

Annex 1B: Policy Principles Document: Summaries of Representations Received

1,426 comments received: 709 in support; 315 objections; and 402 comments.

CONSULTATION POINT	SUMMARY OF ISSUE
Overall Document 26 representations by 25 people 4 support 9 object 13 comment	Consultation Process / Style
	General support for EPP
	Need for more flexibility within some policies.
	High growth, jobs led, is unjustified
	Need to provide specific policies rather than statements.
	Inconsistencies between EPP and DS.
	Propose additional policies: <ul style="list-style-type: none"> • Aerodrome Safeguarding • Airport Public Safety Zones • Agricultural policy • Light Pollution • Energy Conservation • Sustainable development • Area of Special County Value • Green Belt
What is the Local Plan? 2 representations by 2 people 0 support 0 object 2 comment	Need more information on the Infrastructure Plan
	Need more information on Community Facilities
Purpose of this Policy Principles Document 3 representations by 3 people 0 support 2 object 1 comment	Consultation Process / Style
	Greater consideration for region, regional strategies
	Additional policies proposed: <ul style="list-style-type: none"> • high quality design • car parking • conservation • places of worship • Community facilities
Your Views 2 representations by 2 people 0 support 1 object 1 comment	Consultation Process / Style
Background to Cheshire East 20 representations by 16 people 3 support 3 object	General Support for the Background to Cheshire East
	Transport links between towns within the Borough should be improved
	CEC have assumed older people can not be wealth creating
	Should recognise Lindow Man at Lindow Moss in heritage information
	Update photo of Henbury
	Refer to Sandstone Trail, Beeston, Bickerton and Peckforton Section 2.34
	Figure 2.10 should be 'natural' environment designations

14 comment	Population info update
	HS2 info 2.6 Update with reference to High Speed 2 connections
	Correlation between household increase and people increase
	Add Meres and Mosses to 2.33
	Paragraphs 2.72 to 2.74 - The information relating to Wilmslow could usefully note the role played by Quarry Bank Mill and Styal Estate in terms of tourism, recreation and education.
	Macclesfield Town Centre - Investigations suggest there is a surplus of smaller units (c.1,000-1,500 sq ft) and a shortage of larger retail units (c.4,000 sq ft).
	We do not agree with section 2.31: this really undersells the landscape character of the area. This is an area with a very rich, diverse and attractive landscape in its own right which should be recognized.
Principal Towns 5 representations by 3 people 0 support 0 object 5 comment	The links to Manchester Airport need to be improved for Macclesfield
	Macclesfield: the major employer Astra Zeneca will diminish over time as jobs are moved abroad.
	Macclesfield transport links need to be improved,
	High quality housing needed to uplift Macclesfield as a pleasant location not just local employment but also for residents who work in Greater Manchester and to address areas of multiple deprivation in the town
Key Service Centres 10 representations by 9 people 0 support 6 object 4 comment	Tatton Park is part of Knutsford not a separate settlement and the development of the two should be considered in tandem. Over development of Tatton will put unsustainable pressure on Knutsford.
	Knutsford Town centre requires a Manager to develop and balance retail offer.
	Middlewich - the bypass should be completed now to open up employment land to meet the CEC core objectives.
	Middlewich history starts in prehistoric times with salt extraction from the Iron Age (pre Roman)
	It is vital that Alsager remains a Key Service Centre providing facilities that are not available in the villages around, and that the relevant public transport links and cycle routes are maintained and enhanced. However, many residents have concerns about the pressure put on Alsager's infrastructure by such a large potential increase in the population of the area.
	Handforth has the lowest population of all the other Key Service Centres, why does it then deserve to have the greatest proportion of New Housing pro rata to the existing population?
	Knutsford has a distinctive character and identity, as a small market town in a rural location, and with important Conservation Areas.
	The description of Knutsford as "largely a dormitory town" insufficiently acknowledges its employment base (providing 6,900 jobs) It would be a fairer representation to refer also to the fact that Knutsford has many jobs (including in the town centre and at Parkgate Trading Estate, Longridge Trading Estate, Booths Park, Radbroke Hall, Knutsford Academy, etc.)
	Nantwich - no mention is made of recent, rapid growth to this population which needs acknowledging in any local plan profile of the town & proposals for further larger scale growth.
Local Service Centres	Object to Goostrey being a Local Service Centre.

and Sustainable Villages 65 representations by 63 people 2 support 60 object 3 comment	Hough is not a sustainable village
	Should include a definition of 'Sustainable Village'.
	Object to Winterley being a Sustainable Village.
	Disagree with definition of sustainable village pertaining to Hassall Green.
	LSCs should be split into small towns and large villages, with villages taking less development.
	The definition of LSCs is too wide and includes small settlements that do not contain sufficient shops and services
	Alraham is a sustainable village with good transport links via the A51 and less than 2km from significant employment uses at Wardle.
Enterprise and Growth 14 representations by 13 people 3 support 6 object 5 comment	Support 20,000 new jobs.
	Employment land needs to be allocated in the right place.
	Housing should be suitably sited in relation to new employment.
	General support for Enterprise and Growth section
	Employment growth ambitions are not achievable.
	Housing growth target is too high.
	The indicators are not quantified & measurable to test whether policies are met or not & by how much.
	Need to accommodate the job and housing needs of the Borough.
	Suggested amendment to Enterprise and Growth section: <ul style="list-style-type: none"> • Include reference to horse breeding, horse training and livery stables. • Include reference (para. 3.5) to industrial minerals (silica sand, brine) as a particular strength of the Cheshire East economy. • sustainable development has a wider definition
Objective 1: Promoting economic prosperity by creating conditions for business growth 23 representations by 21 people 10 support 2 object 11 comment	Town centres need professional managers.
	High quality design needs to be added
	Need to balance local resident needs with visitors/tourists needs.
	General support for objective.
	Use of qualification as performance indicator can only be improved by creating more upmarket housing.
	The provision of a suitable amount, range and type of housing in appropriate locations should be included among those criteria for delivering such economic prosperity
	Suggested amendments to Objective: <ul style="list-style-type: none"> • recognition of Astra Zeneca's role • mineral development should be included in point 4
	Employment growth ambitions are not achievable.
	Housing growth too high.
	Need to maintain and improve existing community facilities not just provide new.
	Need to ensure adequate parking provision is provided.
	Need to address out commuting and reduce travel.
	Green Belt land is not appropriate for employment land.
	HS2 is important

	Strategic employment sites, which lie outside Key Service Centres, have a major part to play in contributing to the Local Plan Vision
Policy EG 1: Economic prosperity 29 representations by 29 people 15 support 6 object 8 comment	General support for Policy EG1.
	B1, B2 and B8 are not suitable in Local Service Centres (LSC's) and Sustainable Villages.
	Should include other types of employment development not just B1, B2 and B8.
	B8 should not be supported within settlements.
	Additional employment land in Wilmslow should be identified.
	Should include link to visitor economy policy.
	General objection is relation to Policy CS2 and EG1.
	Need for a more balanced approach to distribution of development amongst all settlements.
	Focus on larger towns is unduly restrictive. Should be recognition of the role of Astra Zeneca.
	Need for appropriate mix of housing to support this policy.
	The economic growth of Cheshire East cannot be considered in isolation from major external influences and economic drivers such as Manchester Airport.
	Proposals for employment development on non-allocated employment land should be favoured on existing brownfield sites, where they will secure the long term viability of the site.
	Mixed use developments can make a substantial contribution to employment.
Policy EG 2: Rural Economy 29 representations by 29 people 13 support 5 object 11 comment	General support for Policy EG2.
	Need to apply policy.
	Should include large villages.
	Suggested amendments: <ul style="list-style-type: none"> Section 3.13, last sentence should contain a reference to horse-related enterprises (breeding, training and livery stables) which are important employers
	Need to refer to Green Belt policies
	Rural areas are not appropriate for large scale development.
	The diversification of agricultural business is not confined to the facilitation of modern agricultural practices and indeed could include diversification from agriculture uses to leisure and recreation uses.
	Public and community uses should be recognised as economic development (as defined by the NPPF), and that developments associated with all religious and faith communities should be supported in rural areas in the same way as other economic development.
	Need to have a clear delivery strategy.
	Sustainable farming may become more important as pressure on world food supplies increases the price of food.
	Need to include sufficient onsite parking to avoid traffic congestion.
	Avoid harm to protected/designated wildlife sites and species.
	Develop harmonious relationship between commercial agriculture, recreation and wildlife, halting decline of biodiversity in farmland.
	Permit local rural employment only where there is a direct connection with rural economy.
Part (b) provides undue restrictions providing considerable presumption	

	against rural development.
	The Local Plan should include policies to prevent existing rural houses and barns being overdeveloped.
	Employment should include sport.
	Policy makes no differentiation between the rural areas within the Green Belt and those outside the Green Belt.
Policy EG 3: Existing and Allocated Employment Sites	General support for Policy EG3.
31 representations by 29 people 10 support 10 object 11 comment	Allocation of housing next to industrial areas is not conducive to business.
	Where there is special employment use such as sand and gravel extraction the sites should be allowed to extend for additional extraction and to preserve jobs in the rural areas.
	The policy is not in line with the Regional Spatial Strategy (RSS), which identified a large oversupply of land in Cheshire. A large part of East Tytherington and South Macclesfield could be de-allocated for employment use and re-allocated for housing.
	This policy should allow change of use to non-employment uses, including an allowance for loss to residential development where there is a demonstrable need.
	Policy should allow change of use to residential development.
	Policy should be strengthened to ensure sustainable communities and balance is retained.
	Criteria are unnecessarily restrictive.
	Further clarification required in relation to criteria.
	Mixed use schemes may not be appropriate in all cases.
	We recommend that point 3 is removed and that instead, point (1) is amended to refer to <i>existing employment sites and/or allocated employment sites</i> . We recommend criteria at Bullet 2 are amended to read <i>the site is no longer suitable or viable for employment</i> .
	Employment allocations should be under regular review, therefore policy should include reference to review.
	Policy is not flexible enough.
	Non-employment uses will only be allowed where it is demonstrated that these are compatible with existing retained employment sites in the vicinity of the new development. Residential development proposals will be resisted where these may be incompatible with existing uses, particularly in relation to their sensitivity to noise.
	Support residential use of upper floors in town centres.
	CEC should encourage lower town centre rents.
	Stricter policies to retain existing employment (and support its ongoing growth) should be prepared.
	Inclusion of criteria (2) could make development of former employment sites, which may already be subject to significant remediation costs, undeliverable for alternative and more appropriate use. Implementation of this policy could hinder the housing supply.
	There is no assessment as to whether a site is actually needed to be retained in employment use. Where a site is located in an area with adequate supply and vacant employment land and the loss of the site would clearly not prejudice the supply of employment land locally then redevelopment for alternative uses should be encouraged.
	Policy EG3 as it stands is contrary to paragraph 22 of the National

	<p>Planning Policy Framework which makes clear that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.</p> <p>Relaxed permitted development rights need to be considered.</p> <p>Should not be a general presumption that all existing employment sites should be protected.</p> <p>Need to define 'nuisance' and 'environmental problems'.</p>
<p>Policy EG 4: Tourism</p> <p>28 representations by 28 people 15 support 6 object 7 comment</p>	<p>General support for Policy EG4.</p> <p>Reflect importance of Cheshire Ring and rest of canal network as tourist asset.</p> <p>Objection to point 3 (i). What about sustainable/unsustainable villages?</p> <p>Knutsford and Tatton Park 'tourist development ' must be jointly considered alongside sustainable community infrastructure for local residents.</p> <p>Need to promote new visitor attractions and accommodations in sustainable and appropriate locations.</p> <p>Include reference to enhancement and improvement of visitor attractions. Amend policy to read - 'Promoting the enhancement and expansion of existing visitor attractions and tourist accommodation, and the provision of new visitor and tourism facilities, in sustainable and appropriate locations'.</p> <p>It is requested that the opening sentence is amended to read: 'The Core Strategy will protect and enhance the unique features of Cheshire East that attract visitors to the area, including their settings, whilst encouraging investment'.</p> <p>Include reference to theatres.</p> <p>The policy does not place sufficient emphasis on the role which the rural area will play in Cheshire East's tourism sector.</p> <p>Consideration of potential re-use of mineral sites.</p> <p>Tourist assets should include:</p> <ul style="list-style-type: none"> • Macclesfield Silk Heritage Museum, West Park Museum and Heritage Centre. • Cheshire East's Gardens, Nature Reserves, Peak District National Park, long-distance footpaths. • Jodrell Bank • reference to Peak District National Park. <p>This policy needs to underline that tourist development must not have adverse impacts on protected sites and ecosystem services.</p> <p>The policy needs amendment to ensure that the intention is only to allow tourist development that does not conflict with the conservation and protection of nationally important heritage assets.</p> <p>Non-designated sites also have potential to contribute to the visitor economy. The policy needs amendment to ensure that the intention is only to allow tourist development that does not conflict with the conservation and protection of nationally important heritage assets (such as Tatton Park).</p> <p>Links to Marketing Cheshire's and Visit England's growth strategies for tourism.</p>

