

APPENDIX 1

Cheshire East Local Plan

Site Allocations and Development Policies Document

Regulation 20 Representations Statement [ED 56a]

April 2021

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1. Introduction

Purpose of this statement

- 1.1 This Regulation 20 Representations Statement (part II consultation statement) [ED 56a] sets out how the council has involved stakeholders in preparing the Cheshire East Site Allocations and Development Policies Document (SADPD) in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the publication stage). It reports on the representations made under Regulation 20. The statement should be read in conjunction with the part I Consultation Statement [ED 56] (September 2020), which sets out the earlier consultation carried out under Regulation 18 (the plan-preparation stage).
- 1.2 Together, the part I and part II consultation statements meet the requirements of Regulation 22(1)(c) and demonstrate that consultation on the preparation of the SADPD has been carried out in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI).
- 1.3 The SCI sets out how the council will consult and involve the public and statutory consultees in planning matters. The current SCI can be viewed on the council's website¹. The first Cheshire East SCI was adopted by the council in June 2010 and a revised version was adopted in December 2018, reflecting updated statutory requirements, national planning policy and guidance. A further revised SCI was adopted in October 2020, reflecting temporary amendments to the Regulations made under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020.
- 1.4 Throughout the preparation of the SADPD, consultation has taken place in accordance with the SCI and relevant Regulations in place at the time of consultation.

Background

- 1.5 This part II consultation statement describes how the council has engaged with stakeholders at the publication stage (Regulation 19), setting out how the responses have shaped the submission plan and the main issues raised in those representations.
- 1.6 The accompanying part I consultation statement describes how the council has undertaken community participation and stakeholder involvement in the earlier stages of the production of the SADPD, setting out the main issues raised in representations and how these have been taken into account.
- 1.7 The first part of the council's Local Plan is the Local Plan Strategy (LPS). This was adopted by the council on 27 July 2017 and provides the overall vision, strategic objectives, spatial strategy and strategic policies for the borough to

¹ The SCI is available at https://www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/sci.aspx

2030. This includes setting out the amount and location of new housing and employment development as well as allocating strategic sites for development.

- 1.8 The purpose of the SADPD is to provide further detailed and non-strategic planning policies and land allocations in line with the overall strategy set out in the LPS over the period to 2030. It has been prepared to support the policies and proposals of the LPS by providing additional policy detail. It deals with the allocation of sites and the designation of safeguarded land but focused on any residual figures left over from the LPS and its accompanying evidence base, taking into account any relevant changes in circumstances around land supply. It is not the intention of the SADPD to revisit or amend strategic policy matters that were settled through the LPS process, including the planned amount of housing and employment land or its spatial distribution.
- 1.9 Once adopted, the SADPD will replace the remaining saved policies from the Congleton Borough Local Plan First Review (adopted January 2005), the Borough of Crewe and Nantwich Local Plan (adopted February 2005) and the Macclesfield Borough Local Plan (adopted January 2004).
- 1.10 The third part of the Local Plan will be the Minerals and Waste Development Plan Document, which will set out planning policies for minerals and waste, including the identification of specific sites for those uses.
- 1.11 The Local Plan will also include the Crewe Hub Area Action Plan, which will include policies to manage development around Crewe Railway Station and its immediate environs.

Structure of this statement

- 1.12 This Regulation 20 Representations Statement comprises of four sections:
 - Section 1 is an introduction.
 - Section 2 sets out the timeline that has been followed in the preparation of the SADPD, which is in accordance with the up-to-date Local Development Scheme² (LDS).
 - Section 3 provides a high-level summary of the main issues raised through Regulation 20 representations and how the comments received have been considered by the council.
 - Section 3 is supported by the Appendix, setting out how the Regulation 19 consultations were carried out. Schedule 2 of the Appendix provides a summary of the main issues raised in the representations received along with brief responses to these.

² The LDS is available at https://www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/local_development_scheme.aspx

2. SADPD preparation timeline

- 2.1 A principal priority of the planning system is to engage local people in the development of Local Plans enabling local planning authorities to better reflect the identified priorities of local communities. The council has actively engaged with the borough's key stakeholders and local communities throughout the preparation of the SADPD.
- 2.2 The timeline (A to F) below outlines the main consultation stages of the emerging SADPD up until its submission for examination.

A. Identify issues and collect evidence (2017)

- 2.3 In anticipation of the adoption of the LPS in July 2017, work began on preparing the SADPD during the latter part of 2016. At this time, the council began to:
- consider the issues that should be addressed by the SADPD;
 - identify any gaps in policy coverage; and
 - consider what further evidence may be required to support policies and proposals in the SADPD.
- 2.4 Consultation on the SADPD Issues Paper took place for 6 weeks between February and April 2017. It was the first opportunity for stakeholders to give their views on the scope of the SADPD and the direction that its policies should take.
- 2.5 The Issues Paper identified a range of matters and issues that the SADPD was likely to address and asked a series of questions to encourage feedback on them. In parallel, consultation also took place on a draft sustainability appraisal scoping report, setting out the proposed environmental, economic and social issues against which SADPD policies and proposals would be tested.
- 2.6 The consultation also included a 'call for sites' exercise, through which landowners and developers were invited to submit sites for consideration, to inform the selection of land allocations in the SADPD.
- 2.7 Further information on these Regulation 18 consultations is presented in the part I Consultation Statement [ED 56] (September 2020).

B. First Draft SADPD (2018)

- 2.8 Following consideration of the responses to the issues stage, the council carried out further research, updated the evidence base and liaised with infrastructure providers and statutory consultees. A first draft of the proposed SADPD was prepared in the early part of 2018. Prior to public consultation, all town and parish councils were invited to an individual meeting to discuss policies, proposals and options within the emerging first draft.

- 2.9 The First Draft SADPD was substantially a full draft version of the plan published for consultation, although in some limited areas further views were sought on the most appropriate policy approach. An extensive series of supporting evidence was also published. Consultations on the First Draft SADPD, the Interim Sustainability Appraisal, the First Draft Habitats Regulations Assessment, and a Gypsy, Traveller and Travelling Showperson accommodation call for sites took place for six weeks during September and October 2018.
- 2.10 Further information on these Regulation 18 consultations is presented in the part I Consultation Statement [ED 56] (September 2020).

C. Initial Publication Draft SADPD (2019)

- 2.11 Following consideration of all the responses submitted under the Regulation 18 consultations, an initial Publication Draft of the SADPD was prepared. Prior to publication, all town and parish councils were invited to an individual meeting to discuss policies, proposals and options within the emerging publication draft during May and June 2019.
- 2.12 The initial Publication Draft SADPD was published in accordance with Regulation 19 and representations were invited during August and September 2019 under Regulation 20.
- 2.13 Representations were also invited on the initial Publication Draft Sustainability Appraisal and the Habitats Regulations Assessment (initial Publication Draft version) at the same time. A full set of evidence base documents was also published in support of the policies and proposals in the plan.
- 2.14 Following consideration of the representations made, the initial Publication Draft SADPD was not submitted to the Secretary of State under Section 20 of the Planning and Compulsory Purchase Act 2004. Instead, a series of amendments were made to the initial Publication Draft SADPD to produce a Revised Publication Draft SADPD.
- 2.15 Whilst the initial publication document consulted on was titled the “Publication Draft SADPD”, it is now referred to as the “initial Publication Draft SADPD” in this report, to distinguish it from the “Revised Publication Draft SADPD” which was subsequently published in accordance with Regulation 19 to invite further representations under Regulation 20.
- 2.16 Further information on this Regulation 19 consultation is set out in the Appendix to this part II consultation statement.

D. Revised Publication Draft SADPD (2020)

- 2.17 Following consideration of the representations made to the initial Publication Draft SADPD, the preparation of further evidence and assessment of changing circumstances, a series of changes were made to the initial Publication Draft SADPD.

- 2.18 The changes proposed to the initial Publication Draft SADPD were significant and required further consultation under Regulation 19 before the document could be submitted for examination. Given the extent of the changes, a Revised Publication Draft SADPD was published showing the ‘tracked changes’ from the initial Publication Draft version. The tracked changes document was accompanied by a ‘clean’ version of the Revised Publication Draft SADPD and a schedule of changes.
- 2.19 The Revised Publication Draft SADPD was published in accordance with Regulation 19 and representations were invited between October and December 2020 under Regulation 20. Because of the extent of changes made to the Plan, stakeholders were able to make further representations to any part of the Plan, whether they were shown as tracked changes or not.
- 2.20 Representations were also invited on the Revised Publication Draft Sustainability Appraisal and the Habitats Regulations Assessment (Revised Publication Draft version) at the same time. A fully updated set of evidence base documents was also published in support of the policies and proposals in the plan, as amended.
- 2.21 Further information on this Regulation 19 consultation is set out in the Appendix to this part II consultation statement.

E. Submission to the Secretary of State (2021)

- 2.22 This part II consultation statement sets out the council’s consideration of the representations received under Regulation 20 in response to both the initial Publication Draft SADPD Regulation 19 consultation and the Revised Publication Draft SADPD Regulation 19 consultation. The Council did not consider that the representations about the Revised Publication Draft SADPD could entirely supersede those received about the initial Publication Draft SADPD, effectively starting the Regulation 19 stage afresh. Those parties who made representations to the initial Publication Draft SADPD did so under Regulation 20, with the expectation that their comments would be taken account of by the appointed Inspector as required under Regulation 23.
- 2.23 Unfortunately, this has led to a more complicated position. For example, some of the representations made to the initial Publication Draft SADPD have been addressed through the changes made to it. Other comments have now become irrelevant in the light of changes. However, the approach taken means that no representation made under Regulation 20 has not been ignored or lost because of the changes made to the plan.

F. Examination and adoption

- 2.24 The plan will be examined by an independent planning inspector on behalf of the Secretary of State for Housing, Communities and Local Government to consider whether it is sound and legally compliant.
- 2.25 The up-to-date LDS envisages that its examination will take place during the third quarter of 2021, with adoption by the council in the first quarter of 2022.

3. Summary of process and main issues

Summary of the consultation process for the SADPD

- 3.1 Public consultation under Regulation 18 took place in two main stages. Stage 1 involved an initial round of consultation on the issues to be addressed through the SADPD over six weeks between February and April 2017. Stage two involved consultation on a near full draft version of the emerging plan and took place over six weeks in September and October 2018.
- 3.2 The part I Consultation Statement [ED 56] (September 2020) provides details of how the requirements of Regulation 22(1)(c)(i) to (iv) have been met in relation to the Regulation 18 consultations, including which bodies and persons the local planning authority invited to make representations; how they were invited to make representations; a summary of the main issues raised by the Regulation 18 representations; and how those representations have been taken into account.
- 3.3 The initial Publication Draft SADPD was published under Regulation 19 and representations invited under Regulation 20 for six weeks in August and September 2019. The document was subsequently amended, a Revised Publication Draft SADPD was published under Regulation 19, and further representations were invited under Regulation 20. Representations were initially invited for a six-week period between October and December 2020, but the representations period was subsequently extended for a further two weeks due to additional restrictions related to Covid-19.
- 3.4 The Appendix to this part II consultation statement (which includes Schedules 1 and 2) provides details of how the requirements of Regulation 22(2)(c)(v) have been met, including the number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations. In line with the Planning Inspectorate's Procedure Guide for Local Plan Examinations³, the Appendix also provides the council's brief response to each of the main issues raised.
- 3.5 An executive summary of the main issues raised in Regulation 20 representations is also provided below.

Main issues raised in Regulation 20 representations

- 3.6 This section sets out a very high-level summary giving an overview of the key main issues raised through the Regulation 20 representations. Further detail relating to all of the main issues raised, with the council's responses is set out in plan order in Schedule 2 to the Appendix of this part II consultation statement.

³ Procedure Guide for Local Plan Examinations (sixth edition) is available at <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

Chapter 1: Introduction/general issues

- 3.7 A number of general issues were raised including that the SADPD does not address minerals issues; it should revisit a number of matters set out in the LPS due to changed circumstances since its adoption; and a number of the policy requirements will adversely affect the viability of new development.

Chapter 2: Planning for growth

- 3.8 The housing allocations at Local Service Centres should be re-instated into the SADPD. The LPS indicative level of development for Local Service Centres should be disaggregated to individual settlements. There is a need to assess locally arising needs in each Local Service Centre. The LPS indicative level of development for the Other Settlements and Rural Areas should be disaggregated in individual settlements.
- 3.9 The housing land supply is inadequate and needs to be boosted through further allocations at all tiers of the settlement hierarchy.
- 3.10 The requirement to demonstrate exceptional circumstances has not been met to alter the Green Belt boundary in order to designate safeguarded land around Local Service Centres. The distribution of safeguarded land should be revisited.
- 3.11 There is a need to further review and make changes to settlement boundaries, infill boundaries, Strategic Green Gaps boundaries and Green Belt boundaries.

Chapter 3: General requirements

- 3.12 The recovery of forward funded infrastructure policy needs further detail around its implementation; funding should be provided through the Community Infrastructure Levy; and projects and sites to which the policy applies should be specified.
- 3.13 A number of detailed issues were raised in relation to planning obligations reduced on viability grounds.

Chapter 4: Natural environment, climate change and resources

- 3.14 The ecological network may restrict development. Need more information on how it has been defined and how the policy will be implemented. Detailed issues raised in relation to biodiversity net gain.
- 3.15 The boundaries of several Local Landscape Designation Areas should be amended.
- 3.16 The climate change policy should promote emerging technologies and allocate areas for renewable energy and storage hubs. The proposed policy requirement goes beyond national policy and guidance.
- 3.17 The air quality policy does not include practical measures for improving air quality and it is not clear how effective mitigation could be provided.
- 3.18 The aircraft noise policy is too restrictive and will prevent development coming forward in sustainable locations. Detailed technical issues raised with the setting of noise levels.

Chapter 5: The historic environment

- 3.19 A number of detailed issues were raised relating to heritage assets, heritage at risk, conservation areas, listed buildings, registered parks and gardens, non-designated heritage assets, and archaeology.
- 3.20 Historic England request amendments to strengthen the policy position in relation to the Jodrell Bank World Heritage Site.

Chapter 6: Rural issues

- 3.21 Several policies allow only for a minimum level of development and should instead emphasise growth and the rural economy. The size of agricultural and forestry workers dwellings should not be restricted.
- 3.22 Policy should require proposals on best and most versatile agricultural land to demonstrate that no suitable alternative sites are available that would have a lesser impact.
- 3.23 Detailed issues were raised relating to consideration of extensions and replacement buildings.

Chapter 7: Employment and economy

- 3.24 Various sites promoted to be included as strategic employment areas or employment allocations. Questions regarding the viability of the supply and the need for more employment sites. Potential for parts of employment sites to be used for housing.

Chapter 8: Housing

- 3.25 The minimum housing requirement set out in the LPS should be reviewed to account for changed circumstances and the lower figure from the government's standard method.
- 3.26 Some components of the council's five-year supply of deliverable housing sites are questionable. Further sites should be allocated at all tiers of the settlement hierarchy to boost supply, provide flexibility, address the shortfall against delivery and provide affordable housing. Some strategic sites may not come forward as planned. Further small sites should be allocated so that 10% of the overall requirement can be provided on sites of 1ha or less.
- 3.27 No further sites should be allocated in the SADPD given that plan supply exceeds the adopted requirement and there is sufficient flexibility in the supply.
- 3.28 There is a need to allocate sites for older persons (C2) provision. C2 uses should not be required to provide affordable housing.
- 3.29 Need to provide sufficient pitches to meet the needs of 'unknown' Gypsy and Traveller households. The SADPD does not identify sufficient Gypsy and Traveller sites, the sites offer limited choice and are concentrated in the south of the borough. The policy should also address the re-use of existing Gypsy and Traveller sites for alternative uses.
- 3.30 There is a lack of evidence to support the introduction of the Nationally Described Space Standard.
- 3.31 The housing density policy should be less prescriptive and specifically identify areas of existing low-density housing.

Chapter 9: Town centres and retail

- 3.32 The SADPD should consider whether new retail centres should be defined as part of the LPS strategic sites. Several alternative boundaries for retail centres have been suggested.
- 3.33 The policies should be reviewed to take account of changing town centres and increased space for residential uses. Policies should allow more flexibility in allowing the re-use of retail units for alternative uses.
- 3.34 Additional sites for retail use should be allocated.
- 3.35 Objection to the requirement for restricted opening hours for hot food takeaways within 400m of secondary schools and sixth form colleges.

