	<p>Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p> <p>The approach to the identification of safeguarded land is set out in document [ED 53].</p>
<p>Dyers Mill Pond, Bollington – seeking housing on part of site (logged under REC 1)</p>	<p>See REC 1 Proforma</p> <p>Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Settlement boundary should be revised to include the group of houses at Dumbah Lane, Tytherington Lane, Springwood Way and Larkwood Way. (Logged under PG 9)</p>	<p>The council disagrees; this area correctly falls within the settlement boundary defined for Macclesfield as it forms part of the general built-up area of the town. The settlement and infill boundaries review [ED 06] sets out the methodology and justification for the approach to settlement boundaries in the SADPD. This methodology has been applied and the outcomes documented in the 'Bollington Settlement Report' [ED 24].</p>

Site BOL 1 'Land at Henshall Road'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
For general issues see Bollington proforma	
Traffic impact, safety, increased risk of accidents and congestion;	Traffic, ecology and flooding are issues that have all been considered

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access off bend	as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Concern regarding impact on local wildlife and local wildlife habitats; Cheshire Wildlife Trust survey – area medium to high habitat distinctiveness; tree loss; contrary to policies in the Neighbourhood Plan (e.g. ENE.P1)	
To comply with policies ENV 1 and ENV 2 substantial areas of habitat creation are likely to be required.	
Increase in run-off; removal of sump effect of site; increased risk of flooding (recent flooding events in Bollington this summer cited); stress on combined sewer systems; concern re run-off towards Albert Road in particular and the two schools there an residential properties; United Utilities expressed a preference to use other sites	
Contamination concerns (toxic waste, asbestos etc); tipping of waste by Bollington Printworks upto 1980	Contamination issues are considered as part of the site selection methodology and in the 'Bollington Settlement Report' [ED 24].
Area of land part of the larger open space of Hall Hill overlooking Lowerhouse	Landscape, trees, historic assets and sustainability are issues that have all been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Concerns regarding effect on nearby historic assets - Lowerhouse area and it's association with Samuel Greg (see Bollington Civic Society representation for historical detail)	
Not compatible with sustainable development	
Essential to retain mature trees	
Add reference to Historic Impact Assessment within the policy – additional bullet point to be added: “Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site” (Historic England)	The Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process. Specific mitigation/enhancement measures would be required for any future development proposal. The plan contains a whole suite of heritage policies, which would be applied during the consideration of any application.
2013 SHLAA – site assessed as not suitable, not achievable and not currently developable	Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation

	have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
The proposed allocation of BOL 1 for around 40 dwellings is supported and considered to be justified, effective and consistent with national policy, and based upon robust and up to date evidence. The site is suitable, available and achievable. Representation provides detailed information on why the site is suitable as an allocation looking at how the development policy requirements would be met and providing detail around drainage and flooding concerns, the creation of a new green belt boundary and the visually contained nature of the site (in a bowl with rising land to the east and west and woodland barrier to the north). Updated masterplan for site also attached to representation.	Support noted. Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the "Site Selection Methodology Report' [ED 07]. This site has been considered appropriate to identify as safeguarded land in the Revised Publication Draft SADPD [ED 01].

Site BOL 2 'Land at Oak Lane/Greenfield Road'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
See Bollington proforma for general comments	
Tree loss, effect on local wildlife; great crested newts on site and bats	Ecology, trees, historic assets, green belt, landscape and contamination are issues that have all been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Historic site of the Beehive Mill; potential contamination	
Impact on Kerridge Conservation Area	
Houses on site will introduce a significant urban element to quiet country lane; land acts as strong border to Green Belt; valuable amenity for nearby homes	
Insufficient weight given to location of site within Peak Park Fringe	
Concerns regarding access to site; effect on nearby properties and	Access to the site, traffic and access to local facilities plus drainage

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walker's access to Tinker's Clough	issues have all been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24]. Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the ' Site Selection Methodology Report' [ED 07].
Not within walking distance of local services	
Flooding concerns; flooding in nearby garden July 2019	
Insufficient attention given to gravity sewer crossing site	
Traffic impact; concerns re provision for off-road parking; doubt about suitable access	
History of planning permissions refused for site – nothing has changed	The Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process. Specific mitigation/enhancement measures would be required for any future development proposal. The plan contains a whole suite of heritage policies, which would be applied during the consideration of any application.
Need reference to historic impact assessments in policy	
Support for site's release from green belt and the delivery of much needed homes in Bollington; Council supported green belt release of site in the 1990s; logical in-fill; target for Bollington should be much higher than 390 dwellings (detailed information concerning site in representation – covering Green Belt, access rights etc)	Support noted. Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. This site has been considered appropriate to identify as safeguarded land in the Revised Publication Draft SADPD [ED 01].

Site BOL 3 'Land at Jackson Lane'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
See Bollington proforma for general comments	
Steep sloping site between track and busy road – neither upgrade of	Access and traffic, historic assets, green belt, infrastructure and

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track or impacting upon stone wall acceptable; limited access	contamination are issues that have all been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Impact on Kerridge Conservation Area and surrounding historic assets; sensitive area; houses in local stone	
Traffic problems – parking and congestion	
Concern regarding radon on site – unsuitable to disturb the natural surroundings	
Urban sprawl – would connect Bollington to Kerridge	
Infrastructure would not support the development of housing on the site	
Site privately owned – CEC no right to allocate it for development	Owner of site has confirmed that site is available for development and supports proposed allocation. Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07]. This site has not been identified as safeguarded land in the Revised Publication Draft SADPD [ED 01] and as such will remain in the Green Belt.
Not compatible with sustainable development	Sustainability, landscape and ecology are issues that have all been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Insufficient weight given to site within the Peak Park Fringe ; landscape impact	
Impact on wildlife in area; presence of international important plants in area e.g. wax-cap fungi	
Need reference to historic impact assessments in policy	The Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process.
Suggestion of covenant on site preventing building	Owner of site has confirmed that site is available for development.
Effects of tree preservation orders; lime tree will be compromised	Trees and landscape are issues that have all been considered as part

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Further information required on topographical impact and effect on views through site	of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].
Owner of site confirms site is available for development and supports proposed allocation	Support noted. Sites submitted through the Call for Sites exercise and the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. This site has not been identified as safeguarded land in the Revised Publication Draft SADPD [ED 01] and as such will remain in the Green Belt.
Low water pressure; inadequate drainage system – concern regarding flooding	Drainage aspects have been considered as part of the site selection methodology and are considered in the 'Bollington Settlement Report' [ED 24].

Bunbury (general issues)

Summary of the main issues raised	How the main issues have been taken into account
Land at Whitchurch Road, Bunbury Heath has been put forward for consideration.	No allocations are considered necessary at the Local Service Centre tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].
The proposed settlement boundary should be amended to include Bunbury Heath.	Bunbury Heath largely consists of an area of ribbon development along Whitchurch Road (A49) and separated from the majority of the village by several fields. Including Bunbury Heath would therefore require a considerable and unnecessary amendment to the existing settlement boundary. The proposed settlement boundary is set out in the Bunbury Settlement Report [ED 25].

Chelford (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Chelford Neighbourhood Plan questions the ability of the area to accept further development (para 28). There are a number of sites under construction in the village. The Neighbourhood Plan says it does not want to see further development on Green Belt land (policy HP1).</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for allocations for housing or employment allocations at Chelford. However there is a requirement for safeguarded land.</p>
<p>Spatial distribution - no explanation on means of decision making in respect of the options identified. Complex analysis offers a catalogue of statistics and explanation, but there is no means of actually understanding some methods of calculation.</p>	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for housing or employment land allocations at Chelford in the SADPD.</p> <p>The LSC safeguarded land distribution report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the northern part of the borough.</p> <p>The Chelford settlement report [ED 26] in line with the site selection methodology [ED 07] and outcomes of the LSC safeguarded land distribution report [ED 53] has identified proposed areas of safeguarded land in the village.</p>
<p>Site selection – object to no weighting in decision making. Unclear on role of RAG analysis in final decisions. RAG prone to optimism bias.</p>	<p>The Chelford Settlement Report [ED 26] sets out the approach to site selection and has considered relevant availability, achievability and suitability factors in coming to a position on recommended areas of safeguarded land to be included in the SADPD.</p> <p>The role of the Red/Amber/Green traffic light assessment is set out in the site selection methodology [ED 07]. The detailed criteria for the assessment have not been pre-weighted. The traffic light assessment provides a way of presenting information about the characteristics, constraints, capacities and circumstances of sites in a consistent way</p>

	that enables this, along with other factors, to form part of the overall site selection process, and ultimately the recommendation of whether or not a site should be included in the SADPD.
Distinction between major and significant contributions to Green Belt purposes is unclear.	The definitions used for major and significant contribution to Green Belt purposes are consistent with that of the Green Belt Assessment (August 2015) utilised in the Local Plan Strategy.
Low level of housing need in Chelford – lower future of applications on the housing register than the median figure for LSCs.	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for housing or employment land allocations at Chelford.</p> <p>The LSC safeguarded land distribution report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the northern part of the borough. There is a residual requirement for safeguarded land to be identified at Chelford. The process of selecting areas of land to safeguard at Chelford has been documented in the Chelford Settlement Report [ED 26].</p>
There is also a question mark against the accuracy of the data used to determine the settlement profiles in PUB05—to describe some of the data as 'up to date', when it is clearly not, does little to instil confidence in the analyses	The settlement profile information presented in the LSC safeguarded land distribution report [ED 53] formed one of a number of relevant planning factors considered across the northern local service centres in determining an appropriate distribution of safeguarded land for Chelford.
The vision for 'modest growth' in the LSCs over the planning period would appear to have been met already in Chelford.	<p>The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for housing or employment land allocations at Chelford in the SADPD</p> <p>The LSC safeguarded land distribution report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the northern part of the</p>

	borough. There is a residual requirement for safeguarded land to be identified at Chelford. The process of selecting areas of land to safeguard at Chelford has been documented in the Chelford Settlement Report [ED 26].
Disagree with moving Bollington's share of safeguarded land to Chelford. Disagree with the level of safeguarded land distributed to Chelford.	The LSC safeguarded land distribution report [ED 53] clearly sets out the approach and rationale for the distribution of safeguarded land across the northern part of the borough. It also presents the alternative options considered and discounted in the analysis undertaken.

Site CFD 1 'Land off Knutsford Road'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
Exceptional circumstances have not been proven to remove this site from the Green Belt. The site makes a significant contribution to Green Belt purposes	The Chelford Settlement Report [ED 26] includes a detailed Green Belt Site Assessment and sets out the approach to Green Belt matters.
East Cheshire Clinical Commissioning Group – the policy refers to the need for “a financial contribution towards the provision of health facilities”. This is no longer required as the Medical Centre has undergone modification in the last 5 years to future proof the premises.	Noted, this position is reflected in the Chelford Settlement Report [ED 26]. Stage 6 of the site selection process includes informal engagement with statutory consultees and infrastructure providers and the outcomes of this informal engagement are included in the Chelford Settlement Report [ED 26].
Not related to housing need in Chelford	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for housing or employment land allocations at Chelford in the SADPD. The LSC safeguarded land distribution report [ED 53] has been produced to clearly set out the approach and rationale for the

	distribution of safeguarded land across the northern part of the borough. There is a residual requirement for safeguarded land to be identified at Chelford. The process of selecting areas of land to safeguard at Chelford has been documented in the Chelford Settlement Report [ED 26].
Note the statement protecting car parking, but there is no clear information on whether this will still lead to a loss of parking space overall. Car parking is extremely limited for residents and visitors.	The site CFD 1 'land off Knutsford Road' has been identified as an area of safeguarded land in the SADPD [ED 01].
Reinforce the points made elsewhere, relating to increased car usage, emissions, and out commuting.	The Chelford settlement report [ED 26] has appropriately considered a number of relevant factors, detailed in the settlement report, in line with the Council's site selection methodology [ED 07]. This included an assessment of access to services and facilities.
Representation from site promotor noting legal control of the site. The site could represent an extension to the adjacent site (Cricketers Green development). The allocation is supported. Supporting statement submitted detailing site specific matters.	Noted.

Safeguarded land CFD 2 'Land east of Chelford Railway Station'

This initial Publication Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
Representation from site promotor. Information included in the representation setting out the support for the safeguarded land proposal - east of Chelford Railway Station.	Noted.
Representation from site promoter - supporting text to policy CFD 2 is premature and unjustified – the development of the safeguarded land should be considered, if necessary, against the relevant circumstances at that time, rather than trying to meet the anticipated requirements from an earlier Development Plan.	Site CFD 2 'land east of Chelford Railway Station' has been identified as an area of safeguarded land (4.63 ha) in policy PG 11 'Green Belt and Safeguarded Land Boundaries' in the revised publication draft SADPD

<p>The decision to choose a location for safeguarded land, which is grade 2 agricultural land flies in the face of Cheshire East policies which recognise the importance of retaining good quality agricultural land to maintain local food production</p>	<p>The Chelford settlement report [ED 26] has appropriately considered a number of relevant factors, detailed in the settlement report, in line with the Council's site selection methodology [ED 07] when considering the safeguarding of the site.</p>
<p>The area of safeguarded land identified, represents a significant reduction in green belt land in the Parish and any further development on this land will impact negatively on its settlement character and urban form, the visual amenity, its openness and character and on the character of the village itself.</p>	<p>The LSC safeguarded land distribution report [ED 53] clearly sets out the approach and rationale for the distribution of safeguarded land across the northern part of the borough. The Chelford settlement report [ED 26] has appropriately considered a number of relevant factors, detailed in the settlement report, in line with the Council's site selection methodology [ED 07] when considering the safeguarding of the site.</p>
<p>Furthermore weight should also be given to the impact a future large housing development would have on the adjacent natural habitats surrounding the quarries east of the Alderley Road. Many of the important planning considerations appear to be reduced in importance by the panacea of mitigation, which seems to be a convenient way of removing their relative importance.</p>	<p>The Chelford settlement report [ED 26] has appropriately considered a number of relevant factors, detailed in the settlement report, in line with the Council's site selection methodology [ED 07] when considering the safeguarding of the site.</p>
<p>The impact on infrastructure would be significant and would not deliver the proposals set out in policy.</p>	
<p>A further large scale development in Chelford will increase out commuting, increase the use of the car and will turn Chelford into a dormitory village, such as to retail destinations.</p>	
<p>A study of the cumulative effects of developments on the road network is desperately required not in the future, but now before the SADPD proposals become effective. This is a point made by Highways England. We are also concerned that this area of land has accessibility issues.</p>	<p>The Chelford settlement report [ED 26] has appropriately considered a number of relevant factors, detailed in the settlement report, in line with the Council's site selection methodology [ED 07] when considering the safeguarding of the site. The site assessment has included the consideration of highway impacts on the network and access into the site.</p>
<p>Residents of Chelford have indicated in feedback during the preparation of its Neighbourhood Plan, strong views that any future development in Chelford should be small scale, that visual amenity and openness are retained, the open countryside and green belt is</p>	<p>The justification for the proposed safeguarding of the site is set out in the Chelford settlement report [ED 26]</p>

protected and that the character of the village is not significantly altered	
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Disley (general issues)