	Check data / figures used do not contradict as in paras. 3.23 and 3.28.
	Policy should include reference to maintaining footpaths, cycleways, bridleways and canal side paths which are a key infrastructure for tourism and leisure.
	Sites of Special Scientific Interest (SSSI) and Sites of Biological Importance (SBI) must be protected.
	Policy should be amended to accommodate limited marina development in the Green Belt, as canals are not always in sustainable locations.
	The policy should reference the contribution of the Airport and benefits of direct access for domestic and international visitors to Cheshire East.
Policy EG 5: Promoting a town centre first approach to retail and commerce 292 representations by 284 people 264 support 11 object 17 comment	General support for Policy EG5.
	Town Centre Managers should be employed.
	Policy should focus on maintaining existing, rather than providing new.
	Where are / when will town centre boundaries be defined.
	New retail development should be directed to the PSA in the first instance. Any new development that would detrimentally impact on existing PSAs (demonstrated by an up-to-date retail assessment) should not be supported.
	The ratio of service to retail must be controlled and core retail areas identified, defined and used to protect the shopping area.
	Bullet point 7 which presumes against the development of retail and other town centre type uses outside the centres identified in this policy is supported.
	Bullet point 7 is too negative.
	Bullet point 7, there should be regard to the guidance in paragraph 26 of the NPPF, i.e. that there is no automatic presumption against out of centre retail & commercial development.
	In bullet point 8, it is considered that sub bullets i and ii are not required as they duplicate policy which is already set in the NPPF.
	Bullet point 8 should be reworded to state 'Proposals for main town centre uses that cannot be accommodated in or adjacent to the town centre will only be considered where: iii it is demonstrated that the tests outlined in current Government guidance can be satisfied.
	Bullet point 8i) 'need' should be removed, as it is not in line with NPPF.
	Bullet point 8ii) a locally derived threshold should be set.
	Bullet point 8ii) wording should be changed to reflect the NPPF test of 'significant adverse impact'.
	With regard to Part (8), we support the need to satisfy the three retail tests when considering any new retail development that cannot be accommodated within town centres.
	Government tests should be defined.
	The development of active town centres is vital to our future economy.
	Mixture of uses, including residential, within the town centre are supported.
	Designated town centres should be reduced in size, as shopping habits are changing.
	Re-use of upper floors should be encouraged, giving consideration to amenity of neighbouring properties.
Need to apply policy.	
Recommend the Council commissions an updated retail study, to ensure	

	the plan is based on robust evidence.
	Sport uses should be allowed within the town centre.
	Need to use consistent terminology – ‘major towns’ or ‘Principal Towns’, ‘Key Service Centres’ and ‘Local Service Centres’.
	Support retention and enhancement of markets.
	We support the idea of improvements to the public realm, but would wish you to add that this includes town centre green infrastructure which has a vital role to play in the appearance of a town and sense of wellbeing.
	Development of strategic sites will benefit in terms of sustainability from on site retail development.
	Support retention of small parades of shops.
Stronger Communities	I support the need for stronger communities and the introductory statements made here.
12 representations by 8 people	Introductory statements need to carry through into the policies.
5 support	Para 4.1 Should ‘Cheshire East’ read ‘Cheshire East Council’?
4 object	Para 4.6 Should ‘Local Plan’ read ‘Cheshire East Council’?
3 comment	Not convinced that the employment growth ambitions which underpin the plan are achievable.
	Housing numbers are too high.
	Add ‘Accessible Natural Green Space’ as a Performance Indicator.
	We do NOT recognize the idea that leisure facilities could be surplus to requirements. Leisure facilities are vital to the wellbeing of the entire community, from infancy to old age.
	Do not agree that shared services are necessarily suitable in all communities and communities need to be consulted about this.
	Support retention of small parades of shops.
Objective 2: To create sustainable communities, where all members are able to contribute and where all the infrastructure required to support the community is provided.	Inadequate local stakeholder engagement has led to the lack of detail in the plan regarding community infrastructure projects needed for sustainable communities.
	There is no mention of establishing what the infrastructure requirements are from the community.
	There is too much emphasis in development on the outdoor element. The need for indoor community/social venues is important for local communities.
	General support for objective.
	Object to the number of homes proposed.
	Should this objective state ‘at least’ 27,000 new homes as elsewhere in the documents.
32 representations by 25 people	The proposed 27,000 dwellings are insufficient to:
12 support	<ul style="list-style-type: none"> Meet the predicted increase in households during the course of the plan period. Support the significant economic growth and job creation objectives of the local authority. It will not provide enough affordable housing to meet the demand for affordable properties. The proposed housing target is not supported by either the SHMA or ONS Household Projections.
13 object	27K more houses seems about right across CE.
7 comment	Support the need to provide 27,000 more homes in an economically and

	environmentally sustainable fashion, using brown field sites wherever possible.
	Housing development must reflect the character of the area.
	The Objective should recognise the 'special relationship' between Crewe and Shavington which is recognised in the Development Strategy, whereby significant development is proposed at Shavington as part of the Greater Crewe spatial strategy.
	Greater emphasis should be placed upon Crewe, above the other settlements within the Borough, and certainly above the Key Service Centres.
	Welcome inclusion of sport in point 2.
	It should be acknowledged that housing can be provided within and on the edge of the key service centres.
	Care is needed that affordable housing built for CE residents is not used to house overflow from cities such as Liverpool or London as a result of cuts in housing benefits.
	Post Offices, Pharmacies and Buses are all important services that are not mentioned in this objective.
	New housing should be located where it is needed.
	Ensuring that all new development is well designed, sustainable and energy efficient building outside the core areas of towns is mistaken and does not allow the economic prosperity to follow it will only have a drag effect on long established market towns and shopping centres like Crewe Town.
	Improved links for cycling, walking and public transport should be provided.
	Clause 3 There is no mention of establishing what the infrastructure requirements are from the community
Policy SC 1: Leisure 30 representations by 27 people 22 support 2 object 6 comment	Macclesfield Leisure Centre should stay where it is currently located.
	Macclesfield Leisure Centre and Athletics Track Site should be developed as an integrated Sports Village.
	Agree that CEC should 'allocate a range of suitable sites to meet the scale and type of leisure development'.
	Concerned as to how you will determine how leisure facilities might be "surplus to requirements".
	The phrase 'surplus to requirement' is often interpreted a being surplus to the needs of the owner/operator. I suggest rewording this point: 'surplus to need as identified in an up-to-date Needs Assessment'.
	Support for open space, leisure and outdoor sports provision by various individuals.
	There is no description as to what is meant by the term 'community facilities'.
	Point 2 - it is inappropriate in many cases to locate sports facilities according to a sequential test. Sports facilities need to be located where the greatest demand is for that facility type. This can only be determined through the emerging Playing Pitch Strategy and an Indoor Sports Facilities Strategy.
	This policy is appropriate for leisure complexes such as bowling alleys, cinemas etc. However, I strongly advise removing the reference to sports facilities and creating either a new policy or incorporating point 1 into Policy SC2 (Health and Wellbeing) to reflect the unique nature and role of

	<p>sports facilities underpinned by a Playing Pitch Strategy and Indoor Sports Facility Strategy.</p> <p>The potential for leisure and recreation facilities at Local Service Centres and Sustainable Villages could be achieved through permitting suitable tourism accommodation, such as niche-boutique hotels or holidays lodges, adjacent to settlement boundaries on the basis that any leisure and recreation facilities provided are also available for use by the local community.</p> <p>It is therefore suggested that Policy SC1 is amended to support the incorporation of an existing recreational use into a new development proposal in order to cross-fund improvements to that facility.</p> <p>Whilst it is acknowledged that there will be a requirement for new development to contribute to mitigating its impact upon appropriate sports, leisure and recreational facilities, no definition is provided with regard to 'appropriate developments'.</p> <p>There is also no reference to the consideration of viability when determining the requirement for the provision of appropriate sports, leisure and recreational facilities through land assembly and financial contributions. The development industry is facing difficult economic conditions and imposing a significant level of obligations to be provided is likely to impact upon scheme viability.</p> <p>Everyone should have access to low-cost "classic" activities, such as walking, cycling, ball games, swimming, reading, singing, gardening, language learning and art classes, but "trendy" activities can be priced commercially.</p> <p>Add to do not harm character, amenity 'or biodiversity value of an area'.</p> <p>Reword 3i) as it is not clearly worded.</p>
<p>Policy SC 2: Health and Well-being</p> <p>32 representations by 29 people 15 support 6 object 11 comment</p>	<p>The Cheshire East Health and Wellbeing Strategy identifies as a priority the need to support independent living therefore the following could be added: - Supporting health and wellbeing and independent living through new developments that recognise the needs of older people, those with dementia and other vulnerable people; this will include developing dementia friendly communities.</p> <p>The following could be considered for inclusion: - Reviewing new developments that include fast food outlets off licences and/or licensed premises to ensure that communities are not encouraged into unhealthy behaviours.</p> <p>The 2009 Housing our Ageing Population: Panel for Innovation (HAPPI) report set out design criteria for new 'care ready' housing that would meet the needs of our ageing population, allowing them to retain their independence for longer, match the aspirations of the baby boomer generation and promote good health.</p> <p>The All Party Parliamentary Group on Housing and Care for Older People recently sought to encourage implementation with its report calling for a more coherent strategy across housing, health and social care. It is not clear that this level of coherent strategic planning across health and social care economies has taken place in the development of the Cheshire East Local Plan.</p> <p>A Sports Village and Community Centre on the Macclesfield Leisure Centre and Athletics Track site would help promote healthy, fulfilling and active lifestyles by co-location of indoor sports and community facilities</p>

	(particularly for people aged 65 and over) that meet their needs and are easily accessible .
	The Council must promote compact walkable communities, yet strategy seems to be doing exactly the opposite by continuing development patterns of past 50 years which is partly responsible for obesity crisis. If a new development is not within easy walking distance of a school, shop or public transport, it should not be allocated land.
	No mention of cultural facilities.
	The council will protect existing community, cultural and social facilities by resisting their loss or change of use unless replacement facilities are provided on site or within the vicinity which meet the need of the local population; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on site.
	It is considered that a requirement for Health Impact Assessments is unjustified in the absence of any evidence to demonstrate that they are necessary.
	There is no viability evidence to support such a requirement and it would potentially add unreasonable charges to development, threatening scheme viability.
	Policy SC2 states that the Council will seek contributions towards new or enhanced health and social care facilities from developers where development results in a shortfall of worsening of provision. However, there is no reference made in relation to viability or individual site circumstances. This Policy should therefore be amended to ensure compliance with national planning policy.
	Point 2 should be deleted.
	Points 2 & 3: Add in that 'provision of facilities will be phased alongside the development' to both of these requirements to ensure facilities are not left till after the development has taken place.
	Strongly support access to exercise, cycling and walking, but wish to see access to swimming added to this.
	Support the idea of locally produced food and would like to see this expressed in the plan.
	There will be a number of instances where it will not be practical to accommodate such uses within a development scheme due to issues such as space restrictions or the type of development proposed (e.g. apartment development). The provision of allotments should only be provided where there is evidence justifying that there is a need to deliver them and they should be based on up to date evidence contained in the Council's Open Space Assessment. Object to the wording of Part (6) of Policy SC2 and consider it should be reworded as follows: 'Where practical and based on evidence, the Council will promote the role of allotments, community orchards, garden plots within developments, small scale agriculture and farmers markets in providing access to healthy, affordable locally produced food options'.
	It is not the case that community facilities are all provided by the public sector, nor is it the role of planning to provide only for 'essential public services'. There is a wide range of 'community facilities' that are valuable and important to local communities but which are provided by the

	<p>voluntary, charitable and private sector e.g. educational facilities; meeting halls/rooms; day centres; playgroups/children’s nurseries; places of worship; etc. There is a danger that policies of this type are subsequently interpreted rigidly and prescriptively, as they tend to focus on social, health and recreational needs to the exclusion of spiritual and religious needs.</p>
	<p>The supporting text at paragraphs 4.20 - 4.22 should also be augmented to make explicit reference to facilities that meet the spiritual and religious needs of the community.</p>
	<p>Add to ‘ensure new developments provide opportunities for healthy living through ... the provision of high quality open space, in a network of similar GL...’.</p>
	<p>Cycling needs to be encouraged with cycle lanes and cycle storage.</p>
	<p>Should make reference to need to address fuel poverty.</p>
	<p>Leighton Hospital is too crowded. There is no clear statement in the policy to improve the facility and service.</p>
	<p>Would like more detail to be included about what ‘promoting the role of allotments’ actually means in practice.</p>
	<p>A number of individuals have concerns regarding sustainable access etc plus phasing of development to ensure facilities provided as part of the development.</p>
<p>Policy SC 3: Residential Mix</p> <p>49 representations by 48 people 19 support 11 object 19 comment</p>	<p>Developers should be required to build houses that are relevant to local needs.</p>
	<p>Developers should be required to provide homes that are accessible to first time buyers.</p>
	<p>Lower cost housing should be provided.</p>
	<p>Support residential mix.</p>
	<p>Residential mix can provide sustainable care network.</p>
	<p>Cross section / balance of homes needed to ensure people can move (depending on their needs) but stay in the same community.</p>
	<p>Support provision of housing for older people.</p>
	<p>Decisions on the number of Lifetime Homes within each development should be made at a local level, in proportion to local need and aligned with other local housing support and information services.</p>
	<p>Given the projections and forecasts for older people in Cheshire East, sites should be allocated specifically for older persons housing in the Borough.</p>
	<p>Support mix as it allows for diversity and choice.</p>
	<p>Consideration needs to be given to what constitutes older person's housing - prevalence of extra care / retirement apartment / sheltered accommodation in the past has created an oversupply - many older people want to be able to live in mainstream housing / bungalows - housing choice needs to reflect this - not just create older people's communes. You lose the support networks where younger members of communities provide informal support for older people in their communities - grouping older people in one place destroys that, and results in higher social care costs.</p>
	<p>Do not consider it acceptable or appropriate to enforce a mix of size, tenure etc on all new developments. This is forcing social engineering onto an existing stable community and is not acceptable within a democracy.</p>

	Do not support a mix of housing as it will impede development and make them less successful, this particularly applies to social housing.
	Only a proportion of housing should be provided to full standards to meet the requirements of elderly people. The requirement for all houses to be designed to this standard would add to the cost of buildings generally and reflect in increased house prices and diminishing affordability.
	Support the Council's decision to not embellish on the detail pertaining to mix, type, size or tenure, within the Policy.
	The mix should reflect location.
	In North Cheshire there is a large unmet need for local & affordable housing, as well as elderly person's accommodation, it is therefore inappropriate to see a residential mix, which you might expect elsewhere. It is therefore recommended that there are different policies on residential mix to reflect the local housing needs.
	Relatively small housing sites will be unlikely to have the ability to provide certain forms of properties, such as extra care homes, due to viability issues.
	Policy SC3 should include a threshold for its implementation.
	The policy should recognise that where a development comes forward with a scheme that provides housing that meets the needs of a specific group this will be a material factor that weighs in favour of the grant of planning permission.
	A residential mix is also required to attract and maintain the workforce and growth creators required as part of the overall growth strategy and this should also be referred to within Policy SC3.
	The need to deliver lifetime homes, bungalows and extra care facilities should be based on robust evidence contained in the Cheshire East SHMA 2010.
	The need to provide accommodation for the elderly should instead be assessed and determined on a site by site basis taking into account local need and demand.
	Recommend that Policy SC3: Residential Mix is reworded in line with the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly, led by McCarthy and Stone, and encouraging a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly.
	Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we feel, offers a more suitable approach than the one currently suggested by the Council: The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home. 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.
	Amend Policy SC3: so that the requirement for all developments to provide an element of specialist housing be removed and substituted with something more suitable. Additional to this, the Policy should incorporate a clause that supports the provision of all forms of specialist accommodation for the elderly allowing the Council to demonstrate that it is adopting a holistic approach which addresses the diverse housing needs of the elderly.
	This policy is not justified. Whilst alternatives have been considered they have not taken into consideration research which has shown the limited impact which mixed tenures has on social cohesion.
	The NPPF also supports flexibility in Local Plan policies, something which is not provided here.
	The policy on Lifetime homes is not strong enough - it is relatively cheap to improve to this standard with new build and it saves a considerable amount of money and eases alterations which may be needed by older/disabled residents. It also enables disabled residents ease of visiting their friends etc. With longer life expectancy and a disability inclusion agenda CEC should be more prescriptive in this requirement.
	Life time homes should be defined.
	Need to ensure all residential schemes, including extra care homes, provide sufficient parking.
	Care should be taken to ensure that housing for young people and young families is also provided.
	It is noted that this policy provides little guidance over how this will be achieved and whether or not there are any criteria that potential residential schemes will be tested against. It is unclear how the proposed policy will ensure the desired residential mix is achieved.
	Do not believe that Policy SC 3 addresses this element of housing need in sufficient detail. Policy SC 3 provides little clarity on the level of provision required, or details of the policies which will ensure delivery of such accommodation. The proposed policy fails to address in sufficient detail the need for specialist housing with care for older people. The Cheshire East Local Plan does not take a positive policy approach in relation to the housing needs of older people. Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self contained homes, where people are able to readily access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.
	Given the evidence base and the national strategy in relation to housing for older people, a policy should be included within the Core Strategy in relation to the provision of specialist accommodation. Recommend that