Chapter 10: Transport and infrastructure

- 3.36 The SADPD should consider allocations and specific policies for roadside facilities and motorway service areas.

- 3.37 The SADPD should not specify the provision of charging points for electric vehicles.

Chapter 11: Recreation and community facilities

- 3.38 Several representations object to the designation of specific areas of land as protected open space; other detailed issues related to open space provision.

Chapter 12: Site allocations

- 3.39 Various sites are promoted as further or alternative allocations.
- 3.40 There has been no opportunity to allocate non-strategic sites in many of the settlements.
- 3.41 The issue of minerals sterilisation in Minerals Safeguarding Areas has not been given due consideration and should have been considered properly before proposing sites for allocation.
- 3.42 Representations that various settlements at all tiers of the settlement hierarchy should have more site allocations or should have fewer site allocations.
- 3.43 There are many detailed issues raised about specific sites proposed for allocation or for safeguarded land.

Chapter 13: Monitoring and implementation

- 3.44 Detailed issues related to the monitoring framework.

Chapter 14: Glossary

- 3.45 Detailed issues related to the glossary of terms.

Sustainability Appraisal

- 3.46 The Sustainability Appraisal does not give sufficient emphasis to the sterilisation of minerals. It does not identify reasonable alternatives for accommodating development and shows that some options perform better than the preferred option.
- 3.47 The initial equality impact assessment was deficient.
- 3.48 Detailed issues related to various options and site appraisals.

Habitats Regulations Assessment

- 3.49 The Habitats Regulations Assessment does not consider the National Nature Improvement Area in the south of the borough.

Conclusion

- 3.50 Section 3 and the Appendix (including Schedule 1) explain which bodies and persons were invited to make representations under Regulation 19 and how, in accordance with the plan-making regulations and the council's SCI. The Appendix (including Schedule 1) sets out the number of representations made pursuant to Regulation 20. Section 3 and the Appendix Schedule 2 provides a summary of the main issues raised. The council has therefore met the requirements of Regulation 22(1)(c)(v).

Appendix

- A.1 This appendix gives further details of the consultation carried out on the initial Publication Draft SADPD and the Revised Publication Draft SADPD. It addresses the requirements of Regulation 22(1)(c)(v):

“(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations”.

Introduction

- A.2 The council published the initial Publication Draft SADPD and supporting documentation under Regulation 19 and invited representations under Regulation 20 for six weeks in August and September 2019. The document was subsequently amended, a Revised Publication Draft SADPD was published under Regulation 19, and further representations were invited under Regulation 20. Representations were initially invited for a six-week period between October and December 2020, but the representations period was subsequently extended for a further two weeks due to additional restrictions related to Covid-19.

- A.3 Across both stages of the Regulation 19 consultations, a total of 1,177 parties made 4,428 comments under Regulation 20.

Who was consulted under Regulation 19 and how was that undertaken?

Initial Publication Draft SADPD consultation 2019

- A.4 The decision to publish the initial Publication Draft SADPD together with its supporting evidence to invite representations was made by a meeting of the council's Cabinet on 6 August 2019. Consultation took place for six weeks between 19 August and 30 September 2019. The consultation was carried out in accordance with the requirements of the SCI.
- A.5 Comments were invited on the following documents:
- Initial Publication Draft Site Allocations and Development Policies Document;
 - Initial Publication Draft SADPD Sustainability Appraisal; and
 - Initial Publication Draft SADPD Habitats Regulations Assessment.
- A.6 An extensive series of supporting documents, background evidence and reports was also published. Comments could be made on any of the supporting documents by relating them to the resulting paragraph, policy or site in the SADPD.

- A.7 Copies of all the consultation documents were deposited in the council's headquarters, customer service centres and all public libraries in the borough. They were also available on the council's consultation portal, accessed via its website. Copies of all the supporting documents were deposited in the council's headquarters, customer service centres and were also available on its consultation portal. Copies of selected key supporting documents and background evidence were deposited in public libraries.
- A.8 Responses were accepted using the consultation portal, by email and by post. Information on how to submit comments was included:
- on the consultation portal;
 - on the printed comments form;
 - in a guidance note placed on the consultation portal and in the council's headquarters, customer service centres and all public libraries in the borough; and
 - in a formal 'statement of representations procedure' notice placed on the consultation portal; in the council's headquarters, customer service centres and all public libraries in the borough; and placed in several local newspapers.
- A.9 Copies of the consultation materials are included in Schedule 1(B) of this Appendix.

Notifications

- A.10 Notification of the consultation was sent to all active stakeholders on the council's local plan consultation database. This consisted of over 2,300 letters and emails. The stakeholders on this consultation database include local residents, landowners and developers, along with the 'specific consultation bodies', 'general consultation bodies', and 'residents and other persons carrying on business in the Local Planning Authority's area' as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- A.11 Notifications were also sent to site promoters who were not on the main consultation database, as well as to all town and parish councils in Cheshire East and all MPs whose constituencies lie wholly or partly in Cheshire East.
- A.12 The list of consultees included everyone who had responded to the 2017 issues consultation, 2017 call for sites, and 2018 First Draft SADPD consultation (unless they had specifically indicated that they did not want to be contacted). The consultees also included the statutory consultees (Natural England; Historic England; the Environment Agency; and Natural Resources Wales).
- A.13 Further details about the people notified are included in the Schedule 1(A) to this Appendix and copies of the letters and emails sent are included in Schedule 1(B).

Website and publicity

- A.14 Several pages on the Cheshire East Council website provided information and links to the consultation. These pages included:
- the homepage (in the 'have your say' section)
 - the Cheshire East Council Consultations page
 - the Cheshire East Local Plan page
 - the Site Allocations and Development Policies Document page
 - the Local Plan Public Notices Page
- A.15 Three press releases were issued informing people of the consultations (two before the start of the consultation period and one on the first day of the consultation). These resulted in several articles about the consultation being published in the local and regional media outlets, both in printed and online form. A series of messages highlighting the consultation were also sent from the council's Twitter account to reach users of social media.
- A.16 The consultation was also highlighted in the September 2019 edition of the council's 'Strategic Planning Update' newsletter, which is sent to all town and parish councils, all Cheshire East councillors and is also available on the council's website.
- A.17 A formal 'statement of representations procedure' notice was placed in several local newspapers, including the Crewe Chronicle; Macclesfield Express; Congleton Chronicle Series (including Sandbach, and Biddulph Chronicle); Wilmslow and Knutsford Guardian; and the Northwich Guardian (Mid-Cheshire Guardian).
- A.18 Copies of publicity materials are included in Schedule 1(B) to this Appendix.

Revised Publication Draft SADPD consultation 2020

- A.19 The decision to publish the Revised Publication Draft SADPD together with its supporting evidence for public consultation was made by a meeting of the council's Cabinet on 6 October 2020. It was published on 26 October 2020 to invite representations, with an original deadline of 5pm on 7 December 2020. The consultation was carried out in accordance with the requirements of the updated SCI, which came into effect on 23 October 2020.
- A.20 Comments were invited on the following documents:
- Revised Publication Draft Site Allocations and Development Policies Document;
 - Revised Publication Draft SADPD Sustainability Appraisal; and
 - Revised Publication Draft SADPD Habitats Regulations Assessment.
- A.21 An extensive series of supporting documents, background evidence and reports was also published. Comments could be made on any of the supporting documents by relating them to the resulting paragraph, policy or site in the SADPD.

- A.22 Prior to publication of the Revised Publication Draft SADPD, the council's SCI was updated to reflect the temporary changes to regulations made by the Town and Country Planning (Local Planning) (England) (Coronavirus) Amendment Regulations 2020. The introduction of these temporary regulations meant that the following requirements did not apply during the period 16 July to 31 December 2020⁴:
- the requirement for the local planning authority to deposit printed copies of the documentation at its principal office and at other such places considered appropriate during normal office hours; and
 - the requirement to provide copies of documents on request.
- A.23 At the time of publication, Cheshire East was subject to restrictions related to Covid-19, which meant that although the council's principal offices and customer service centres were closed to visitors, the majority of libraries in the borough remained open (although opening hours were restricted in some cases). To assist people in accessing the consultation documents, printed copies of the consultation documents were deposited in all libraries that remained open.
- A.24 All the consultation documents and supporting documents were available on the council's consultation portal, accessed via its website.
- A.25 Following publication on 26 October, additional national restrictions to prevent the spread of Covid-19 were put in place and all libraries were required to close between 5 November and 2 December. As a result, the period during which representations could be submitted was extended from 7 December at 5pm, to 23 December at 5pm.
- A.26 Representations were accepted using the consultation portal, by email and by post. Information on how to submit comments was included:
- on the consultation portal;
 - on the printed comments form;
 - in a guidance note placed on the consultation portal and in libraries; and
 - in the formal 'statement of the representations procedure' notice placed on the consultation portal and in libraries.
- A.27 Although not required due to the temporary change in regulations, printed copies of all documents were made available on request (by telephone or email) as stated in the statement of the representations procedure, the guidance note and on the consultation portal.
- A.28 Copies of the consultation materials are included in Schedule 1(B) of this Appendix.

⁴ The Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020 have subsequently extended this period to 31 December 2021.

Notifications

- A.29 Notification of the consultation was sent to all active stakeholders on the council's local plan consultation database. This consisted of over 2,700 letters and emails. The stakeholders on this consultation database include local residents, landowners and developers, along with the 'specific consultation bodies', 'general consultation bodies', and 'residents and other persons carrying on business in the Local Planning Authority's area' as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- A.30 Notifications were also sent to site promoters who were not on the main consultation database, as well as to all town and parish councils in Cheshire East and all MPs whose constituencies lie wholly or partly in Cheshire East.
- A.31 The list of consultees included everyone who had responded to the 2017 issues consultation, 2017 call for sites, 2018 First Draft SADPD consultation, and 2019 initial Publication Draft SADPD consultation (unless they had specifically indicated that they did not want to be contacted). The consultees also included the statutory consultees (Natural England; Historic England; the Environment Agency; and Natural Resources Wales).
- A.32 A second notification letter/email was also sent during the representations period to inform stakeholders about the extension to the representation period due to additional restrictions related to Covid-19.
- A.33 Further details about the people notified are included in the Schedule 1(A) to this Appendix and copies of the letters and emails sent are included in Schedule 1(B).

Website and publicity

- A.34 Several pages on the Cheshire East Council website provided information and links to the consultation. These pages included:
- the homepage (in the 'have your say' section)
 - the Cheshire East Council Consultations page
 - the Cheshire East Local Plan page
 - the Site Allocations and Development Policies Document page
 - the Local Plan Public Notices Page
- A.35 Three press releases were issued informing people of the consultations (one before the start of the consultation period, one at the start of the consultation period, and one during the consultation period to publicise the extended deadline for submitting responses). These resulted in several articles about the consultation being published in the local and regional media outlets, both in printed and online form. A series of messages highlighting the consultation were also sent from the council's Twitter and Facebook accounts to reach users of social media.

A.36 The consultation was also highlighted in the October 2020 edition of the council's 'Strategic Planning Update' newsletter, which is sent to all town and parish councils and all Cheshire East councillors.

A.37 Copies of publicity materials are included in Schedule 1(B) to this Appendix

Main issues raised in plan order including the council's response

A.38 In total, 4,428 separate comments were received from 1,177 different parties as shown in the table below.

Document	Number of people making representations	Number of comments made
Initial Publication Draft SADPD	774	2,698
Initial Publication Draft SADPD Sustainability Appraisal	9	9
Initial Publication Draft SADPD Habitats Regulations Assessment	1	1
Revised Publication Draft SADPD	598	1,711
Revised Publication Draft SADPD Sustainability Appraisal	8	9
Revised Publication Draft SADPD Habitats Regulations Assessment	0	0
Totals	1,177	4,428

A.39 578 parties made representations at the initial Publication Draft stage only; 403 parties made representations at the Revised Publication Draft stage only; and 196 parties made representations at both stages. All the duly made representations are available to view on the council's consultation portal⁵.

A.40 The breakdown by type of respondent is included in Schedule 1(A) of this Appendix.

A.41 Schedule 2 of this Appendix summarises the main issues raised by the Regulation 20 representations received in response to the Regulation 19 publications.

⁵ Responses to the initial Publication Draft SADPD can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubsadpd>
Responses to the initial Publication Draft SADPD Sustainability Appraisal can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubsustapp>
The response to the initial Publication Draft SADPD Habitats Regulation Assessment can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/pubhra>
The responses to the Revised Publication Draft SADPD can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>
The responses to the Revised Publication Draft SADPD Sustainability Appraisal can be viewed at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsa>

- A.42 The council has identified further potential minor amendments to the proposed submission plan (the Revised Publication Draft SADPD) and these are shown in Schedule 3 to this Appendix. It is not considered that these alter the substance of the plan's policies or carry soundness implications but are intended to provide further clarity to the reader and rectify factual, grammatical and/or typographical errors. These have therefore not been published for representations prior to submission.
- A.43 In addition to the duly made representations, 15 parties submitted representations to the initial Publication Draft SADPD after the close of the representations period and seven parties submitted representations to the Revised Publication Draft SADPD after the close of the representations period. As specified in Regulation 20(2), representations must be received by the local planning authority by the date specified in the Statement of the Representations Procedure. These late representations have not been considered as duly made, have not been counted in the total number of representations, are not displayed on the consultation portal and have not been included in the summary of main issues.

Conclusion

- A.44 The summary above, in combination with Schedule 1 of this Appendix explains which bodies and persons were invited to make representations under Regulation 19 and how this was carried out, in accordance with the Regulations and the council's SCI.
- A.45 In combination with Schedule 1 and 2 of this Appendix, it also sets out the number of representations made under Regulation 20 and provides a summary of the main issues raised.
- A.46 This satisfies the requirements of Regulation 22(1)(c)(v).

Schedule 1: Details of the consultation undertaken.

A: People notified and parties making representations to the plans published under Regulation 19

The table below gives details of those notified of the initial Publication Draft SADPD and the Revised Publication Draft SADPD published under Regulation 19. It also gives details of those that made representations (on either the initial Publication Draft SADPD and/or the Revised Publication Draft SADPD).