Summary of the main issues raised	How the main issues have been taken into account
Two sites were submitted (references refer to the site's reference in the Disley Settlement Report [PUB 29]): <ul style="list-style-type: none"> • Cloughside Farm (CFS29); and • Land off Jacksons Edge Road, Disley (FDR1941). 	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Disley Settlement Report [ED 29].
Further development will lead to additional traffic on the already congested A6. Traffic has increased significantly following the opening of the A555 (A6-Manchester Airport) road; Disley needs a bypass.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
Further development will increase air pollution, which already breaches legal limits.	Air quality issues are considered through the Disley Settlement Report [ED 29]. In addition, any proposals would be subject to Revised Publication Draft SADPD policy ENV 12 'Air quality'.
There is no capacity in local education, health care and public transport services for additional residents.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.
Green Belt should only be altered in exceptional circumstances.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land. Exceptional circumstances are considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53].
The housing requirement for local service centres has nearly been	The Provision of Housing and Employment Land and the Approach to

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achieved already and the remainder will be met through windfall developments; therefore there is no requirement for further housing development in Disley.	Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
The total supply in Disley is just one dwelling over its 245 dwelling requirement which gives no flexibility. A flexibility factor of at least 10% should be applied, meaning that more sites are required.	Housing supply flexibility is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution [ED 05].
There have been flood events in the area recently.	Flooding issues for each site put forward are considered in the Disley Settlement Report [ED 05].
The promoter of land at Cloughside Farm considers the council's flood risk assessment of the site is incorrect as there has not been any flooding on the eastern section of the land in 20 years and the flooding that occurred in the western section was as a result of a mains water leak. The site has never been sprayed by insecticides or pesticides and contamination is not considered to be an issue.	The flood risk and contaminated land assessments in the Disley Settlement Report [ED 29] have been produced in accordance with the criteria set out in the Site Selection Methodology [ED 07].

Site DIS 1 'Greystones Allotments'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
Policy CF2 in the made Disley Neighbourhood Plan states that the allotments are 'greatly valued'. The policy requires that any proposal to develop allotment land should result in clear and significant environmental community benefits.	This site has been removed from the Revised Publication Draft SADPD.
Green Belt land should only be used in exceptional circumstances. Use of Green Belt sets a precedent for future developments.	This site is not in the Green Belt.
Further development will lead to additional traffic on the already congested A6. Traffic has increased significantly following the opening of the A555 (A6-Manchester Airport) road. All traffic from this site would access to the A6.	Highways issues have been considered in the Disley Settlement Report [ED 05], but this site has been removed from the Revised Publication Draft SADPD.

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It is considered that safe vehicular access could not be provided to the site, either through Peveril Gardens or from the A6.	Highways issues have been considered in the Disley Settlement Report [ED 05], but this site has been removed from the Revised Publication Draft SADPD.
Further development will increase air pollution, which already breaches legal limits. The SADPD fails to account for the air pollution impacts of additional traffic generated by this development.	Air pollution issues have been considered in the Disley Settlement Report [ED 05], but this site has been removed from the Revised Publication Draft SADPD.
The allotment holders have worked on the site to get good crop yields; good yields would not be assured on a different site. Plot holders have improved drainage and if moving the allotments to the area adjacent to Newtown Playing Field, drainage of the playing fields is problematic.	This site has been removed from the Revised Publication Draft SADPD.
Loss of the Newtown Playing Fields would be contrary to SADPD Policy REC 1.	This site has been removed from the Revised Publication Draft SADPD.
A development of 20 houses would be overbearing and unsympathetic to the surrounding properties which would not be in accordance with SADPD Policy HOU 10.	This site has been removed from the Revised Publication Draft SADPD.
The habitats provided by the allotments and their proximity to the railway embankment wildlife corridor could not be replicated by a high density housing scheme.	This site has been removed from the Revised Publication Draft SADPD.
The site promoter has confirmed that there are various sites within its ownership that could be used to provide replacement allotments.	This site has been removed from the Revised Publication Draft SADPD.
The site for the replacement allotments has not been identified but would be in the Green Belt; therefore allocation of this site would still require development in the Green Belt.	The provision of allotments is not inappropriate development in the Green Belt.
The site promoter has stated that there is no guarantee that the site will actually be developed.	The site promoter has confirmed that if allocated, the land would be made available for development during the plan period. This site has been removed from the Revised Publication Draft SADPD.
The site is considered to be further from the village centre than alternative sites and is therefore less sustainable.	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location but this site is not proposed for inclusion in the Revised Publication Draft SADPD.

<p>There are approximately 40 empty dwellings in Disley which indicates there is no need for more houses considering the falling birth rate and the fact that the council's plans for the number of houses were drawn up in the 1980s.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.</p>
<p>The village infrastructure (schools, GP surgery, drains) could not cope with additional residents.</p>	<p>In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.</p>

Safeguarded land DIS 2 'Land off Jacksons Edge Road'

This initial Publication Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

<p>Summary of the main issues raised</p>	<p>How the main issues have been taken into account</p>
<p>The site promoter considers that the site should be allocated for residential development rather than safeguarding, in order to provide a realistic prospect of meeting the overall housing need; to ensure the council can demonstrate and then maintain a deliverable five year supply of land for housing; to ensure the SADPD is consistent with the LPS; and to provide flexibility in the event that HS2 is committed to come to Crewe by 2027. The site promoter also considers the assessment of the site in the Green Belt Assessment Update 2015 to be inaccurate and further Green Belt assessment of the site should be carried out as required by the LPS examining inspector.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land. A Green Belt Site Assessment of the site has been completed as required by the Site Selection Methodology [ED 07] and is presented in the Disley Settlement Report [ED 29].</p>
<p>The site has a history of flooding; surface water run-off from the site means Lymewood Drive is susceptible to flooding; there is a history of flooding on Jacksons Edge Road. Development on this field would increase the risk of flooding.</p>	<p>Flooding issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the Site Selection Methodology [ED 07].</p>
<p>Further development will lead to additional traffic on the already</p>	<p>Highways issues are considered through the assessments in the</p>

congested A6. Traffic has increased significantly following the opening of the A555 (A6-Manchester Airport) road. Jacksons Edge Road is already congested and very dangerous.	Disley Settlement Report [ED 29] in accordance with the Site Selection Methodology [ED 07].
Further development will increase air pollution, which already breaches legal limits. The SADPD fails to account for the air pollution impacts of additional traffic generated by this development.	Air pollution issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the Site Selection Methodology [ED 07].
The proposals do not include any affordable housing.	The site not proposed to be allocated for development. If allocated in the future, affordable housing would be required in line with the development plan policy in place at the time.
Green Belt land should only be used in exceptional circumstances. Use of Green Belt sets a precedent for future developments.	The exceptional circumstances to alter Green Belt boundaries to designate safeguarded land are considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53].
The Disley Neighbourhood Plan seeks to protect Green Belt land.	The exceptional circumstances to alter Green Belt boundaries to designate safeguarded land are considered in the Local Service Centres Safeguarded Land Distribution Report [ED 53].
The housing should be built on brownfield sites instead.	The site is not proposed to be allocated for housing development.
The village infrastructure (schools, GP surgery, dentists, wastewater, public transport, car parking, policing) could not cope with additional residents.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.
Lyme Park and Disley are tourist attractions and any more homes would detract from the natural beauty.	The landscape impact has been assessed through the assessments in the Disley Settlement Report [ED 29] in accordance with the Site Selection Methodology [ED 07].
Several trees will need to be felled.	The site is not proposed to be allocated for development.
73 houses is far too many for this site; 90+ houses is too many for the site.	The site is not proposed to be allocated for development. If allocated for housing development in the future, consideration would need to be given to an appropriate number of dwellings on the site.
The site provides habitats for a number of different species.	Ecology issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the Site Selection

	Methodology [ED 07].
To walk to the village, the pavements are narrow and the road is steep.	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location.
The village boundary will become blurred and Disley will be regarded as part of High Lane. Further, gradual incursions into the Green Belt would eventually result in Disley effectively merging with High Lane.	The Green Belt Site Assessment for this site considers this issue, showing that the new Green Belt boundary would be defined using physical features that are readily recognisable and likely to be permanent. The site is surrounded by built development on three sides.
There is no information on the compensatory improvements that are required to offset the impact of removing the land from the Green Belt.	Revised Publication Draft SADPD Policy PG 12 'Green Belt and safeguarded land boundaries' requires that, if allocated for development in the future, proposals for this site should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of its removal from the Green Belt.
The housing requirement for local service centres has nearly been achieved already and the remainder will be met through windfall developments; therefore there is no requirement for further housing development in Disley.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
The one-year review on traffic and air pollution arising from the opening of the A555 due in November 2019 should be undertaken before any further development in Disley village is considered, as it is clear that an important way to mitigate the impact of the A555 is not to develop further sites of this size.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
The First Draft Disley Settlement Report [FD 29] agrees that this site should not be developed.	The First Draft Disley Settlement Report considered a smaller version of the site; concluding that it would be suitable for safeguarded land but was not of a sufficient size to accommodate all of Disley's safeguarded land requirement.
The plan is not compliant with the Duty to Co-operate because it has not taken into account cross-boundary matters. As Disley is on the edge of Cheshire East, neighbouring areas will have to cope with	Duty to Co-operate discussions are set out in the SADPD Duty to Co-operate Statement of Common Ground [ED 51]. In accordance with the Site Selection Methodology [ED 07], infrastructure providers and

increased demand for services and increased traffic. No consultation has been made with neighbouring authorities, health care providers, transport bodies or other key stakeholders.	statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6.
There are approximately 40 empty dwellings in Disley which indicates there is no need for more houses	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Disley. However there is a requirement for safeguarded land.
The 2013 Green Belt Assessment considered that the site made a 'major contribution' to Green Belt purposes but the 2015 Green Belt Assessment Update downgrades the contribution to 'significant contribution' even though it concludes that it '...is considered to make a major contribution of the Green belt purposes and removal of this parcel from the Green belt will detrimentally undermine the overall Green Belt function of preventing urban sprawl.'	The Disley Settlement Report [ED 29] includes a Green Belt Site Assessment, which demonstrates that the site makes a 'significant contribution' to Green Belt purposes.
Disley should be considered to be a rural village rather than a local service centre	The settlement hierarchy is already determined by LPS policy PG 2 'Settlement Hierarchy', which designates Disley as a Local Service Centre.
The site promoter seeks to develop the land as soon as possible; therefore there is a high risk that building would start soon rather than after 2030.	LPS Policy PG 4 'Safeguarded land' states that "development of safeguarded land for uses other than those appropriate in the open countryside will not be permitted, unless a review of the Local Plan has taken place to allocate the land following an assessment of the need for development at that time, and the identification of the most appropriate areas for development o take place".
The site was not included in the First Draft SADPD; therefore denying the opportunity to comment at that stage.	Following consideration of the consultation responses and undertaking further assessments through the Disley Settlement Report [ED 29] in accordance with the Site Selection Methodology [ED 07], it is considered that this site is more preferable for safeguarded land than the site proposed in the First Draft SADPD.
The site is currently an ecological stepping stone, therefore development would not be compliant with LPS Policy SE 3 'Biodiversity and geodiversity'.	Ecology issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the Site Selection Methodology [ED 07].

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The site makes a 'significant contribution' to the purposes of Green Belt yet there are other sites elsewhere that make a lower contribution but are not proposed for allocation.	As demonstrated in the Disley Settlement Report [ED 29], there are no alternative suitable sites in Disley that make a lower contribution to Green Belt purposes.
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Goostrey (general issues)

Summary of the main issues raised	How the main issues have been taken into account
One site put forward for consideration: <ul style="list-style-type: none"> land adjacent to 51 Main Road, Goostrey (CFS 296, FDR2251, PBD2704), greenfield, 6 dwgs 	All Goostrey sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered in the 'Goostrey Settlement Report' [ED 30] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
The correct ONS Census figures for Goostrey are pop 2,179 and 956 dwellings. At minimum the footnote wording in [PUB 30] should be changed to say that as well as including an extensive area outside the LSC boundary it also includes Cranage Parish, which is part of another LSC boundary.	Footnote 1 in the 'Goostrey Settlement report' [ED 30] has been amended to clarify the area to which the population figure relates: 'The population figure <u>relates to the whole area of the Goostrey LSC (as defined for Local Plan purposes, i.e. LSOAs E01018411 & E01018412)</u> includes an extensive area outside of the LSC boundary. '

Haslington (general issues)

Summary of the main issues raised	How the main issues have been taken into account
Site submissions received for land at:- <ul style="list-style-type: none"> Land East of Slaughter Hill, Haslington (CFS 195) Land at Shukers Farm 	The Council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The provision of housing land and employment land and the approach to spatial distribution' [ED 05] report. It concludes that there is no need for housing or employment land allocations at Haslington in the SADPD. The site submissions have been considered through the Haslington Settlement Report [ED 32].