	<p>the following policy should be included within the Cheshire East Local Plan: The provision of purpose built and/or specialist accommodation with care for older people in sustainable locations will be supported in every settlement with more than 10,000 population. Schemes should also be considered in other sustainable settlements where there is proven need. Apartments should be restricted for occupation by only those with care needs, include minimum compulsory care packages, should also include age restrictions and an extensive range of communal facilities. Schemes are expected to be promoted in partnership with an on site 24/7 care provider to safeguard the delivery of care and support to residents. Such schemes fall wholly within the auspices of C2 use, meet an otherwise unmet need for specialist accommodation for older people, deliver care and communal facilities and will not therefore be required to contribute towards affordable housing.</p>
	<p>Encourage higher density one storey living rather than traditional bungalow low density development.</p>
	<p>Policy should state 'where' there is a need, rather than 'if' there is a need.</p>
	<p>Policy should be reviewed in light of latest SHMA.</p>
	<p>Policy needs to be rewritten to reflect the variations across Cheshire East. A residential mix might be a useful aim in new villages, but it is totally inappropriate in places like Wilmslow, Knutsford and Poynton. In these towns there is a large unmet need for local & affordable housing, as well as elderly persons accommodation. New housing should focus on these rather than 4 bed detached houses on Greenfield sites.</p>
	<p>There is no provision for care homes in the plan.</p>
	<p>Part 2 of this policy should be deleted.</p>
<p>Policy SC 4: Housing to meet Local Needs</p> <p>59 representations by 58 people 18 support 20 object 21 comment</p>	<p>Why not have cascade (as in Policy SC5) for towns as well. Lived in local ward Lived in local town.</p>
	<p>Viability means that residential developments are able to provide much lower levels of affordable housing than stated in the policy.</p>
	<p>The percentage of affordable housing should be 35% not 30%.</p>
	<p>Paragraph 4.41 which states that <i>'the Council will seek the balance of housing that best meets local needs and the characteristics of the site. As a guide, currently, this would normally be 65% affordable (or social) rent housing and 35% intermediate affordable housing. The Council may refine both the headline percentage, tenure split and any geographical variation as the plan progresses. Any future requirements will be determined through evidence such as the Strategic Housing Market Assessment and local housing needs surveys'</i> should be part of the policy with fixed term reviews over plan period (say 5 years).</p>
	<p>General support for the policy.</p>
	<p>Support is given to this policy as there is clearly a very real issue with affordability generally across the Borough but particularly in hot spots such as Alderley Edge.</p>
	<p>In an age where capital grant is reducing, this will provide an increasingly significant way of delivering affordable homes in future.</p>
	<p>More emphasis should be put on financial contributions or alternative contribution to affordable housing where it is not economically viable to deliver affordable housing.</p>
	<p>There should be little or no discretion to reduce the affordable housing</p>

	contribution (whether that is actual, in-kind or off-site provision) below 30%.
	Affordable housing should not mean a compromise on construction standards and energy efficiency.
	Pepper potting can lead to incongruous mixing of housing types, and groups of people that could lead to unsatisfactory developments and social mixes.
	In all cases, development viability is a material consideration.
	There are already 50% of all houses that are affordable being built at the moment, this is far too many.
	If the Council had a higher housing requirement it would allow for more housing to be built and therefore a greater proportion of affordable homes.
	In smaller developments a contribution may be better, especially for developments of 3 or 4 dwellings. 90% of a dwelling is not much use?
	Suggested amendments to this policy: <ul style="list-style-type: none"> • Replace the reference to 'at least' with 'a target of', this will provide both the developer and the Council with flexibility. • Add 'In certain circumstances it may be appropriate to divert affordable housing contributions towards other forms of infrastructure provision'.
	Point 1 it is considered that the wording should be revisited to make it clear that the policy is seeking to secure a proportion of market dwelling schemes to incorporate the requisite quantity of affordable housing and that this is as defined in the NPPF. As currently drafted the wording is a bit ambiguous.
	The threshold of 0.4 hectares is also considered too low as in some circumstances there may be significant parts of the site that are either undevelopable which result in a lower number of units on a larger site, but which would theoretically be caught by this policy.
	The requirement for schemes of 3 dwellings to incorporate affordable housing is also considered to be an unduly low trigger that may prevent development from taking place.
	Point 3 duplicates the first point of Policy SC3.
	The testing of the overall viability of these requirements does not seem to have been undertaken.
	Point 6 in respect of viability does not make it clear that a reduced affordable housing requirement will be acceptable where it has been demonstrated that it is not viable to do so.
	Point 7, it is considered that a financial contribution should be considered appropriate on all schemes below 15 units.
	It is considered that the 2009/10 Strategic Housing Market Assessment is now out of date and does not identify the current full objectively assessed needs for the Borough (for both market and affordable homes). This is because it is based upon out of date evidence that has been superseded and will shortly be superseded by evidence emerging from the 2011 census.
	If the required number of affordable homes were to be provided each year, only through this 30% policy the overall housing requirement would need to be much larger.
	Whilst there is support for a differential between urban and rural

	<p>situations, there is a need to set higher ratios of affordable housing in the towns of North Cheshire. This would reflect the large unmet need, resulting from the price of land, and housing.</p>
	<p>Given that Crewe has the most affordable market properties in Cheshire East it may, in certain circumstances, be appropriate to divert the planning obligation for affordable housing towards other infrastructure requirements.</p>
	<p>There should be further flexibility in the Local Plan for specific strategic sites where the Local Planning Authority agrees that the level of affordable housing requirement for the site can be adjusted through rebalancing of infrastructure priorities to deliver key infrastructure with a wider benefit than mitigating the impact of the development.</p>
	<p>The Policy should give further flexibility by allowing for negotiation between the developer and Local Planning Authority, whereby the affordable housing requirement can be adjusted through rebalancing of infrastructure priorities.</p>
	<p>The Council will need to satisfy itself that there is compliance with the Community Infrastructure Levy Regulations.</p>
	<p>Policy needs to be properly enforced.</p>
	<p>Properties need to be tenure blind, to date many developers have been allowed to get away with affordable housing that is very obviously so, e.g. 'market' housing being 3/4 bed detached with token 'affordable' housing being terraced shoe-boxes shoved away as much out of sight as possible.</p>
	<p>It is considered that the policy is not justified or consistent with national policy in the Framework [158] which advises local planning authorities to ensure that their assessment of and strategies for housing take full account of relevant market and economic signals. Policy SC4 is based upon housing need evidence which is now almost two and a half years old and may have viability implications for the development of sites. There have been a number of recent cases of planning applications in Cheshire East where developers have been unable to meet the Council's aspirations for affordable housing delivery because viability issues that have arisen and the resultant affordable housing provision agreed with the Local Authority has been significantly lower than its policy requirement. On this basis, it is considered that the SHMA 2010 and accompanying viability evidence need to be updated to reflect current market conditions and this evidence should be used to inform the affordable housing requirements of Policy SC4.</p>
	<p>It is considered that Part (3) of Policy SC4 should include the types of affordable housing tenure which are currently available and suitable.</p>
	<p>Object to the inclusion of a specific tenure split in the supporting text. In practice, a range of tenure splits have been recently accepted for residential applications in Cheshire East to account for viability issues on individual sites. In order to help ensure that viable development continues to come forward it is considered that the Council should continue to be flexible in terms of the tenure split and should not seek to impose arbitrary tenure splits across the Borough as a whole. It is therefore considered that the second sentence of Paragraph 4.41 of the supporting text to Policy SC4 should be deleted.</p>
	<p>Part 6 - this does not read sufficiently clearly and it should be made clear</p>

	that such assessments may demonstrate that only a lower proportion of affordable housing is deliverable, and/or a different tenure mix than is sought.
	This policy has not been positively prepared as it looks to prescribe affordable housing targets on a vast majority of housing developments. As a result it may impact upon the viability of housing schemes and subsequently limit the number of schemes which come forward, which will ultimately prevent affordable housing targets being met. The council should look at the requirement of affordable housing on a case by case basis and not look to prescribe overly prescriptive stipulations.
	Policy should define 'exceptional circumstances'.
	Consider that the wording of clauses 6 and 7 of Policy SC4 do not reflect the provisions of the NPPF, particularly paragraphs 173 to 177 and paragraph 50 of the NPPF. The NPPF requires careful attention to viability and costs in plan making and decision taking, and development should not be subject to such a scale of obligations and policy burdens that their ability to be developed viable is threatened. Thus, clauses 6 and 7 must recognise that there will be instances where it is not possible to provide for affordable housing, either on, or off site, or to make a financial contribution towards affordable housing.
	This policy does not make reference to the HCA Design & Quality Standards, this is particularly important for RPs.
	The policy needs to make sure there is a clear definition of Housing to meet Local Needs. The definition in the Glossary states that Housing to meet Local Needs is affordable housing. As such, we need there to be either of the following two options included: a. examples of the types of Housing to meet Local Needs eg. supported housing, key worker accommodation, gypsy and traveller etc. b. A definition that allows us flexibility in determining what housing is needed to meet local needs.
	Future evidence may show a need for a different affordable housing requirement including potential different requirements in different geographical areas, will this policy have the flexibility to accommodate this?
	The NPPF advises that affordable housing policies should be sufficiently flexible to take account of changing market conditions over time. The wording of SC4 at present does not provide this confidence as it includes a specific target of 'at least' 30% affordable housing.
	It would be unsound to explicitly set a 'minimum' requirement within the policy, as those developments that bring forward developments with a lower amount of affordable housing based on an assessment of the viability of the scheme would in effect be contrary to that same policy.
	Point 2 of the policy states that a property will remain affordable for its lifetime. Could this be reworded to take into account recycling of subsidy for 100% staircasing or current/future options to purchase rented property?
	Para 4.41 is not clear that affordable rent may not be acceptable in particular areas of Cheshire East.
	Extra help should be given to developers (such as social landlords) wanting to build only affordable housing on a site - their project should not be made unaffordable by demanding planning conditions.
	Please strengthen policy to make sure that areas such as Alderley Edge

	are not allowed to get away with commuted sums instead of onsite affordable housing.
	Object to the proposed two tier approach to affordable housing.
	Locals cannot need 200 affordable houses when one affordable house has only just filled after nearly 1 year empty.
	It is unclear as to why the policy does not refer to 'affordable housing' directly.
	There is no requirement set within this policy to restrict the housing delivered to those who live locally. This could mislead the public into believing that this is a policy designed specifically to benefit local people when in actual fact that this is an affordable housing policy.
	The need for affordable housing should be assessed and published for each settlement, not averaged across CE, and adjustments need to be made as affordable houses are built.
	Would like to see the Council working more proactively with the Homes and Communities Agency and registered social landlords to identify possible suitable sites and opportunities for funding for social rent and intermediate housing products rather relying entirely on developers.
Policy SC 5: Rural Exceptions Housing for Local Needs	Small schemes should be no more than 1 or 2 houses and that the housing survey must be in the local parish, following CE best practice model.
19 representations by 19 people 8 support 7 object 4 comment	Some guidance on what constitutes a 'small scheme' would be useful.
	Schemes should have the support of Parish Councils.
	This type of housing should be for community (village) needs only, not adjoining or other communities (villages), or for people living in other communities (villages) who have a connection.
	The cascade provision if employed proves that there was no community need in that village. The Housing should be for people who live or work in the village, it makes no sense for people outside a village to set up home there and the have to commute to work and to shops and other facilities particularly if they are on a low income.
	A greater standard of proof of community need should be required for housing exemption sites, as there are for farm workers houses.
	Any development should be community led, not landowner or housing association led.
	Market housing should not be permitted this is creating another exception.
	Does this policy only relate to Sustainable Villages covered by Policy CS2? This could be made explicit.
	A maximum of 20% market housing may not be sufficient to generate the viability required.
	It is unclear whether this policy applies to Green Belt sites and as such whether this guides the fact that such development is appropriate development in the context of paragraph 89 of the NPPF.
	There is no differentiation between Green Belt areas and other rural areas. The policy should reflect the very clear national differentiation between the two.
	Point 6 cannot reasonably be complied with as the Councils own evidence is too old to meet this test.
	There is incorrect punctuation (and possibly missing words) in point 5 which make it somewhat unclear what that part of the statement is

	intended to convey.
	There should be a requirement that the surveys demonstrating need have been conducted in conjunction with the Parish Council and based on the CEC model survey.
	Scrap this policy and apply SC4 to rural areas as well.
	Add 'The development of rural exception sites should have no adverse impact on all sites and species of nature conservation value; and result in biodiversity gains'.
	We welcome the recognition that an element of market housing is often required to enable the delivery of affordable housing, which is particularly the case in rural settlements where additional infrastructure costs are expected and contributions particularly needed to assist the provision of local amenities, facilities and services. We object however to the strict requirement that such market housing is supported by open book viability assessments and is limited to a maximum of 20%. Greater flexibility should be provided by the policy to consider all circumstances, particularly in Sustainable Villages where further growth is both accepted and required to meet the District targets.
	Sites should adjoin or be well related to Local Service Centres and Sustainable Villages and be close to existing or proposed services and facilities. We agree that sites should adjoin or be well related to existing settlements. We do not accept, however, however, that these must be only the Local Service Centres and Sustainable Villages listed in the current draft of Development Strategy Policy CS2. We consider in this respect that the Council is taking a narrow and outdated view of sustainability.
	Agree that proposals must be for small schemes and be appropriate in scale, design and character to the locality.
	A thorough site options appraisal must be submitted, to demonstrate why the site is the most suitable one. Agreed in principle, but this is too narrow a test. Candidate sites must also be deliverable in terms of footnote 11 of NPPF: 'To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable'.
	It is illogical for the beginning of Policy SC5 to say that all of the criteria should be met when the requirement for proposals to consist in their entirety of subsidised housing directly contradicts the next in relation to the provision of market homes.
	We agree that an open book viability assessment must be provided, that the Council should not accept aspirational land value and that the minimum number of market units to deliver affordable housing should be provided. However, the statement that there must not be an element of profit is unrealistic and unacceptable. Traditionally rural exception schemes have been delivered by Registered Providers. However, they are now frequently delivered by private companies, such as our client MCI Developments. In exchange for their use of capital and the time and risk involved in delivering schemes, which are often controversial locally, an element of profit is required. The level of profit required is lower than with a market housebuilder because the dwellings are pre-sold to the