Type of respondent	Number of people notified (initial Publication Draft)	Number of people notified (Revised Publication Draft)	Number of people making representations	Names of parties making representations
Specific consultation bodies				
Infrastructure providers	29	28	5	EDF Energy; Highways England; National Grid plc; NHS Cheshire Clinical Commissioning Group; United Utilities
Town councils, parish councils and neighbourhood planning groups	203	192	42	Alderley Edge Neighbourhood Plan – Housing Group; Alderley Edge Neighbourhood Plan Steering Committee; Alderley Edge Parish Council; Alsager Town Council; Audlem Parish Council; Bollington Town Council; Chelford Parish Council; Congleton Town Council; Crewe Town Council; Disley Parish Council; Eaton Parish Council; Gawsworth Parish Council; Gawsworth Parish Council (2); Goostrey Parish Council; Hankelow Parish Council; Haslington Parish Council; Haslington Parish Council (2); Holmes Chapel Parish Council; Hulme Walfield and Somerford Booths Parish Council; Knutsford Town Council; Macclesfield Town Council; Macclesfield Town Council (2); Middlewich Town Council; Middlewich Town Council (2); Moston Parish Council; Odd Rode Parish Council; Peover Superior Parish Council; Pickmere Parish Council; Poynton Town Council; Prestbury

				Parish Council; Prestbury Parish Council (2); Sandbach Town Council; Shavington-cum-Gresty Parish Council; Sound & District Parish Council; Sound and District Parish Council (2); Sutton Parish Council; Weston and Basford Parish Council; Wilmslow Town Council; Worleston and District Parish Council; Wybunbury Combined Parishes Neighbourhood Plan Steering Group; Wybunbury Parish Council
Neighbouring authorities (including town and parish councils)	63	59	3	Cheshire West & Chester Council; Peak District National Park Authority; Stockport Metropolitan Borough Council
Other specific consultation bodies	18	21	7	Environment Agency; Historic England; Historic England (2); Homes England; Marine Management Organisation; Natural England; The Coal Authority
General consultation bodies				
Voluntary bodies: community groups	115	100	12	Bollington Civic Society; Bollington Civic Society (2); Cheshire Community Action; Disley Sustainable Development Group; Poole Residents Group; Prestbury Amenity Society; Save Disley's Green Belt Action Committee; South Knutsford Residents Group; South Knutsford Residents Group (2); The Prestbury Lane Residents Group; The Roe-naissance Project Macclesfield; Wychwood Community Group
Voluntary bodies: other interest groups	66	62	6	Cheshire Gardens Trust; Cheshire Wildlife Trust; Cheshire Wildlife Trust (2); CPRE Cheshire; Green Party (High Peak); National Trust
Bodies representing the interests of different racial, ethnic or national groups	12	12	1	Irish Community Care
Bodies representing the interests of different religious groups	5	6	0	-

Bodies representing the interests of disabled persons	6	6	0	-
Bodies representing the interests of businesses	16	12	1	Prestbury Business Forum
Other consultees				
Affordable housing providers/registered social landlords	25	18	2	Keyworker Homes (NW) Ltd; The Guinness Partnership Ltd.
Businesses	158	127	13	Barclays Bank plc; Barclays Bank plc (2); Emery Planning; Holiday Extras Ltd and Airparks Ltd; Kentucky Fried Chicken (GB) Ltd; McDonald's Restaurants Ltd; Pet Twigg; PWA Planning; Roger Hannah; Roger Parry & Partners; Sibelco UK Ltd; Visualise; Wharfe Rural Planning
Cheshire East Council members	87	87	10	Cllrs Carol Bulman, Paul Findlow, Alift Harewood, Charlotte Leach, Brendan Murphy, James Nicholas, James Nicholas (2), Jonathan Parry, Amanda Stott, Amanda Stott (2)
Developers/landowners	243	240	149	Alcock and Bailey; Anwyl Homes; Anwyl Homes (2); Anwyl Land Limited; Audley Group; Barlows Ltd; Barratt Developments, Taylor Wimpey, Redrow Homes, Bloor Homes and Jones Homes; Batley Architects; Bellway Homes Ltd; Bloor Homes; Bloor Homes (NW) Ltd; Bluefield Sandbach Limited; Bluemantle Ltd; Boars Head Estates LLP; Bourne Leisure Limited; Mr Mark Bracegirdle; Mr C Brennan; Bucklow Garage Ltd; Capesthorpe Estate; Cashtal Properties Ltd; Cedar Invest Ltd; Cilldara Group (Holmes Chapel); Cinnamon Retirement Living Ltd; Cognatum Developments Limited; Consolidated Property Group; Countryside Properties, Taylor Wimpey and Bloor Homes; David Wilson Homes North West; Dewscope Ltd; Duchy of Lancaster; Elan Homes Limited; Elderloch Ltd; Elle R Leisure Ltd; Dr and Mrs Etherington; Entwisle Project Management; Eskmuir Securities Ltd; Exchange Events Limited;

				<p>FCC Environment (UK) Limited; Footprint Land & Development Ltd; Ford Family, Hazel Sutcliffe and Jennifer Youatt; Mr T Gardiner; Gateway 18 Ltd; Glade Developments Ltd; Gladman; Gladman Developments Ltd; Gladman Retirement Living; Gleave Homes Ltd; Gravitas Properties Ltd; Greene King plc; H Cumberbirch and Son Building Contractors; Harris Homes; Harrow Estates plc; Hartford Homes; Harwil Development Co Ltd; Henbury Estate; Henderson Homes (UK) Ltd; Herring Properties Ltd; Hillcrest Homes; Mr Anthony Hill; HIMOR (Land) Ltd; Hollins Strategic Land; Mrs Margaret Hollins; Mr Ian Marlowe; I M Group; IM Land; Inspired Villages; Mr G Jackson; JGV Developments Ltd; JJJ Heathcote; Jones Homes (North West) Ltd; Jones Homes (North West) Ltd (2); Mr and Mrs Steven and Gaynor Jones; Mr N Kendrick; Land First Investments Ltd; Lane End Developments Construction Ltd; Mr Alan Leonard; Mr and Mrs Lloyd; Macclesfield Rugby Union Football Club; Macclesfield Rugby Union Football Club (2); Mansion House Project Management Limited; Mr Chris Matchett; Mr and Mrs McGarry; Alistair McNulty; Middlemede Properties Ltd; Morning Foods Ltd; Morris Homes Ltd; MSB Developments; Muller Property Group; Optimus Build Ltd; Orbit Investments (Properties) Limited; Orbit Investments (Properties) Ltd (2); Peel Land and Property Ltd; Peel Real Estate (Properties) Ltd; Persimmon Homes (North West); Persimmon Homes North West (2); PH Properties; Poynton Sports Club & Jones Homes (North West) Limited; Property Capital PLC; Prospect Homes; Prosperity Land and Development; QDOS Developments Ltd; Recipharm (Holmes Chapel); Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement Living; Renew Land Audlem Ltd; Richborough Estates; Romcon Investments Limited; Sandyford Property Investments Ltd; Saorsa Developments Ltd; Satplan Ltd; Seddon Homes Ltd; Mr Colin Silvester and Mr Brian Rigby; Simpatico Ltd; Simply Develop UK Ltd; Mr and Mrs Sims; Mr Stuart Sinclair; Sky Global Properties Ltd; SMA Developments Ltd; Somerford Park Farm; Story Homes; Story Homes (2); Stretton Willaston Ltd; Tabley Homes; Tarmac Trading Limited; Tata Chemicals Europe (Including British Salt) Limited;</p>
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				Tatton Group; Tatton Services Ltd; Taylor Wimpey UK Ltd; Taylor Wimpey UK Ltd (2); Mr R Taylor; Ms SA Taylor; Tesni Properties Ltd; Tesni Properties Ltd (2); The Cary Family; The Cholmondeley Estate; The Club Company; The Crown Estate; The Estate of Marques Kingsley Dec'd; The Executors of the Late Michael Kidd; The King's School (Macclesfield); The landowners of Land off New Platt Lane, Goostrey; David and Janet Thelwell; Thistlewood Properties; Tilstone Industrial Ltd; Hazel, Marcus, John & Cathleen Lydia Tomkinson; Mr Robert Twemlow; Wainhomes North West Ltd; Warford Park Limited; William Beech Skip Hire; Mr Gary Wilson; Zan Limited
Individuals	1,173	1,634	912	Mr Steve Adcock; Mrs Sarah Adcocks; S Ainscough; Carolyn Aird; Ms Sally Allenden; J Alvarez; Dr Sarah Anderson; Zoe Andreae; Miss Elizabeth Anfield; Margaret Angus; Paul Angus; Ms S Ankers; Sally Arden; Will & Elena Arlan; Mr Najam Asghar; AW Astbury; Nigel and Jean Atkins; Mrs Elizabeth Atkinson; Olwyn Atkinson; Mr Andrew Axccl; A Baggaley; Mrs Margaret Bagshaw; Mr Gordon Bagshaw; C Bailey; John Baistow; Miss Karen Baker; Mrs Janice Ball; Jane Bamford; Richard Banks; Mrs Victoria Barber; Ms Louise Barber; Edwin Leslie Barber; Mr Matthew Bardsley; Mr Steven Barnett; Katie Barrett; Dr Johanna Barry; Mr Simon Barton; Emily Bartram; Tania Batley; Mr Lee Bayley; Julie Bayley; Mrs Sandra Bean; Mr Christopher Beard; AJ Beaumont; Mr Michael D Bell; Mrs Patricia Bell; Robyn Bell; Diane Bellamy; Serena Bellamy; Mrs Mandy Bellini; Mrs Rose-Marie Benavides; Cristina Benavides; Catherine Bennett; Jane Berry; Sophie Berry; Ms Victoria Bettison; Mr Dave Biggin; Tracy Billing; Mark Billing; J Birchenough; DJ Birchenough; T Birtles; E Blackshaw; Christine Boardman; Mr Steven Bonar; Mrs Ann Bonar; Mr Stephen Booth; Caroline Booth; Ms Hannah Booth; Michelle Borrelle; Mr Robert BoSmith; Mrs Marion BoSmith; Kate Boutinot; Mrs Lois Bower; Mr Richard Bower; Rob Bowers; Mr David Bowes; Mrs Christine Bowes; Mrs Kirsten Boyd; Judith Boyle; Wendy and David Bradbury; Norman and Fiona Braithwaite; Mrs Christine Brear; Mrs Christine Brear (2); Mr Derek