Holmes Chapel (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land off Manor Lane, Holmes Chapel (PBD2249) (includes part of CFS 272 and FDR2311), greenfield, 60 dwgs and residential care home • Land south of Middlewich Road, Holmes Chapel (PBD1355) (includes parts of CFS 425, CFS 280, FDR1318 and PBD1334, and FDR2654B), greenfield, 14.7ha mixed use (employment 3.7ha (FDR 2654B), housing 6.4ha, extra care 0.55ha) • Land north and south of Middlewich Road (PBD1334) (includes CFS 425, FDR2654A, FDR2654B and PBD1344 and parts of CFS 280, CFS 426 and FDR1318.), greenfield, mixed use (north 7.5ha housing, south 38ha mixed use) 	<p>All Holmes Chapel sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered in the 'Holmes Chapel Settlement Report' [ED 33] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>
<p>Additional sites should be allocated to provide flexibility and contingency regarding delivery for both housing and employment.</p>	<p>The approach to housing supply flexibility is addressed in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] The employment land requirement identified in the LPS already includes a 20% flexibility factor, as set out in the Alignment of Economic, Employment and Housing Strategy (¶¶3.55 to 3.58).</p>
<p>The Neighbourhood Plan has identified development needs that will not be delivered by the committed and more limited forms of development in Holmes Chapel as provided for through the LPS and SADPD.</p>	<p>The approach to Holmes Chapel has been considered through 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Holmes Chapel Settlement Report' [ED 33]. The selection of sites has been considered through the 'Holmes Chapel Settlement Report' [ED 33]. Neighbourhood Plans are able to set development figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.</p>
<p>Holmes Chapel has accommodated the housing and employment land need in the SADPD proposal, which includes a provision to accommodate Goostrey requirements. This assumption should be</p>	<p>The development figures that the LSCs are expected to accommodate are set out in 'Revised Publication Draft SADPD' [ED 01], Policy PG 8 'Spatial distribution of development: local service centres' and are</p>

<p>confirmed and that no more growth due to Goostrey needs is expected.</p>	<p>expressed as ‘in the order of’. As stated in ¶8.73 of the ‘LPS, ‘these figures are intended as a guide and are neither a ceiling nor a target.’ The approaches to Goostrey and Holmes Chapel are set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05], the ‘Holmes Chapel Settlement Report’ [ED 33] and the Goostrey Settlement Report’ [ED 30].</p>
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Site HCH 1 ‘Land east of London Road’

<p>Summary of the main issues raised</p>	<p>How the main issues have been taken into account</p>
<p>The allocation is intended solely for the purposes of a particular operator, and does not serve as new employment land (available on the open market) to secure new inward investment into the Borough.</p>	<p>It remains the case that investment to create employment floorspace creates jobs, whether that’s through the expansion of a local business or a new business. The proposed allocation would not fall neatly into the categories of either owner expansion land or generally available employment land; development could be led or significantly influenced by other companies, albeit working collaboratively and commercially with Recipharm. As a Contract Development and Manufacturing Organisation (CDMO) Recipharm’s business model is to supply CDMO services to third parties. Their standard model is that the customer invests to establish capability on the site to complete the specific activity for them. For example this could include: establishing ‘Development Capability’ to produce material for the medical approval process, completing testing of material or devices to support the development phase for a new product, taking a product through its medical approval process and establishing full scale manufacturing capability on the site, or taking an existing product and establishing full scale manufacturing capability on the site.</p>
<p>Workers living in Holmes Chapel, and who are not employed in the pharmaceutical industry, will have to continue to travel greater distances out of Holmes Chapel to access jobs.</p>	<p>There is a requirement for 380ha of employment land Borough-wide. There is no need to provide a mix for every LSC, or even KSC. The Local Plan (read as a whole) is considered to provide an extensive range and distribution of employment land.</p>
<p>The SADPD fails to provide for new employment growth/inward</p>	<p>There is a requirement for 380ha of employment land Borough-wide.</p>

investment across the LSCs.	There is no need to provide a mix for every LSC, or even KSC. The Local Plan (read as a whole) is considered to provide an extensive range and distribution of employment land.
Any new riparian development adjoining River Croco, make sure main ecological network and ecological receptor of site is actively protected and where feasible enhanced.	Policies in the LPS and Revised Publication Draft SADPD [ED 01], for example LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'ecological implementation' will help to mitigate any negative effects arising from the proposed development.
The 8m wide buffer should be measured from bank top and should be increased to 15m to protect the wildlife corridor.	Amend bullet 1 to read: 'provide an undeveloped 8 15 metres wide buffer zone <u>to either side of the bank tops.</u> '
Impacts to the riparian zone and any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric in order to achieve biodiversity Net Gain.	Policies in the LPS and 'Revised Publication Draft SADPD' [ED 01], for example LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'ecological implementation' will help to mitigate any negative effects arising from the proposed development.

Mobberley (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Environment Agency MOB 1 any scheme design should ensure any surface water discharges to watercourse adopt multifunctional SUDs systems approach to protect adjoining watercourse and ecological receptor.</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Mobberley. Site MOB 1 has been removed from the Revised Publication Draft SADPD.</p>
<p>Warford Park is in the Green Belt to the south Mobberley, Our client seeks the allocation of land to the north of Warford Park for an extension to the existing care village to meet the demand for C2 older persons accommodation in Cheshire East. The accommodation would encompass social housing. Whilst this national policy is no longer in place, a similar specialist designation (Major development site in the Green Belt) at Warford</p>	<p>Policy HOU 2 'specialist housing provision' sets out criteria for the consideration of schemes, including those for C2 uses, in the borough. All sites submitted have been considered in accordance with the site selection methodology [ED 07].</p>

<p>Park would recognise the existing use and enable the potential for sustainable expansion to meet the need for additional C2 bedspaces.</p>	
<p>These representations seek to allocate the land at Pavement Lane for new residential development.</p>	<p>All sites submitted have been considered in accordance with the site selection methodology [ED 07].</p>
<p>These representations seek the allocation of the land at Ryecroft Lane for a care home (C2) and retirement living accommodation and new residential development immediately adjoining the existing settlement boundary. The site is put forward under 2 options:</p> <ul style="list-style-type: none"> · First, it is requested that the whole site be considered as an allocation for a Care Home (C2), specialist care unit and retirement living accommodation (apartments and bungalows) including a club house and other communal facilities. This is referred to as Option 1 · Second, if the larger parcel (Option 1) is not taken forward then we request consideration of a smaller 0.9 hectares (2.3 acres) parcel immediately adjacent to the settlement boundary for a Care Home (C2) and a specialist care unit. The parameters of this option would follow the existing settlement line along the boundaries of the properties to the south of Mayfield Road. This is referred to as Option 2. 	<p>Policy HOU 2 ‘specialist housing provision’ sets out criteria for the consideration of schemes, including those for C2 uses, in the borough. All sites submitted have been considered in accordance with the site selection methodology [ED 07].</p>
<p>The proposed site allocations is unsound because the plan doesn’t allocate enough land. Mobberley is a local service centre . Land to the south of the settlement; to the east of Ryecroft Lane, affords a logical extension of the settlement which is Available, Developable and Deliverable. The land owner is in discussions with an affordable housing developer about bringing forward a suitably sized affordable housing development on this site.</p> <p>The requirement for affordable homes in Mobberley has not been met; our client is proposing an allocation for 100% affordable housing development in an area of high unmet demand. The latest figures from September 2019 show a requirement for affordable housing in Mobberley of; 16 cottage style apartments, 17 bungalows and 20 houses. All these units can easily be accommodated on the site.</p> <p>Our clients site sits between Ryecroft Land and Pavement Lane</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Mobberley. All sites submitted have been considered in accordance with the site selection methodology [ED 07].</p>

<p>The proposed housing on the land off Ilford Way should be removed from the SADPD and the Ilford site should be zoned as a mixed use employment site only. Access arrangements to the safeguarded land north of Carlisle Close should be specified in the SADPD</p>	<p>The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Mobberley. Site MOB 1 has been removed from the Revised Publication Draft SADPD.</p>
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Site MOB 1 'Land off Ilford Way'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>With close proximity of Mobberley Brook failing WFD waterbody (Ref: GB112069061330), any scheme design should ensure any surface water discharges to watercourse adopt multifunctional SUDs systems approach to protect adjoining watercourse and ecological receptor.</p>	<p>This site is no longer a site allocation in the revised publication SADPD.</p>
<p>The draft policy relies on ENV 13, which is not sound. It is currently neither consistent with national policy and guidance, nor justified by evidence. Limiting development to between the 57 and 60 dB LAeq contours is not sound in terms of national policy and guidance and undermines the purpose of a comprehensive master planning exercise. ENV 13 only allows for non-family homes, presumably on the premise that it would not be possible to provide acceptable external amenity space. In the Cranford case, it is considered that this restriction is also not justified and should be deleted. The policy should not restrict residential development and imposes an arbitrary maximum of up to 50 dwellings.</p>	<p>ENV 13 has been reviewed and revised in the Revised publication draft SADPD taking into account further technical advice and the latest Planning Practice Guidance.</p>
<p>Request that brownfield land is assessed in line with empirical evidence, rather than stated opinion and the brownfield benchmark land value should be adjusted to reflect an industrial value of £872,000 per hectare plus 20% = £1,045,000 per hectare.</p>	<p>This site is no longer a site allocation in the revised publication SADPD.</p>

<p>It is noted that all greenfield sites are assessed at the same benchmark land value, with no reference to the achievable residential sales values within the five proposed value areas. As currently drafted, residential sales values in prime value areas are 65.6% higher than in the very low value areas and the adoption of a single uplift value from the existing use value is regarded as inappropriate. VA paragraph 10.81 states that "...the Council can be confident that the sites in the emerging SADPD are deliverable when taking into account the full cumulative impact of the policies in the SADPD and the adopted LPS." The conclusion makes no reference to the sentence at VA paragraph 10.12 which, in respect of development in low values areas, states "The Council should be cautious about relying on such sites to deliver housing, and should seek confirmation from the site promoter that they will be forthcoming."</p> <p>2.58 The VA does not determine which of the proposed allocation sites fall within each of the five value areas and baseline testing summarised at VA Table 10.2 also indicates that large brownfield development in low and high value areas is unviable.</p> <p>2.59 Peel request confirmation of the proposed allocation sites which are regarded as being at risk of non-delivery.</p> <p>2.60 Peel has concerns that the issues raised within this representation mean that there is a danger that the SADPD will be regarded as unsound. The VA is not regarded as providing proportionate evidence, as required by NPPF paragraph 35.</p>	
<p>United Utilities. MOB 1 addresses our concerns regarding odour, however noise and access are not addressed. Any noise assessment should also include that generated from our WwTW site specific policy to address future developments relationship with the access to our WwTW. We would therefore request the following amendments to MOB 1:</p> <p>4. be accompanied by an Acoustic Design Statement to demonstrate how the internal noise levels for any new homes from all surrounding receptors , as set out in Policy ENV 13 'Aircraft noise' will be met;</p> <p>9. Maintain appropriate access to Mobberley Wastewater Treatment</p>	<p>This site is no longer a site allocation in the revised publication draft SADPD.</p>

<p>Works at all times during development and thereafter. Applicants must demonstrate evidence that developments will not adversely impact the existing access to the detriment of United Utilities use or public safety. 12.128 United Utilities has a legal right of access to their assets. The access road is used by tankers and large vehicles, and applicants will be required to address any increased risk to highway safety. The applicants must agree any required access with United Utilities and provide information on the necessary highway safety measures to mitigate any potential issues created by proposals proximity to the access.</p>	
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Safeguarded land MOB 2 ‘Land north of Carlisle Close’

This initial Publication Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>The site is so small as to be effectively undevelopable making a wholly nominal contribution to potential future development needs. Such a small safeguarding site has been influenced by the aircraft noise policy.. This is a flawed approach and the low housing apportionment to Mobberley has in turn determined the distribution of the residual requirement for safeguarded land across the LSC's. It is considered that land adjacent to MOB 1 should safeguarded to provide for the element of the safeguarded land requirement that cannot be met in Bollington (instead of Chelford, which is a less sustainable option).</p>	<p>This site is no longer a site allocation in the revised publication draft SADPD.</p>
<p>The land makes a ‘significant contribution’ to Green Belt purposes in the Arup Green Belt Assessment and it still has that designation. Land with that designation should not be identified for development.</p>	<p>This site is no longer a site allocation in the revised publication draft SADPD.</p>
<p>The Viability Assessment is not regarded as providing proportionate evidence, as required by NPPF paragraph 35.</p>	<p>This site is no longer a site allocation in the revised publication draft SADPD.</p>
<p>8. Policies PG 11 & 12: Green Belt Boundaries and</p>	<p>This site is no longer a site allocation in the revised publication draft t</p>

Safeguarded Land including MOB 2

8.3 The Council proposes a purely nominal area of land to be released from the Green Belt in Mobberley known as “land north of Carlisle Close”. This is so small as to be effectively undevelopable and would make a wholly nominal contribution to potential future development needs. The land is in disparate ownership and appears to be, at least in part, currently domestic garden land. It is inaccessible and the Councils evidence base confirms it has no obvious means of access, and its future demolition would require at least one current house on Carlisle Close to be demolished. It is not obvious how this land could potentially contribute to future development needs, which is a key requirement of any safeguarded land as recognised in the Safeguarded Land Distribution Report (PUB 53) which says that (para 2.1) “...it should be provided in locations where it is likely to be able to assist in meeting future development requirements, should it be required to do so.” Even if this land parcel could it, is so small as to be largely irrelevant.

8.4 PREP owns land to the east of its currently developed site which would provide a much more meaningful resource and which is shown edged red on the attached plan at Appendix 2 (Safeguarded Land). The land is well contained and there are clear opportunities to follow well established, firm physical features which could form long term defensible Green Belt boundaries. This land, or a major part of it, could be released from the Green Belt without significant harm to its purposes. It would enable an area of readily developable land to form a sensible land parcel, able to be drawn down as required, for future development purposes. Such development purposes could include housing, but also potentially other uses including employment, for post Plan needs. The land is accessible via the current developed site which is covered by draft policy MOB 1. The comprehensive master planning approach called for in that policy could readily include consideration of the provision for future access to the safeguarded land promoted by PREP.

8.5 The Councils identification of such a small parcel of land for

SADPD.