	<p>housing association. The justification for a modest profit is commonly recognised by the Council in development appraisals, such as where negotiations take place over open space contributions. The ability to introduce market units to deliver 'rural exception' housing is supported by NPPF, which makes no reference to profit being unacceptable. The Council's proposed approach is not backed up by viability evidence, is unjustified and would be a serious impairment to delivery. Our clients would be happy to work with the Council to devise a 'cross subsidy' model to allow mixed sale and rent schemes on 'rural exception' sites, under which the profit from the sale of the market units would be used to fund the affordable units. The level of profit, for the site assessed as a whole, would be sufficient to provide a modest incentive to secure delivery.</p>
	<p>Agree that in all cases proposals for rural exceptions housing schemes must be supported by an up-to-date within the last five years housing needs survey that identifies the need for such provision within the local community."</p>
	<p>Occupancy will generally be restricted to a person resident or working in the relevant locality, or who has other strong links with the relevant locality in line with the community connection criteria as set out by Cheshire Homechoice. Agreed in principle, but the policy should say what the community connection criteria are, rather than refer to those set by separate body which could conceivably be modified in format and name within the plan period, or who could change its criteria without scrutiny through the development plan process. We would support the inclusion of the current local connection criteria within the policy: - Currently live, or have lived, within the boundaries of the Parish or adjoining Parish and have done so for at least one of the last two years or three of the last five years. - Have immediate family (sibling, son, daughter, parent, step parent or adoptive parents) who are currently living within the boundaries of the Parish or adjoining Parish and have done so for at least five years. - Have a permanent contract of employment within the Parish or adjoining Parish."</p>
	<p>Agree the locality to which the occupancy criteria are to be applied must be agreed with the Council prior to determination of the relevant planning application. Generally this is taken as the Parish or the Parish plus adjoining Parishes, within Cheshire East.</p>
	<p>Agree to ensure an adequate supply of occupiers in the future, the Council will expect there to be a 'cascade' approach to the locality issue appropriate to the type of tenure. Thus, first priority is to be given to those satisfying the occupancy criteria in relation to the geographical area immediately surrounding the application site, widening in agreed geographical stages.</p>
	<p>It is an inescapable conclusion that the application of these policies would make it more difficult to obtain planning permission for local needs affordable housing in villages which both the Council and the Planning Inspectorate have very recently judged to be sustainable. When the Strategic Housing Market Assessment has identified a net affordable housing requirement of 1,243 each year, this would be a retrograde step which would be contrary to the requirement of paragraph 50 of NPPF to plan for a mix of housing based on current and future demographic</p>

	<p>trends, market trends and the needs of different groups in the community identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. However, our clients do believe that a series of modifications in accordance with our suggestions above could achieve a more balanced and acceptable approach.</p>
	<p>It would be helpful to add after 'Registered Provider' [in condition 5] 'including local housing/land trusts'.</p>
	<p>The need for affordable housing should be assessed and published for each settlement, not averaged across CE</p>
	<p>This policy is vital to ensure that rural communities only have increased development where there is supported and proven need for this type of housing and where there are defined employment opportunities in the immediate rural locality.</p>
	<p>This is another example of treating North Cheshire and South Cheshire with the same blanket policy. Policies in North Cheshire reflect National Green Belt policies, whereas a more relaxed stance should be taken outside the Green Belt. This policy should be reworded to recognise the differences.</p>
	<p>Speculative developments without a properly identified need , undertaken by the local Parish Council should be rejected.</p>
	<p>Rural exception sites must be able to demonstrate full sustainability.</p>
<p>Policy SC 6: Gypsies and Travellers and Travelling Showpeople</p> <p>15 representations by 14 people 8 support 7 object 4 comment</p>	<p>Your Evidence Base is flawed. The GTAA figures which were produced 6 years ago are deemed to be outdated and unreliable and have been questioned both by industry professionals and the original authors.</p>
	<p>Central government has now decreed that CEC is now free to adopt its own figures. This opportunity must be grasped.</p>
	<p>This policy lacks a firm commitment to establish an up to date/recent local Cheshire East GTAA.</p>
	<p>CEC could take a more balanced approach, making the distribution of sites more equitable to both Gypsy/Travellers and the local settled communities. The present policy has led to overloading of specific areas within CEC and this now appears to be leading to social unrest, giving little opportunity for Gypsy/Travellers to assimilate into local society. Over 60 percent of Gypsy/Travellers sites in CEC area are sited within post codes CW10 and CW11, this imbalance must be rectified.</p>
	<p>As the council is keen to have a mix of housing types, and needs and to pepper pot them on new developments, should a percentage (say 30%) of gypsy caravan standings be included on all new developments, otherwise they will not be inclusive.</p>
	<p>Policy is not prescriptive enough. It contains generalisations such as 'proximity', 'adequate', and 'access to'. No specific sizes or distances are provided to clarify these generalised statements. The current local plan is much more detailed (e.g. policy H8 and HOU6). Similar precise detail must be written in to the new local plan or it should be made clear that currently saved policies are incorporated into the new plan.</p>
	<p>Policy is not stringent enough.</p>
	<p>Policy requires more detail to be added.</p>
	<p>We should NOT be planning to provide sites for these people at all!!!</p>
	<p>Gypsies and travellers provide an alternative culture within our society and should be supported in retaining their identity.</p>

	Numbers are too high.
	It is essential that the affect on local residents should be the main criteria and any proposal must have accessible services such as electric, gas and sewers in close proximity together with convenient refuse disposal.
Sustainable Environment 16 representations by 15 people 9 support 2 object 5 comment	General support for this section.
	Very important to keep Cheshire environment and character.
	In protecting the environment, an appropriate balance needs to be struck in achieving socially, economically and environmentally sustainable development.
	This section needs to be strengthened.
	Climate change is a major issue for the next 50 years. We need to address the problems now by making development truly sustainable.
	This section should build on / provide more details to the requirements set out in CS Policies 8 and 9.
	Suggested amendments to this section: <ul style="list-style-type: none"> • Page 63 section 5.49 that the wording be changed from 'scientists agree' to 'some scientists postulate' (there is not universal agreement on the clauses of climate change) • Section 5.50 the second sentence should begin 'Changes might include.. .' (there is not universal agreement on the clauses of climate change) • Para 5.1 CE is not all 'unusually' rich & so insert 'much of' before Cheshire East
	It is requested that a policy should be included which specifically refers to development within the green belt. Such a policy should acknowledge the advice within the NPPF, which allows limited infilling or redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use, provided that it does not impact on openness of the green belt. The inclusion of a green belt policy would enable strategic employment sites such as Alderley Park, the ability to expand, develop and redevelop; this would support their continued major contribution to the economy of the Borough. Such a policy should also recognise and accept the potential to develop complimentary uses on surplus land with these Strategic Sites. This policy approach would reflect the advice within Paragraph 21 of the NPPF which requires planning authorities to recognise the need for existing businesses to expand or contract. It also would provide flexibility to accommodate changing business needs and enable the Council to plan positively for the promotion and expansion of clusters or networks of knowledge-driven, creative or high technology industries. (NPPF, Paragraph 21)
	Welcome very much the references to the National Park in text about context, key features, major attractions, environmental designations, and historic environment, together with specific policy references in Policies SE3 (Biodiversity and Geodiversity) and SE5 (Green Infrastructure), and the separate policy SE15 that seeks to protect the National Park from detrimental development nearby A little more on the social/economic relationship of East Cheshire Centres (in particular Macclesfield) to the needs of the National Park population would in our view be beneficial.
	There are few qualitative indicators listed except for condition of Sites of Special Scientific Interest & condition of air quality management areas.

	Indicators need to be quantified & measurable to test whether policies are met or not & by how much.
	Policy on Light Pollution and Energy Conservation should be added - The Royal Commission on Environmental Pollution report on Artificial Light in the Environment 2009 examined the explosive growth in outdoor lighting since WW2 and the resulting loss of visual amenity of the night sky due to light pollution. Although mentioned in para. 5.103, there is no policy.
Objective 3: Environmental quality should be protected and enhanced 36 representations by 34 people 19 support 7 object 10 comment	General support for Objective 3.
	Believe it is essential to maintain the character and separate identities of the Borough's towns and villages and are pleased to see this set out as a specific objective.
	Development proposed does not protect the environment.
	Objective should make reference to preserving open country side and agricultural land.
	Performance indicators should include percentage of countryside/agricultural land retained relative to today.
	Development of A500, M6 and associated road networks do not champion working towards reducing carbon emissions but promotes the use of road transport.
	North CE is very densely populated.
	Increased levels of fine particles in the air, from increase vehicle movements, is consistently and independently related to causing serious health conditions in humans/animals.
	Renewable Energy needs better definition.
	Do not support transporting waste products into the area as this will increase road traffic to and fro, and potentially cause local pollution and the need to dispose of final waste
	Do not support unsightly and inefficient wind farms.
	Do not support anything in Class B1/B2 that is constructed on open countryside.
	Preserve Jodrell Bank Observatory.
	Protect the environment of Cheshire East.
	Protect the historic environment of Cheshire East.
	Character of Cheshire East is what makes it a popular visitor destination
	It is considered that the first part should make specific Reference to buildings (i.e. so as to encompass important individual buildings, including those standing alone e.g.Little Moreton Hall) not just to places.
	Point 4 fails to encompass the wider settings within which assets sit and that are part of their significance; the following is suggested: Conserving and enhancing the natural and historic environment ensuring appropriate protection is given to designated and non-designated assets, including their wider settings.
	Point 7 should be broadened to promote a more sustainable approach to natural resources, in particular to include encouragement for recycling minerals, using secondary aggregates where practical and ensuring that primary aggregates are only used where essential.
	Point 8 could usefully make reference to the waste hierarchy and in particular the role of recycling and potential for waste minimization.
This section should also include the need to protect and enhance the environment in terms of WFD eg maintain or improve the current WFD	

	<p>status. By measuring according to WFD, it not only includes water quality and water resources, but also it encompasses the ecological, biological and chemical parameters. We hold monitoring data for WFD status and this could be used as a performance indicator.</p>
	<p>Care should be taken to provide green corridors within a built-up environment to prevent flora and fauna becoming isolated in pockets of green space.</p>
	<p>Add 'creating landscape-scale GI networks that will allow species adaptation and migration'.</p>
	<p>GB and SOG boundaries should also be set up to ensure that natural assets are preserved and enhanced. Where possible they should coincide with the boundaries of other large-scale designations such as NIAs or areas of special or historic landscape character and value.</p>
	<p>Sustainable Environment Performance Indicators Expand and clarify targets and timetables to include the following</p> <ul style="list-style-type: none"> • Reduce overall ecological footprint. • Increase to 95% the proportion of protected nature sites in favourable condition. • Improve local biodiversity • Proportion of Local Wildlife Sites (SBIs) where active conservation management is being achieved • Increase index of abundance of terrestrial breeding birds, in particular farmland and woodland species.
	<p>Add biodiversity to para 5.3 for example '<i>development should seek to improve the quality, appearance and biodiversity value of an area and the way it functions</i>'.</p>
	<p>Paragraph 5.4 is almost a repeat of the preceding one and could be combined into a single paragraph.</p>
	<p>The policy is too generic and non-specific to adequately replace the current saved MBC Local Plan. CEC should incorporate the detailed management policies within the MBC Local Plan.</p>
	<p>However, we strongly object to point 6 as drafted: it undermines the principle of the greenbelt. It introduces an element of flexibility and opportunism which is incompatible with the principle of the greenbelt as expressed in the National Planning Framework.</p>
	<p>Performance Indicator on maintaining the integrity of the greenbelt.</p>
	<p>Page 48 Objective 3 point 3 that radiation be added to the list of hazards (this would include radio-active, electro magnetic, heat light, sound and infra sound emissions).</p>
<p>Policy SE 1: Design</p> <p>33 representations by 28 people 16 support 6 object 11 comment</p>	<p>Support approval of development only if it reflects the amenity of the site and its neighbouring area in terms of scale, architectural form and landscape character.</p> <p>SE1 is too weak - Developments should complement the existing settlement, but not necessarily be slavish copies. Innovative architecture should be considered</p> <p>Policy should require all new developments to be designed and built to Passivhaus Standard.</p> <p>There is scope for neighbourhood developments, e.g. Eco zones.</p> <p>The overall Plan should flow from this.</p> <p>Policy should replicate NPPF and its guidance on good design.</p>

	Support Policy which is consistent with NPPF
	Support Policy but doubt it will be delivered
	Policy should require development to be environmentally sustainable and appropriate to surrounding landscape features, including an absolute presumption against development in areas where landscape value and features cannot be maintained if development was permitted.
	Developments should reflect local housing design styles and proposals which include standard developer designs without any local reference should be refused.
	Policy should be more detailed, with SE6, to cover the full remit of issues relating to appropriate approaches to development in and adjacent to Built Heritage assets.
	High quality design should include the use of high quality materials.
	Policy should protect against over-development of sites.
	Policy should not allow garden grabbing or developing in the back garden.
	Request Policy wording is amended to include 'and protect and enhance the biodiversity value of natural assets'
	Request Policy wording includes a reference to the preferred use of native plant materials, of local provenance and source.
	The quality and distinctiveness of Knutsford's natural and built environment need to be ensured through the adoption of this Policy, and through the preparation and adoption of the SPD and design coding - the latter not limited in Knutsford to "major developments".
	Object to requirement for 'rigorous design assessment': onerous & ambiguous, going beyond national policy. Object to environmental sustainability being a key design priority: onerous, ambiguous & could harm viability by demanding unrealistic requirements for renewable energy etc. Rewrite to say 'Development proposals should respond to and respect the amenity of the site and its neighbouring area in terms of scale, height, layout, architectural form, materials, landscape character, relationship to neighbouring buildings and uses in terms of its impact upon the highway network and safety.'
	Policy needs to include the unacceptability of poor design in poor settings that fails to take the opportunity for improving the area's character and quality. Support should be sought from DCCABE and/or Places Matter! NW design review service. If an SPD on Design is borough-wide it may not address the unique character of different places eg Nantwich. The SPD should extend beyond generic advice & identify particular locations that have their own vernacular character & include Building for Life, Code for Sustainable Homes, Lifetime Homes, BREEAM and CEEQUAL.
	Add a further borough-wide SPD for house extensions to replace the saved SPD from the former Crewe & Nantwich Local Plan
	Clause 3: Add at end '& in building construction through sustainable practices e.g. materials as renewable, local & non polluting as possible'
	Environmental Sustainability should be a key design priority especially the use of green infrastructure and SUDS to mitigate and adapt to climate change.
	Detail should be provided now and not at a later date, through an SPD
Policy SE 2: Efficient	Support requirement for site density to be appropriate to the area and its