				<p> Brear; Dee and Anthony Brereton; Mr Dee and Anthony Brereton (2); Julie Brereton; Dr David Brickwood; Andrew Brier; Richard Brimelow; Elizabeth Brimelow; NR Brimelow; David Bristow; Elspeth Bristow; Miss Annie Broadbent; C Brodhag; JM Brookes; Sheila Brooman; Mr Duncan Broomhead; Helen Brown; Phillip Brown MBE; Mr & Mrs S & J Brownbill; Mrs Pamela Brownhill; Mr Peter Brownhill; Mr James Browning; Mr Matthew Brundrett; Margaret Buckel; Mr Trevor Budd; Mr Trevor Budd (2); Mrs Janet Budd; Mrs Margaret Dorothy Burchett; Michael Burdekin; Michael Burdekin (2); Mrs Jennifer Burdekin; Mrs Thelma Burdock; Miss Anna Christabel Burgess; Mel Burgess; Paul Burke; Paul Burke (2); Mr Ross Burns; D Burns; Mr Richard Burrow; Mrs Afsan Burrow; Mr Nigel Burrows; Stephen Burt; Edward Bush; Kate Bush; Mr Timothy Peregrine Butterill; Mrs Joanne Butterill; Sarah Butterworth; Mr and Mrs P Buttrick; Mr Robert Buxton; Joanne Byrne; Mrs Edwina Cagol; Mr Mauro Cagol; Ellen & David Cail; David Calvert; Gaynor Calvert; Jon Calvert; Dr and Mrs S Campbell; Mr and Mrs David Carey; Kerina Carrington; Mr Michael Carter; Christopher Cassidy; Matthew Caunt; Martin Chapman; Mr Peter Chapman; Florence Mavis Charnock; Aral Chater-Poole; Mr Jeffrey Child; Mrs Debbie Christopherson; Mr and Mrs Clark; Mrs Susan Clark; Mr Stephen Clark; Lauren Clark; Jordan Clark; J Clark; Mr Laurence Clarke; Mr John Clay; Dr Edward Clayton; Mrs Mary J Clayton; Edward and Gillian Cockram; Mrs Jane Coffey; Susan and James Coley; Mrs Julie Collingwood; Jonathan Collingwood; Peter Collishaw; Peter and Kathleen Collishaw; David Condliffe; Mrs Christine Connick; Mr David Connick; R Connor; Trish and Tony Conroy; Vicki Cook; P Cooke; Mrs Patricia Cooley; Mrs Nancy Coope; Maurice Coope; GA Coope; Mrs Victoria Cooper; Daniel Cooper; Allan Cope; Patricia Cope; E Corfield; Dr Philip Cornwall; Suzanne Cousineau; Caroline Cowdrey; Keith Cox; Michael James Cracknell; Mr and Mrs Crone; JAB Crosland; PA Culverwell; Mr Neal Cunningham; Mr Keith Curran; Mrs Val Cutter; Dr John Cutter; Mrs Bessie Dale; Mrs Lynn Daley; Miss Faye Daley; Mrs Anya Daley; E Daley; Ken Gates, Matthew Taylor, Darragh Lenihan and Patricia Ikin; CM Davenport; Mr Stephen Davies; Marlene Davies; Mr and </p>
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				<p> Mrs Barbara Davies; Mrs Jackie Davies; Mr Wynn Davies; John Davies; Mr J Davies; Miss Celia Davies; Jean Davies; Dr Maureen Dawson; Peter Day; Mr Peter Day (2); Mrs Sally Deacon; Maria Del Sagrario Garcia-Fernandez; Mr & Mrs D & J Devaney; Joanne Dew; Mr Jay Dhokia; Mr Daniel Dickinson; Andrew Dignan; Mr and Mrs R Dixon; Mr Andrew Dixon; J Donald; Euan Donald; Councillor Alexandra Douglas-Kane; Miss Alison Draper; Lee Dudley; Nicola Dudley; Mike Duffy; Philip Duffy; Justine Duffy; Mrs Betty Durrant; Mr Paul Eardley; Ann Eden; Mr Ken Edwards; Mr John Edwards; Mrs Teresa Edwards; Mrs Francesca Edwards; Dr Roland Edwards; Jean Egerton; Miss Sue Egerton; Clive and Ruth Elliott; Mr Ian Ellis; Linda English; Michael Scott Etherington; Mrs Kay Margaret Evans; Rita Evans; Mrs Barbara Everatt; Terry & Barbara Everatt; Sara Fagg; Mrs Ann Fairclough; Mark Fearn; Nina Fenwick; LM Ferguson; Isabella Fink-Williams; Catherine Fitzsimmons; Mr Stephen Flegg; Patricia Flegg; Mr J Florence; Mr Martin Fox; Cynthia E Frank; Peter Frecknall; Eileen Frecknall; P Freeman; Mr R Frodsham; Mr R Fury; Mr Giles Gaddum; Ms Angela Gallagher; Eileen Gallagher; Mr Frank Gannon; Mr Peter Gardiner; Mrs Patricia Gardiner; John Garg; Mr David Garlick; J Garlick; Jane Garner; Stewart Garnett; Helen Garth; Helen Gaskell; Mr and Mrs Gates; Mrs Cath Gibbons; Donna Gilman; Judi Goodwin; Mr Michael Goodwin; Mrs Hilary Goodwin; Marie Goodwin; Ms Rebecca Gordon; Lyn Gorman; John Gorman; Sharon Gorman; Mrs Christine Gosling; D Gould; Mrs Carol Goymour; Mrs Angela Graneek; Dr Bernard Graneek; Mr John Grantham; Rob Gray; Ms Karen Green; Phillip Green; Melissa Green; C Green; Mrs Sarah Greenwood; Mr Andrew Greenwood; Mr Nicholas Gregory; Mr Jason Gregory; Mrs Suzanne Gregson; Alison Griffies; Mr Peter Griffiths; Mr Stephen Grime; Mrs Christine Grime; Corinne Grimes; Kirsty Grogan; Denis and Daphine Grundy; Rosemarie Gudger; Mr Keith Gustall; John Gutteridge; Helen Gutteridge; Mr Andrew Hackshall; Mark Hadley; Marg Halfs; Mr Steve Hampson; Mrs Barbara Hancox; Mr Liam Hancox; Mr Richard Hancox; Mrs Christine Hancox; Evelyn Hancox; Mr MR Hanson; Miss Elisabeth Hardebeck; John Hardman; Mr Mike Harfield; Mr Andrew Harley; Oscar Harley; </p>
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				<p> Julia Harley; Jim and Judith Harries; Mr John Harrington; Martin S Harris; Mr Robert Hart; Claire Hartley; Mr Paul J Harvey; Mrs Penny Harvey; Ida Hastings; Mrs Amy Hastings; ET Hatton; Clare Heery; Mrs Alison Heine; Mr Ian Hemmings; L Hermann; Charlene Heywood; Mr William Hibbs; Mrs Mary Hibbs; Mr David Higton; Paul Hilgart; CP Hockney; Dr Alexandra Hodby; Mr and Mrs Alan and Catherine Hoe; Mr Chris Holdcroft; Judith Holden; Dr Robin Holgate; Mrs Tracey Holland; Mr PS Holland; Mrs Mary Hollick; Mr Robert Holmes Naden; Robert Holmes Naden (2); Mrs Christine Holohan; Paul Holtappel; Rachael Hopper; A Horowood; Miss Alison Horsfield; Mrs Rebecca Horsman-Johnson; Mr James Horspool; Ms Phyllis Horton; Mrs Aimee Howarth; Mr Stuart Howarth; Jane Hoyle; Dr Liz Hufton; Mr Andrew Huggett; Mr Mark Hughan; Mrs Nicola Hughan; John Hughes; Mrs Phyllis Hughes; Mr Lester Humphreys; Mrs Susan Humphreys; Roland Hunt; Mrs Elizabeth Hunt; Mr John Hunter; Mrs Rachel Hunter; Malcolm and Barbara Hurrell; K Hutchison; AJ Hyde; Mr and Mrs Iklin; GS Inskip; Jackie Irving; Ms Andrea Ives; June Jackson; Mr Anthony Jackson; Mrs Hilary Jackson; Miss Hannah Jackson; Jan Jackson; M Jackson; PMG Jackson; Tony Jackson; Steve Jackson; Martin Jackson; Jill Jacobs; Michael and Rachel James; Mrs Debbie Jamison; JM Jazzman; M Johnston; David I Johnstone; S Johnstone; C Johnstone; Mr Robert Jones; Dr Stuart Jones; Mrs Tracey Jones; Miss Angharad Jones; Mrs Stuart Jones; O Jones; Barbara Kavanagh; Ms Teresa Keefe; Mr Jon Kelly; R Kershaw; Mr Ben Kettle; Christine Kettlety; Dr Brenda King; Mr John King; David King; Margaret King; Miss Kathryn Knass; Mr Gareth Knass; Miss Jenny Knass; Miss Heidi Krauth; David Laffan; Mr David Lambert; Mr Omar Lamptey; CA Lancashire; Jo Lancaster; Jane and Peter Lancaster; Mrs Julie Langden; Jane Langley; Nicola Latimer; P Lawson; Mr Robert Lea; Mr James Leach; Mr Rob Leather; Mr Robert leather; Mr and Mrs M Leech; Geoff Leech; N Lee-Gallon; SY Leigh; David Leigh; JM Leighton; Genna Lenden; Mr Christopher Leonard; Mr Howard Levitt; Ann Lewis; Ms Matt Lewis; Mr John Lewis; Miss Heather Lewis; Abbe Lewis; James Bowers and Linda Peake; Ms Gillian Lindsey; George Lingwood; Nicola Little; Mrs Sybil </p>
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				<p> Littlewood; Mr Matthew Lloyd; Sarah J Lloyd; Mrs Marian Lockley; John and Lorraine Loeb; Mrs Kathryn Lomas; Mr Cliff Lomas; George F Long; Mrs Lauren Longden; Ms Caroline Longworth; Caroline Longworth; Janet Love; Susan Lovick; J Lovick; K Lowey; Mr Stephen Lowry; MJ Lynham; Mr Nigel Macartney; Mrs Annabel Macera; Mr Richard Macera; Wendy Mackinnon; Mr John Mackintosh; Mr Alistair MacLeod; EK Madeley; Debra Makin; Ian Malyan; Mr Graham Marginson; Mr Michael Marley; Anna Marley; Kay Marriti; Alan Marsden; Mrs Linda Marshall; Mr Roy Marshall; Vera N Marten; Tim Marten; Mr William Matthews; W Mayers; Dean Mayers; Amanda McAlister; Austin and Nicola McBride; Clare McCann; Clare McCleverly; Julie McCoy; Mr Steve McEachran; Miss Anne McGourlay; Mr Eamonn McGrath; Ms K McHugh; Dr Paul McIntyre; Mr JA Mckay; Kathryn McKeever; James McKeown; Mr James McKeown (2); John McLeod; Mrs Margaret McLeod; Ben McLoverty; Mr Douglas McNair; Mr Ben Meggitt; Gill Melander; Stuart, Ann and Daniel Mellor; Mr Harry Melmoth; Kim Bishop and Mick Wilkins; William Miller; Mrs Linda Miller; Mr and Mrs RN Mills; GR Mills; Millward; Mr John Minister; ES Mitchard; Mrs Norma Mitchell; Dr Claire Mitchell; Ms Elaine Mitchell; Ms Elisabeth Mitchell-Wilkinson; Mr Christopher Monkhouse; Claire Moorby; Ms Kathryn Moore; Miss Andrea Moran; Mr and Mrs Christopher and Lucy More; Miss Lori Moreton; Dr Ken Morris; Mr Alan Morris; Mrs Lynn Morris; Sarah Morton; Hayley Moser; Sylvia Moss; Anita Mourne; Mr D Hill and Mrs D Lee; Mrs Janet Thompson and Mrs Susan Moss; Mrs Marilyn Mulcahy; Mr Anthony Mulcahy; Mr Stephen Mulcahy; Tracy Murdoch; Stephen Murphy; Mrs Amanda Murphy; Letitia Murphy; Martin L Murphy; Sue Murphy; Mr Eamonn Murtagh; Mr Jamie Mutton; Mr Jamie Mutton (2); Mrs Margaret Naden; Penelope & Nigel Naden; Ms Miriat Naiga; T Neale; R Needham; Mrs LA Newall; Mrs Sheila Newbould; Mr Chris Newsome; E Newton; Mrs Deirdre Nicholls; Dr Mark Nicholls; Dr Tracey Nichols; Sally Noone; Joanne Nunnock; Mary Oakden; Jason Oakey; Mr Derek O'Brien; Mrs Jacqueline O'Connor; Mrs Alison O'Connor; Mr Neil O'Hara; Ms Barry O'Kane; JS Olive; Patrick Onwochei; Miriam Onwochei-Garcia; </p>
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				<p>Charlotte Palazzo; Mr Andrew Palmer; Mrs Rita Palmer; Mr Philip Palmer; N Palmer; Holly Palmer; Stuart Palmer; Mr Andrew Pankhurst; Mrs Andrea Pankhurst; Derek J Parry; Mrs Gillian Parry; Mrs Jacqueline Pass; K Payne; Michael Payne; James Pearce; Barbara Pearson; Mrs Helen Pearson; Samuel Pearson; AJ Pearson; Thomas E Pearson; Alan Peckham; Mrs C Peden; Mr Arndt Pedersen; Alan Pedlar; Pauline Pedlar; Jan Pele; David Peters; Mrs Elaine Phillip; A Phillips; Ms Sarah Pimlott; John W Place; Chris Place; Mrs Helen Plant; Mr Jonathan Plant; C Platt; Lindsey Pollard; Mrs Barbara Poole; Miss Suzanne Potts; Mrs Susan Potts; Mr Ian Potts; Mrs Lisa Preece; Rhona Prescott; B Press; Paul Prest; Kevin Price; J Purdu; Dr Melissa Purves; Gaynor Qualter; Daniel Quigley; Mr Paul Quiligotti; Mrs Margeret Raeburn; P Raen; Nicola Rainer; Mr Andrew Ramshall; Sharon Rankin; A Ratcliffe; Catherine Ray; Mrs Norma Raynor; CL Raywood; Mr Martyn Read; Ms Lindsay Reade; Carla Read-Shaw; S Reece; Dinny Reed; BC Reed; Heidi Reid; Archie Reid; Elisabeth Reis; Ms D Renshaw; Mrs Nicola Reucroft; Denise Richbell; Geoff Richbell; Mr and Mrs E Rigby; Dr Hannah Roberts; Dr Mark Roberts; Paul Roberts; Barbara L Roberts; Mr David Roberts; Dianne Roberts; Mrs Nicole Roberts Morris; Rachel Roberts-Newton; Ms Lucy Robey; Kat Robinson; Mr Nigel Robinson; Mr John Robinson; Mrs Lesley Robinson; Penny Robinson; Mr John Boyd Roe; Heather Rogers; Hannah Rogers; Mrs S Rollaston; Nick and Jane Roome; Mrs Karen Rose; Rebecca Roth-Biester; Mr and Mrs B Rothwell; Mr Michael Rowlands; G Rowlands; Chris Rowley; Jacqueline Rowley; Mrs Susan Roycroft; Rosamund Ryan; Zoe Sadler; J Sains; Liz Salem; Darren and Elizabeth Sapey; Mrs Janine Sayce; William Scaeff; Mr Tom Schlageter; Mrs LC Schofield; Mrs Jayne Scholes; Paul Scholes; Mr Les Scoffins; Mr Trevor Scott; Mr Trevor Scott (2); Mr Richard Scowcroft; Dr Jane Selkirk; Mrs B Sellers; Cherie Semper; Gillian Serjeant; Malcolm Serjeant; Mr Tarshish Setalvad; Mr Andrew Seymour; Dr Vian Shafiq; Mr John Shannon; Mrs Dorothy Sharpley; Ms G Shaw; JM Shaw; GJ Shaw; Mrs Jacqui Shaw; Rachel Shaw; Christine Harding and Sheila Richardson; Mr Kevin Shelton; Mr Kevin Shelton (2); Mr Frank</p>
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				<p>Shepley; Mrs Helen Shepley; James Shering; David Shipley; Mr & Mrs P & L Sidebottom; Ms Sioban Simcock; NG Simon; Mr Kay Simpson; Mr John Simpson; Mrs E Simpson; Mr Stuart Simpson; Stuart and Anne Simpson; Gill Singh; Brenda C Slater; Janet L Slinn; JP Slinn; Mr Kevin Small; Mr Paul Smart; Mr Leslie Smith; Aaron Smith; Mr Nikk Smith; Mrs Joanne Smith; Ms P Smith; Mr M Smith; Mrs Y Smith; Mr Andrew Smith; Cherry Smith; Mrs Angela J Smith; DG Smith; James Smith; Amy Smith; Gary Smith; Matthew Smith; Lauren Snelson; Ms Judy Snowball; Mr Reginald Southwell; Mrs Linda Spencer; Mrs Judith Start; Mr David Steeden; Rhonda Steele; Mr John Stewart; Mrs Sheila Storey; Mr John Storey; Ms Diana Storey; Mr John Stott; Dr Andrew Street; Mrs Claire Street; Mr Carlton Stretch; Dr Don Stribling; Mrs Tracey Stubbs; Simon Styles; Mr Paul Summerton; Mr Herbert Surdy; Mr John Sutton; Mr James Swann; Mrs Ruth Tams; Mrs Ruth Tams (2); Mr Ian Tams; Mr Edmund Tan; J Tann; Anna Tappenden; Simon Tappenden; Mrs Jackie Tasker; Mr Glyn Taylor; Mr and Mrs Taylor; Dr David M Teale; George Tew; Emma Thackham; Mr Jamie Thomas; Tora Thomas; Mr Philip Thompson; Ted Thompson; Miss Joan Thompson; JN Thompson; Ms Ruth Thompson; Pete Thorp; Andrew Thorp; LD Thwaites; Mr Garry Tildsley; Mrs Louise Timmis; Cathryn Timms; John Timms; Simone Tomasi; Mrs Christine Tomlinson; Mr NA Tomlinson; Pamela Tomlinson; Mr Simon Tugby; Alexander W Turner; David Turner; Rose Tyldesley; William Uley; GR Van Dam; Mr and Mrs Peter and Vivien van de Riet; Mrs Christiane van Doorn; RD Vanner; Ross Velasquez; John & Jacky Venables; John Vincent; Jennifer Vincent; Oliver & Sandra Vipond; Mrs Margaret Wadsworth; Mr T Wadsworth; Mr Mark Wadsworth; Mr R Wain; Mr Gavin Wainwright; Diane Wainwright; Ashley Waite; Mr Phil Walker; Mrs A Walker; Mrs Barbara Walker; Mrs Elizabeth Wallace; Elliot Waller; Mr Sean Walsh; Mr Tim Walters; Mr Ian Walton; Mrs Nicola Walton; Phillip Warburton; Dr Guy Ward; Mr Stephen Ward; Siân Ward-Hampson; Mrs Caroline Waterhouse; Ms Karen Waters; FHE Watkinson; RG Watkinson; Charlene Watson; Mr Nicholas Webb; Miss Sophie Webb; Trevor & Maureen Webb; Mrs Linda Webster; Mr</p>
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				Paul Webster; Ms J Wells; KR Wells; D Wells; Andrew Wells; Mr David West; Mrs Linda West; Mrs Sarah West; Mr Martin West; Mrs Mary Lynne Westhead; Mr Kevin Whaites; Karen White; June White; Mrs Rosemary White; BH Whitehurst; Joanna Whitney; Mr George Whitney; Mrs Elizabeth Whittaker; Mrs Hilary Whittaker; Mr and Mrs J Whittaker; Mr David Whitworth; Sarah Wild; Miss Elizabeth Wild; Peter Wild; Gavin Wilkie; Mr Andrew Wilkinson; A Wilkinson; Councillor Gareth Williams; Jennifer Williams; Matthew Williams; Mr Desmond Williams OBE; Mr Sam Williamson; Mr Peter Williamson; Mrs Christine Williamson; Mrs Laura Wilson; Mr Alan Wilson; Mrs SE Wilson; Mr John Wilson; Ms E Wiseman; Ms Elizabeth Wiseman; Mr John Woolfenden; Mr and Mrs David and Wendy Wootton; Mr & Mrs David and Wendy Wootton (2); Miss Leigh Woulfe; Ms Helen Wright; Mr Christopher Wright; Mr Colin Wright; Mrs Susan Wright; Mr Martin Wright; AJ Wright; Mrs Norma Wylie; Kevin Wymbs; Mr Peter J Yates; James Yates; Emma Yates; Mr Richard Yorke; Susan Yorke; Mr Rosemary Yorke; S Youel; Stuart Young; Mr Hongjun Yuan
Infrastructure providers (not listed in specific consultation bodies)	37	32	5	Canal & River Trust; High Speed 2 (HS2) Ltd; Manchester Airport; Manchester Airports Group; Royal Mail Group
MPs	5	5	3	Fiona Bruce MP; Dr Kieran Mullan MP; David Rutley MP
Other local planning authorities (not neighbouring)	12	10	0	-
Planning agents	325	332	119 ⁶	Adams Planning and Development (Mr Russell Adams); AE Planning Consultants (Mr Andrew Ellis); Anthony Blasdale Chartered Surveyor (Anthony Blasdale); Avison Young (Miss Alice Routledge); Avison Young (Mr Ed Harvey); Avison Young (Miss Emma Williams); Avison Young (Richard Barton); Avison Young (Matt Verlander); Avison Young (Mrs Emily Hill); Avison Young (Miss Rachel Jones); Avison

⁶ Planning agents submit representation on behalf of their clients. These representations are recorded under the relevant client's details in the table above and to avoid double-counting, the number of agents responding has not been added to the total number of people making representations.

				<p>Young (Conor Vallely); Avison Young (Mr Gary Halman); AXIS (Mr David Adams); Axis Ped Ltd (Mr Martin Pollard); Aylward Town Planning Ltd (Mr Mark Aylward); Barton Willmore (Ian Gilbert); Barton Willmore (Miss Hannah Walker); Barton Willmore (Jordan Clark); Barton Willmore LLP (Ms Stephenie Hawkins); BERRYS (Mr Michael Lloyd); Broadgrove (Richard Walters); CBRE (Ms Alice May); CBRE Ltd (Mr Harry Bolton); Civitas Planning Limited (Mr Endaf Roberts); Cockwill and Co (Mr Chris Cockwill); Cushman and Wakefield (Miss Claire Pegg); DLDC Ltd (Mr Grant Dinsdale); DPP One Ltd (Richard Purser); Eden Planning (Mrs Sarah Jones); Emerson Group (Mr Peter Hilddrup); Emery Planning (Mr Stephen Harris); Emery Planning (Mr Ben Pycroft); Emery Planning (Mr Rawdon Gascoigne); Emery Planning (Mr John Coxon); Emery Planning (Mrs Alexa Burns); Emery Planning (Mrs Alison Freeman); Emery Planning (Mr Nick Smith); Emery Planning (Mrs Clare Gascoigne); Emery Planning Partnership (Mrs Caroline Payne); Emery Planning Partnership (Mrs Jill Naylor); Emery Planning Partnership (Mr Nick Scott); Fisher German LLP (Nia Borse); Grimster Planning Ltd (Mr Steven Grimster); GVA How Planning (Conor Vallely); Hancock Town Planning (Joel Hancock); Harris Lamb Ltd (Mr John Pearce); Heaton Planning Ltd (Sam Salt); HGH Consulting (Mr Matthew Robinson); Hourigan Connolly (Mr Marc Hourigan); Hourigan Connolly (Beverley Moss); JLL (Miss Yvette Black); Jones Lang Lasalle (Keith M Jones); Jones Lang LaSalle (Mr Mike Hopkins); JWPC Ltd (Mr Stuart Booth); Knights plc (Mr Matthew Wedderburn); Knights plc (Mr Alan Corinaldi-Knott); Lambert Smith Hampton (Alan Pearce); Leith Planning Ltd (Miss Abigayle Boardman); Lichfields (Mr Nathan Matta); Lichfields (Mr Nicholas Mills); Litchfields (Mrs Rebecca Hilton); Meller Speakman (Mr Mark Murphy); Mosaic Town Planning (Mr Paul Williams); NJL Consulting (Mr Nick Lee); P4 Planning Limited (Mrs Charlotte Fowler); Pearce Planning (Mr Alan Pearce); Pegasus Group (Mrs Clare Eggington); Pegasus Group (Mr Keith Fenwick); Pegasus Group (Sebastian Tibenham); Pegasus Group (Kate Lowe); Pegasus Group (Hanna Mawson); Pegasus Planning Group (Mr Jonathan Storey); Pegasus</p>
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				Planning Group (Mrs Katherine Lovsey-Barton); Peter Richardson & Co (Peter Richards MRICS); Planware Ltd (Benjamin Fox); PWA Planning (Mr Matthew Wyatt); Roger Hannah (Mr Robert Donnelly); RPS (Mrs Katherine Putnam); Ruston Planning Ltd (Dr Simon Ruston); SATPLAN Ltd (Mr Shaun Taylor); Savills (Mr Nick Heard); Savills (Mr Matthew Dawber); Savills (UK) Ltd (Mr Rob Moore); Savills UK Ltd (Alun Davies); Savills UK Ltd (Peter Whittingham); Savills UK Ltd (Miss Laura Mackay); Savills UK Ltd (Alison Ewing); SSA Planning Limited (Steve Simms); The Planning Bureau (Miss Carla Fulgoni); Thomson Planning Partnership (Mr Andrew Thomson); Turley (Mr Steve Smith); Turley (Mr Paul Forshaw); Turley Associates (Alice Fitton); Turley Associates (Nick Graham); Walsingham Planning (Helen Binns); Walsingham Planning (Mr Mark Krassowski); Wardell Armstrong (Mr Adam Day); Wharfe Rural Planning (Mrs Liza Woodray); Wharfe Rural Planning Ltd (Mr Ben Kettle); Williams Gallagher (Rob Wells); Wilmslow Town Council (Mr Matthew Jackson); Wood (Mr Neil Hall); Wood E&I Solutions UK Ltd (Lucy Bartley); WSP (Mr Daniel Jackson); WSP Indigo (Mr Matthew Dugdale); Mr Robert BoSmith; Mr Dee Brereton; Mr Rex Brockway; Mr Gerallt Davies; Mr Wyn Evans; Joanne McGrath; Mr Ryan McTeggart; Mr Jamie Mutton; Mrs Kristine Pemberton; Mr Richard Purser; Mrs Sally Tagg; Mrs Pet Twigg; Mr Paul Williams; Mr Peter J Yates
Representative bodies	22	22	6	Home Builders Federation; Mineral Products Association; National Custom & Self-Build Association; National Farmers Union; Sport England; Sport England (2)
All consultees				
Totals	2,620	3,005	1,177	