<p>removal from the Green Belt and safeguarding has been wholly influenced by its approach to the development potential of land in Mobberley by reference to the draft aircraft noise policy (ENV 13). It is this flawed approach which has led to the identification of only 60 new homes for the Mobberley area. This apportionment of (purely nominal) housing growth has then in turn determined the proportions of the total residual requirement for safeguarded land (calculated by the Council as 13.6 ha) and its distribution across the LSC's.</p> <p>8.6 This apportionment exercise results in an assessed figure of 0.9 ha for Mobberley. However the outcome of this same exercise produces a requirement for Bollington of 4.09 ha which PUB 53 says (para 5.1) cannot be met in Bollington for Green Belt reasons, as suitable land has not been identified for release without unduly harming Green Belt purposes around that settlement. As a result, the Council has then tested various scenarios in order to establish how it should reassign Bollington's safeguarded land figure of 4.09 ha so that this need is met elsewhere amongst the other LSC's. It has concluded that all of it should be met in Chelford instead. PREP object to this as it is not justified. It perpetuates the Councils misapplication of noise policy, such that Mobberley is neither adequately recognised as a suitable location for new housing (see MOB 1 comments above) nor its potential contribution to safeguarded land requirements acknowledged.</p> <p>8.7 The land owned by PREP adjacent to the existing developed site is sustainably located and ideally suited to longer term development needs and can be released without unacceptable harm to Green Belt purposes. It should be the recipient of that element of the safeguarded land requirement that cannot be met in Bollington, instead of Chelford, which is a less sustainable option.</p> <p>8.8 PREP object to MOB 2 and PG 11 and 12 on the basis that the Plan's policies are not justified, nor consistent with national policy, and the Plan is not positively prepared.</p>	
<p>The Mobberley Settlement Report (PUB 37), dated June 2019, identifies a 0.4 ha. Green Belt site, MOB 2 (also referenced as</p>	<p>This site is no longer a site allocation in the revised publication draft SADPD.</p>

<p>CFS333A) for safeguarding for development during the period of the next Local Plan (post 2030). This land to the north of Carlisle Close was part of a parcel (MB 05) that was classified in the Arup Green Belt Assessment Report as making a 'significant contribution' to Green Belt purposes. It still has that designation. Land with that designation should not be identified for development.</p> <p>35. Also, the level of aircraft noise suffered by the area renders it unsuitable for housing.</p>	
<p>HE comments</p> <p>A safeguarded site establishes the principle of land for future development and therefore in doing so it is expected that in identifying the site, there will be a need to undertake a heritage impact assessment as per all other sites. The Council has done a heritage impact assessment for this site which is included within the evidence base for the Local Plan. Therefore, we do not object to the proposed inclusion of the site as safeguarded land.</p>	<p>This site is no longer a site allocation in the revised publication draft SADPD.</p>

Prestbury (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>Six sites were submitted (references refer to the site's reference in the Prestbury Settlement Report [PUB 40]):</p> <ul style="list-style-type: none"> • Land off Heybridge Lane (southern site) (FDR2871); • Land to the north of Withinlee Road, Mottram St. Andrew (CFS576); • Land at Shirleys Drive (CFS58); • The Bowery (CFS391 plot 4); • Butley Heights (CFS391 plot 5); • Chrystallis Care Centre and Butley Heights Commercial Zone (CFS391 plot 5b); and • Land off Heybridge Lane (northern site) (FDR2001). 	<p>All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].</p>
<p>Allocations are made for around 45 dwellings in Prestbury, meaning</p>	<p>The Provision of Housing and Employment Land and the Approach to</p>

that with completions and commitments there remains an 11 dwelling shortfall against the 155 dwelling requirement.	Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
A flexibility factor should be applied to the housing requirements for Prestbury.	Flexibility in housing supply is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Further Green Belt site allocations are needed in Prestbury.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
The site promoter of land of Heybridge Lane (southern site) considers the site to make a 'contribution' to Green Belt purposes.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
The site promoter of The Bowery and Butley Heights considers these sites to make a 'contribution' to Green Belt purposes.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
The housing requirement for Prestbury should be expressed as a minimum figure, rather than 'in the order of'.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
The council over-estimated housing delivery figures for the strategic sites included in the LPS and it is important that the same error of judgement is not repeated in Prestbury.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
At March 2019, 72 houses had been completed or committed in Prestbury. If you add in the 10 houses proposed for PRE 1, that gives 82 houses (71% of the total) in less than half of the plan period. Based	This calculation double-counts the commitments. In any case, The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for

on the current 'run rate' of 8 new houses per year and include the 10 houses on PRE 1, Prestbury will achieve its target in 2023 with no need for Green Belt release.	additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
Sites are identified for only 45 homes, leaving a shortfall of around 70 over the plan period. At 31 March 2018, there were only 18 completions (just over 2 per year) but this figure is not thought to account for demolitions which are prevalent in Prestbury and net completions may well be less than 18.	The Prestbury Settlement Report [ED 40] takes account of net completions and commitments.
The housing requirement for local service centres has nearly been achieved already and the remainder will be met through windfall developments; therefore there is no requirement for further housing development in Prestbury.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
The sites selected should be closer to the village centre to support local services and facilities.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
Sites should provide accommodation for young families and people over the age of 55.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
The site promoter of land at Shirleys Drive considers the council's assessment of heritage issues overstates the harm that would be caused to the conservation area and St. Peters Church; and that development has the potential to enhance the heritage assets.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
The site promoter of land at Shirleys Drive considers that the council's assessment of landscape impact overstates the harm to landscape character; and that development has the potential to enhance the landscape.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
The site selection process should prioritise the most accessible locations as required by the NPPF.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
Specific sites should be allocated for retirement living in Prestbury.	All sites submitted have been considered in accordance with the Site

	Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
Each of the sites is within or surrounded by designated low-density housing areas and the amounts of housing proposed would be significantly out of keeping with the area.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
Prestbury is unusual in having in-commuting for work.	Noted
Prestbury is not listed as an area of high housing need in the Local Service Centres Spatial Distribution Disaggregation Report [PUB 05] and exceptional circumstances have not been identified to justify alteration of Green Belt boundaries.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land. The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the exceptional circumstances to release Green Belt land for safeguarded land.
Prestbury has lost over 20 ha of Green Belt for a large school development which will generate significant amounts of traffic. Therefore, there should be no further development in Prestbury.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.
The council has ignored the community response to the First Draft SADPD consultation.	All responses have been taken into account in preparing the Revised Publication Draft SADPD.
The site selection methodology ignores the Strategic Priorities set out in the LPS.	Consideration of sites against the strategic priorities of the LPS is carried out as part of the Site Selection Methodology [ED 07].
The site selection ignores the community benefits from alternative site options.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].
The small plot of previously derelict land at the rear of the former Ye Olde Chocolate Box has been counted as Prestbury's allocation for employment land when in fact this plot is a car garage for the adjoining residence. Consequently, Prestbury has not been given any employment land although it is been given a quota.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land.

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Specific sites should be allocated for self-build housing.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40]. The Revised Publication Draft SADPD Policy HOU 3 'Self and custom build dwellings' is supportive of self-build.
The site promoter of land to the north of Withinlee Road considers the site makes only a limited contribution to the purposes of Green Belt.	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Prestbury Settlement Report [ED 40].

Site PRE 1 'Land south of cricket ground'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
There is concern that a ball strike risk assessment has not been carried out and is instead deferred to the planning application stage. There is a lack of supporting evidence and likely prejudicial impact on the cricket pitch.	This site has been deleted from the Revised Publication Draft SADPD.
The number of units should be reduced allowing for higher quality, lower density housing that is less susceptible to ball strikes.	This site has been deleted from the Revised Publication Draft SADPD.
Some of the land is used by Prestbury Cricket Club for parking; some of which should be retained.	This site has been deleted from the Revised Publication Draft SADPD.
Tree cover should not be lost.	This site has been deleted from the Revised Publication Draft SADPD.
The pedestrian crossing on Castle Hill should not be lost or rendered unsafe.	This site has been deleted from the Revised Publication Draft SADPD.
The land is unable to sustain vehicular and other access for 10 properties. The visibility splay at the entrance is hampered by a protected tree. The access point is considered unsafe.	This site has been deleted from the Revised Publication Draft SADPD.
The site is adjacent to the Bollin Valley Flood Zone	This site has been deleted from the Revised Publication Draft SADPD.
The site is adjacent to an area categorised as making a 'significant	This site has been deleted from the Revised Publication Draft SADPD.

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contribution' to Green Belt and also adjacent to the cricket ground which is within a local landscape designation area.	
The proposed access point is adjacent to a pedestrian crossing point on Castle Hill.	This site has been deleted from the Revised Publication Draft SADPD.
An additional policy requirement should be added to require development to be in accordance with the Cheshire East heritage impact assessment document including the specific mitigation/enhancement measures for the site.	This site has been deleted from the Revised Publication Draft SADPD.
The site policy should note that Policy ENV 1 requires development at this site to increase the size of core areas and the quality and quantity of existing new or priority habitat; and that in order to achieve biodiversity net gain (required by ENV 2), impacts to semi-natural habitat on site will require mitigation/offsetting in accordance with the DeFRA metric version 2.0.	This site has been deleted from the Revised Publication Draft SADPD.
The volume of traffic generated will make local roads more dangerous.	This site has been deleted from the Revised Publication Draft SADPD.

Site PRE 2 'Land south of Prestbury Lane'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
Prestbury Lane is narrow and an accident blackspot. The junctions at either end of Prestbury Lane are accident blackspots. It is considered that the site should score 'red' for highway safety due to the accident statistics.	The Prestbury Settlement Report [ED 40] considers highways issues. If allocated in the future, junction mitigation measures may be required but it is considered that these could be achieved.
Prestbury Lane is heavily congested.	The Prestbury Settlement Report [ED 40] considers highways issues. If allocated in the future, junction mitigation measures may be required but it is considered that these could be achieved.
Pedestrian access via Prestbury Lane is not suitable and the proposal	The assessments in the Prestbury Settlement Report [ED 40] have

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for pedestrian access via the footpath to Heybridge Lane is also unsuitable and cannot be delivered as part of the access is owned by a third party. The path would need widening and the pedestrian crossing at Heybridge Lane improved.	considered pedestrian access. The site promoter has demonstrated that a new pedestrian access can be provided to link to the public footpath network. The site is within walking distance of the village centre.
The site has poor drainage and building would increase surface run-off, creating additional flood risk to surrounding properties. The site is subject to flooding. The site is permanently waterlogged and boggy. The field absorbs surface water run-off from London Road, which will increase with the development of the Poynton Relief Road.	Flooding and drainage issues have been considered in the Prestbury Settlement Report [ED 40].
The proposals are for high density housing in a low density area and are not appropriate.	The capacity of the site has been considered through the assessments in the Prestbury Settlement Report [ED 40]. The Revised Publication Draft SADPD now proposes this site as safeguarded land.
The site promoter considers the site to be capable of delivering around 50 new dwellings; the flood risk supporting information should be updated in light of the information provided; the reference to the likely need for mitigation measures at either end of Prestbury Lane should be removed; the reference to the requirement for a botanical survey should be removed.	The capacity of the site has been considered through the assessments in the Prestbury Settlement Report [ED 40]. The Revised Publication Draft SADPD now proposes this site as safeguarded land.
The site is considered to be peripheral and encroaches into open countryside.	The site is enclosed by the existing settlement on three of its four sides.
The site is not as sustainably-located as some of the other potential sites and is distant from the services and amenities in the village centre. Only 4 out of 20 of the services and facilities required by LPS Policy SD 2 (in Table 9.1) are within the recommended distance. The site significantly fails to meet the recommended distances and should score 'red' in the traffic light assessment for accessibility.	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location.
It is not considered to be possible to provide mitigation measures to address the issues at the junctions at either end of Prestbury Lane. No information is provided as to what these measures may be.	The Prestbury Settlement Report [ED 40] considers highways issues. If allocated in the future, junction mitigation measures may be required but it is considered that these could be achieved.
There is no need for further site allocations and there are no	The Provision of Housing and Employment Land and the Approach to

exceptional circumstances to justify altering the Green Belt boundary.	Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land. The exceptional circumstances for altering Green Belt boundaries to identify safeguarded land are considered in the Local Service Centres Safeguarded Land Distribution report [ED 53].
The 2013 Green Belt Assessment categorised the site as making a 'major contribution' to Green Belt purposes but this has now been downgraded to 'contribution'. The Green Belt status has been downgraded on a subjective basis, presumably to justify the site's allocation.	The Green Belt Site Assessment included in the Prestbury Settlement Report [ED 40] demonstrates that the site makes a 'contribution' to Green Belt purposes.
The site forms part of the setting of Prestbury on its north-west approaches and development would have an adverse impact on the character, appearance and setting of the village.	Landscape impact; and impact on the character and urban form are considered in the Prestbury Settlement Report [ED 40].
There is a high likelihood that protected species are present on site, including great crested newts. The site provides a variety of habitats	Ecology issues are considered in the Prestbury Settlement Report [ED 40].
The land either side of Prestbury Lane should be designated as part of the adjacent Local Landscape Designation Area. The site should score 'red' for landscape impact.	The site is not within a Local Landscape Designation Area. The extent of Local Landscape Designation Areas is considered in the Cheshire East Local Landscape Designation Review [ED 11].
The site will not come forwards for development in the plan period as the landowner has expressed a clear unwillingness to sell the land for development.	The landowner has actively promoted the site through the SADPD process. The site is now proposed for safeguarded land, rather than being allocated for development.
The foul and surface water systems in the area are already over-stretched.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees (including water and wastewater providers) have been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6
Local services are overstretched, including the GP surgery and dental surgery.	In accordance with the Site Selection Methodology [ED 07], infrastructure providers and statutory consultees (including water and wastewater providers) have been consulted on each of the sites

	proposed for allocation in the SADPD through the infrastructure providers / statutory consultees consultation at stage 6
There is no safe pedestrian route to access public transport, therefore this should score 'red' in the traffic light assessment.	The assessments in the Prestbury Settlement Report [ED 40] have considered pedestrian access. The site promoter has demonstrated that a new pedestrian access can be provided to link to the public footpath network. The site is within walking distance of the village centre.
Other brownfield sites in Macclesfield should be used instead.	The site is proposed as safeguarded land which is 'land between the urban area and the Green Belt'.
Reports prepared by the site promoter are said to lack credibility and their information has not been challenged by the council. The reports were only released following a Freedom of Information request. A number of respondents challenge statements made in the site promoter's literature.	It is not unusual for a site promoter to submit promotional and / or technical documents in support of a site. The reports submitted to the council by the site promoter were provided in response to a Freedom of Information Request; however no request for information was received through the normal channels of communication beforehand. In any case, the council does not accept the findings of the site promoter's literature in all cases (such as the suitability of Prestbury Lane to provide a dedicated pedestrian access route). The council's assessment of the site is based on its own evidence as set out in the Prestbury Settlement Report [ED 40].
The site selection is based on a subjective and inaccurate traffic light assessment; it appears to be based on a pre-conceived outcome. The rationale for decisions made is opaque.	The traffic light assessments of the site have been carried out in accordance with the methodology set out in the Site Selection Methodology [ED 07]. The reasons for including the site in the SADPD are set out in the Prestbury Settlement Report [ED 40].
None of the responses made at the first draft stage have been taken into account or reflected in the revised traffic light assessments. The council has not even commented on any of the previous responses.	The traffic light assessments of the site have been carried out in accordance with the methodology set out in the Site Selection Methodology [ED 07]. This consultation statement set out how each of the main issues raised have been taken into account in the preparation of the plan.

Safeguarded land PRE 3 'Land off Heybridge Lane'

This initial Publication Draft SADPD safeguarded land has been deleted in the Revised Publication Draft SADPD but is listed in Policy PG 12 'Green Belt and safeguarded land boundaries'.