<p>use of Land 38 representations by 36 people 14 support 10 object 14 comment</p>	character
	Support the priority of building and land reuse.
	More emphasis is needed to stop using green belt; need to recognise the need for smaller dwellings & more dense developments.
	NPPF has no density standards and none are proposed here
	Policy places a different burden on windfall sites & is unreasonable. The sequential approach is not in the NPPF (para 111) & cannot be applied to windfall sites. The NPPF contains a presumption in favour of sustainable development. Delete all but part 3 of this Policy.
	Such a sequential approach as proposed by this policy could restrict the potential for sites to come forward for development & restrict the 5 year supply of housing sites.
	Support sequential approach to windfall development and the priority given to the development of existing buildings and previously developed land in settlements.
	The NPPF does not seek to distinguish between previously developed land within and outside settlements. On this basis, it is considered that the second part of the policy should be deleted, and it should be replaced by a further bullet point to the first part as follows: iv Utilise previously developed land wherever possible, provided that it is not of high environmental quality.
	Windfall sites & higher densities on sustainable brownfield sites will help to meet Macclesfield's housing needs, rather than Greenfield unsustainable sites.
	Policy SE2 should be amended to incorporate the principle of sustainable development – ref paragraphs 14 and 15 of the NPPF.
	Brownfield sites can also be an opportunity to improve an urban landscape by the provision of green space, memorials or playgrounds rather than dwellings.
	Add to Policy – to build upon existing concentrations of activities and existing infrastructure- unless this places strain upon existing infrastructure
	Support Policy & its implementation
	The policy could be overly restrictive if rigidly followed and some room for flexibility ought to be included within the policy or its explanation.
	All windfall development should consider the existing landscape, build on existing concentration of activities and infrastructure, not require major investment in new infrastructure, make use of existing buildings as a priority, then consider infill sites and finally develop where it is well located to existing housing, jobs and services. All development should be of an appropriate density.
	A better title for the Policy would be Windfall Sites.
	Windfall sites should be included in housing numbers for towns & taken into account permissions given on such sites.
Policy should recognise that the redevelopment of brownfield sites can make a significant contribution to the sustainability and deliverability of the Plan, even when located outside of existing settlements. The Plan needs to include a stronger approach which favours the re-use of vacant brownfield land.	
Concern that windfall development could erode urban greenspace particularly private gardens; there should be effective safeguards in the	

	<p>policy.</p> <p>The first & over-riding condition should be where such a site is open land, permission will only be given where no planned, well-located, but more difficult sites remain undeveloped.</p> <p>The policy is confusing and misleading as it appears to be attempting to address a number of separate elements / issues within the one policy (brownfield first approach, density policy and character policy). This policy should be split into three separate and distinct policies.</p> <p>It is more appropriate for the policy in relation to the efficient use of land to cover all development rather than restricting this to windfall Brownfield sites should not be released at all cost; they still need to be able to demonstrate that they are policy compliant and sustainable.</p> <p>Local Plan should seek to provide a portfolio of sites that would deliver a mix in house types and sizes to meet demand. Over reliance on brownfield sites may prevent this range from being maintained.</p>
<p>Policy SE 3: Biodiversity and Geodiversity</p> <p>35 representations by 26 people 15 support 13 object 7 comment</p>	<p>Need to apply policy.</p> <p>Weight to be given to benefits, particularly where impacts are irreversible.</p> <p>General support for Policy SE3.</p> <p>Suggested amendment to Policy SE3</p> <ul style="list-style-type: none"> Section 4 - Careful wording needed to clarify degree of impact <p>Para 5.20 - Insert between 'metric' & 'published in March 2012' 'contained in Biodiversity Offsetting Pilots' to make sense of this reference.</p> <p>Policy is overly restrictive.</p> <p>Policy is not inline with the NPPF.</p> <p>Consideration of Soil and Agricultural Land Quality.</p> <p>Strengthen Policy SE3.</p> <p>Survey work should be undertaken, to cover the whole of Cheshire East.</p> <p>Where a potential development could provide a negative irreversible impact (such as destruction of ancient woodland), then a very high bar should be set in terms of weighing benefit.</p> <p>Policy needs to be rigorously enforced</p> <p>The principle behind this policy is accepted but the wording may need consideration to avoid interpretation that could preclude all development eg section 4. Even waste land could be said to have some biodiversity value.</p> <p>Do not agree with mitigation, compensation and offsetting. Habitat is a finite resource - once built on it's lost for good.</p> <p>The low incidence of designated sites such as SBIs is likely to be a reflection of lack of survey effort rather than lack of sites, and in this respect the evidence base has significant shortcomings. A Borough-wide Biodiversity Audit is therefore an urgent requirement.</p> <p>Add '...increasing the total area of valuable habitat in the Borough' by requiring and/or initiating the improvement of farmland biodiversity and regional GI networks and linking up existing areas</p> <p>Add Cheshire Wildlife Trust Nature Reserves to this list</p> <p>Offsetting should be permitted only as a last resort, and suitable sites for offsetting will be selected only from those with existing value which can be restored, enhanced or extended. The potential loss of ancient semi-natural woodland cannot be compensated for or offset. If suitable sites</p>

	are unavailable compensation or offsetting will not be an acceptable solution.
	Historic designed parks and gardens' contribution to nature conservation should be recognised and mentioned somewhere in the listings.
	Areas of importance to local groups should be protected. Add 'protect non-designated assets & sites valued by the local community from development where no compromise through mitigation & compensation is acceptable & promote creation & enhancement in areas of deficiency where these have been identified as important through Parish Plans, Neighbourhood Plans or other community planning. The Council will actively promote the improvement of local nature value by the creation of new rich habitat in areas of low quality & diversity'
	Add in detail re green infrastructure and Green Space Strategy & produce an SPD
	Provide a GI action plan for Nantwich
	The draft has an over-reliance on the Cheshire-wide Biodiversity Partnership which focuses mainly on the 'most vulnerable wildlife' and an independent and ad hoc database, Record; both of which are inadequate for the purpose of being proactive in nature enhancement across the borough. The policy should incorporate lost PPS9 detail. Additional policy or clause 4: Add 'CEC will undertake a detailed, comprehensive borough-wide survey of all habitats and species wider than of existing designated sites', explaining the specialist resources required for such surveys & provide for the 'findings to trigger revision of the policy where necessary'. In accordance with NPPF which specifically requires identification and mapping of 'local ecological networks' including, but not restricted to designated sites, add 'CEC will undertake to a detailed, comprehensive borough-wide survey of all habitats and species wider than of existing designated sites'. Ecological networks and connectivity are vitally important in sustaining sites and addressing the impacts of climate change. Additional policy or clause 5: Add 'CEC will actively promote previous commitments such as Action Plans, a programme of designating Local Nature Reserves & managing its own land for the benefit of biodiversity.'
	Include new Nature Improvement Areas & the Cheshire Orchard Project.
	Additional policy or clause 6: There should be a policy commitment to CEC's joint working with adjoining authorities. In first list of bullet points: replace 'candidate' with 'potential'; insert 'candidate' before Special Areas of Conservation & insert 'or proposed' before Ramsar sites.
	Remove from clause 3 & replace in clause 2 list: National Nature Reserves - all NNRs are SSSIs & carry the same status.
	Offsetting: Para 5.20 Insert between 'metric' & 'published in March 2012' 'contained in Biodiversity Offsetting Pilots' to make sense of this reference. In all places where 'offsetting' appears, insert 'biodiversity' before it [policy clause 4, paras 5.19 & 20]
	Clause 4 wording improvement: After 'overriding' insert 'public' after 'interest' insert 'no alternatives'. The policy also needs to address the provisions of the Conservation of Habitats and Species (Amendment) Regulations 2012 particularly the new duty in relation to wild bird habitat. Wider protection for bird habitat outside designated areas. Also the strict protection regime for European protected species is not

	addressed
	Policy clause 4 monitoring: Add at end; 'Where a damaging plan has been permitted and compensation is required, there should be monitoring to ensure that the damage is as assessed and the compensation is effective'. Omission: Insert 'Reference should also be made to UK report on the implementation of the Habitats Directive (Article 17 report). This includes assessments of the conservation status of all European protected species and habitats found in the UK'.
	Paragraph 5.14 does not do justice to the quality and distinctiveness of the character of the Cheshire landscape.
SE4: Landscape 34 representations by 26 people 15 support 11 object 8 comment	Need to apply policy.
	Conditions for restoration and replanting where appropriate are supported
	This policy needs to be followed throughout the plan.
	This policy should not prevent land in open countryside at sustainable locations coming forward for development to meet housing needs over the plan period.
	Policy should include reference to the historic dimension relating to landscape character which is an important layer of landscape significance that should also be respected.
	General support for Policy SE4.
	All hedges of 20m or more unbroken length should be protected, and extended if possible, because they are classified as UK BAP Priority Habitat.
	Recommend that an urban landscape character assessment is carried out including the role of parks and gardens.
	Priority to safeguard best agricultural land (grades 1, 2 and 3a)
	Woodland access standard shows very poor quality of woodlands and accessibility is poor, need for more tree planting scheme and coppicing areas need to be provided.
	More regard should be given to agricultural productivity and farm structure in safeguarding the local farm economy
	Does not offer a balance or assessment of the significance of impacts – too restrictive/onerous, particularly part 4 which is inconsistent with NPPF. NPPF provides a more balanced approach – account for economic and other benefits.
	Policy should be preceded by an introduction describing the Cheshire East landscape and making reference to the Cheshire Landscape Character Assessment 2008
	Point 1 should include requirement to retain landscape features of importance where reasonable and possible to do so.
	Omit: "where possible" from point 1 (i), add " and biodiversity value"
	Point 2(i) should be amended to allow the off setting of any harm by appropriate mitigation or other environmental benefit.
	More flexibility required in part 2 as they are restrictive
	Suggest new first clause: The landscape character of the Borough is varied & the character & local distinctiveness of the rural & urban landscape should be protected & enhanced through measures developed in the Landscape Strategy
	Suggest new second clause: The Council will actively promote the creation of a rich & diverse landscape across the borough; especially in

	<p>areas of poor quality, & the improvement of local landscape value.</p> <p>Add a new clause: CEC will undertake a detailed borough-wide landscape character survey at local level and assessment to supplement the Cheshire Landscape Character Assessment 2008 & explaining the specialist resources required for such surveys & provide for the findings to trigger revision of the policy where necessary.</p> <p>Too much focus on high value assets and does not sufficiently protect assets and sites of local value.</p>
<p>SE5: Green Infrastructure 41 representations by 39 people 15 support 9 object 17 comment</p>	<p>General support for policy SE5 by groups such as SUSTRANs and the National Trust and other organisations and individuals</p> <p>Detailed points regarding access to Peak District e.g. better paths to Teggs Nose Country Park</p> <p>Need for a green environment plan for the whole authority area so that there is evidence of “joined up” planning; green gap part insufficient</p> <p>Concern re green issues and the proposed allocation at Handforth East</p> <p>More implementation of green infrastructure needed and commitment to develop more detailed action plans for Green Infrastructure in areas that may need a deeper spatial plan</p> <p>Policy should recognise green belts</p> <p>Support for policy but suggestion that confusion may arise with inclusion of green gaps which are planning policy designations rather than green infrastructure as such</p> <p>Too many designations</p> <p>Suggestions re extension of green gap around Haslington in relation to Winterley and Crewe and also suggested amendments to green gap adjacent to Sandbach; suggest green gap should be green belt</p> <p>List of assets in policy should include the Cheshire East parts of The Cloud, Congleton Edge and Mow Cop; partnership work with Staffordshire to protect these assets.</p> <p>Playing fields and sport should be included/referenced in policy. FIT and CABE standards not applicable for outdoor sport – NGBs have their own standards. Emerging Playing Pitch Strategy will address this issue - needs to be referenced in policy.</p> <p>Need for community facilities and play areas</p> <p>More evidence is required to support policy, ensure GI assets are fully identified/mapped in order to give detailed picture of GI-deficient areas of the Borough. Provision should not just be developer-dependent. Follow Natural England guidelines for accessible natural greenspace. Biodiversity duty - important that CEC conserves and enhances biodiversity.</p> <p>The Canal & River Trust supports Policy SE 5 in respect of the canal network, particularly 2(iii), 3(ii) and 4(ii). The Llangollen Canal and the Middlewich Branch of the Shropshire Union Canal should be added at 4(ii).</p> <p>Sibelco UK is of the view that minerals developments should be noted in Policy SE 5 since minerals developments can contribute to green infrastructure, ecological enhancement and biodiversity gains.</p> <p>Lack of evidence for green gaps</p> <p>Object to open space standards - not justified or consistent with FIT standards of 2.4ha/1000 population; additional standards proposed which could affect viability.</p>

	<p>Policy welcomed but felt that more detail and proposals should be added from the Green Space Strategy; need for more detailed surveys; more detailed policies needed for complexity of relationship between biodiversity, landscape and GI</p>
	<p>Information provided regarding the Mosses Natural Improvement Areas and desire to see local mosslands restored etc. Importance of Urban Green Space highlighted.</p>
	<p>Cheshire Gardens Trust supports the inclusion of historic and modern parks and gardens as part of green infrastructure, provided their use does not conflict with their special qualities and values, including original design intentions.</p>
<p>Table 5.1 Open Space Standards 2 representations by 2 people 2 support 0 object 0 comment</p>	<p>Support for green infrastructure provide properly maintained</p>
<p>SE6: The Historic Environment 21 representations by 21 people 13 support 1 object 7 comment</p>	<p>General support for Policy SE6</p>
	<p>Neighbourhood Plans would be a useful route for identifying and protecting heritage that people locally consider important.</p>
	<p>Policy should make specific reference to recognising the need for listed buildings and their settings to be maintained and enhanced, and where appropriate, altered and extended to enable their longer term economic use for sustainable tourism.</p>
	<p>Why does conservation not have its own separate policy?</p>
	<p>Policy should also make reference to historical land uses, such as ridge and furrow farming practice, and their protection.</p>
	<p>Cheshire East has a unique heritage that must be conserved and enhanced and its assets protected.</p>
	<p>The policy approach is supported but two changes are suggested to specific wording. Clause 3 Add ‘and historic field patterns’ to last bullet. Insert an additional bullet point: ‘historic buildings and vernacular character that contribute to landscape character’ from the Cheshire Landscape Assessment.</p>
	<p>This lists non-designated assets, the last one being historic parks and gardens. To this should be added historic field patterns. Add ‘and historic field patterns’ to the last bullet point, historic parks and gardens as recommended by the Cheshire Landscape Character Assessment 2008. In order to prevent further loss of an easily overlooked asset, insert an additional bullet point: ‘historic buildings and vernacular character that contribute to landscape character’.</p>
	<p>Note that Policy SE 6 includes elements that are not actually policy, for example part 2 which provides a list of designated heritage assets. Specifically in relation to part 3 of this policy would suggest that bullet point three ‘locally important built assets not on the local list’ should be removed from the list of non-designated assets.</p>
	<p>In terms of undesigned heritage assets, need to cover:</p> <ul style="list-style-type: none"> • Areas of Archaeological Potential (defined in 10 towns) – these are a local designation.