B: Consultation materials

Copies of various consultation materials for the initial Publication Draft SADPD consultation (2019) and the Revised Publication Draft SADPD (2020):

- Statement of the representations procedure (2019)
- Notification letter and email (2019)
- Screen shots from the council website (2019)
- Press releases (2019)
- Social media posts (2019)
- Screen shots from the consultation portal (2019)
- Representations forms (2019)
- Consultation guidance note (2019)
- Statement of representations procedure 26/10/20
- Updated statement of representations procedure 17/11/20
- Notification letter and email 23/10/20
- Further notification letter and email 17/11/20
- Screen shots from the council website (2020)
- Press releases (2020)
- Social media posts (2020)
- Screen shots from the consultation portal (2020)
- Representations forms (2020)
- Consultation guidance note (2020)
- Libraries poster (2020)

Statement of the representations procedure (2019)

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



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

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

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

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

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

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

Representations: May be made in writing or by way of electronic communication:

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

Your personal data will be processed in line with our Strategic Planning Privacy Notice, which is available online at www.cheshireeast.gov.uk/council_and_democracy/council_information/website_information/privacy-notices/spatial-planning-including-neighbourhood-planning-team-privacy-notice.aspx.

Notification: Representations may be accompanied by a request to be notified at a specific address of any of the following:

- i. The submission of the Site Allocations and Development Policies Document for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004;
- ii. The publication of the recommendations of the person appointed to carry out an independent examination of the Site Allocations and Development Policies Document under Section 20 of the Planning and Compulsory Purchase Act 2004; and
- iii. The adoption of the Site Allocations and Development Policies Document.

Proposed Submission Documents: Documents can be viewed using the council's consultation portal, accessed from www.cheshireeast.gov.uk/localplan. They can also be inspected at:

- Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ (Mon - Fri 8:45am - 5:00pm);
- Macclesfield Customer Service Centre, Town Hall, Market Place, Macclesfield SK10 1EA (Mon - Fri 8:45am - 5:00pm); and
- Westfields, Middlewich Road, Sandbach CW11 1HZ (Mon - Fri 9:00am - 5:00pm).

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

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

Notification letter and email (2019)



Working for a brighter future together

<<AddressBlock>>

Strategic Planning
Westfields, Middlewich Road
Sandbach
CW11 1HZ

Tel: 01270 685893
Email: localplan@cheshireeast.gov.uk

DATE: 16/09/2019

OUR REF: PUBSADPD

YOUR REF: <<Person_ID>>

<<GreetingLine>>,

**Publication Draft Site Allocations and Development Policies Document:
consultation 19 August to 30 September 2019.**

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

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

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

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

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jeremy Owens", written over a horizontal line.

Jeremy Owens
Development Planning Manager

All other enquiries 0300 123 5500

www.cheshireeast.gov.uk

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

Dear Sir or Madam

Publication Draft Site Allocations and Development Policies Document consultation 19 August to 5pm on 30 September 2019.

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

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

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

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

Yours faithfully,

Jeremy Owens
Development Planning Manager

Cheshire East Council
Strategic Planning Team
Westfields, Middlewich Road, Sandbach CW11 1HZ
Tel: 01270 685893
Email: localplan@cheshireeast.gov.uk



Working for a *brighter future* together

Screen shots from the council website (2019)


[A to Z site Index](#)

Beechmere fire, Crewe

Residents and relatives who have any concerns about social care and accommodation with regards to the fire at Beechmere in Crewe, can call our 24-hour helpline on 0300 123 5025.

I want to find...

Jobs at the Council	Library books to renew or reserve	Care and support for children and adults
Payments to the Council	Council Tax	Housing
Bins and recycling	Benefits entitlements	Leisure and culture
Planning and planning applications	Business and Business Rates	Births, marriages and deaths
Schools and education	Roadworks and highway services	Rangers and outdoor recreation
Council and democracy	Car parks and parking	Environment
	Bus timetables and travel information	

In Focus



Cheshire East Partnership Five Year Plan
Improving the health and wellbeing of Cheshire East residents.

News

- 19/08/2019 - Cheshire East consults on next phase of Local Plan
- 15/08/19 - Continued A-level success for Cheshire East students
- 12/08/2019 - Multi-agency drop-in session to be held following flooding in north of borough
- 06/08/2019 - Cheshire East Council acts to strengthen its planning framework
- 01/08/2019 - Council and partner agencies continue to respond to emergency flooding incidents - Information Bulletin

[Public Notices](#) | [Media Hub >>](#)

Have your say

Consultations

- [Southern Link Road Bridge \(SLRB\) Access Options Consultation](#) - closes 3 September 2019
- [Crewe Hub Area Action Plan Consultation](#) - closes 3 September 2019
- [Council Tax Support Consultation](#) - closes 16 September 2019
- [Local Plan: Site Allocations and Development Policies Document](#) - closes 30 September 2019
- [Cheshire East High Needs Funding Consultation](#) - closes 11 October 2019
- [Join the digital influence panel](#)

Planning applications

- [Comment on a current planning application](#)



The new Cheshire East Council resident magazine



Live Well Cheshire East offers a range of services so you can find support, care and social activities for yourself or a loved one.

Screen shot of www.cheshireeast.gov.uk (taken 19 August 2019)

• [Give your feedback on the SLRB Access Options Consultation](#)

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

Council Tax Support Consultation

Cheshire East Council is proposing changes to its Council Tax Support scheme. This could affect how those living in working age households claim their Council Tax Support.

- [Read more about the Council Tax Support scheme and give your feedback](#)
- [Visit our Council Tax Support webpages for further information](#)
- [View the Council Tax support Consultation Equality Impact Assessment \(PDF, 352KB\)](#)

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

The council will be holding the following drop-in sessions for anyone with queries about this consultation:

- 12 August 2019 between 12noon and 3pm at Delamere House, Crewe, CW1 2JZ.
- 13 August 2019 between 12noon and 3pm at Macclesfield Town Hall, Macclesfield, SK10 1EA.

Please inform our customer service centre reception on arrival - there is no need to book an appointment.

CE Draft Economic Strategy Consultation

Cheshire East Council is consulting on its draft economic strategy, which outlines plans to grow the local economy to deliver £15bn GVA per year, and improve the quality of the local area.

The draft strategy, which was approved for consultation by cabinet on Tuesday 9 July, uses a strong evidence base and has been developed in partnership with representatives from the private sector.

We now want to test the strategy through a consultation so that the local community can tell us what they think.

- [View the full draft CE Economic Strategy \(PDF, 873KB\)](#)
- [Give your views on the draft CE Economic Strategy](#)

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

Local Plan: Site Allocations and Development Policies Document

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

The SADPD has been prepared to support the policies and proposals of the existing Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations. This consultation is a formal stage in the preparation of the SADPD and is being carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Full details of the consultation are set out in the [Statement of Representations Procedure \(PDF, 103 KB\)](#).

- [Read the Site Allocations and Development Policies Document and submit your representations \(via our consultation portal\)](#).

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

Cheshire East High Needs Funding Consultation


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

A working group established by the Schools Forum have developed a proposed new model, and we would like your views on this proposal.

- [Give your feedback on the High Needs Funding Consultation](#)

Please submit your consultation response by **5pm on Friday 14 October 2019**.

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




[A to Z site Index](#)

[Home](#) / [Planning](#) / [Spatial Planning](#) / Cheshire East Local Plan

Cheshire East Local Plan

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

Our [Spatial Planning Update](#) provides a regular bulletin on planning policy matters affecting Cheshire East.



Key Local Plan documents

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

Document	Status	Description
Local Plan Strategy	Adopted 27 July 2017.	The LPS is the centrepiece of the Local Plan, setting out strategic priorities for the development of the area along with planning policies and proposals. It is accompanied by an interactive policies map, which shows sites, policies and environmental / heritage designations.
Site Allocations and Development Policies document	Representations on publication draft invited by 5pm Monday 30 September 2019.	The SADPD will allocate the remaining sites needed for future development and set out further detailed planning policies to be used when considering planning applications. Consultation on the Publication Draft SADPD is underway until 5pm on 30 September 2019. Full details of the consultation are set out in the Statement of Representations Procedure (PDF, 103 KB) .
Minerals and Waste Development Plan Document	Draft in preparation.	The MWDPD will set out policies for dealing with minerals and waste, and identify sites. Consultation on an Issues Paper took place between 24 April and 05 June 2017, alongside a 'call for sites' for minerals and waste sites.
Crewe Hub Area Action Plan	Consultation on the Development Strategy and Further Options document is underway.	An AAP is a type of DPD providing a planning framework for a specific area of opportunity, change or conservation. Unlike the LPS, the AAP will have a very narrow geographic focus, being confined to an area close to the existing Crewe Railway Station. Consultation on the Development Strategy and Further Options document is underway until 03 September 2019.
Saved Policies from previous Local Plans	Saved development plan policies.	A number of saved policies from the Congleton Local Plan, Crewe and Nantwich Local Plan, Macclesfield Local Plan, Cheshire Waste Plan and Cheshire Minerals Plan will continue to be used until the SADPD and MWDPD have been adopted.

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

[Supporting Local Plan documents](#)

In this section

- [Local Plan Strategy Development Plan Document](#)
- [Crewe Area Action Plan](#)
- [Authority Monitoring Report](#)
- [Cheshire East Local Plan](#)
- [Local Development Scheme](#)
- [Local Plan Consultation Portal](#)
- [Local Plan Consultations](#)
- [Site Allocations and Development Policies Document](#)
- [Statement of Community Involvement](#)
- [Supplementary Planning Documents](#)

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01270 685893

All other planning enquiries (including planning application queries)

[Email Planning Department](#)

0300 123 5014

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Screen shot of www.cheshireeast.gov.uk/localplan (taken 19 August 2019)

Site Allocations and Development Policies Document



[Consultation on the Publication Draft SADPD](#) is underway until 5pm on 30 September 2019.

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

Current status

The Publication Draft [SADPD](#) has been published to invite representations before it is submitted for examination by a planning inspector. [Consultation on the Publication Draft SADPD](#) is taking place between 19 August and 5pm on 30 September 2019. This consultation is a formal stage in the preparation of the [SADPD](#) and is being carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Full details of the consultation are set out in the [Statement of Representations Procedure](#) (PDF, 103 KB).

The council has published a number of supporting documents in the [Publication Draft SADPD Evidence Base](#) as well as a [Housing Completions and Commitments at 31 March 2019 Report](#) (PDF, 13.6MB).

Previous stages

First draft SADPD

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

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

Issues paper

An initial [consultation on the Site Allocations and Development Policies Issues Paper](#) took place between 27 February and 10 April 2017, alongside a separate 'call for sites' exercise to inform the allocation of development sites.

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

We have now published the [Report of Consultation on the SADPD Issues Paper](#) (PDF, 2.6 MB).

In this section

- [Local Plan Strategy Development Plan Document](#) >
- [Crewe Area Action Plan](#) >
- [Authority Monitoring Report](#) >
- [Cheshire East Local Plan](#) >
- [Local Development Scheme](#) >
- [Local Plan Consultation Portal](#) >
- [Local Plan Consultations](#) >
- [Site Allocations and Development Policies Document](#)
- [Statement of Community Involvement](#) >
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Screen shot of www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/site_allocations_and_policies.aspx (taken 19 August 2019)

[Home](#) / [Planning](#) / [Spatial Planning](#) / Local plan notices

Cheshire East Local Plan public notices

Please see the [Local Plan](#) pages for further information on the Cheshire East Local Plan.

Current public notices:

Cheshire East Council has published the Site Allocations and Development Policies Document to invite representations before it is submitted for examination by a planning inspector. Representations are invited in accordance with the [Statement of Representations Procedure \(PDF, 103KB\)](#).

Strategic Planning privacy notice

The [Strategic Planning \(including Neighbourhood Planning\) Team privacy notice](#) explains how we store and process personal data.

In this section

[Local Plan Public Notices](#)

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OK



Poor

Screen shot of www.cheshireeast.gov.uk/planning/spatial_planning/local-plan-notices/local-plan-public-notices.aspx (taken 19 August 2019)

Press releases (2019)



Cheshire East Council set to strengthen its planning framework

16 July 2019

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Press release 1 dated 16 July 2019



Cheshire East Council acts to strengthen its planning framework

6 August 2019

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

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

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

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

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

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

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

Councillor Toni Fox, Cheshire East Council cabinet member for planning, said: “This plan takes account of consultation responses to the draft document published last September and I’m gratified that extra effort has been made in recent months to engage with town and parish councils about the proposals.



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

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

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

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

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

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

“We want to move promptly to a position where our five-year supply targets properly reflect the revised approach towards identifying housing requirements using the national methodology – and so we will be looking to assess which parts of Local Plan Strategy need to be reviewed and updated.

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

Press release 2 dated 06 August 2019



Cheshire East consults public on next phase of Local Plan

19 August 2019

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

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

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

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

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

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

Hard copies of the consultation documents and supporting reports will be available at the council's offices at Macclesfield Town Hall, Westfields in Sandbach and

Delamere House in Crewe. The main consultation documents are also available at local libraries during their normal opening hours.

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

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

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

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

Press release 3 dated 19 August 2019

Social media posts (2019)



Screen shots from the consultation portal (2019)

Cheshire East Council
Consultation Portal

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Search

Consultation Home > Planning > Cheshire East Local Plan > Site Allocations and Development Policies Document > Publication Draft Site Allocations and Development Policies Document

Publication Draft Site Allocations and Development Policies Document

The Site Allocations and Development Policies Document (SADPD) has been prepared to support the policies and proposals of the Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations.

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

Consultation document

The Publication Draft SADPD is available to read online on this consultation portal (please click the 'read and comment on document' button below). PDF versions of the Publication Draft SADPD and the Draft Adopted Policies Map can also be downloaded here:

- PUB 01 Publication Draft Site Allocations and Development Policies Document
- PUB 02 Draft Adopted Policies Map

Submitting comments

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

Whichever method is used, all representations must be received by the council by **5:00pm on Monday 30 September 2019**.