Summary of the main issues raised	How the main issues have been taken into account
The site does not meet the accessibility criteria for four of the key facilities identified.	The accessibility assessment of the site in the Sustainability Appraisal [ED 02] shows that the site is in an accessible location.
There are unproven and untested access constraints that need to be addressed before the site could be developed. The access requires demolition of one detached home to gain access to the site.	Highway and access issues are considered in the Prestbury Settlement Report [ED 40].
The settlement report notes that it may be necessary to reduce the development area to mitigate landscape impacts. The presence of the pond and problematic access arrangements may reduce the area further. These need to be factored in and the SADPD should be clear about how many houses can be delivered.	As set out in the Prestbury Settlement Report, a much smaller area of the site is proposed for safeguarded land in order to mitigate the landscape impacts. The site is proposed for safeguarded land.
The site was found to make a 'significant contribution' to Green Belt purposes in the 2015 Green Belt Assessment Update but has now been downgraded to make only a 'contribution'. The re-classification was done without a re-evaluation of the Green Belt Assessment Update and is simply an acceptance of the developer's opinion.	The Green Belt Site Assessment included in the Prestbury Settlement Report [ED 40] demonstrates that the site makes a 'contribution' to Green Belt purposes.
There are concerns about the density of housing proposed. 70 dwellings on this site would be out of character with the surroundings.	The site is proposed as safeguarded land.
The land is understood to house a variety of flora and fauna and a full environmental impact assessment must be carried out. The site provides habitats for a number of species.	Ecology issues are considered through the Prestbury Settlement Report [ED 40].
The site promoter considers that the site should be allocated for development rather than safeguarded; and that a further area of adjacent be safeguarded for future development.	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Prestbury. However there is a requirement for safeguarded land. The extent of the land proposed for

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	safeguarded land is considered in the Prestbury Settlement Report {ED 40}.
This section of Heybridge Lane is not connected to mains drainage/sewage systems.	This issue is considered in the Prestbury Settlement Report [ED 40].
The site policy should note that Policy ENV 1 requires development at this site to increase the size of core areas and the quality and quantity of existing new or priority habitat; and that in order to achieve biodiversity net gain (required by ENV 2), impacts to semi-natural habitat on site will require mitigation/offsetting in accordance with the DeFRA metric version 2.0.	Ecology issues are considered through the Prestbury Settlement Report [ED 40].

Shavington (general issues)

Summary of the main issues raised	How the main issues have been taken into account
The housing requirement for Shavington should be increased.	The Local Service Centres (LSCs) requirement is no longer disaggregated to individual LSCs. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].
The following sites should be (re)considered for housing: <ul style="list-style-type: none"> • Grove Farm • Oakleaf Close • 199 Crewe Road • Land rear of 199 Crewe Road • Land south of the A500, • Depot and land west of Crewe Road • 414 Newcastle Road • 272 Newcastle Road • Main Road 	No allocations are considered necessary at the Local Service Centre tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].

Wrenbury (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>The site north of Cholmondeley Road is considered to be suitable for residential development and is available and achievable. The site should be allocated for housing and the settlement boundary amended to reflect this.</p>	<p>No allocations are considered necessary at the Local Service Centre tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].</p>
<p>New Road, Wrenbury is considered to be suitable for housing development. The site although refused and dismissed at appeal was not subject to any technical reasons for refusal.</p>	

Other settlements and rural areas (OSRA) (general issues)

Summary of the main issues raised	How the main issues have been taken into account
<p>A number of sites were submitted (references refer to the site's reference in the Other Settlements and Rural Areas Report [PUB 46]):</p> <ul style="list-style-type: none"> • Land off Crewe Road Winterley (part of CFS548); • Land at Agden Park Lane, Broomedge (CFS432); • Land off Dodds Green Lane, Burleydam (CFS262) • Warmingham Brinefield, Hole House and Spring Moss Farm (CFS330); • Land opposite Weaver View, Over Road, Church Minshull (CFS303); • Land off Newcastle Road and Holmes Chapel Road, Brereton (CFS297/300); • Land off Newcastle Road, Hough (CFS495); • Land at Newcastle Road, Brereton (FDR599); • Land at Boar's Head Public House, Walgherton (FDR1926); • Land at the former George and Dragon Public House, Higher Hurdsfield (CFS251); • Brookside Hall, Arclid (CFS209/211); 	<p>All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Other Settlements and Rural Areas Report [ED 46] but as set out in that report, there is no requirement to make further site allocations within this tier of the settlement hierarchy.</p>

<ul style="list-style-type: none"> • Land at Cemetery Road, Weston (FDR1593); • Crewe Road / Newtons Lane, Winterley (CFS285/286); • Stone Cottage, 14 Summerhill Road, Prestbury (FDR1918); • Land adjacent to 150 Buxton Road, Disley (CFS85); • Land west of Fowle Brook, Crewe Road, Winterley (new site); • Warford Park, Great Warford (larger version of site CFS399); • Land at Corner Farm, Newcastle Road, Hough (new site); and • Land off Audlem Road, Hankelow (new site). 	
The flexibility factor should be applied to OSRA.	The employment land requirement set out in LPS Policy PG 1 already includes 20% flexibility. Flexibility in housing supply has been taken into account in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
The OSRA requirement should be disaggregated.	This issue is taken into account through the Other Settlements and Rural Areas report [ED 46].
Sites should be allocated for development in the OSRA.	The Other Settlements and Rural Areas report [ED 46] considers whether it is necessary to allocate further sites within this tier of the settlement hierarchy.

Gypsy, Traveller and Travelling Showpersons sites (general issues)

Summary of the main issues raised	How the main issues have been taken into account
Site submission received – land at Mill Lane, Smallwood – should be considered as a site for Gypsy and Traveller pitches (permanent and transit pitches).	The site has been considered through the site selection report [ED 14] and is proposed as an allocated site G&T 6 ‘The Oakes, Mill Lane, Smallwood’ in the SADPD.
Irish Community Care is keen to ensure that the consultation process on the SADPD is not the sole opportunity for community consultation.	The Council report of consultation [ED 56] documents the consultation on the SADPD to date. There will be further opportunities to provide comments on the SADPD prior to its examination.
Irish Community Care objects to the Gypsy and Traveller Accommodation Assessment assumptions regarding household formation rates and the assessment of ‘unknown need’. The highest	Policy HOU 5a ‘Gypsy and Traveller Site Provision’ sets out the SADPD approach to planning applications where the GTAA has not been able to determine the travelling status of a Gypsy and Traveller

figure for permanent residential pitches therefore is 102 pitches to meet all need and the lowest is 57 pitches required using ORS small household base data according to Irish Community Care.	household.
Irish Community Care advises the Council to use negotiated stopping places in consultation with relevant groups.	Noted.
Irish Community Care has had sight of the document “Cledford Lane Assessment” by Cheshire East Councillors Carol Bulman and Jonathan Parry. Irish Community Care would, whilst recognising that there are different thresholds relating to site standards for transit and permanent provision, like to offer support to the report’s statements relating to the suitability of the Cledford Site to meet the needs of nomadic Gypsies and Travellers as a transit site.	The document entitled ‘Cledford Lane Assessment’ is not a document which has been relied upon or prepared to evidence the proposals contained within the SADPD. The Gypsy, Traveller and Travelling Showperson site selection report [ED 14] has been prepared to consider allocations in the SADPD. The report has considered a number of relevant planning factors, in line with national guidance, concluding that the Cledford Hall, Cledford Lane site (G&T 5) is an appropriate site for allocation in the SADPD.
Irish Community Care - There are 8 potential permanent sites discussed, and full viability assessments still need to be undertaken of which, there is also a requirement for habitat survey or botanical survey due to protected species being resident potentially, on several sites and one will need a contamination examination and the majority near areas of SSSI, and water flashes. Whilst all of these issues relating to the land development for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.	There are a number of proposed site allocations in the SADPD relating to permanent Gypsy and Traveller site provision. The site allocations proposed in the SADPD are supported by a detailed Gypsy, Traveller and Travelling Showperson site selection report [ED 14] which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, which has identified where further mitigation and assessment will be required at planning application stage.

Site G&T 1 ‘Land east of Railway Cottages, Nantwich’

This initial Publication Draft SADPD site has the reference G&T 1 ‘Land east of Railway Cottages, Nantwich (Baddington Park)’ in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
Contrary to the advice in the Peter Brett Associates Report (“PBA”) (2014) which considered the site to be unsuitable.	The site now has planning permission (ref 19/5261N) for six permanent pitches. As noted in the Council’s Gypsy, Traveller and

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	<p>Travelling Showpeople Site Selection Report [ED 14], a number of site(s) have been considered previously through the Peter Brett Associates Gypsy, Traveller and Travelling Showpeople Site Identification Study (“PBA”, 2014).</p> <p>The PBA report has formed part of the evidence base for producing the site selection report, but the site assessments included represent a fresh appraisal of each site option, utilising the site selection methodology outlined in sections 1-3 of the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14].</p>
<p>The Council owns numerous sites (see the East Cheshire Gypsy and Traveller Study Report) which are suitable for development, and a Council is required to use its own public sites before considering private sites for development.</p>	<p>There is no requirement to consider the provision of public sites for Gypsy, Traveller and Travelling Showperson uses before considering private sites for development.</p> <p>Paragraph 4 (e) of National Planning Policy for Traveller Sites notes that one of the aims in respect of Traveller sites is to <i>“promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites”</i>.</p> <p>The Council’s Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] has utilised a clear and transparent site selection methodology to consider sites appropriate for allocation in the SADPD [Section 3, ED 14].</p> <p>Stages 1 and 2 of the Council’s site selection methodology involves establishing a pool of sites from a number of different sources (including but not limited to Council owned sites considered ‘available’ for consideration in the study) which are then subject a site sift, at stage 2, in line with the stated criteria in the site selection report.</p>
<p>The site is in an unsustainable location. The proposed site can only be reasonably accessed by vehicles, not pedestrians. This means that the approval of this site would fail to meet the Council policy of reducing the impact of vehicle journey pollution.</p>	<p>The site now has planning permission (ref 19/5261N) for six permanent pitches. The Council’s site selection report details the sites sustainability noting that the site is assessed as amber with respect of accessibility to services and facilities. However, this has to be balanced against the requirement to identify a supply of specific deliverable sites (5 years worth of sites against the findings of the 2018 GTAA). Opportunities to maximise sustainable solutions will vary between urban and more rural areas; most journeys to and from this site would be made by the occupants’ cars or other motor vehicles</p>

	<p>and journeys to access important facilities and services would not be lengthy for a number of services and facilities, as supported by the sites amber assessment for accessibility. National planning guidance makes it clear that sustainability should not only be considered in terms of transport modes and access to services, other factors such as economic and social considerations are important. These factors are considered in more detail in the site selection report. Following a evaluation of the relevant planning factors, the site selection report [ED 14] recommends that the site is proposed to be allocated in the SADPD to support the intensification of use on the site by a further 2 permanent pitches.</p>
<p>Road safety concerns due to a humpback bridge adjacent to the site entrance with failure to meet DRMB Sightlines. There is no footway or street lighting in the vicinity. The additional volume of traffic which would be generated by the proposed application would constitute a risk to highway users</p>	<p>The site now has planning permission (ref 19/5261N) for six permanent pitches. The site scored an 'amber' rating in respect of highway access and impact in the site selection report, matters that have potential to be dealt with using appropriate mitigation measures. The site has a dedicated access from Baddington Lane which is wide enough for vehicles to pass each other and is typical of its rural location. Policy G&T 1 'land east of Railway Cottages, Nantwich' [ED 01] notes that development proposals for the site must provide for appropriate visibility splay and access arrangements from Baddington Lane (A530).</p>
<p>Impact on landscape character. The proposed site would be highly visible from local roads and public footpaths. Visual intrusion on the open countryside. The report errs in completely failing to address the interim effect of any development of the site as a gypsy or traveller site. In the period between the planting and maturity of the landscaping.</p>	<p>The site now has planning permission (ref 19/5261N) for six permanent pitches. The site selection process identifies that the site is rural in character but it is considered that landscape and impacts on the character and appearance of the open countryside could be suitably mitigated ED 14]. Policy G&T 1 'land east of Railway Cottages, Nantwich' [ED 01] notes that development proposals for the site must retain hedgerows and incorporate a comprehensive landscaping scheme that provide for appropriate boundary treatments.</p>
<p>The site selection is "not consistent with national policy" because PPTS (2015) states that the site must relate the number of pitches or</p>	<p>The site now has planning permission (ref 19/5261N) for six permanent pitches. As noted in the site selection report [ED 14] – the</p>

<p>plots to the circumstances of the specific size and location of the site and the surrounding population size and density. The proposed development, added to the existing plots, will be of such a scale that it will dominate the local settled community of Baddington both in terms of the number of residents and size.</p> <p>The site selection report completely fails to identify the location of the nearest settled community to the site and apply an appropriate analysis to its scale with that of the site. The consideration of scale is not applied consistently compared with the approach to other sites in the site selection report.</p>	<p>site was originally considered for 11 pitches in the site selection report. However, in recognising the scale of the proposal and given the site's semi-rural location alongside the need for appropriate boundary treatment(s), the site is only recommended as being suitable for a proposed allocation of two additional Gypsy and Traveller pitches in the SADPD [ED 01]. This would represent a total provision of 8 pitches on the site when considered alongside the planning permission on the site (ref 19/5261N) for six pitches. The Council has therefore appropriately responded to the context of the site.</p>
<p>There is concern about potential surface water rainwater run-off onto adjacent prime farming land, and sewage pollution which could have an adverse impact on wildlife in the area.</p>	<p>The site now has planning permission (ref 19/5261N) for six permanent pitches. As noted in f the site selection report [ED 14] the site is located in Flood Zone 1. The report acknowledges that alterations that increase areas of hardstanding may require a drainage strategy to reduce the potential for surface water run off, particularly to the pond and brook outside of the site boundary.</p> <p>Point 2 of policy G&T 1 'land east of Railway Cottages, Nantwich' [ED 01] notes that development proposals for the site must use permeable materials as hardstanding and provide a drainage strategy to prevent surface run off from the site into the adjacent pond.</p>
<p>There are protected species present within 300m of the site and a potential for protected species to be present on the site.</p>	<p>The supporting information of the policy G&T 1 [ED 01] notes that there is potential for protected species to be present. A habitats survey will be required to support any future planning application and inform the mitigation measures.</p>
<p>The site is in the open countryside.</p>	<p>The Gypsy, Traveller and Travelling Showperson site selection report [ED 14] acknowledges that the site is in open countryside and this has been considered as part of the assessment of the site.</p>
<p>Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.</p>	<p>The site allocations proposed in the SADPD are supported by a detailed Gypsy, Traveller and Travelling Showperson site selection report [ED 14] which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, whereby further mitigation and assessment will be required at planning application</p>

	stage.
<p>Information submitted by the land owner, in support of the allocation of the site. In the land owners view, the site is:- Sustainably located and the site would contribute to meeting unmet need in the area.</p> <ul style="list-style-type: none"> • The site is within Flood Zone 1 (low risk of flooding), it is not subject to any other relevant designations. The site is in the open countryside for planning purposes. • Site allocation consistent with policy SC7 of the Local Plan Strategy. It would meet the needs set in the Gypsy and Traveller Accommodation Assessment. • The site benefits from an existing safe access on to Baddington Lane. The Draft SADPD states that development proposals for this site must “provide for an appropriate visibility splay and access arrangements from Baddington Lane”. This will ensure that this criterion is met. • There is adequate space on the site to provide appropriate pitch sizes to ensure adequate amenity for future occupiers. • The site is of adequate size to provide sufficient parking and circulation space. • The Draft SADPD states that development proposal for the site must “retain hedgerows and incorporate a comprehensive landscaping scheme that provides for appropriate boundary treatments” this will ensure that the impact on the character and appearance of the surrounding area is considered. • Site G&T 1 is not located within a conservation area and there are no listed buildings or ancient monuments on which the proposal will impact. 	<p>Noted. The site has been considered in the Gypsy, Traveller and Travelling Showperson site selection report [ED 14].</p>