	<ul style="list-style-type: none"> • Sites of archaeological significance • Historic landscape – This needs to be covered as part of the historic environment policies as a justification for advice provided on applications which involve historic landscape features - need to ensure consistency with landscape policies. <p>Knutsford's distinctive character and identity are much valued, widely so - and are the essence of the 'making of place'. They are relevant factors in the consideration of proposed growth.</p> <p>This policy needs to take due account of minerals proposals, which given the nature of the development, has the potential to affect buried heritage assets. These assets may not in all cases be able to be protected, but can be the subject of detailed assessment and recording, thereby adding to the cultural heritage database of Cheshire East.</p>
<p>SE7: Low Carbon Energy 26 representations by 25 people 9 support 4 object 13comment</p>	<p>Policy needs to be much more robust, not caveatted round with so many ifs and buts. Wind farm developments (perhaps mainly as smaller community-based assets) should be much more prominent, and appropriately supported by this policy.</p> <p>This is too weak. It needs targets for houses fitted with PV and fitted with solar thermal. Targets for utilisation of low head hydro sites, targets for installation of CHP at industrial and office complexes, etc.</p> <p>Agree that low carbon energy is vital to the future of Cheshire East's environment, economy and people and that proposals for zero or low carbon technologies must address any potential negative impacts that may arise from the development.</p> <p>I have to support this policy, as it doesn't say anything wrong, but it is weak and there is nothing in the Plan that suggests anything will be done to promote this.</p> <p>Proven health risks associated with proximity to wind turbines. Proliferation of 'small' turbines damaging to landscape</p> <p>Please give serious consideration to the recognised hazardous health risks to humans associated to the proximity of dwellings to wind turbines - both large and 'small'.</p> <p>Central Government is implementing its low carbon energy agenda through Building Regulation revisions and your policy should not go beyond this. We work with Councils to come up with solutions that meet these requirements and tend to support a 'fabric-first' approach.</p> <p>The approach set out in this Policy to Low Carbon Energy is considered to be sound and it is supported.</p> <p>Any wind farm application should provide an assessment analysing the impacts on the visitor economy in the short and longer term. The emerging Local Plan should identify broad opportunity areas for low-carbon energy, away from visitor destinations and other most sensitive uses and areas.</p> <p>The policy could look to highlight which renewable energy policies the Council will look to support to provide more confidence to the sector. Accordingly see recommended amendments to policy SE7.</p> <p>Yes - solar panels and hydro-electric power should be encouraged. There are a number of disused water-wheels on the River Dane, witness to an unused source of energy.</p> <p>Why is there nothing about the impact on the landscape which has been a concern in relation to wind turbines elsewhere. Also the importance of</p>

	noise protection for local residents.
	Noise disturbance to residents of Knutsford, especially at night, is a big issue affecting many people. This is not dealt with adequately in this Policy, despite the reference at 5.59 to loss of amenity.
	Staffordshire County Council would like to be consulted regarding the location of any potential wind farms. We would wish to know where it is planned to source biomass wood from.
	CE should support the use of low carbon energy to benefit the environment, economy and people of CE by the use of solar, photovoltaic, air/ground source heat pumps and geothermal. On no account must wind turbines be allowed as they are inefficient, not cost effective and a blight on the landscape.
	I support this policy.
	We support this policy but note very little in the Local Plan that supports this. CEC should spearhead the reinstatement of the degraded Mosslands as carbon sinks. We would request the provision of a Low Carbon Subject Plan. Strongly support the suggestions in 5.56.
	Change wording to reflect absence of universal agreement on causes of climate change. Make reference to critique regarding disadvantages of wind power. Proposals must demonstrate lack of detrimental effects. Must maintain 2km separation between turbines and homes/offices etc.
	There is growing evidence pointing to health problems caused by proximity of turbines i.e. within 2km radius of home/workplace. This point must be emphasised in the Plan. Impacts on costs to NHS and local industry. Current costs are £7-10billion, and will increase if not taken into account.
	Support
	The Nantwich LAP supports this policy.
	Suggested amendment to Page 64 section 5.56 - large single or groups of medium sized turbines should be required to be sited at least 2 km from the nearest residential property, educational establishment, place of work and operational religious or community buildings.
	Gladman note that Policy SE 7 does not actually include a policy requirement as such, instead it just provides a statement in relation to how the Council intends to support low carbon technologies.
	Strengthen significance of renewable energy; better set out how CE will achieve objectives. Protect safe operation of airport when considering wind/solar development etc. We welcome reference to potential negative impacts but text should emphasise that in these cases, development is not allowed.
	Suggested amendment to Page 64 section 5.56 - large single or groups of medium sized turbines should be required to be sited at least 2 km from the nearest residential property, educational establishment, place of work and operational religious or community buildings.
SE8: Energy Efficient Development	This section needs to add in a specification that all new housing developments should be built to Passivhaus standard.
33 representations by 33 people	I support the policy in principle, but not Point 3. The 10% renewables target is a weak objective - would prefer to adhere to the definition of low to zero carbon (LZC) developments to achieve the objective here, and not have the "get out clause" contained therein.
8 support	
10 object	
15 comment	Agree that all new development must work towards delivering national

	and local carbon dioxide reduction targets.
	The Plan should be more explicit about the level of sustainability you expect developers to build to. Frequently developers cite economic cost as a reason not to build to the highest sustainability standards, and without appropriate policies in place, economic cost will always usurp environmental cost.
	Agree.
	The Policy is important in addressing the necessary reduction in impacts of climate change and accordingly it is supported.
	Early stages of some of this technology. Wording re. Viability and feasibility needs to be considered.
	Contradicts low density strategy of Council (which I don't support).
	Support.
	Should remove need for development to be of 'highest feasible construction standards in order to maximise energy efficiency'. Use of district wide heating could make a development unviable. Should undertake a viability study to support this policy.
	Suggested amendment to policy wording regarding viability.
	'highest feasible construction standards' - There is no requirement for this in national policy or justification for it being included in a Local Plan policy. This requirement has not been tested in order to see what impact it has on scheme viability. It should be removed from the emerging plan.
	SE8 (Energy-efficient Development) could also be stronger. Use of 'must' rather than 'should' would give a firmer message.
	Object to part 4. The requirement for all major developments to explore the potential to include district heating is onerous and may threaten the viability of the development. Part 4 should only be applied to very large schemes where it is deliverable and viable - the policy should be amended.
	The policy does not provide adequate recognition of issues of viability, nor of the balance between energy efficiency and low-carbon energy generation.
	New River Retail and SWIP object to the requirement for development of over 1000sqm to secure 10% of its energy through renewables as it is considered this is unnecessary and unsound.
	SE8 to be amended to confirm that when assessing construction methods, the integration of renewable energy technologies/low carbon sources, the precise details will be negotiated on a case by case basis. This allows specific site circumstances and local need to be considered in the requirements.
	The requirement of 10% renewable/ decentralised energy in 3 seems rather unambitious given the urgency of the need for energy saving and generation - and the technologies now available. Please consider a stronger commitment to this.
	This sounds wonderful. I look forward to seeing it realised - if it is feasible at the current time!
	The end of point 3 is too much of a let out clause.
	Renewables use in minerals schemes could be problematic as the combination of developments may cause conflicts. Energy efficient developments should not be inextricably linked to renewable energy generation.

	Object to pt4: requirement for major developments to explore district heating potential is onerous and could threaten viability. Can only be viably provided on schemes of 600+ dwellings. Need viability evidence to set minimum size of scheme for which this policy applies.
	Central Government is implementing its low carbon energy agenda through Building Regulation revisions and your policy should not go beyond this. We work with Councils to come up with solutions that meet these requirements and tend to support a 'fabric-first' approach.
	Development must be of the highest feasible construction to maximise energy efficiency. Use decentralisation, renewable/low carbon source. In areas not connected to the gas network, new developments must be encouraged and helped to use low carbon energy technology.
	Whilst the current economic climate tests viability, the policy should include a review for tightening up as the situation improves. 'Feasible' & 'viable' may still lead to less improvement than the alternative considered & CEC will have limited enforcement resources to follow up retrofit.
	We believe that the 10% renewables target is outmoded and need to define low to zero carbon developments to achieve this objective. We are very concerned that the effectiveness of policy SE8 is vulnerable to the interpretation of developers with regard to feasibility and should be strengthened.
	SE8 dismisses other robust carbon mitigation measures i.e. fabric energy efficiency, in favour of on-site energy generation. We consider that the deliverability of this policy needs to be much better researched and considered in line with the other local plan requirements as it can affect viability.
	Strongly Support.
	Whilst the current economic climate tests viability, the policy should include a review for tightening up as the situation improves.
	SE8 should be amended to confirm that when assessing construction methods, the integration of renewable energy/low carbon sources, the precise requirements will be negotiated on a case by case basis, to specific site circumstances to be considered and reflected in the requirements.
	Requirements are onerous, may affect viability and go beyond NPPF requirements. Remove 10% target in respect of decentralised/renewable/low-carbon sources. Remove requirement to install district heating.
	It is recommended that the Local Planning Authority encourages the delivery of sustainable energy through a generic policy approach that includes a positive strategy to facilitate sustainable energy where appropriate and viable.
SE9: Allowable Solutions 11representations by 10 people 4 support 3 object 4 comment	What is required is the creation of a number of Eco Districts where the residents work together to reduce their emissions. The Council would obviously provide expertise and 'seed corn' cash.
	Don't really understand this policy.
	Also object to Council stating it is seeking to significantly reduce CO2 emissions whilst promoting low density car dependent development on edge of many settlement
	Not possible to secure contributions to allowable solutions by s106 and

	<p>requirements of this policy would fail at least 2 of the tests set out Regulation 122 of CIL Regulations - policy should be deleted</p>
	<p>It would also be difficult to justify that the requirement is necessary to make development acceptable in planning terms given that the 'Allowable Solutions' Framework is still in the development stages</p>
	<p>Not supported by viability evidence</p>
	<p>This type of requirement should be dealt with through the Community Infrastructure Levy and it does not therefore need to be set out as a requirement in a Local Plan Policy</p>
	<p>Details of Allowable Solutions are not defined as yet and therefore this policy may change.</p>
	<p>Policy SE 9 is not a policy; this is just a statement of intent made by the Council.</p>
<p>SE10: Minerals 18 representations by 16 people 6 support 3 object 9 comment</p>	<p>Aggregates and silica sand will require slightly different approaches - this will be difficult to do in one catch-all policy. Suggest that the MPA gives consideration to splitting the policy statements into at least two policies, one for aggregates and one for silica sand.</p>
	<p>Policy SE10 should indicate the level of provision to be made over the Plan period. Policy does not specify how much aggregates are required to provide a steady and adequate supply. The agreed sub-regional apportionment endorsed by the AWP should be mentioned in the policy (not just in the supporting text) with a target amount given which is calculated by multiplying the annualised rate (rolled forward as necessary) for the plan period.</p>
	<p>Policy needs to include a commitment to provide at least the minimum landbank as recommended by national policy.</p>
	<p>In accordance with policies in the NPPF, a Local Aggregate Assessment needs to be produced which will provide the evidence for assessing an appropriate level of provision to sustain the growth planned for the area. The Cheshire East Local Plan would be required to produce a Local Aggregate Assessment and take the findings of this into account.</p>
	<p>In accordance with NPPF paragraph 146, the document should note that mineral planning authorities should not only provide for a stock of permitted reserves of at least 10 years for individual silica sand sites but also " at least 15 years for silica sand sites where significant new capital is required".</p>
	<p>Policy needs to recognise the national importance of the Cheshire East (silica sand) deposits and commit to maintaining minimum stocks of planning permissions of at least 10 years at each site throughout the plan period, or a minimum of 15 years at sites in which there has been or is intended to be, significant investment.</p>
	<p>In accordance with NPPF paragraph 146, industrial minerals sites are required to be provided with "...a stock of permitted reserves ..." and we suggest that this terminology should be used instead.</p>
	<p>Term 'appropriate and environmentally acceptable areas for future extraction' does not give the necessary confidence to the industry that you are looking to allocate Specific Sites or Preferred Areas, which should be the approach for most needs. Areas of Search should be reserved for minerals where information about resources is poorly understood, or for</p>

<p>longer term allocations which will be needed towards the end of the plan period. We would feel more comfortable if you used the commonly accepted terminology for allocations of mineral extraction sites (see MPS1 Practice Guide paras 37-42 and NPPF para 145).</p>
<p>Should industrial sands quarried in Cheshire East be used for the manufacture of clear glass, the Council should be aware that the production of this type of sand at Moneystone Quarry in Staffordshire has now ceased. This may affect requirements for production at sites in Cheshire.</p>
<p>Only sites and extensions to existing sites should be identified for new mineral working to provide the best balance between the needs of the extraction industry but also provide certainty for the local community that no new extraction areas would be considered.</p>
<p>The policy should be sufficiently flexible to allow for new sites to come forward should they be needed. An amalgamation of Options 2 and 3 when considering mineral policy SE10. This would provide both certainty and flexibility during the plan period and beyond.</p>
<p>Where suitable, the use of secondary and recycled aggregates should be encouraged, however in terms of industrial (silica) sand whilst advancements are being made in technology to help increase recycling of e.g. foundry sands and glass cullet, the specification required by industry is so high a large proportion of primary material is required to produce the right quality products. Recycling has reduced the overall requirement for primary land won minerals for some end uses but new processed mineral is still required and very often of a higher quality due to blending with recycled components (such as glass cullet and reuse of foundry sands).</p>
<p>Prudent use of primary land won minerals is supported. However, the use to which minerals are put cannot reasonably be sought to be controlled by development management mechanisms. How would the “ prudent and efficient use of minerals” be equitably assessed and managed through planning and development management processes? How will you go about ‘ensuring the prudent use of mineral resources...’ The policy or supporting text needs to be much more explicit about this since we have severe reservations about its inclusion. The MPA is not qualified to judge how minerals are best used because this is a commercial matter dictated by the business model of the operation, the requirements of the customer and the constraints of the resource. We would prefer to see this deleted from the policy.</p>
<p>The policy should confirm the type of mineral resources to be safeguarded in the Site Allocations and Policies Document. It would be a helpful addition if the Plan were at this stage to set out in principle which minerals were to be safeguarded. Whilst the Policy Principles set out the principle of safeguarding minerals in Cheshire East the plan gives no detail of which mineral resources are intended to be within the MSAs which will be designated in the Site Allocations and Policies Document In order to assess conformity with the NPPF and to determine whether the policy principles are sound the Plan should indicate what mineral resources are proposed to be safeguarded.</p>
<p>Approach to Mineral Safeguarding Areas (MSAs) appears to fall short of</p>

the requirements of national guidance.
 BGS Guidance states, “Where the largest part of the safeguarding process is to be set out in a subsequent DPD, the broad extent of the mineral resources should be shown on the Key Diagram.” You will need to make sure this is done for the submission version of the Plan in order to make it sound. As a minimum we would expect the plan to set out

- a. Which minerals are being safeguarded
- b. Show the general extent of the MSAs in a Key Diagram
- c. Say what information will be used to identify boundaries
- d. Say whether environmental areas, urban areas and buffer zones will be included
- e. Say where development management criteria may be found

It is necessary and appropriate to safeguard the whole of the surface coal resource in Cheshire East, without any exceptions in order to meet the requirements of paragraph 143 of the NPPF

Compatibility with potential safeguarding areas in Staffordshire should be provided for sand & gravel and clays associated with coal resources

The words ‘where necessary’ should be removed. All existing and potential mineral related infrastructure should be safeguarded

Alternative transport for mineral sites is aspirational but unlikely to be deliverable or viable in most cases giving the rural and remote nature of many quarry sites. In this context we agree a flexible attitude towards mineral transport needs to be maintained.
 You need to say how you intend to encourage the sustainable transport of minerals, especially in the light of what you have said about the alternatives available. Our position is that if road transport is the only viable transport method it is sustainable by definition.