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

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

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

Other documents

In addition to the Publication Draft SADPD, we are also inviting representations on:

- The Sustainability Appraisal, which assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.
- The Habitats Regulations Assessment, which considers the impact on internationally-designated nature conservation sites.

There are also a number of supporting documents that are proposed to be submitted alongside the SADPD. To make representations on any of the other supporting documents, please relate these to the resulting paragraph, policy or site in the SADPD. All of the supporting documents can be downloaded from the [SADPD Evidence Base page](#).

Next steps

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

[Read and comment on document](#)

Event Information | Supporting Documents

Access: Login required
Status: open (From 19/08/19 07:00 to 30/09/19 17:00)

Screen shot from SADPD consultation portal page (taken 19 August 2019)

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[Consultation Home](#) > [Planning](#) > [Cheshire East Local Plan](#) > [Site Allocations and Development Policies Document](#) > [Sustainability Appraisal \(Publication Draft SADPD\)](#)

Sustainability Appraisal (Publication Draft SADPD)

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

Consultation document

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

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

Submitting comments

This online consultation portal is our preferred method for submitting responses; please click the 'Read and comment on document' button below to get started. Alternatively, you can respond by email or by post. To respond by email or by post, please complete one Part A Representations Form (Personal Details) and then a separate Part B Representations Form for each representation you wish to make. The return address details are included on the Part A Representations forms. Whichever method is used, all representations must be received by the council by **5:00pm on Monday 30 September 2019**.

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

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

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

Other documents

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

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

[Read and comment on document](#)

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[Supporting Documents](#)

Access: Login required

Status: **open** (From 19/08/19 07:00 to 30/09/19 17:00)

Privacy: If you take part: your name may be displayed, your answers may be displayed, your town/city may be displayed

Description: The Sustainability Appraisal assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.

Organisation: Cheshire East Council

Contact Name: Spatial Planning Team

Contact Email: localplan@cheshireeast.gov.uk

Contact Telephone: 01270 685893

<http://www.cheshireeast.gov.uk/>

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

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[Site Allocations and Development Policies Document](#)
[Habitats Regulations Assessment \(Publication Draft SADPD\)](#)

Habitats Regulations Assessment (Publication Draft SADPD)

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

Consultation document

The Habitats Regulations is available to download here:

- PUB 04 SADPD Habitats Regulations Assessment (publication version)

Submitting comments

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

Whichever method is used, all representations must be received by the council by **5:00pm on Monday 30 September 2019**.

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

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

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

Other documents

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

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

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[Supporting Documents](#)

Access: Login required

Status: open (From 19/08/19 07:00 to 30/09/19 17:00)

Privacy: If you take part, your name may be displayed, your answers may be displayed, your town/city may be displayed

Description: The Habitats Regulations Assessment considers the impact on internationally-designated nature conservation sites.

Organisation: Cheshire East Council

Contact Name: Spatial Planning Team

Contact Email: localplan@cheshireeast.gov.uk

Contact Telephone: 01270 685893

Other Contact Information: Westfields C/O Municipal Buildings Earle Street Crewe CW1 2BJ

Screen shot from Habitats Regulations Assessment consultation portal page (taken 19 August 2019)

Representations forms (2019)

Cheshire East Local Plan

Publication Draft Site Allocations and

Development Policies Document: Representations Form



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

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

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

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

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

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

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

Submit your views

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

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

Email: To localplan@cheshireeast.gov.uk

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



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

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

Cheshire East Local Plan Representation Form



Name of the Local Plan to which this representation relates:

Site Allocations and Development
Policies Document

Please return to:

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

Please return by:

5pm, Monday 30 September 2019

This comment form has two parts:

- Part A – Personal details: need only be completed once
- Part B – Your representation(s): please fill in a separate sheet for each representation you wish to make

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		
Email Address (where relevant)		
Your Reference No. (if known)		

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

Part B: Representation

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

Name and
Organisation:

Office Use Only:

PID:

RID:

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

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

To which part of the document does this representation relate?

Paragraph

Policy

Site

Policies
map

Q1. Do you consider the SADPD is:

- | | | |
|---|------------------------------|-----------------------------|
| (1) Legally compliant | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (2) Sound | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (3) Compliant with the Duty to co-operate | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

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

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

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

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

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

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

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

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

Signature

Date

Part B: Representation

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

Name and
Organisation:

Office Use Only:

PID:

RID:

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

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

To which part of the document does this representation relate?

Paragraph

Policy

Site

Policies
map

Q1. Do you consider the SADPD is:

- | | | |
|---|------------------------------|-----------------------------|
| (1) Legally compliant | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (2) Sound | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (3) Compliant with the Duty to co-operate | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

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

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

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

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

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

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

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

Signature

Date

Printed representations form 2019

[https://cheshireeast-consult.objective.co.uk/](#)
Cheshire East Council - Pu...

[Consultation Home](#) > [Planning](#) > [Cheshire East Local Plan](#) > [Site Allocations and Development Policies Document](#) > [Publication Draft Site Allocations and Development Policies Document](#)

[Publication Draft Site Allocations and Development Policies Document](#)

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Spatial distribution and settlements

Policy PG 8

These comments are for this policy (Policy PG 8)

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

The Publication Draft SADPD has been published to invite representations before it is submitted for examination by a planning inspector. The purpose of the examination is to consider whether the plan complies with all legal requirements and is sound. The inspector will consider all representations submitted by the closing date of 5pm on 30 September 2019.

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

Your personal data will be processed in line with our privacy notice and your name, town and full response will be published and made available to view online. Please add your representation below. Once submitted, you will be able to add further representations if you wish.

Q1

Do you consider the SADPD is:

(1) Legally compliant	Yes <input type="radio"/>	No <input type="radio"/>
(2) Sound	<input type="radio"/>	<input type="radio"/>
(3) Compliant with the Duty to co-operate	<input type="radio"/>	<input type="radio"/>

Q2

Please give details of why you consider the SADPD is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the SADPD or its compliance with the duty to co-operate, please also use this box to set out your comments.

Q3

Please set out the modification(s) you consider necessary to make the SADPD legally compliant and sound, in respect of any legal compliance or soundness matters identified at Q1 above. Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the SADPD legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Supporting information

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

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

Upload:

Browse...

Title

Q4

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

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

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

Q5

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

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

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

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

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

 Cancel if you want to disregard the answers/changes you have made since your last save.

Cancel

Save as draft

Submit

Electronic (consultation portal) representations form 2019

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



1. Introduction

- 1.1 Cheshire East Council has published the Site Allocations and Development Policies Document (SADPD) to invite representations on it before it is submitted for examination by a Planning Inspector. Under the Planning and Compulsory Purchase Act 2004 (PCPA), the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made by 5:00pm on Monday 30 September 2019.
- 1.2 To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. We cannot accept anonymous representations and you must provide us with your name and contact details when making representations. Personal data will be processed in line with our Strategic Planning Privacy Notice, which is available on the council's website. Representations will be published on the council's consultation portal alongside the name and town of the representor. The council will also make sure the names and addresses of those making representations can be made available and taken into account by the Inspector.

2. Planning Inspectorate Guidance

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

Legal Compliance and Duty to Co-operate

- 2.2 You should consider the following before making a representation on legal compliance:
 - The plan should be included in the council's current Local Development Scheme (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the council proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the council's website and available at its main offices.
 - The process of community involvement for the plan in question should be in general accordance with the council's Statement of Community Involvement (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
 - The council is required to provide a Sustainability Appraisal (SA) report when it publishes a plan. This should identify the process by which the SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended (the Regulations).

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

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

Soundness

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

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

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

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

General advice

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

2.7 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the

plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

- 2.8 Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 2.9 Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

3. Making Representations

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

Published Documents

- 3.2 The following consultation documents have been published for representations:
- The **Publication Draft SADPD** has been prepared to support the policies and proposals of the Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations;
 - The **Sustainability Appraisal** assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives; and
 - The **Habitats Regulations Assessment** which considers the impact on internationally-designated nature conservation sites.
- 3.3 There are also number of supporting documents (listed in Appendix A of the SADPD) proposed to be submitted alongside the SADPD. All of the proposed submission documents can be viewed at www.cheshireeast.gov.uk/localplan and inspected at:
- Westfields, Middlewich Road, Sandbach CW11 1HZ;
 - Crewe Customer Service Centre, Delamere House, Delamere Street, Crewe CW1 2JZ; and
 - Macclesfield Customer Service Centre, Town Hall, Macclesfield SK10 1EA.
- 3.4 In addition, the SADPD, Sustainability Appraisal, Habitats Regulations Assessment and selected supporting documents (including the policies map) are available to view at public libraries in Cheshire East.
- 3.5 You can also submit representations on any of the supporting documents, but it would be helpful if you would relate these representations to the resulting paragraph, policy or site in the SADPD.

Submitting Representations

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

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

Email: To localplan@cheshireeast.gov.uk

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



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

Discrimination

- 3.8 When making representations, please be mindful that the full representation will be published, alongside your name and town. Under the Equality Act 2010, the council has a duty to foster good relations between different community groups, eliminate discrimination and advance equality of opportunity. As such, the council should not publish any statement about any particular community group that could be discriminatory, racist or offensive (or misinterpreted to be discriminatory, racist or offensive).
- 3.9 Representations that may be considered discriminatory, racist or offensive include generalisations, stereotypes or negative perceptions of race, ethnicity or culture. Where a representation is identified as potentially containing discriminatory, racist or offensive content, the Head of Strategic Planning is the designated officer to determine whether the representation is discriminatory, racist or offensive. If it is, the author will be invited to amend and re-submit their representation prior to the close of consultation to focus on planning issues including the tests of legal compliance and soundness.
- 3.10 Representations that are deemed to be offensive, abusive, insulting, threatening or inciting racial hatred are matters for the police.

Next Steps

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

Further Information

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

Consultation guidance note 2019

Statement of the representations procedure 26/10/20



Site Allocations and Development Policies Document Statement of the Representations Procedure (26 October 2020)

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

The Site Allocations and Development Policies Document was previously published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations. Representations were invited in accordance with Regulation 20 between 19 August and 30 September 2019.

A revised version of the Site Allocations and Development Policies Document has now been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations. Further representations are invited in accordance with Regulation 20.

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

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

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

Representation Period: Monday 26 October 2020 to 5:00pm on Monday 7 December 2020. All representations must be received by the council by **5:00pm on Monday 7 December 2020**.

Representations: May be made in writing or by way of electronic communication:

- Online, using the council's consultation portal at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>;
- By email to localplan@cheshireeast.gov.uk; or
- By post to SADPD Representations, c/o Print Unit, Cheshire East Council, Town Hall, Macclesfield SK10 1EA.

Your personal data will be processed in line with our Strategic Planning Privacy Notice, available online at www.cheshireeast.gov.uk/council_and_democracy/council_information/website_information/privacy-notice/spatial-planning-including-neighbourhood-planning-team-privacy-notice.aspx.

Notification: Representations may be accompanied by a request to be notified at a specific address of any of the following:

- i. The submission of the Site Allocations and Development Policies Document for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004;
- ii. The publication of the recommendations of the person appointed to carry out an independent examination of the Site Allocations and Development Policies Document under Section 20 of the Planning and Compulsory Purchase Act 2004; and
- iii. The adoption of the Site Allocations and Development Policies Document.

Proposed Submission Documents: Documents can be viewed using the council's consultation portal at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>. Selected proposed submission documents (including the Site Allocations and Development Policies Document; Draft Adopted Policies Map; Sustainability Appraisal; and Habitats Regulations Assessment) can also be viewed at public libraries in Cheshire East. Opening hours may be restricted due to the coronavirus pandemic and you are advised to check the current libraries opening times at www.cheshireeast.gov.uk/libraries/libraries_opening_hours.aspx or telephone the 24 hour library information service on 0300 123 7739.

Further information and paper copies of all proposed submission documents can be requested from the Strategic Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 685893 (please leave a message). Please note that a reasonable charge will be made to cover printing and postage costs.

Updated statement of representations procedure 17/11/20

Site Allocations and Development Policies Document Statement of the Representations Procedure (17 November 2020)



The original Statement of the Representations Procedure dated 26 October 2020 has been updated to reflect: the extended period during which representations can be made; and the locations in which documents can be inspected.

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

The Site Allocations and Development Policies Document was previously published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations. Representations were invited in accordance with Regulation 20 between 19 August and 30 September 2019.

A revised version of the Site Allocations and Development Policies Document has now been published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations. Further representations are invited in accordance with Regulation 20.

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

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

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

Representation Period: Monday 26 October 2020 to 5:00pm on Wednesday 23 December 2020. All representations must be received by the council by **5:00pm on Wednesday 23 December 2020**.

Representations: May be made in writing or by way of electronic communication:

- Online, using the council's consultation portal at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>;
- By email to localplan@cheshireeast.gov.uk; or
- By post to SADPD Representations, c/o Print Unit, Cheshire East Council, Town Hall, Macclesfield SK10 1EA.

Your personal data will be processed in line with our Strategic Planning Privacy Notice, available online at www.cheshireeast.gov.uk/council_and_democracy/council_information/website_information/privacy_notices/spatial-planning-including-neighbourhood-planning-team-privacy-notice.aspx.

Notification: Representations may be accompanied by a request to be notified at a specific address of any of the following:

- i. The submission of the Site Allocations and Development Policies Document for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004;
- ii. The publication of the recommendations of the person appointed to carry out an independent examination of the Site Allocations and Development Policies Document under Section 20 of the Planning and Compulsory Purchase Act 2004; and
- iii. The adoption of the Site Allocations and Development Policies Document.

Proposed Submission Documents: Documents can be viewed using the council's consultation portal at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>. Selected proposed submission documents (including the Site Allocations and Development Policies Document; Draft Adopted Policies Map; Sustainability Appraisal; and Habitats Regulations Assessment) can also be viewed at public libraries in Cheshire East. In line with regulations to prevent the spread of Covid-19, all libraries will be closed between 5 November and 2 December. Outside of these dates, opening hours may be restricted due to Covid-19 and you are advised to check the current libraries opening times at www.cheshireeast.gov.uk/libraries/libraries_opening_hours.aspx or telephone the 24 hour library information service on 0300 123 7739. If you are unable to inspect copies of the documents, please contact us using the details below to make alternative arrangements to inspect the documents during the representations period.

Further information and paper copies of all proposed submission documents can be requested from the Strategic Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 685893 (please leave a message). Please note that a reasonable charge may be made to cover printing and postage costs.

Notification letter and email 23/10/20



Working for a brighter future together

«AddressBlock»

Strategic Planning
Westfields, Middlewich Road
Sandbach
CW11 1HZ

Tel: 01270 685893 (please leave a message)

Email: localplan@cheshireeast.gov.uk

DATE: 23/10/2020

OUR REF: RPD/«Person_ID»

«GreetingLine»

Cheshire East planning policy and related documents consultation.

You have received this letter as you have previously responded to a local plan consultation or you have asked to be kept informed of future local plan consultations. The council has published three planning policy-related documents for consultation.

Revised Publication Draft Site Allocations and Development Policies Document (SADPD):

The SADPD includes non-strategic planning policies and site allocations. It has been prepared to support the strategic policies of the Local Plan Strategy. Following consultation in 2019, the draft SADPD has been amended and the council has now published the Revised Publication Draft SADPD to invite further representations before it is submitted for examination by a planning inspector. Full details of the consultation are set out in the 'Statement of Representations Procedure' on the reverse of this letter. Consultation ends at 5pm on Monday 7th December.

Draft Houses in Multiple Occupation Supplementary Planning Document (HMO SPD): The Draft HMO SPD provides guidance around planning applications that involve the change of use (or extension) of buildings to HMOs across the borough. Further information is available on the council's consultation portal: <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/hmo>. Consultation ends at 5pm on Monday 7th December.

Article 4(1) Directions to withdraw permitted development rights for the change of use of dwellings to small houses in multiple occupation in parts of Crewe: Three non-immediate Article 4 Directions were made on 6/10/20, meaning that planning permission will be required to use a dwelling (use class C3) as a small HMO (use class C4) within the areas of the Directions (subject to confirmation) once they come into force on 1/11/21. Further information is available on the council's website: www.cheshireeast.gov.uk/A4D. Consultation ends at 5pm on 30th November.

Please do not hesitate to contact the Strategic Planning Team using the details at the top of this letter should you require further information on any of these consultations.