Site G&T 2 ‘Land at Coppenhall Moss, Crewe’

Summary of the main issues raised	How the main issues have been taken into account
<p>Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.</p>	<p>The site allocations proposed in the SADPD [ED 01] are supported by a detailed Gypsy, Traveller and Travelling Showperson site selection report [ED 14] which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, whereby further mitigation and assessment will be required at planning application stage.</p>

Site G&T 3 ‘New Start Park, Wettenhall Road, Nantwich’

Summary of the main issues raised	How the main issues have been taken into account
<p>New Start Park has consistently been refused permanent planning permission since 2009, as recently as August 2018. Its extension to temporary permission has been granted with the sole purpose of allowing Cheshire East time to allocate appropriate alternative sites within the SADPD at which point the New Start Park site would be returned to its original rural state.</p>	<p>The New Start Park site has been considered in the Council’s Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] alongside a number of other alternative sites, in line with the stated site selection methodology. Stage 1 of the site selection methodology, which establishes an initial ‘pool’ of sites to consider through the site selection process, includes sites with temporary planning permission alongside other sources of sites. The site assessment and conclusions for the New Start Park site has been clearly set out and the allocation justified through the Council’s Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] as site reference GTTS 17.</p>
<p>In its GTTS Site Accessibility Assessment 2018, New Start significantly failed to meet 70% of the listed criteria, including those for accessibility and transport accessibility. By way of contrast, an existing site at Wybunbury Lane, Stapeley, failing 50% of the listed criteria, has been disregarded. This is of particular concern as the latter was given permission at Appeal in</p>	<p>The existing supply of Gypsy, Traveller and Travelling Showperson sites, including the site at Wybunbury Lane, Stapeley (for 3 pitches) are set out in Appendix D of the Gypsy, Traveller and Travelling Showperson Accommodation Assessment (2018) [ED 13]. An extension to the Wybunbury Lane site has been considered and discounted through the site selection report [Ref GTTS 13 ED 14].</p>

<p>2009, APP/R06660/A/10/2131930, but is not fully occupied, nor is it clear whether these pitches have been included in the Council's overall provision.</p>	<p>The assessment and conclusions for the proposed allocation of the New Start Park site has been clearly set out and justified through the Council's Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] as site reference GTTS 17.</p>
<p>Detrimental impact upon the rural character and appearance of the open countryside - conflict with the PPTS and NPPF. The PPTS places strong emphasis against new development in Open Countryside and the onus is on LPAs to "very strictly limit" Traveller Site development in this context.</p>	<p>The Council's Gypsy, Traveller and Travelling Showpeople site selection report [ED 14], under site reference GTTS 17, has taken into account and balanced a range of factors considered in the site selection methodology. Following detailed analysis, it is recommended that this site is allocated for eight permanent Gypsy and Traveller pitches in the SADPD.</p>
<p>The site cannot be sufficiently landscaped to mitigate its effect upon Open Countryside. It introduces urbanising features, such as floodlighting, to an otherwise rural landscape.</p>	<p>The site selection report [ED 14] notes that the site is not within nor adjacent to a landscape designation. It concludes that its continued use is likely to have a limited adverse impact on landscape, which would require mitigation. Point 1 of the text included in the sites proposed allocation [G&T 3, ED 01] includes reference to development proposals retaining hedgerows and incorporating a comprehensive landscaping scheme that provides for appropriate boundary treatments.</p>
<p>The number of pitches proposed to be allocated, in what the Appeal Inspector considered to be a "reasonably large" site for this area, do not relate well to the size and density of the nearest settled community.</p>	<p><i>As noted in the site selection report [ED 14] – "Allocation of this site in the SADPD will make a positive contribution to the needs identified by the GTAA. In the absence of deliverable site options and the lack of alternative provision (as set out in this SSR), there is a strong case to allocate this site. The council is conscious that the site has been in use now for a number of years and that the temporary permissions reflected an unmet need for additional pitches. It has provided a settled base for its occupiers for some time. The site is not ideal but it responds directly to a demonstrable need identified by the GTAA and will provide certainty in relation to the delivery of sites across the borough"</i></p>
<p>Impractical to use permeable materials as hardstanding as the structure of the site is already in place and occupied by substantial chalet homes. There have been drainage and run off issues from the site in the past which the Council is aware of (Paragraph 12.150)</p>	<p>It is noted that this is a site with temporary planning permission and therefore parts of the structure of the site are already in place. However, the reference to permeable materials and reference to a drainage strategy are valid in the policy wording to recognise the</p>

	matters referenced through the representation.
This point refers to the biodiversity of Wimboldsley Wood SSI which has a postcode of CW73NX and is 10.4 miles from this site (Paragraph12.149)	Reference to Wimboldsley Wood SSSI has been removed from the proposed supporting information to the site allocation [G&T 3, ED 01].
Proposed allocation is not in line with conclusions of Peter Brett Report.	The Council's Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] notes that a number of site(s) have been considered previously through the Peter Brett Associates Gypsy, Traveller and Travelling Showpeople Site Identification Study ("PBA", 2014). The PBA report has formed part of the evidence base for producing the site selection report, but the site assessments included represent a fresh appraisal of each site option, utilising the site selection methodology outlined in sections 1-3 of the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14].
Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.	The site allocations proposed in the SADPD are supported by a detailed Gypsy, Traveller and Travelling Showperson site selection report [ED 14] which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, whereby further mitigation and assessment will be required at planning application stage.
The site was "fully discounted" the site in the first draft SADPD due to its "rural location (Open Countryside), distance from facilities and an absence of public transport".	The recommendation for GTTS 17 'New Start Park, Wettenhall' at the time of the First Draft of the SADPD was as follows:- <i>"Taking into account and balancing the range of factors considered in the SSM and summarised above, this is not a preferred site. It is recommended that this site is not proposed to be allocated in the first draft SADPD, at this time, pending the outcomes of the SADPD consultation and further analysis of this site, alongside the outcomes of the additional call for sites process for Gypsy and Traveller sites".</i> <i>The site has been considered through the Gypsy, Traveller and Travelling Showperson site selection report [ED 14] and following detailed analysis has been recommended for allocation (as site G&T 3) in the SADPD [ED 01]</i>

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<p>There is no public transport to the site, there are no roadside pavements along Wetenhall Road and the entrance to the site is directly off/onto a road with a 60mph limit. The site is only reasonably accessed by vehicles, not pedestrians, which is contrary to the Council's policy of reducing the impact of vehicle journey pollution in any new developments</p>	<p>The site selection report [ED 14] highlights that the site scores red in respect of access to services and facilities and is in the open countryside. The report then goes onto acknowledge that a number of sites considered through the site selection report perform in similar terms. The allocation of the site would make a positive contribution towards meeting the needs identified by the Gypsy, Traveller and Travelling Showperson Accommodation Assessment [ED 13].</p>
<p>Residents are similarly aware of other applications in the immediate area for permanent residential development which have also been dismissed at Appeal on the basis of unsustainability in terms of lack of transport, lighting or footways, a 60-mph speed restriction and distance from accessible services. APP/R0660/W/16/3146021 in 2016 rejected the development of two new dwellings less than half a mile from New Start but in closer proximity to Nantwich</p>	<p>The allocation of the site in the SADPD has been considered through the preparation of the Gypsy, Traveller and Travelling Showperson site selection report [ED 14]. The allocation of the site has been considered on its own merit in line with the stated criteria in the site selection report.</p>

Site G&T 4 'Three Oakes Site, Booth Lane, Middlewich'

Summary of the main issues raised	How the main issues have been taken into account
<p>There is no live planning permission on this site and given the site has been subject to two previous planning consents over the last 14 years neither of which have been implemented, concerns are raised over the deliverability of the site. Given there are also 6 plots within the existing site which are vacant, it is questioned whether there is an identified need for additional plots in this location.</p> <p>The site is not considered to contribute to supply. Given the deliverability concerns of this site for market housing restricted to occupation for gypsy and traveller, the site should be reallocated for open market housing. Housing on this site should be developed at a higher density to promote delivery in Middlewich.</p>	<p>The proposed allocation of this site has been considered through the Gypsy, Traveller and Travelling Showperson site selection report [ED 14] as site GTTS 15a. Following this detailed site assessment, the site is recommended for allocation in the SADPD.</p>
<p>Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs</p>	<p>The site allocations proposed in the SADPD are supported by a detailed Gypsy, Traveller and Travelling Showperson site selection</p>

and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage	report [ED 14] which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, whereby further mitigation and assessment will be required at planning application stage.
If an additional 24 are given planning permission at 3 Oaks it would take provision in Cheshire East to 151 pitches 75 of which would be in Moston. It is unreasonable that half of the Cheshire East Gypsy site provision could be located in one parish, there are other areas within Cheshire East where sites could be located and assimilated into the area	The proposed allocation of this site has been considered through the Gypsy, Traveller and Travelling Showperson site selection report [ED 14] as site GTTS 15a. Following this detailed site assessment, the site is recommended for allocation in the SADPD.
Historic England - An additional bullet should be included which states: Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	Reference to the heritage impact assessment has been added to criterion 1 of policy G&T 4 'three oakes site' in the SADPD [ED 01].

Site G&T 5 'Cledford Hall, Cledford Lane, Middlewich'

Summary of the main issues raised	How the main issues have been taken into account
Site is in industrial area (existing uses and allocated site in the Local Plan Strategy – Midpoint 18) and not fit for purpose. Site is too close to Wincanton Warehouse, TATA Chemicals and Lorry Park which runs 24/7	The Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] acknowledges that the site is adjacent to employment uses accessed from ERF Way. Some form of mitigation may be required to minimise any amenity impacts. Policy G&T 5 in the SADPD [ED 01] notes that the site should demonstrate through a noise impact assessment that external and internal noise impacts can be acceptably minimised through appropriate mitigation including a noise management plan
There are no pavements up to the proposed site. The road is narrow. Safety concerns	The Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] notes that existing access can be achieved into the site but will need to be improved to make sure adequate visibility splays are

	<p>maintained. No highways objections were received to the previous planning application (ref 14/5721c) subject to all internal roads and parking facilities being provided for prior to first occupation. In addition, the proposed route of the Middlewich Eastern Bypass will lead to improvements along Cledford Lane. This is recognised in the supporting information to the policy.</p> <p>Policy G&T 5 in the SADPD [ED 01] notes that the site provide for an appropriate visibility splay and access arrangements from Cledford Lane.</p>
<p>There was no proper consultation with the settled community, the settled traveller community about the Cledford Hall Farm.</p>	<p>The Council report of consultation [ED 56] documents the consultation on the SADPD to date. There will be further opportunities to provide comments on the SADPD prior to its examination.</p>
<p>The planning permission for Cledford Hall has now lapsed and since the Planning permission was granted in May 2015 there have been changes to the area.</p>	<p>The suitability of the site for allocation has been considered through the Gypsy, Traveller and Travelling Showpeople site selection report [ED 14].</p>
<p>Irish Community Care (ICC) has had sight of the document “Cledford Lane Assessment” by Cheshire East Councillors Carol Bullman and Jonathan Parry</p> <p>ICC would, whilst recognising that there are different thresholds relating to site standards for transit and permanent provision, like to offer support to the report’s statements relating to the suitability of this site to meet the needs of nomadic Gypsies and Travellers as a transit site.</p> <p>ICC echoes the key concerns from the report that, the 24 hour operation of the Wincanton site including the reversing of heavy lorries throughout the night time, with the addition of the ANSA waste Hub added to that and the difficulty for mothers with pushchairs to access the site, and a route to school, doctor and all other local services, as it has no pavements and is on a busy road, highlight that this is not a place for families to live, even temporarily, when temporarily is defined as up to three months.</p>	<p>The document entitled ‘Cledford Lane Assessment’ is not a document which has been relied upon or prepared to evidence the proposals contained within the SADPD.</p> <p>The Gypsy, Traveller and Travelling Showperson site selection report [ED 14] has been prepared to consider allocations in the SADPD. The report has considered a number of relevant planning factors, in line with national guidance, concluding that the Cledford Hall, Cledford Lane site (G&T 5) is an appropriate site for allocation in the SADPD. The Gypsy, Traveller and Travelling Showpeople site selection report [ED 14] acknowledges that the site is adjacent to employment uses accessed from ERF Way. Some form of mitigation may be required to minimise any amenity impacts.</p> <p>Policy G&T 5 in the SADPD [ED 01] notes that the site should demonstrate through a noise impact assessment that external and internal noise impacts can be acceptably minimised through appropriate mitigation including a noise management plan</p>

<p>The drivers to developing a site need to include the local community insight of those who will be utilising the site, to ensure it's suitability and fit with cultural and community needs. There have been some communications with Travellers encamping on the Barony Park, and they have expressed a desire to reside or resort to the Crewe area, and in encamping on the Barony repeatedly, that is itself an insight into the needs of the community who are in the area.</p>	
<p>No solid testing for contamination</p>	<p>Any planning application on the site would be considered against polices in the development plan, when read as a whole, alongside any other material considerations. The traffic light assessment for the site scored a green for contamination matters as no contamination concerns were raised in relation to the previous application (ref 14/5721C).</p>
<p>The site is a significant distance away from where the bulk of unauthorised encampments occur.</p>	<p>The Criminal Justice and Public Order Act 1994 is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62A of the Criminal Justice and Public Order Act allows the Police to direct trespassers (unauthorised encampments) to remove themselves, their vehicles and their property from any land where a suitable pitch on a relevant caravan site is available within the same Local Authority area. A suitable pitch on a relevant caravan site is one that is situated in the same Local Authority area as the land on which the trespass has occurred, and that is managed by a Local Authority, Registered Provider or other person or body as specified by order by the Secretary of State.</p>
<p>Site has no sewage connection</p>	<p>Policy HOU 5c 'Gypsy, Traveller and Travelling Showpersons site principles' notes how sites should provide for an appropriate level of essential services and utilities and make sure that waste stored appropriately for disposal and able to be collected in an efficient manner.</p>
<p>The eastern Bypass has been given planning permission and Cledford Lane will be an access road for the bypass. This will increase the traffic on the narrow lane even more making it extremely dangerous for pedestrians and also the noise levels will be drastically increased</p>	<p>The Gypsy, Traveller and Travelling Showperson site selection report [ED 14] notes that the proposed route of the Middlewich Eastern Bypass will potentially lead to improvements to Cledford Lane. No objection to the amount of traffic generated or highway safety was</p>