Word “reinstated” or “restored” may be a more appropriate term than “reclaimed”.

Mineral sites should be restored in the highest practicable manner. However, the end use/afteruse of a mineral site is not a matter for mineral planning. The design of the restoration of mineral sites can, nevertheless, reflect potential or possible afteruses. In addition to the potential afteruses noted in paragraph 5.82, employment land and other forms of built development (to facilitate the beneficial future use of plant site areas) should be added. The appropriate restoration of mineral sites should be considered on its own merits.

How and where does Cheshire East Council propose to set environmental criteria? Is Cheshire East attempting to set its own environmental criteria as opposed to assessing developments against recognised national criteria. It is very important that mineral developments are set against national criteria.

Provision should be made for small scale extraction from suitable quarry sites to meet building conservation needs.

Policy will need to say where the development management criteria will be found. Will this be in another DPD, and if so, which one?

The Plan at present fails to mention the cross boundary issue that arises as a consequence of the adopted strategy of the Peak District Core Strategy. Namely the objective of achieving a reduction in the amount and proportion of aggregates from the National Park over our plan

	<p>period. This may have consequences for the future levels of aggregate supply from Cheshire East.</p>
	<p>It is understood that a significant proportion of that sand and gravel imported into CE came from quarries in Staffordshire. Local policy should provide for local sourcing of construction materials including aggregate minerals.</p>
	<p>The draft proposals contained within the plan give no consideration to out of County reserves or indeed to any other out of County reserve.</p>
	<p>It is not clear how much research of the Cheshire cavities has been done on this risk of gas storage. Change the wording of this policy clearly exclude any possibility of storage nuclear materials either as waste or for reuse.</p>
<p>SE11: Waste 14 representations by 14 people 6 support 0 object 8 comment</p>	<p>Plan at present fails to mention cross boundary waste issue that arises as a consequence of the adopted strategy of the Peak District Core Strategy. Namely the fact that the Peak District Core Strategy makes no explicit provision for waste facilities to meet the waste arising in the National Park.</p>
	<p>Therefore the Peak District National Park Authority is looking to its constituent Authorities to meet the waste management needs of their respective parts of the National Park. The Authority would be looking for the Plan to be clear in its assessment that it is looking to meet the waste arisings from the whole borough.</p>
	<p>More detail expected on potential waste arisings from their proposed new developments in the south, e.g. Congleton, Alsager and Crewe, as this may place pressure on Household Waste Recycling Centre (HWRC) facilities located in the north of Staffordshire.</p>
	<p>The Policy Principles document refers to a predicted reduction in waste arisings, from 870,000 tonnes to 797,000 tonnes by 2030. It is slightly unclear if this accounts for the new developments proposed in the development strategy, as a decrease in waste arisings may ultimately result in less waste coming into Staffordshire HWRCs, but as specified above, Staffordshire's HWRCs may not be able to cope with an influx of waste delivered by Cheshire residents should arisings increase as a result of new housing developments.</p>
	<p>There is reference to the development of new waste and recycling facilities, but no detailed plans. New facilities developed to serve new settlements, and homes, around the northern boundary may be more convenient for Staffordshire residents, thus potentially increasing the flow of cross boundary waste movements in to Cheshire East.</p>
	<p>Policy SE11 does not indicate the strategic waste planning issues to be addressed and in particular, how gaps in waste management capacity will be met. This should be defined before work commences on detailed waste policies in the proposed waste development plan document.</p>
	<p>The presence of the largest waste site in North Cheshire in Macclesfield, and the need to address the future of waste in the Waste Development Plan Document, makes it essential that full public consultation takes place on any waste proposals in the area. The involvement of Parish Councils is paramount in this process. These are essential requirements to avoid the disastrous recent history relating to waste in the area.</p>
	<p>Whilst supporting the policy's waste hierarchy, the Waste Development Plan should expressly advocate minimising use of primary raw minerals,</p>

	<p>making the link with the Minerals policy & to educate those companies & bodies that produce waste to know the potential uses for their materials to replace raw minerals.</p> <p>Need to understand what Cheshire East has in mind in seeking to cooperate with other planning authorities from a waste planning point of view</p>
<p>SE12: Pollution 13 representations by 13 people 7 support 3 object 3 comment</p>	<p>Support this Policy. However, it does not seem to notice that commuters' vehicle emissions are also pollution. Thus this policy is part of the need to reduce commuting within the authority.</p>
	<p>As such the proposed plan is considered to be deficient with the omission of any reference to unstable land. Policy SE12 would be the most appropriate location to include such policy criteria.</p>
	<p>Policy SE12 The last sentence of Point 2 is a statement rather than a policy and should be in the supporting text if it is to be retained rather than the actual policy. In terms of Point 3, it is unclear what mitigation might be required or possible to comply with this requirement.</p>
	<p>Support in principle, but again, land allocation and strategy seems to contradict policy. Low density piecemeal development is being proposed on the edge of many settlements which encourages car use, along with major road building proposals.</p>
	<p>Support.</p>
	<p>Agree.</p>
	<p>It is important to ensure that developments are not in places which are too noisy. Otherwise residents will complain of existing industrial uses to the detriment of existing businesses.</p>
	<p>Manchester Airport aircraft noise disturbance is a real problem for many Knutsford residents (especially at night) and policies should be considered to deal better with it.</p>
	<p>I support this overall policy.</p>
	<p>We are concerned about the pollution implications from road traffic of new developments and would like to see this concern carried through into the local plan. This has significant implications in north of CE where traffic volumes are already high and contribute to carbon emissions and health.</p>
	<p>Support.</p>
	<p>The Nantwich LAP supports this overall policy.</p>
	<p>SE13: Water Management 13 representations by 13 people 9 support 0 object 4 comment</p>
<p>New development impacts on rainwater run-off adding to impermeable land surface acerbating existing problems</p>	
<p>Will the Cheshire East SFRA take account Climate Change and its impacts</p>	
<p>Point 6 could refer to WFD status and not just water quality. New development and growth should not cause a deterioration in WFD status and this needs to be considered when planning new developments. Deterioration can be avoided by putting suitable mitigation measures in place.</p>	
<p>In point 7, we are pleased to see reference to water efficiency measures. However, this policy does not state to what standard this is going to be promoted to. This should be made clear within the policy.</p>	
<p>There should be mechanisms for detecting and managing new flood risks arising from natural causes.</p>	
<p>I suggest that there should be an insurance test- no good building if</p>	

	<p>insurers will not insure.</p> <p>There are a number of references to flood risk and water management within Cheshire East, but we would want to ensure that any defences or mitigation plans do not exacerbate flooding elsewhere, i.e. further downstream in Staffordshire. Therefore, it would be beneficial for us to be consulted as part of the Strategic Flood Risk Assessment review mentioned on page 147, paragraph C.29 of the development strategy, to ensure there are no proposals that will affect Staffordshire's flood risk strategy.</p> <p>Omission 1: There is insufficient detail in the policy for workable implementation so a SPD is suggested or the discussions and plans should take place as recommended in the HRA appropriate assessment.</p> <p>Omission 2: There is only the briefest reference to water infrastructure but has the possibility of long term water shortage in Cheshire East been fully researched? This possibility should be included in view of CECs proposed high level of new development?</p>
<p>SE14: Jodrell Bank 41 representations by 41 people 35 support 7 object</p>	<p>Development should not impair the operation of the Jodrell Bank telescopes</p> <p>Jodrell Bank should be protected from interference</p> <p>Policy should say that Jodrell Bank will be consulted and their comments adhered to (objections should not be over-ruled by planners or Councillors as they do not have the scientific knowledge)</p> <p>Difficult to demonstrate a harmful impact until development is complete</p> <p>Development should be limited or designed and constructed correctly to ensure development does not impair the efficiency of Jodrell Bank</p> <p>Policy is weak and vague</p> <p>This policy is vague and not clear to developers. No clarification of how "impairment" is judged. Detail and clarification of policy should be provided at this stage.</p> <p>Support policy principle. Further wording that is referred to on policy operation should be provided for comment as this creates uncertainty.</p>
<p>SE15: Peak District National Park Fringe 16 representations by 16 people 6 support 2 object 8 comment</p>	<p>Development should take into account Jodrell Bank as a world Heritage Site, a HQ of the SKA (Square Kilometre Array), eMERLIN/VBI National Facility and the Grade 1 Lovall Telescope</p> <p>Jodrell Bank is globally important in advancement of human knowledge. Must not diminish its potential.</p> <p>The presence of a large area of the Parish within the Jodrell Bank Zone, means that the Parish Council has a strong interest in maintaining its current extent. It recognises that it may need to be refined and updated as it has been unaltered for 40 years.</p> <p>Jodrell Bank is an essential part of the visitor economy of Cheshire East</p> <p>Development must not be allowed to disrupt the operation of the Jodrell Bank Telescopes and put at risk a world class research facility.</p> <p>Make new dwelling one storey to avoid minimal interference</p> <p>Radio emissions from domestic IT services within 7km from JB can be detrimental to radio astronomy. The aggregated radio emission from hundreds of homes with several devices each is therefore a significant threat. 6,000 new homes more than 25% of the total plan for Cheshire East are envisaged to be within or on the fringe of JBO consultation Zone this represents a significant potential impact upon the future scientific operations of JBO</p>

	Boundaries of Consultation Zone and restriction of development in the zone reviewed. Review should provide clear guidance on the type of development acceptable within the zone. Up to date policy document should be prepared and consulted on. Until this takes place existing boundaries should be retained.
6 Connectivity 8 representations by 7 people 1 support 0 object 7 comment	Need to rethink due to impact of HS2.
	Requirement for travel plans must be made stronger to balance pedestrian and cycle routes with road and rail routes
	It must be recognised that for a majority of people, because of location, age etc car travel will remain the most suitable and for some journeys, the only viable means of transport.
	Parking provision should seek to meet likely needs including in residential areas.
	The rural areas must not be forgotten from the plan for the future for Cheshire East; they should have transport provided whether it is via a commercial bus service or by community transport. Rural transport is vital in the rural areas to keep the communities vibrant & viable.
	Implied assumption that the provision of employment opportunities near to residential areas result in local employment
	Report received from Cheshire Community Action on access to rural services
	Indicators in this section need to cover quality as well as quantity and need to be measurable
Objective 4 To reduce the need to travel, manage car use, promote more sustainable modes of transport and improve the road network. 21 representations by 21 people 17 support 1 object 3 comment	Building homes with sufficient onsite parking to stop cars parking on the pavements. Ensure off street car park spaces are in front of homes.
	New homes should be built close to or easily accessible to where people work; shop and enjoy recreational facilities therefore reducing the need to travel.
	Handforth East will promote car use and commuting, as will the failure to plan for the proper housing needs of the Wilmslow area to match the jobs there and forecast.
	I am not aware of reliable assessment tool that Cheshire East is using to measure the quality of cycleways. In the absence of this I suggest judging against the standard set out by the Department for Transport's Local Transport Note 02/08 - Cycle Infrastructure Design.
	CE should ensure that development gives priority to walking; cycling and public transport and thereby reduce congestion.
	CE should develop improved transport and infrastructure networks, enhance the role of key railway stations and provide extra transport infrastructure to improve connectivity.
	Proposed plans for Congleton will make the town disconnected not more connected.
	CE should ensure that development gives priority to walking; cycling and public transport and thereby reduce congestion.
	CE should develop improved transport and infrastructure networks, enhance the role of key railway stations and provide extra transport infrastructure to improve connectivity.
	Proposed plans for Congleton will make the town disconnected not more connected.
Agree that new residential development should where possible be close, or easily accessible, to where people work, shop and enjoy recreational	

	activities
	If a development doesn't have public transport that works as a minimum to attend the nearest local school, or for Full Time employment purposes, it cannot be considered sustainable.
	Should be amended to include cycling, e.g. <i>'Ensuring development gives priority to walking, cycling and public transport within its design'</i> .
	Contradicts support for low density sprawl and road building in land allocation and strategy.
	New housing estates should be designed to allow the reliance on cars to be reduced
	Travel by mobility scooter should be facilitated wherever possible
	The Canal & River Trust supports the Council's commitment to promoting sustainable modes of transport, particularly by improving infrastructure networks such as canal towpaths to encourage increased use by pedestrian and cyclists.
	Whilst the indicators cover quality as well as quantity, they need to specify quality standards & be measurable to test whether they are met or not & by how much
Policy CO 1 Sustainable Travel and Transport	Travel is not sustainable for people living in Somerford.
49 representations by 47 people 16 support 8 object 25 comment	Use hierarchy of road users as provided in the Department for Transport's Local Transport Note 02/08.
	One of the most appropriate ways of reducing the need to travel is to concentrate development in and around the principal settlement and in the closest positions to the town centres.
	The policy should recognise that large parts of Cheshire East are rural in character. By their very nature, they are less accessible than urban areas but still require limited development to maintain their prosperity and vitality.
	Rural transport is vital in the rural areas to keep the communities vibrant & viable.
	It's important to note the approach to "cyclist facilities" highlighted in the Department for Transport's Local Transport Note 02/08 - Cycle Infrastructure Design.: <i>"the road network is the most basic (and important) cycling facility available, and the preferred way of providing for cyclist is to create conditions on the carriageway where cyclists are content to use it, particularly in urban areas."</i> A major step to achieve this is to implement 20 mph speed limits.
	No reference to Nantwich or the surrounding rural areas. Nantwich LAP is largest LAP geographically, with extensive rural areas. There should be reference to the rural areas consultation which remarked on transport issues for rural areas.
	There is no mention of the Rights of Way Improvement Plan or Local transport Plan. It is inconceivable that the Development Strategy has no policy to develop and improve Public Rights of Way. There is no mention of any consultation with the Local Access Forum on paths, cycleways and bridleways.
	20mph speed limits in towns should be introduced to achieve these objectives.
	Allocation of new settlements should take into account the existing transport arrangements such as Chelford which has excellent road and rail networks and the proposal would be in walking /bicycle access to