Yours sincerely,

Jeremy Owens
Development Planning Manager

From: LOCAL PLAN
Sent: 23 October 2020 12:40
To: <<Email Address>>
Subject: Cheshire East planning policy documents consultation

<<GreetingLine>> <<Position>> <<Company__Organisation>>
Ref: PBD/<<Person_ID>>

You have received this email as you have previously responded to a local plan consultation or you have been asked to be kept informed of future local plan consultations. The council has published three planning policy documents for consultation.

Revised Publication Draft Site Allocations and Development Policies Document (SADPD): The SADPD includes non-strategic planning policies and site allocations. It has been prepared to support the strategic policies of the Local Plan Strategy. Following consultation in 2019, the draft SADPD has been amended and the council has now published the Revised Publication Draft SADPD to invite further representations before it is submitted for examination by a planning inspector. The consultation ends at 5pm on Monday 7th December.

- Further information and the proposed submission documents can be found at the council's consultation portal: <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>
- The formal notice of consultation is set out in the statement of the representations procedure: <https://cheshireeast-consult.objective.co.uk/file/5710767>

Draft Houses in Multiple Occupation Supplementary Planning Document (HMO SPD): The Draft HMO SPD provides guidance around planning applications that involve the change of use (or extension) of buildings to HMOs across the borough. Further information is available on the council's consultation portal: <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/hmo>. The consultation ends at 5pm on Monday 7th December.

Article 4(1) Directions to withdraw permitted development rights for the change of use of dwellings to small houses in multiple occupation in parts of Crewe: Three non-immediate Article 4 Directions were made on 6 October 2020, meaning that planning permission will be required to use a dwelling (use class C3) as a small HMO (use class C4) within the areas of the Directions (subject to confirmation) once they come into force on 1 November 2021. The Directions relate to the Nantwich Road, West Street and Hungerford Road areas of Crewe. Further information is available on the council's website: www.cheshireeast.gov.uk/A4D. Consultation ends at 5pm on Monday 30th November.

Please do not hesitate to contact the Strategic Planning Team at localplan@cheshireeast.gov.uk or telephone 01270 685893 (please leave a message) should you require further information on any of these consultations.

Yours sincerely,

Jeremy Owens
Development Planning Manager



Further notification letter and email 17/11/20



Working for a brighter future together

«AddressBlock»

Strategic Planning
Westfields, Middlewich Road
Sandbach
CW11 1HZ

Tel: 01270 685893 (please leave a message)

Email: localplan@cheshireeast.gov.uk

DATE: 17/11/2020

OUR REF: RPD/«Person_ID»

«GreetingLine»

Cheshire East planning policy and related documents consultation.

You have received this letter as you have previously responded to a local plan consultation or you have asked to be kept informed of future local plan consultations. The council is currently consulting on three planning policy-related documents and due to the current restrictions related to Covid-19, the deadlines for commenting on each of these documents have been extended.

The **Revised Publication Draft Site Allocations and Development Policies Document (SADPD)** includes non-strategic planning policies and site allocations. It has been prepared to support the strategic policies of the Local Plan Strategy. Following consultation in 2019, the draft SADPD has been amended and the council has now published this revised document to invite further representations before it is submitted for examination by a planning inspector. Full details of the consultation are set out in the updated 'Statement of Representations Procedure' on the reverse of this letter. The deadline for representations is now 5:00pm on Weds 23 December.

The **Draft Houses in Multiple Occupation Supplementary Planning Document (HMO SPD)**: provides guidance around planning applications that involve the change of use (or extension) of buildings to HMOs across the borough. Further information is available on the council's consultation portal: <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/hmo>. The deadline for making comments is now 5:00pm on Weds 23 December.

Article 4(1) Directions to withdraw permitted development rights for the change of use of dwellings to small houses in multiple occupation in parts of Crewe: Three non-immediate Article 4 Directions were made on 6/10/20, meaning that planning permission would be required to use a dwelling (class C3) as a small HMO (class C4) within the areas of the Directions once they come into force on 1/11/21. Further information is on the website: www.cheshireeast.gov.uk/A4D. The deadline for comments is now 5:00pm on Mon 11 January 2021.

Please contact the Strategic Planning Team using the details at the top of this letter should you require further information or assistance to access the consultation documents.

Yours sincerely,

Jeremy Owens
Development Planning Manager

From: LOCAL PLAN
Sent: 17 November 2020 15:36
To: <<Email Address>>
Subject: Cheshire East planning policy documents: consultation extended

<<GreetingLine>> <<Position>> <<Company__Organisation>>
Ref: PBD/<<Person_ID>>

You have received this letter as you have previously responded to a local plan consultation or you have asked to be kept informed of future local plan consultations. The council is currently consulting on three planning policy-related documents and due to the current restrictions related to Covid-19, the deadlines for commenting on each of these documents have been extended.

The **Revised Publication Draft Site Allocations and Development Policies Document (SADPD)** includes non-strategic planning policies and site allocations. It has been prepared to support the strategic policies of the Local Plan Strategy. Following consultation in 2019, the draft SADPD has been amended and the council has now published the Revised Publication Draft SADPD to invite further representations before it is submitted for examination by a planning inspector. The deadline for representations has been extended to 5:00pm on Wednesday 23 December.

- Further information and the proposed submission documents can be found at the council's consultation portal: <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>
- The formal notice of consultation is set out in the updated statement of the representations procedure: <https://cheshireeast-consult.objective.co.uk/file/5710767>

Draft Houses in Multiple Occupation Supplementary Planning Document (HMO SPD): The Draft HMO SPD provides guidance around planning applications that involve the change of use (or extension) of buildings to HMOs across the borough. Further information is available on the council's consultation portal: <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/hmo>. The deadline for making comments has been extended to 5:00pm on Wednesday 23 December.

Article 4(1) Directions to withdraw permitted development rights for the change of use of dwellings to small houses in multiple occupation in parts of Crewe: Three non-immediate Article 4 Directions were made on 6 October 2020, meaning that planning permission will be required to use a dwelling (use class C3) as a small HMO (use class C4) within the areas of the Directions (subject to confirmation) once they come into force on 1 November 2021. The Directions relate to the Nantwich Road, West Street and Hungerford Road areas of Crewe. Further information is available on the council's website: www.cheshireeast.gov.uk/A4D. The deadline for making comments has been extended to 5:00pm on Monday 11 January 2021.

Please do not hesitate to contact the Strategic Planning Team at localplan@cheshireeast.gov.uk or telephone 01270 685893 (please leave a message) should you require further information or assistance to access the consultation documents.

Yours sincerely,

Jeremy Owens
Development Planning Manager



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In Focus



Cheshire East placed into Covid alert level 'High'
[Details on the High Alert level classification](#)

News

- 3/11/2020 - Recruitment support available to nurture Cheshire East's economy ahead of second lockdown
- 03/11/2020 - Council extends Covid-19 community response and recovery fund
- 03/11/2020 - Cheshire East Council sees a fairer future ahead
- 03/11/2020 - Chance to voice views on HMOs
- 02/11/2020 - Leaders respond to new national restrictions affecting Cheshire

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Have your say

Consultations

- [Article 4\(1\) Directions - ends 30 November](#)
- [Cheshire East active travel - have a say on your town](#)
- [Cheshire East Waste Strategy Review Consultation - ends 2 November 2020](#)
- [Corporate Plan Engagement - ends 27 November 2020](#)
- [Site Allocations and Development Policies Document - ends Monday 7 December 5.00pm](#)
- [Draft Houses In Multiple Occupation Supplementary Planning Document - ends Monday 7 December 5.00pm](#)
- [Join the digital influence panel](#)

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- [Comment on a current planning application](#)

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In Focus



National COVID Alert
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New National Restrictions from 5 November
[National Restrictions advice](#)

News

- [17/11/2020 - Cheshire East wants your feedback on green priorities](#)
- [16/11/2020 - Council sees rise in illegal and anti-social parking during lockdown 2](#)
- [13/11/2020 - Cheshire East approves crowdfunding policy](#)
- [12/11/2020 - Bin collections to continue in lockdown with new Christmas collection dates advised](#)
- [12/11/2020 - Cheshire East Council pushes ahead with town's regeneration plans](#)

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Current consultations

Cheshire East Waste Strategy Review Consultation

The Waste Strategy has been guiding Cheshire East Council's decisions for the past five years. It is now time to see if it remains relevant and to make sure we are focussed on the right priorities. The strategy was taken to the Council's March 2020 Cabinet meeting and given approval, but cannot be finalised until you have had your say.

- [Read the updated draft municipal waste strategy \(PDF, 3MB\)](#)
- [Respond to the consultation on the online survey](#)

Please submit your views by **Monday 2 November**.

Corporate Plan Engagement

Cheshire East Council has drafted a new draft Corporate Plan for 2020 to 2024. The purpose of this plan is to set out council priorities for the next 4 years.

We would like to know what you think of this plan, and how you think it might be improved.

- [Visit the Corporate Plan Engagement Hub to explore the draft and to feedback your views](#)

Engagement closes on **Friday 27 November**.

Article 4(1) Directions to withdraw permitted development rights for the change of use of dwellings to small houses in multiple occupation in parts of Crewe

Three non-immediate Article 4 Directions were made on 6 October 2020, meaning that planning permission will be required to use a dwelling (use class C3) as a small HMO (use class C4) within the areas of the Directions (subject to confirmation) once they come into force on 1 November 2021. The Directions relate to the Nantwich Road, West Street and Hungerford Road areas of Crewe.

- [Visit the Article 4 Directions page to view the documents and submit your views](#)

Please submit your views by **5:00pm on Monday 30 November**.

Site Allocations and Development Policies Document

The Site Allocations and Development Policies Document (SADPD) includes non-strategic planning policies and site allocations. It has been prepared to support the strategic policies of the Local Plan Strategy.

Following consultation in 2019, the draft SADPD has been amended and the council has now published the Revised Publication Draft SADPD to invite further representations before it is submitted for examination by a planning Inspector.

Visit the [SADPD consultation portal](#) to read the documents and submit your views

The consultation starts on **26 October** and runs until **5:00pm on Monday 7 December**.

Draft Houses in Multiple Occupation Supplementary Planning Document

The Draft Houses in Multiple Occupation (HMO) Supplementary Planning Document (SPD) provides guidance around planning applications that involve the change of use (or extension) of buildings to HMOs across the borough.

Visit the [HMO consultation portal](#) to read the document and submit your views

The consultation starts on **26 October** and runs until **5:00pm on Monday 7 December**.

Draft Tenancy Strategy Consultation

In line with Section 150 of the Localism Act 2011, Cheshire East Council has drafted a Tenancy Strategy.

The council is now carrying out a 12 week consultation on the draft Tenancy Strategy, and is seeking the views of local social landlords, present and future social housing applicants on Cheshire

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Cheshire East Local Plan

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

Our [Strategic Planning Update](#) provides a regular bulletin on planning policy matters affecting Cheshire East.

Key Local Plan documents

A number of key Local Plan documents are part of the statutory development plan, which is the basis for deciding planning applications. Those documents that are still in draft will become part of the development plan once adopted.

Document	Status	Description
Local Plan Strategy	Adopted 27 July 2017.	The LPS sets out strategic priorities for the development of the area along with planning policies and proposals. It is accompanied by an interactive policies map.
Site Allocations and Development Policies document	Revised draft published 26 October 2020.	The SADPD will allocate the remaining sites needed for future development and set out further detailed planning policies to be used when considering planning applications. We are inviting representations on the Revised Publication Draft SADPD from 26 October until 5:00pm on 7 December.
Minerals and Waste Development Plan Document	Draft in preparation.	The MWDPD will set out policies for dealing with minerals and waste, and identify sites.
Crewe Hub Area Action Plan	Draft in preparation	The Crewe Hub AAP will establish a planning framework to facilitate and manage development around a future HS2 hub station in Crewe.
Saved Policies from previous Local Plans	Saved development plan policies.	A number of saved policies from the Congleton Local Plan, Crewe and Nantwich Local Plan, Macclesfield Local Plan, Cheshire Waste Plan and Cheshire Minerals Plan will continue to be used until the SADPD and MWDPD have been adopted.

In addition to the Local Plan documents above, [completed Neighbourhood Plans](#) are also part of the statutory development plan.

Supporting Local Plan documents

The Local Plan also includes a number of other supporting documents. These are not part of the statutory development plan but may be material considerations in the determination of planning applications.

Item	Description
Community Infrastructure Levy	The CIL is a fixed rate charge on the internal floor area of new housing and retail developments in certain areas of the borough.
Supplementary Planning Documents	SPDs give more detailed guidance on the implementation of policies, for example on design, heritage or specific sites or locations. We are consulting on a draft Houses in Multiple Occupation SPD from 26 October until 5:00pm on 7 December.

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Authority Monitoring	The AMR reports on progress in producing Local Plan documents and implementing planning policies. Data is reported on targets and indicators to help

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Site Allocations and Development Policies Document



The Local Plan Strategy is the first part of the new Local Plan and was adopted in 2017. This SADDP will form the second part of the Local Plan, supporting the policies and proposals in the LPS by providing additional non-strategic policy detail and allocating additional sites to assist in meeting the overall development requirements set out in the LPS.

The SADDP is currently a draft document.

Revised publication draft consultation

Following consideration of the responses received to the 2019 Initial Publication Draft SADDP, a Revised Publication Draft SADDP has now been published to invite further representations from 26 October until 5:00pm on 7 December.

You can find further information, read all the consultation documents and submit your comments on the [Revised SADDP consultation portal page](#).

Following this consultation period, there will be a council decision to submit the SADDP for examination by a planning inspector.

Previous stages

Initial publication draft 2019

The 2019 Publication Draft SADDP was published to invite representations before its submission for examination by a planning inspector. Consultation on the 2019 Publication Draft SADDP took place between 19 August and 30 September 2019. The council also published a number of supporting documents in the 2019 Publication Draft SADDP Evidence Base as well as a [Housing Completions and Commitments](#) at 31 March 2019 Report (PDF, 13.6MB).

The 2019 Publication Draft Report of Consultation (PDF, 4.7 MB) has now been published. Over 2,700 responses were received and following consideration of these, amendments have been made to the SADDP and its supporting evidence base that will require a further round of consultation before the SADDP is submitted for examination under Section 20 of the Planning and Compulsory Purchase Act 2004.

First draft SADDP 2018

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

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

Issues paper 2017

An initial consultation on the Site Allocations and Development Policies Issues Paper took place between 27 February and 10 April 2017, alongside a separate 'call for sites' exercise to inform the allocation of development sites.

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

We have now published the [Report of Consultation on the SADDP Issues Paper](#) (PDF, 2.6 MB).

[Call for sites](#)

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The [SADPD](#) is currently a draft document.

Revised publication draft consultation

Following consideration of the responses received to the 2019 Initial Publication Draft [SADPD](#), a Revised Publication Draft [SADPD](#) was published to invite further representations on 26 October. Due to the current restrictions related to Covid-19, the deadline for submitting representations has been extended until 5:00pm on Wednesday 23 December.

You can find further information, read all the consultation documents and submit your comments on the [Revised SADPD consultation portal page](#).

Following this consultation period, there will be a council decision to submit the [SADPD](#) for examination by a planning inspector.

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Call for sites

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Please see the [Local Plan](#) pages for further information on the Cheshire East Local Plan.

Current public notices:

Site Allocations and Development Policies Document

The council has published the Revised Publication Draft Site Allocations and Development Policies Document to invite representations by 5:00pm on 7 December 2020.

Further information is set out in the [SADPD Statement of the Representations Procedure \(PDF, 95KB\)](#).

Draft Houses in Multiple Occupation Supplementary Planning Document

The council has published the Draft Houses in Multiple Occupation Supplementary Planning Document to invite representations by 5:00pm on 7 December 2020.

Further information is set out in the [Notice of Publication of Draft Supplementary Planning Document \(PDF, 278KB\)](#).

Article 4(1) Directions

The council made three non-immediate Article 4(1) Directions on 6 October 2020. The Directions relate to the change of use of a building falling within Class C3 (dwellinghouse) to Class C4 (house in multiple occupation) and apply to specific areas of Crewe.

The [Notice of Making Directions Without Immediate Effect Made Under Article 4\(1\) Relating to Areas of Crewe \(PDF, 74KB\)](#) gives further information and how to make representations by 5:00pm on 30 November 2020.

Strategic Planning privacy notice

The [Strategic Planning \(including Neighbourhood Planning\) Team privacy notice](#) explains how we store and process personal data.