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	<p>raised during the consideration of the previous planning application on the site. The policy notes that the site provide for an appropriate visibility splay and access arrangements from Cledford Lane.</p>
<p>Proximity to local amenities. This highlights the unsafe nature of the road again, but the doctors are about a 20 minute walk from the site. There is only one shop nearby which is still a ten minute walk</p>	<p>The Gypsy, Traveller and Travelling Showperson site selection report [ED 14] notes that the site is assessed as amber in terms of its accessibility to services and facilities. It also notes that the provision of a transit site will ensure that unauthorised encampments can be more effectively addressed and will help with easier access (albeit for a temporary period in this case) to GPs, schools and other services.</p>
<p>Air Quality - how safe is the air in that area at present?</p>	<p>The traffic light assessment for the site scored a green as the site is not in an air quality management area [ED 14].</p>
<p>Historic England - The Council is advised that the National Heritage List for England still contains listing entries for buildings on the site that no longer exist. It is recommended that an application is made for their removal</p>	<p>An application has been made to Historic England as advised in the representation to remove the listed entries for buildings on the site that no longer exist.</p>
<p>There is a private transit site for 8 pitches on Warmingham Lane in Middlewich which satisfies the Council's stated need for 5-10 transit pitches in the borough but which does not satisfy the requirement for a public transit site</p>	<p>Noted. This is reflected in the site selection report [ED 14].</p>
<p>Objection to Site G&T 5 'Cledford Hall, Cledford Lane, Middlewich'; The site is constrained due to its proximity to the Cledford Lime Beds Local Wildlife Site and because the local area is predominantly in industrial use.</p>	<p>The suitability of the site for allocation has been considered through the Gypsy, Traveller and Travelling Showpeople site selection report [ED 14].</p>
<p>Objection to Site G&T 5 'Cledford Hall, Cledford Lane, Middlewich'; Part of the site is located within flood zone 2 and sequential assessment needs to demonstrate that there are no more available or deliverable sites within flood zone 1 prior to looking to allocating the site or developing in areas at greater risk of flooding.</p>	<p>The site scores an 'amber' rating in respect of flooding and drainage matters. The site is in Flood Zone 1. There are areas of Flood Zone 2&3 to the west of the site along Sanderson's Brook. There is a small area of surface water flood risk to the north of the site, a suitable drainage system will be required to alleviate this flood flooding. The site policy G&T 5 Cledford Hall notes that the site should use permeable materials as hardstanding and provide a drainage strategy to prevent surface run off from the site.</p>

<p>Objection to Site G&T 5 'Cledford Hall, Cledford Lane, Middlewich'; The Council's Gypsy, Traveller and Travelling Show people Site Section Report was informed by the findings within the cross-authority 'Gypsy, Traveller and Travelling Show people Accommodation Assessment'. The assessment noted as one of the merits of the site at Cledford Hall in allocating it for transit Travellers, was that it benefited from an extant planning permission. This permission has since expired with no interest having been shown in developing the site. This is despite a Listed Building Consent being agreed on the site in 2017 to demolish the remaining listed outbuildings. The site has therefore already demonstrated its inability to attract a willing developer for Traveller use development in the past.</p>	<p>The site is owned by the Council and is proposed for allocation in the SADPD.</p>
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Site G&T 6 'Land at Thimswarra Farm, Moston'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.</p>	<p>The site is now a commitment and no longer proposed to be allocated in the SADPD.</p>
<p>Site previously considered to be not suitable for permanent development by Cheshire East Council, Peter Brett Associates Report and The Planning Inspectorate. The site has been viewed, historically, in both Council decisions and appeal decisions as unsustainable.</p>	
<p>Overall, there is clear inconsistency and contradiction in the current methodology and assessment processes to reach a view contrary to all of the Council's in-house evidence and previous judgements in fully discounting this site as being wholly unsuitable for permanent residential development</p>	

Site G&T 7 'Land at Meadowview, Moston'

This initial Publication Draft SADPD site has been deleted in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
<p>Irish Community Care – site specific policy requirements for a Traveller site do not preclude such use, they do increase the costs and more importantly, for the community who need them, they will slow up the implementation of said sites into community usage.</p>	<p>The site is now a commitment and no longer proposed to be allocated in the SADPD [ED 01].</p>
<p>Site previously considered to be not suitable for permanent development by Cheshire East Council, Peter Brett Associates Report and The Planning Inspectorate. The site has been viewed, historically, in both Council decisions and appeal decisions as unsustainable.</p>	
<p>Overall, there is clear inconsistency and contradiction in the current methodology and assessment processes to reach a view contrary to all of the Council's in-house evidence and previous judgements in fully discounting this site as being wholly unsuitable for permanent residential development.</p>	

Site TS 1 'Lorry Park, off Mobberley Road, Knutsford'

Summary of the main issues raised	How the main issues have been taken into account
<p>Representation received from a Travelling Showman. There have been no developments for Travelling Showman for over 30 years. There are no issues with the site at Knutsford. It is central to many of the fairs and about 25% of the representors fairs are located in that direction. Questions included relating to the suitability of the site in terms of the need for further assessments and mitigation given proximity to household waste site and petrol station.</p>	<p>Noted.</p>
<p>Objection to the site. The site being in an urban area is not a sufficient</p>	<p>The reasoning and justification for the proposed allocation of the site</p>

<p>reason to allow this site for a proposed use. It is not in the best location. Alternative uses for the site proposed including an expansion to the household waste recycling centre or a clubhouse.</p>	<p>is set out in the Gypsy, Traveller and Travelling Showperson report [ED 14].</p>
<p>The site TS 2 should be expanded from 10 to 13 plots.</p>	<p>Site TS 2 (ref GTTS 68) has been considered separately in the Gypsy, Traveller and Travelling Showperson report [ED 14] where it has recommended that the site be allocated for 10 plots.</p>
<p>In the Councils own site selection methodology they state that stage 1 site sifting must look at the availability of the site. They have stated that Council ownership confirms this. This is an error; the site is in economic use being leased to a lorry transport business. Hence availability should be a red indicator in the traffic light assessment.</p>	<p>Stage 1 of the site selection process includes establishing a pool of sites. One criteria for inclusion in the pool of sites are those in Council ownership where considered available for consideration in the study. The site (ref GTTS 66) is a Council owned site which is considered available for inclusion in the report. The reasoning and justification for the proposed allocation of the site is set out in the Gypsy, Traveller and Travelling Showperson report [ED 14].</p>
<p>The impact on the settlement character should also be a red light as adjacent to the site is a playing field, the future development of which is in the feasibility scoping stage to include an all weather pitch and floodlights as part of an integrated appraisal of facilities required by the proposed development of a nearby strategic site - land south of Longridge.</p>	<p>The impact on settlement character and form has been considered through the site selection report [ED 14]. The site scores a green for settlement character as it is within the urban area. The site scores an amber rating for landscape character. Views from Mobberley Road are limited due to existing buildings and vegetation. Views are also limited from Longridge Road, located to the east, due to existing vegetation. There are no landscape designations on the site and it is considered that controlling conditions regarding siting, boundary treatments and other matters could provide sufficient mitigation in terms of landscape impacts. Policy TS 1 in the SADPD [ED 01] includes reference to retaining the existing hedgerows and incorporate comprehensive landscaping scheme that provides for appropriate boundary treatments (point 1).</p>
<p>As a residential site for travelling show people the suitability of the site for a home should be subject to the housing policies. The environmental impact of aircraft noise, recycling facility and petrol station should render this site as unsuitable for housing.</p>	<p>Policy TS 1 in the SADPD refers to the need for a noise impact assessment and the need to provide for a buffer from the recycling centre to achieve an acceptable level of residential amenity for prospective residents including in terms of noise and disturbance. It also refers to ensuring an acceptable level of residential amenity is achieved.</p>

<p>As Knutsford is surrounded by Greenbelt, it would be unacceptable to force a lorry business off such a brownfield site to a greenfield site or indeed another new employment area expanding into greenbelt.</p>	<p>The reasoning and justification for the proposed allocation of the site is set out in the Gypsy, Traveller and Travelling Showperson report [ED 14].</p>
<p>This is publicly owned land and in Knutsford we lack such land to provide the base for community facilities we consider to be in shortfall. In the area there are 3 such deficiencies. Space for a changing facility for the all weather sports pitch, space for a community meeting building, additional overflow parking for the staff and customers of businesses on the Longridge Trading estate.</p>	<p>Stage 1 of the site selection process includes establishing a pool of sites. One criteria for inclusion in the pool of sites are those in Council ownership where considered available for consideration in the study. The site (ref GTTS 66) is a Council owned site which is considered available for inclusion in the report. The reasoning and justification for the proposed allocation of the site is set out in the Gypsy, Traveller and Travelling Showperson report [ED 14].</p>
<p>It is adjacent to the recycling depot and is potentially on contaminated, infill land. The proximity of the site to the recycling and waste disposal holding facility has not been assessed for health impacts on the show person's families who will occupy the site and a previous option to locate a health centre there was withdrawn on the grounds of potential health hazards.</p>	<p>Policy TS 1 in the SADPD [ED 01] requests that development proposals for the site must undertake a phase 1 and 2 contaminated land assessment.</p>
<p>If the site is approved, it should receive extensive landscaping, provision of suitable servicing, amenity areas which prevent young occupants straying into the shared access by which a constant procession of cars and light vans leave the recycling centre.</p>	<p>Policy TS 1 in the SADPD [ED 01] requests that development proposals for the site must retain the existing hedgerows and incorporate a comprehensive landscaping scheme that provides for appropriate boundary treatments.</p>
<p>Traffic impacts</p>	<p>The site scores a green rating for highways access and impact in the Gypsy, Traveller and Travelling Showperson Site Selection Report [ED 14]. There is an existing access road to the site from Mobberley Road and it is considered that the proposal would not cause a significant highway issues, as the site is already used for waste recycling and access accommodates HGVs.</p>
<p>Paragraph 12.169 should be expanded to refer to Petrol Station and Shaw Heath Social Club</p>	<p>Policy TS 1 in the SADPD [ED 01] refers to the need for a buffer to provide for an acceptable level of residential amenity for prospective residents.</p>
<p>Paragraph 12.171 - The proposal of this site is unclear. Is it for the residence only of people employed as travelling showpersons,</p>	<p>The SADPD [ED 01] notes that no commercial activities shall take place on the land other than as is necessary for the use as a Travelling Showpersons site.</p>

Paragraph 12.172 - For residential amenity, outdoor greenspace should be designed into the development.	The SADPD [ED 01] appropriately refers to the amenity impacts of the development, including noise and odour.
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Site TS 2 ‘Land at Firs Farm, Brereton’

This initial Publication Draft SADPD site has the reference TS 2 ‘Land at Fir Farm, Brereton’ in the Revised Publication Draft SADPD.

Summary of the main issues raised	How the main issues have been taken into account
Representation received from site owner. Providing background to the operations on the Fir Farm Site. The site promotor has sought a more comprehensive allocation to cover other uses on the land and are disappointed that the Council has only proposed to allocate a specific area of land on the site. Notwithstanding this, they support the allocation of land for accommodation needs at Firs Farm	The information provided regarding the background to the site is noted. The support for the allocation of land for accommodation needs for Travelling Showperson plots at Fir Farm is noted.
Representation received from site owner to paragraph 12.173 in the Plan. Objects as the cottages are 180 metres of the proposed allocation. The representation proposes amendments, as follows:- <i>“Any landscaping scheme should consider the retention and provision of native hedgerows and trees. Careful consideration will need to be given to <u>Urbanising</u> features such as walls, gates <u>and fences which together with</u> the design of ancillary outbuildings should maintain the rural setting of listed buildings at Tudor Cottage and Holly Cottage”</i> <u>have regard to the rural location of the allocation whilst maintaining a secure environment.</u>	The supporting information to the site is considered to be appropriate and informed by a heritage impact assessment which has been undertaken for the site. Reference to the Heritage Impact Assessment has been included in point 1 of policy TS 2 ‘Land at Fir Farm’.
Representation received from site owner to paragraph 12.177 in the Plan. Objects to the potential for the current wording to prevent circus and theatrical related activities being carried out at Fir Farm. The representation proposes amendments, as follows:- <i>No commercial activities shall take place on the land <u>allocated for travelling showpersons</u>, including the storage and sorting of materials, other than as necessary for the use as a Travelling Showpersons site.</i>	The wording included in the supporting information to policy TS 2 ‘land at Fir Farm’ is considered to be appropriately framed.

<i>Travelling Showperson plots should avoid conflict between vehicles and residents through an appropriate layout of the site”.</i>	
Historic England - An additional bullet should be included which states: Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site	Noted, reference to the Heritage Impact Assessment has been included in point 1 of policy TS 2 ‘Land at Fir Farm’.

Chapter 13: Monitoring and implementation

Summary of the main issues raised	How the main issues have been taken into account
Triggers that prompt a full review of the Local Plan should be included.	The Council does not consider identifying specific triggers is necessary since a Local Plan Monitoring Framework [ED 54] has been developed, the purpose of which is to list the monitoring indicators that will appear in the Council’s yearly Authority Monitoring Report (AMR). The AMR seeks to establish what has occurred in the Borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved, and determine whether changes to policies or targets are necessary. A local plan review is a requirement of Regulation 10A of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017.
The LPMF should not be flexible – any changes made should be consulted on for 4 weeks. Delete the start of para 13.1 and amend: <u>A separate Local Plan Monitoring Framework (LPMF) has been published, which replaces the monitoring framework contained in Table 16.1 of the LPS. The differences between the table and this version is highlighted below.</u> <u>During the plan period and outside of any plan review, any subsequent changes to the framework will only be to strengthen already identified measures and or add new ones. These changes will be subject to a 4 week public consultation.</u>	As alluded to in ¶13.1 of the ‘Revised Publication Draft SADPD’ [ED 01] information sources may change or become unavailable, there may be a change in monitoring practices and Local Plan documents are adopted or revised. Therefore the LPMF needs to be responsive to change. To consult on changes made to the LPMF is not considered to be a proportionate approach to take.
SC11 new assembly and leisure floorspace should have a target, as per the infrastructure plan and Community infrastructure levy	The inclusion of a target is not considered necessary in the LPMF as these matters are covered by the monitoring and updating of the

collected.	Council's corporate indoor sports and recreation strategies e.g. through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'Initial Publication Draft SADPD' and its accompanying documents and have made no comments on the LPMF.
SC12 any loss of assembly or leisure floorspace should be recorded. It is for the notes to justify in line with or NOT policies SC1 & 2	Monitoring of the indicator would entail the recording of the amount of assembly and leisure floorspace lost, including those losses that LPS Policies SC 1 and SC 2 allow. Wider monitoring of indoor sports and recreation is carried out through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'Initial Publication Draft SADPD' and its accompanying documents and have made no comments on the LPMF.
SC13 provision of outdoor sports facilities - amount gained should be stated and the targets in the sports strategy action plan highlighted. Any loss should be stated. This is to encourage a sports net gain ambition.	The target for indicator SC 13 is for no quantitative and qualitative loss and the delivery of recommendations in an adopted sports strategy action plan. This will entail the monitoring and reporting on all losses. Wider monitoring of indoor sports and recreation is carried out through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'Initial Publication Draft SADPD' and its accompanying documents and have made no comments on the LPMF.
SC14 provision of indoor sports facilities should be stated alongside the sports strategy action plan and any loss should be highlighted. This is to encourage a sports net gain ambition	The target for indicator SC 14 is for no net loss of indoor sports facilities, as recorded on the Sport England Active Places database. This will entail the monitoring and reporting on all losses. Wider monitoring of indoor sports and recreation is carried out through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'Initial Publication Draft SADPD' and its accompanying documents and have made no comments on the LPMF.