	station and town centre
	Rail connectivity should be enhanced and stations improved everywhere across the Borough. Stations should have barriers to disabled customers and families with young children removed.
	CLG's Good Practice Guide on Planning for Tourism (May 2006) at paragraph 5.3, states: <i>"Planners will need to recognise that the wide variety of developments that are inherent in the tourism industry means that there are some developments (e.g. touring sites for caravans) that are car dependent."</i> <i>"There will be some occasions where development for tourism is sought at a location where it will be difficult to meet the objective of access by sustainable modes of transport ... Developers and planners may find that in such cases there will be limited opportunities to make the development accessible by sustainable modes of transport or to reduce the number or proportion of visits by car."</i> Moreover, the Guide then notes that: <i>"For small scale schemes, the traffic generated is likely to be fairly limited and additional traffic movements are therefore unlikely to be a reason for refusal for otherwise suitable tourism development."</i>
	Why are there no plans to look at improving public transport and fully utilising the facilities we have? For instance, has CEC investigated the possibility of reopening closed stations, or using goods sidings to deliver to retail and industrial premises?
	It is disappointing that there are no proposals to improve Knutsford's public transport links - particularly the possible link from Knutsford to Crewe.
	Why not improve transport facilities in Macclesfield not just Crewe- bus station, the railway station.
	In Middlewich the excellent work on upgrading canal towpaths has made a real difference to the cycling routes around the town and we would like to see these extended beyond Middlewich borders.
	Policy should include support for Community Rail Partnerships (CRPs); through which working with train operators and other local community stakeholders, local rail services can be promoted and local stations developed as community gateways all of which promotes sustainable alternatives to the car. This is particularly important and several effective CRPs operate within the Cheshire East area. Encouraging rail industry participation in other local partnerships, such as at Wilmslow, should also be fostered.
	Policy should include providing modest match/contributory funding to enhance passenger facilities at local stations. Access to rail industry funds for such schemes can be enhanced by the presence of third party contributions with bids to such funds. This has been successfully delivered with car park improvements at Sandbach and Congleton.
	Policy should include pursuing a policy of obtaining Community Infrastructure Levy contributions from developers for enhancing public transport including local station facilities.
	This has caused many issues in Tabley and if CE are actively encouraging drivers to take responsibility for the amount of times they use the car, it should be highlighted that rural villages should not be used as car parks.
	CE should reduce the need to travel and improve pedestrian facilities so that walking is attractive for shorter journeys.
	Part (4) of Policy CO1 should include details of the locations of the

	stations which will serve the proposed HS2 route.
	In relation to part 1 bullet point 1 policy it is recommended that instead of guiding development to the most sustainable and accessible locations this should be reworded as follows: guiding development to sustainable and accessible locations because there is no requirement for development to be directed to the most sustainable location. Development merely needs to be sustainable.
	Recommend that part 1 bullet point 2 should be removed as this type of policy cannot act to encourage working from home and more flexible working patterns as this is something that cannot be controlled through the land use planning system.
	Suggest that this policy should be restructured and separated into two distinct parts. One addressing the strategic elements (such as rail and bus infrastructure) and the other part more specific to providing the policy requirements for developments.
	I would also urge the council to consider the Workplace Parking Levy across the authority to reflect a more accurate picture of the true cost of motoring and encouraging active travel.
	The reopening of the Sandbach to Northwich railway line, including reopening Middlewich station is very important. Anything that reduces car traffic on the M6 between Stoke and Knutsford is essential.
	Missing from the strategy however, is any talk of the Metro, from South Manchester to North and Mid Cheshire. An extension from Altrincham to Knutsford and beyond, would be a huge economic benefit to East Cheshire. I would even suggest tram trains on the southern lines out of Manchester on the Mid Cheshire Line connecting Manchester to Chester via Knutsford, the Middlewich Branch Line from Manchester to Crewe, and the East Cheshire Line from Manchester to Crewe via Alderley Edge
	There is also no mention of a connection from the Mid Cheshire Line to Manchester Airport as offered to the people of Knutsford and Mobberley while planning for Runway 2.
	The policy has too little on reference to public transport for rural areas. Rural transport is vital in the rural areas to keep the communities viable.
	When referring to the Boroughs connectivity we also feel that it would be useful to specifically acknowledge the links and access to Manchester Airport. The Airport plays a major role in boosting the North Wests connectivity and Cheshire East is well placed to benefit from the opportunities which this brings. Supporting improvements to the strategic transport network between Manchester Airport and Cheshire East will not only be of benefit to passengers that are travelling between the two, but will also connect the Boroughs residents to opportunities at the Airport and enable greater access to the economic benefits that we have previously identified. We would therefore encourage you to emphasise the value of the connections to Manchester Airport within the supporting text of Policy CO 1.
	The Canal & River Trust supports Policy CO 1 in respect of ensuring that new developments are convenient, safe and pleasant to access on foot and cycle including using canal towpaths.
Policy CO 2 Enabling business growth through transport	Should be amended to include cycling infrastructure.
	The focus on road building is not supported.
	Object to the inclusion of both the A6-MARR and WPRR in the draft Local

<p>infrastructure</p> <p>33 representations by 32 people 12 support 12 object 9 comment</p>	<p>Plan and urge CEC to reject them both, as they would have an adverse impact on the Peak District National Park.</p>
	<p>If such schemes go ahead then mitigating measures for walking and cycling should be part of the road project.</p>
	<p>Capacity issues should be addressed by discouraging driving, not new road schemes.</p>
	<p>Policy should be replaced by a policy considering all forms of transport reflecting prioritisation away from single occupancy car use. Building more roads, particularly to improve connectivity to the M6 will not work.</p>
	<p>Promotion of recharging points for electric cars should be more widespread than just for major new developments. What about in Council-owned or managed public car parks with dedicated bays (as currently for disabled drivers)?</p>
	<p>This policy is not sustainable as it makes no reference to other transport infrastructure such as strategic cycle routes or rail infrastructure improvements.</p>
	<p>Policy is going to lead to an increase in CO2 production.</p>
	<p>Object to the provision of electric vehicle recharging points [EVRP] in large new developments. Residential sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viability is threatened. There is no viability evidence to justify the requirement for EVRP in residential development in the Local Plan or any associated documents.</p>
	<p>Support J17 improvements.</p>
	<p>No public money has been set aside for the Woodford to Poynton Relief Road and the provision of the road would in fact hinge upon funding generated by the development of land to the west of Poynton.</p>
	<p>Policy CO2 presently does not appear to contemplate that development proposals can themselves enhance the sustainability of a location beyond that which exists, and this should be rectified by revising the policy wording accordingly.</p>
	<p>There is no automatic connection between transport infrastructure and economic benefit.</p>
	<p>We support 6.16 to 6.19 but question how the 13 road schemes will meet the carbon reduction requirement and ensure a sustainable future</p>
	<p>MLP's pipeline could be affected by improvements to J17 and A500. The land the pipeline runs in is leased from the landowner - legal document called a deed of grant. Also, must adhere to the Pipeline Safety Regulations 1996. The pipeline must be considered in any development proposals</p>
	<p>The A34 North of Wilmslow is already overloaded. Handforth East will make it worse and it needs to be scaled back significantly</p>
<p>We assert that the DS does not adhere to this policy approach, in particular in its proposed creation of Sustainable Villages in the south of the Borough, but also in respect of other proposed Strategic Sites.</p>	
<p>Why only one sentence on improving Macclesfield- the roads are badly congested and in need of extra maintenance.</p>	
<p>In relation to parking standards Gladman recommend that this should be provided as a separate policy, but that it is necessary for the detailed policy requirements to be included as part of this document, rather than referring the reader to another document altogether.</p>	

	<p>Policy CO 2 in its current form is a confusing policy. Suggest that this policy needs revising in order to achieve a clear policy approach. In its current form part two of this policy appears to provide a wish list in relation to infrastructure schemes across the Borough rather than a specific policy requirement. Query where the actual policy requirements are within Policy CO 2</p>
	<p>Request clarity in relation to the current Transport Infrastructure Plan, as throughout the Policy Principles document reference is made to the 'Local Transport Plan' however within this particular policy reference is made to the 'Transport Infrastructure Plan'</p>
	<p>The A537 to A536 section of the link to the A523 should form the new green belt boundary. A new road should be built from the A523(T) at Flash Lane to the A34(T) at Handforth Dean</p>
	<p>I am concerned about SEMMMS, and believe it should be proven to not harm the countryside or local habitats. The Woodford/Poynton relief road should be in place before SEMMMS.</p>
	<p>The Middlewich Eastern relief road is crucial to Middlewich life.</p>
	<p>The delivery of these key infrastructure requirements will assist in releasing land for development whilst also addressing pressure on the local highways network.</p>
<p>Policy CO 3 Digital Connections</p> <p>14 representations by 13 people 10 support 3 object 1 comment</p>	<p>Whilst the provision of communications infrastructure is broadly supported our client objects to Policy CO3 Part (2). It is considered that Part (2) is contrary to national planning guidance in the Framework [173] as it may threaten the viability and deliverability of development by imposing unnecessary cost upon new development.</p>
	<p>This would promote a smaller number of high visibility (i.e. tall) high impact masts rather than greater number of lower impact masts. Given most of Cheshire is relatively flat, fewer but taller is not better!</p>
	<p>Gawsworth / Sutton has been very pro-active in seeking enhancements to its digital connections. This is a very high priority for Gawsworth / Sutton and other rural parishes around Macclesfield.</p>
	<p>It is the responsibility of telecommunications providers to provide the cabling and masts etc for telephone and mobile communications networks and these providers are responsible for identifying the locations where infrastructure needs to be provided. The onus should not therefore be placed upon developers to provide this infrastructure in new development. It is therefore considered that Part (2) of Policy CO3 should be deleted.</p>
	<p>High Speed Fibre networking should be made available to all villages of a reasonable size</p>
	<p>This needs addressing under infrastructure provision from developers contributions. Policy should cover requirement to invest in improving speeds for rural areas and those currently with slow speeds</p>
	<p>Keep masts and installations to a minimum.</p>
<p>Policy CO 4 Travel Plans and Transport Assessments</p>	<p>The three points are sensible, but lack the "stick" of requiring developers to pay a penalty if traffic generation exceeds their Assessment/Plan.</p>
	<p>Cycling seems to be missing from this objective.</p>
	<p>Should add 'Plans will be based upon the Hierarchy of Users which places pedestrians at the top (including the access requirements of people with disabilities), followed by cyclists, then public transport, with unaccompanied private car users last'.</p>

<p>22 representations by 22 people 7 support 3 object 12 comment</p>	<p>Should add 'All Assessments/Plans should be based upon the cumulative effects of all ongoing or expected development projects in the settlement and its related settlements (i.e. will provide a big picture calculation)'.</p>
	<p>Travel Plans and actions must be implemented before development takes effect as this is when alternative sustainable options have most impact.</p>
	<p>Outcomes from previous travel plans, compared with predictions, should be reviewed to inform developing future guidance for travel plans.</p>
	<p>These developments need Green Travel plans to be in place, implemented and followed up.</p>
	<p>The definition of major in the context of this policy should be made clear in the wording of the policy or the supporting text.</p>
	<p>Travel plans should be required to use local trip data and not extrapolations from national data. They should not be accepted uncritically by CE Highways</p>
	<p>Policy CS4 relating to Travel Plans and Transport Assessments does not make reference to sustainable transport. We would therefore welcome an additional requirement for the inclusion of sustainable travel options as part of any Travel Plan accompanying a major development proposal.</p>
	<p>Paragraph 32 of the Framework refers to the need for Transport Statements and Transport Assessments, providing an outline for what Plans and decisions will need to take account of. This states that Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. Believe that Policy CO 4 is too onerous and goes above and beyond the requirements set in national policy. Policy CO 4 states that the Transport Assessment will need to demonstrate that the capacity and efficiency of the highway network will not be adversely affected as a result of development. This is far more restrictive than national policy (referring to development being prevented when cumulative impacts of development are severe) and could provide an additional hurdle for developers and act to stifle development across the Borough.</p>
	<p>In relation to part 3 of this policy (major developments will be required to monitor traffic generated by the development and share data with the Local Authority). We are unsure why this has been included. We suggest that this requirement is not necessary or appropriate and that this element of the policy should be removed.</p>
	<p>We would like to see a fourth point added to monitor how effective Travel Plans are, so that once compiled they are not just forgotten.</p>
	<p>A major Transport Study should have been undertaken for Macclesfield to consider how its lack of connectivity to the motorway network could be addressed.</p>
	<p>Existing highways (roads and footpath) must be maintained to a far higher standard than at present with a full and detailed long term resurfacing strategy put in place. Utility companies need to be given standards to adhere to, and roadworks need to be better controlled.</p>
<p>Need to address the disadvantages Macclesfield suffers from in relation to connectivity to the motorway network.</p>	
<p>7 Monitoring and Implementation 9 representations by 8 people</p>	<p>Monitoring requires the identification and engagement of local resident stakeholder /community groups. Para 7.4 implies no consultation on indicators.</p>
	<p>The plan should have built-in flexibility to cope with unexpected changes.</p>

<p>1 support 3 object 5 comment</p>	<p>Effective monitoring, including review of what is built, and feedback process is essential to plan delivery. DS should set how this will be done and whether Plan B will be activated.</p> <p>Suggest monitoring report should be produced annually with a comprehensive plan review every 5 years. Current wording is impractical and too vague.</p> <p>Include references to NPPF particularly on youth facilities and local car ownership (paras 39 and 70).</p> <p>Section 106 should cover social and community facilities (not just open space and parks).</p> <p>Indicators should be more detailed than 'key' – must be precise, quantified and measurable.</p>
<p>8 Glossary</p> <p>3 representations by 3 people 0 support 0 object 3 comment</p>	<p>Add definitions including:</p> <ul style="list-style-type: none"> • Historic Battlefield • Landscape • Landscape Character Assessment • Historic Landscape • Historic Landscape Characterisation • Local lists (which may include parks and gardens) • Social housing <p>Amend listed building definition to accurately record the curtilage aspect</p> <p>Recognise that Historic Parks and Gardens includes those which are not nationally recognised as important</p> <p>Discrepancies between glossaries in the various consultation documents</p>