Chapter 14: Glossary

Summary of the main issues raised	How the main issues have been taken into account
There is a need to provide housing for first time buyers and the SADPD should include an entry-level exception site policy, as required by NPPF ¶71.	This issue is considered under Chapter 8: Housing (general issues).

Appendix A: Related documents and links

Summary of the main issues raised	How the main issues have been taken into account
A number of issues were raised in respect of the Local Service Centres Spatial Distribution Disaggregation Report [PUB 05].	These issues are considered in the summary and responses to Policy PG 8 'Spatial distribution of development: local service centres'.
A number of issues were raised in respect of the Green Belt Boundary Alterations Explanatory Note [PUB 56].	These issues are considered in the summary and responses to Policy PG 11 'Green Belt boundaries'.
A number of issues were raised in respect of Bollington and the Bollington Settlement Report [PUB 24].	These issues are considered under Chapter 12: Bollington (general issues)
The planning department does not regard the Green Belt as permanent, but as a device to ensure Manchester uses its greenfield sites before releasing Green Belt for development.	The purposes of the Green Belt are set out in LPS Policy PG 3 as well as the NPPF, which also confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.
The search for housing sites was biased and the council put out a request for sites, which meant only sites were submitted that would not normally obtain planning permission.	It is normal practice for a local planning authority to carry out a 'call for sites' exercise to invite the community, landowners, developers and other interested parties to submit sites for consideration.
The duty to co-operate has not been fulfilled as there are very few comments on this section.	The approach to the Duty to Co-operate is set out in the draft Duty to Co-operate Statement of Common Ground [ED 51].
The reference to Groundwater Source Protection Zone maps is old and should point to https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs	The reference has been updated.

Sustainability Appraisal (Publication Draft SADPD)

Summary of the main issues raised	How the main issues have been taken into account
<p>The Equality Impact Assessment (EIA) is not fit for purpose as there is no reference to census data or consultation feedback.</p>	<p>A revised Equality Impact Assessment (“EqIA”) has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03], building on work previously carried out on EqIA; the SA is an iterative process. It includes a section on consultation and contains baseline information. Annex D of the EqIA contains a summary of the main issues raised in relation to the EqIA through consultation on the SADPD and how these issues have been taken into account. Annex B contains a summary of responses of protected characteristics groups made to the SADPD, with comments made in relation to protected characteristics.</p>
<p>It has not been demonstrated in the SADPD that the development needs of protected characteristics have been met and addressed.</p>	<p>A revised EqIA has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03], building on work previously carried out on EqIA; the SA is an iterative process. The EqIA has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all of the protected characteristics considered. It is therefore compatible with the three main duties of the Equality Act 2010. The SADPD has also been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.</p>
<p>There is no reference in the SADPD or in the EIA that the Council has based decisions on individual protected characteristics, needs or circumstances.</p>	<p>A revised EqIA has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03], building on work previously carried out on EqIA; the SA is an iterative process. The EqIA has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all of the protected</p>

	<p>characteristics considered. It is therefore compatible with the three main duties of the Equality Act 2010. Annex B of the EqIA contains a summary of responses of protected characteristics groups made to the SADPD, with comments made in relation to protected characteristics issues. Policy and text amendments have also been made to the SADPD that demonstrate the Council has paid due regard to one or more of the three public sector equality duties set out in the Equality Act 2010.</p>
<p>The question hasn't been asked regarding relations between different groups or communities and the consultation does not identify protected characteristics for analysis.</p>	<p>A revised EqIA has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03] that identifies the protected characteristics. The EqIA has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all of the protected characteristics considered. It is therefore compatible with the three main duties of the Equality Act 2010. The SADPD has also been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.</p>
<p>Question 5 of the EIA has not been answered or the response given justified.</p>	<p>All the questions on the form were answered and a revised EqIA has been published in Appendix G of the Revised Publication Draft SADPD SA [ED 03]. The EqIA has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all of the protected characteristics considered. It is therefore compatible with the three main duties of the Equality Act 2010. The SADPD has also been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.</p>
<p>With regards to actual or potential impact on specific characteristics there does not appear to be any qualitative or quantitative data to</p>	<p>A revised EqIA has been published in Appendix G of the Revised Publication Draft SADPD SA [ED 03], building on work previously</p>

<p>justify this answer, for example age profiles.</p>	<p>carried out on EqIA; the SA is an iterative process. It includes a section containing baseline information, which incorporates age profile data.</p>
<p>The reference to consultation at the end of the EIA is unacceptable.</p>	<p>A revised EqIA has been published in Appendix G of the Revised Publication Draft SADPD SA [ED 03];, building on work previously carried out on EqIA the SA is an iterative process. The SADPD has been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.</p>
<p>Data intelligence should be used to make sure the consultation is accessible to the community</p>	<p>The consultation carried out was not just online based. The consultation length (6 weeks), materials available and consultation process was run in line with the Council's Statement of Community Involvement and the relevant regulations (Town and Country Planning (Local Planning) (England) Regulations 2012). This included notification of the consultation through public notices in local newspapers and press releases carried in local news outlets (details can be provided on request). The Council notified its Local Plan database (individuals could write to us (in any form) at any time to ask to be put on our local plan database to receive a direct notification of consultations taking place (via e-mail/letter)). The Council also accepted representations (received via online portal, e-mail, and letter) in line with its published Statement of Representations Procedure (again available to view in local libraries etc.). The Council also prepared a guidance note to assist those making representations. Officers were also available via telephone (number advertised in the Statement of Representations Procedure available online or in local libraries/council offices) to answer any queries and assist with difficulties in responding to the consultation. There is an issue of proportionality here and the Council's view is that reasonable steps have been taken to notify members of the public and run the consultation in an appropriate manner in line with its Statement of Community Involvement.</p>
<p>Paragraph 3.10 is not wholly correct as PG 7 also focuses upon the Key Service Centres such as Alsager.</p>	<p>Although it is acknowledged that LPS Policy PG 7 contains indicative levels of development for the Key Service Centres, these figures,</p>

	<p>unlike those for the Local Service Centres, have already been disaggregated. Paragraph 8.77 of the LPS highlights that the PG 7 figure for the Local Service Centres will be further disaggregated in the SADPD and/or Neighbourhood Plans. Paragraph 3.10 of the 'Initial Publication Draft SADPD SA' [PUB 03], in the context of its heading of 'Disaggregation Options', is correct.</p>
<p>The focus of the SA is upon the LSCs and Other Settlements and Rural Areas; there are other 'reasonable alternatives' that should have been explored, including the options for Land off Fanny's Croft.</p>	<p>All Alsager sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and the Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Land off Fanny's Croft is located in the Green Belt and further Green Belt release was not considered to be a reasonable alternative by the Council. The SA has clearly set out its approach and reasoning for the identification of reasonable alternatives by topic area ¶¶4.6 to 4.9 of [ED 22] sets out the decision point – the need for sites in Alsager (Stage 3 of the site selection methodology).</p>
<p>The SA under values the sterilisation of minerals by suggesting this is a minor negative impact; this is an unsustainable approach to minerals planning.</p>	<p>The SADPD and its accompanying SA takes a balanced approach to minerals planning within the context of achieving the overall vision and strategic priorities of the Local Plan as identified in the Local Plan Strategy (LPS), which was adopted in July 2017. Ultimately, deciding whether this balance has been achieved is a matter of planning judgment.</p> <p>The fact that the SA identifies the effect on mineral resources as being a negative one acknowledges the planning guidance principle of seeking to protect mineral resources from needless sterilisation. The reason for identifying it as a "minor negative" in the Initial Publication Draft SA [PUB 03] was for the following reasons:</p> <p>All the allocated sites are within or on the immediate edge of existing settlements and so are suitably located from a sustainable development perspective;</p> <p>It is appropriate that some housing and employment provision is made in the smaller settlements to enable them to grow in a proportionate</p>

	<p>and sustainable way. This links in with the policy requirements of the adopted LPS as well conforming to national planning objectives around achieving sustainable development. For example, the LSC employment allocation identified in the SADPD is around 6ha. This represents less than 2% of the overall requirement identified in the adopted LPS. It also represents a miniscule proportion of the known mineral resource in Cheshire East as identified by BGS mapping; None of the identified SADPD allocations are in an allocated site, preferred area or area of search as identified in the Cheshire Minerals Local Plan (1999);</p> <ul style="list-style-type: none">• Following comments on the Initial Publication Draft SADPD [PUB 01] in relation to minerals, the Council has amended the SA to identify that some of the proposed allocations may have a “significant negative” effect on minerals resources. As a result the Council has proposed to introduce the need for a Mineral Resource Assessment (MRASS) to be undertaken on those proposed site allocation that are located in areas identified by BGS as containing a sand resource (sand & gravel and silica sand) or close to such areas, that is, within 250m. This applies to sand resources that are 3ha or greater in size (as any less is not considered likely to be economically viable) or that adjoin a wider sand resource (regardless of the size of the allocated site). The MRASS will enable the Council to understand the potential impact that the proposed development may have on the mineral resources. This should include whether it is feasible to require prior extraction of the mineral before development proceeds and whether the proposed development has the potential to sterilise any future extraction of the wider mineral resource. Therefore, the requirement for a MRASS will enable the Council to make an informed planning judgment regarding mineral resource impacts when determining planning proposals on relevant allocated sites.
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<p>Progressing the SADPD in isolation risks the sterilisation of mineral resources.</p>	<p>The Council does not consider this is the case for the reasons identified above.</p>
<p>The appraisal methodology used in the SA to identify suitable sites for allocation fails to recognise the importance of minerals, which are fundamental in the pursuit of sustainable development.</p>	<p>The consideration of minerals is one of the twenty criteria used in the site selection methodology. The traffic light criteria for minerals against which all the sites are judged has been enhanced as a result of the representations received. All of the considered sites were either classified as red, amber or green against the mineral criterion assessment used in the site selection methodology. Planning judgment was used to balance the findings of each of the criteria for every site prior to determining which of the sites would be proposed for allocation.</p>
<p>The approach taken to minerals within the SA is contrary to Paragraph 203 of the NPPF and risks the unnecessary sterilisation of nationally significant mineral resources.</p>	<p>The Framework should be read as a whole. The SADPD provides the planning framework for addressing housing needs and other economic, social and environmental priorities in the Borough. The risks of “unnecessary” mineral sterilisation need to be balanced against the need to deliver wider sustainable development priorities for the Local Service Centres identified in the adopted LPS. As identified in the responses above, the Council has made further changes to the site selection criteria and relevant proposed site policies to ensure that appropriate account is taken of the impact on mineral resources as part of the policy making and site development process.</p>
<p>The information used to inform the site selection process derives from the Minerals Local Plan adopted in 1999, which is not an ‘up-to-date’ or an appropriate evidence base.</p>	<p>The Cheshire MLP forms part of the statutory development plan. The SADPD has been subject to two rounds of consultation enabling the minerals industry and others to put forward up-to-date minerals related evidence to the Council to explain why any of the small number of allocations that are being proposed is significant in terms of the overall remaining mineral resource in the Borough and why its safeguarding should be given priority over the need for the Council to achieve its wider objectives. While the Council has received no such information, it has made further changes to the site selection criteria and relevant proposed site policies to make sure that appropriate account is taken of the effect on mineral resources as part of the policy making and site</p>

	development process. Work has also started on the development of a Minerals and Waste Development Plan Document, which will replace the Cheshire MLP. The timetable for which is detailed in the Council's Local Development Scheme.
Information from evidence gathering exercises for the Minerals and Waste DPD (e.g. call for sites) has not been referenced in the SA.	The Council's 2014 Call for Sites exercise representations have been considered in the site selection methodology. Whilst further evidence has been undertaken through the Council's 2017 Call for Sites, this has not been published ahead of consultation on the draft MWDPD. Nevertheless, the introduction of the need for a MRASS in relevant allocated SADPD policies will address the issue of prior extraction and mineral sterilisation.
The SA is contrary to Paragraph 31 as it is not underpinned by relevant and up-to-date evidence. It therefore can't quantify the long-term impact on minerals, or identify whether any of the proposed allocations will result in significant effects.	The SADPD has been subject to two rounds of consultation enabling the minerals industry and others to put forward up-to-date minerals related evidence to the Council to explain why any of the small number of allocations that are being proposed is significant in terms of the overall remaining mineral resource in the Borough and why its safeguarding should be given priority over the need for the Council to achieve its wider objectives. While the Council has received no such information, it has made further changes to the site selection criteria and relevant proposed site policies to make sure that appropriate account is taken of the effect on mineral resources as part of the policy making and site development process. The Council considers its approach is entirely consistent with paragraph 31 of the NPPF by using an adequate and proportionate approach to the use of evidence in plan making.

Habitats Regulations Assessment (Publication Draft SADPD)

Summary of the main issues raised	How the main issues have been taken into account
The SADPD HRA document provides a basic narrative but fails to include the National "Nature Improvement Area" (Meres and Mosses) status of significant areas in the South of the Borough. This is	Wybunbury Moss is part of the West Midlands Mosses Special Area of Conservation and the Midland Meres and Mosses Phase 1 Ramsar. The potential impacts derived from proposals in the SADPD have

important as Shropshire and Cheshire Wildlife Trusts completed a 2 year study of the combined area (ended in late 2017) on behalf of Natural England and the Environment Agency.

been appropriately considered through the HRA report [ED 04].