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Press releases (2020)



Council proposes to remove green belt site allocations

16 September 2020

Cheshire East council is taking the next steps towards finalising the second part of its Local Plan Strategy.

The Local Plan was approved in 2017. The second part of the plan - known as the site allocations and development policies document (SADPD) - is now progressing and the latest draft contains up-to-date planning policies and new, small-scale, potential sites for housing and employment development.

The proposed revisions include:

- Removal of housing allocations around designated local service centres, most of which would have involved taking more land out of the green belt;
- Revised policies for retail development and town centres, reflecting reduced demand for new retail floorspace and a need for diversified uses in town centres to support their vitality; and
- Higher environmental standards for new homes to help tackle climate change.

The revised document will go before the council's strategic planning board on 23 September followed by cabinet on 6 October. If approved, the updated SADPD will be re-published to allow further representations to be made.

The SADPD will require approval by full council, scheduled for spring 2021. The representations will then be submitted to the government, alongside the supporting evidence, and will be considered by a planning inspector during the examination.

Councillor Toni Fox, Cheshire East Council cabinet member for planning said: “We promised during the public consultation last year that we would carefully consider all the comments that were made. These revisions demonstrate that we have fully considered and reviewed the 2,700 responses submitted alongside the latest evidence and information.

“Planning always involves balancing a range of issues – facilitating new homes, jobs and other investments that are needed, whilst protecting our local environment and the health and wellbeing of our residents.

"The revisions we have made reflect all of these considerations.

“We are conscious that central government is consulting on proposals to radically reform the planning system, including the way in which councils prepare their local plans.

“This inevitably raises some uncertainty for councils currently preparing plans, and residents.

"However, until we have more detail it is impossible to gauge how these may affect the emerging SADPD. At this time therefore it is important to progress this document to its next stage.”



Press release 1 dated 16 September 2020



Further chance to voice views on revised planning policy

23 October 2020

Cheshire East residents are being invited to comment again on the second part of the borough's Local Plan, ahead of its submission for examination by an independent planning inspector.

Following feedback on the previous draft in late 2019, the council's cabinet has now agreed changes to the site allocations and development policies document (SADPD), taking on board a wide range of comments from the public.

This final draft is now available to view on the council's website and at public libraries. Owing to the current Covid-secure arrangements, members of the public are asked to make an appointment in advance if they wish to view these documents at one of our libraries.

The SADPD sets out more detailed planning guidelines, aimed at ensuring new development is of a high quality and is well designed. Among the revisions to the SADPD are:

- Retention of green belt sites previously earmarked for development; and
- Strengthened environmental standards for new development to help tackle climate change.

Councillor Toni Fox, Cheshire East Council cabinet member for planning, said: "The site allocations policy document will have a central role in deciding planning applications and will therefore help to shape the quality of the places in which we live.

"I would urge residents to submit any further views they may have so they can be put before the planning inspector who will scrutinise the plan.

"The revisions we have made are a direct response to the comments we have received from our residents."

The consultation is open for six weeks beginning on Monday 26 October and closing at 5pm on 7 December.



[More information about the revised SADPD and how to respond to it is available on this website.](#)

or you can contact the council's strategic planning team via email:
localplan@cheshireeast.gov.uk

or telephone 01270 685893

Press release 2 dated 23 October 2020



Cheshire East Council extends deadline for feedback on key planning policies

20 November 2020

Residents and other stakeholders are being given more time to put forward their views about a number of key planning documents.

Cheshire East Council is currently seeking views on its Site Allocations and Development Policies Document (SADPD), draft supplementary planning document (SPD) for houses in multiple occupation (HMOs) and three Article 4 Directions in Crewe that would bring all HMOs in these areas under full planning control.

These documents are available online and were also being made available to view in libraries. However, due to national Covid-19 restrictions, libraries are currently closed. In order to ensure that people can have their say, the deadlines for commenting on these documents are being extended.

In the case of the SADPD and SPD, the new response deadline is 5pm on Wednesday 23 December.

In the case of the three Article 4 Directions, the new response deadline is 5pm on Monday 11 January.

More information about each of these documents, including how to put your views forward, is available [on the council's website](#)

Anyone who wishes to read and respond to the documents, but does not have access to the internet, is requested to contact the council's strategic planning team on 01270 685893. The team will assist everyone who gets in touch, taking into account their individual circumstances.

Councillor Toni Fox, Cheshire East Council cabinet member for planning, said: “The national Covid-19 restrictions have been put in place part way through the public engagement period for these documents, so it’s right that we extend the deadlines. We want to give everyone the opportunity to feed back their views.

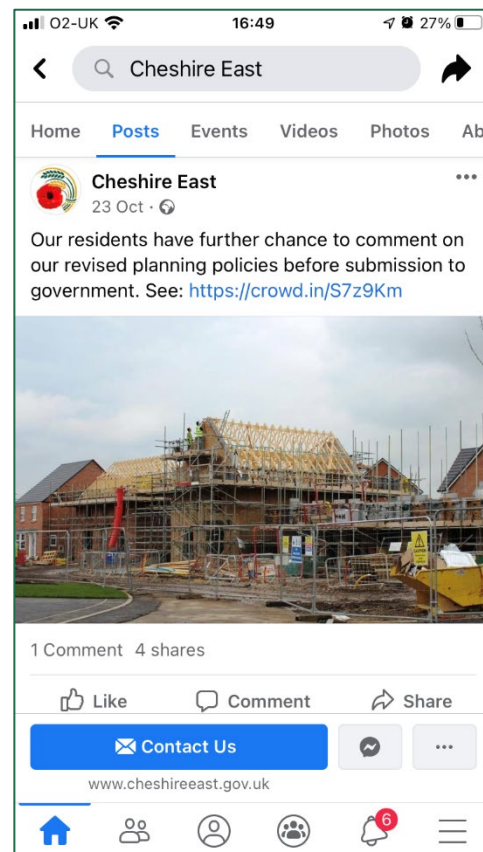
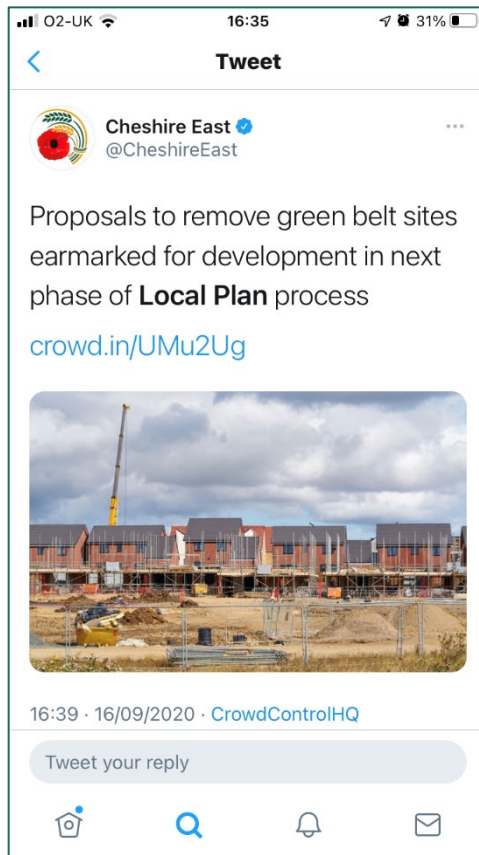
“The national measures are currently proposed to come to an end after Wednesday 2 December, but we may still need to consider the effect of any ongoing restrictions that may come into force after that date.

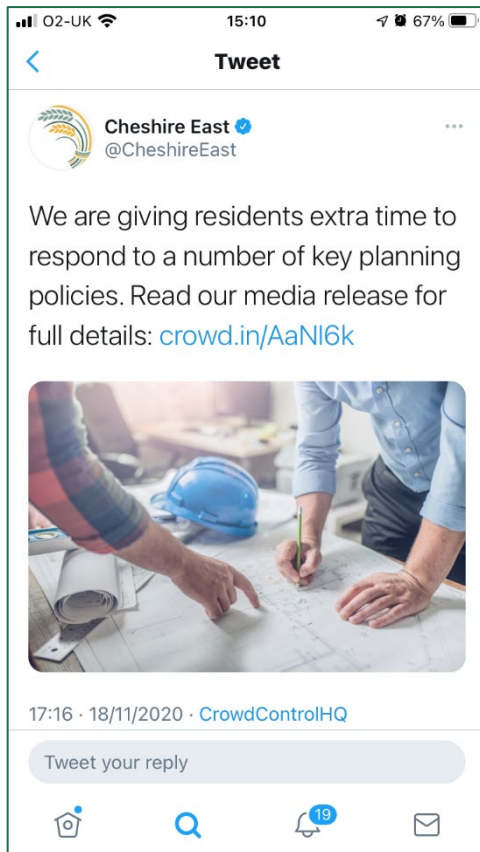
“Each of these documents serves an important purpose, so we will continue to make every effort to progress their preparation. Our objective is to do everything we reasonably can to enable everyone to respond as the situation changes.”



Press release 3 dated 20 November 2020

Social media posts (2020)






Screen shots from the consultation portal (2020)

The screenshot displays the Cheshire East Council Consultation Portal. The header includes the council's logo, the title 'Consultation Portal', and links for Accessibility, Privacy, Home, and Contact Us. A search bar and navigation links (Login / Register, Who Said What?, Help, Print) are also present.

The main content area is titled 'Revised Publication Draft Site Allocations and Development Policies Document'. It provides information about the document's purpose, the consultation process, and the deadline for comments. A 'Read and comment on document' button is prominently displayed.

Below the main text, there are tabs for 'Event Information', 'Supporting Documents', and 'All Comments'. The 'Event Information' tab is active, showing details such as Access (Login required), Status (open), Privacy (name and answers may be displayed), Description (Revised Publication Draft SADPD), Organisation (Cheshire East Council), Contact Name (Strategic Planning Team), Contact Email (localplan@cheshireeast.gov.uk), Contact Telephone (01270 685893), Other Contact (SADPD Representations c/o Print Unit Cheshire East Council Town Hall Macclesfield SK10 1EA), and Subject (Local development plans, Sustainable development, Planning (town and country), Development planning (rural), Development planning (towns), Sites and projects policies (planning), Local development, Sustainability (environmental), Sustainability (economic), Consultation (public)).

Screen shot of SADPD consultation portal page (taken 19 Nov 2020)



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[Consultation Home](#) > [Planning](#) > [Cheshire East Local Plan](#) > [Site Allocations and Development Policies Document](#) > **Sustainability Appraisal (Revised Publication Draft SADPD)**

Sustainability Appraisal (Revised Publication Draft SADPD)

The Sustainability Appraisal assesses the extent to which the Revised Publication Draft Site Allocations and Development Policies Document (SADPD) will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.

Following consultation in 2019, the draft SADPD and its Sustainability Appraisal have been amended. The council has now published the updated Sustainability Appraisal to invite further representations before the SADPD is submitted for examination by a planning inspector. The purpose of the examination will be to consider whether the SADPD complies with all legal requirements and is 'sound'.

Consultation documents

You can read and comment on the Sustainability Appraisal online using this consultation portal, by clicking the "Read and Comment on Document" button below.

In addition to the Sustainability Appraisal, we are also inviting representations on the [Revised Publication Draft SADPD](#) itself, as well as its [Habitats Regulations Assessment](#).


Further information

We have published a [Consultation Guidance Note](#) to explain more about the SADPD and to assist in making effective representations for the inspector to consider.

All representations must be received by the council by 5:00pm on **Monday 23 December 2020**. Your personal information will be processed in line with our [Strategic Planning Privacy Notice](#) and your name, town and comments will be published on this consultation portal.

As required by the relevant regulations, we have also published a formal "Statement of the Representations Procedure".

Representations should be submitted using this consultation portal. For those without access to the consultation portal, we will accept representations submitted by [alternative methods](#).



Event Information

Supporting Documents

Access: Login required

Status: open (From 26/10/20 07:00 to 23/12/20 17:00)

Privacy: If you take part, your name may be displayed, your answers may be displayed, your town/city may be displayed

Description: Consultation on the Sustainability Appraisal of the Revised Publication Draft SADPD. The Sustainability Appraisal assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives.

Organisation: Cheshire East Council

Contact Name: Strategic Planning Team

Contact Email: localplan@cheshireeast.gov.uk

Contact Telephone: 01270 685893 (please leave a message)


Other Contact Information: SADPD Representations c/o Print Unit Cheshire East Council Town Hall Macclesfield SK10 1EA

Subject: Local development plans, Sustainable development, Planning (town and country), Development planning (rural), Development planning (towns), Sites and projects policies (planning), Local development, Sustainability (environmental), Sustainability (economic), Consultation (public)

Sharing Tools

What do these do?

Screen shot of Sustainability Appraisal consultation portal page (taken 19 Nov 2020)



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[Consultation Home](#) > [Planning](#) > [Cheshire East Local Plan](#) > [Site Allocations and Development Policies Document](#) > **Habitats Regulations Assessment (Revised Publication Draft SADPD)**

Habitats Regulations Assessment (Revised Publication Draft SADPD)

The Habitats Regulations Assessment considers the impact of policies and proposals in the Revised Publication Draft Site Allocations and Development Policies Document (SADPD) on internationally-designated nature conservation sites.

Following consultation in 2019, the draft SADPD has been amended and the Habitats Regulations Assessment has been updated to consider the Revised Publication Draft SADPD. The council has now published the updated Habitats Regulations Assessment to invite further representations before it is submitted for examination by a planning inspector. The purpose of the examination will be to consider whether the SADPD complies with all legal requirements and is 'sound'.

Consultation documents

You can download a PDF version of the updated [Habitats Regulation Assessment Document](#) here. To comment online using this consultation portal, please log-in or register and then click the 'Start Survey' button below.

In addition to the Habitats Regulations Assessment, we are also inviting representations on the [Revised Publication Draft SADPD](#) itself, as well as its [Sustainability Appraisal](#).

Further information

We have published a [Consultation Guidance Note](#) to explain more about the SADPD and to assist in making effective representations for the inspector to consider.

All representations must be received by the council by 5:00pm on **Wednesday 23 December 2020**. Your personal information will be processed in line with our [Strategic Planning Privacy Notice](#) and your name, town and comments will be published on this consultation portal.

As required by the relevant regulations, we have also published a formal "Statement of the Representations Procedure".

Representations should be submitted using this consultation portal. For those without access to the consultation portal, we will accept representations submitted by [alternative methods](#).

In order to complete this form you must first [log in](#) or [register](#) if you have not yet done so already.

Event Information

Supporting Documents

Access: Login required

Status: open (From 26/10/20 07:00 to 23/12/20 17:00)

Privacy: If you take part: your name may be displayed, your answers may be displayed, your town/city may be displayed

Description: Consultation on the Habitats Regulations Assessment of the Revised Publication Draft SADPD. The Habitats Regulations Assessment considers the impact on internationally-designated nature conservation sites.

Organisation: Cheshire East Council

Contact Name: Strategic Planning Team

Contact Email: localplan@cheshireeast.gov.uk

Contact Telephone: 01270 685893 (please leave a message)

Other Contact Information: SADPD Representations c/o Print Unit Cheshire East Council Town Hall Macclesfield SK10 1EA


Subject: Local development plans, Sustainable development, Planning (town and country), Development planning (rural), Development planning (towns), Sites and projects policies (planning), Local development, Sustainability (environmental), Sustainability (economic), Consultation (public)

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What do these do?

**Screen shot of Habitats Regulations Assessment consultation portal page
(taken 19 Nov 2020)**



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[Consultation Home](#) > [Planning](#) > [Cheshire East Local Plan](#) > [Site Allocations and Development Policies Document](#) > **Revised Publication Draft SADPD Alternative Response Methods**

Revised Publication Draft SADPD Alternative Response Methods

Representations are invited on the Revised Publication Draft SADPD using this consultation portal. Further information is available on the [Revised Publication Draft SADPD Consultation Portal Page](#).

For those without access to the consultation portal, we will accept representations by email or by post. In order to make effective representations in the format recommended by the Planning Inspectorate, we strongly recommend that all representations are submitted using the official representations forms. However, all representations will be accepted and submitted to the planning inspector, including those not made using the official representations forms.

For those unable to access the consultation portal

If you are not able to access the consultation portal, you can download PDF representations forms and respond by email. Please complete one Part A Representations Form (personal details) and then a separate Part B Representations Form for each representation you wish to make. The return email address details are included in the Part A Representations Form.

- Part A Representations Form (personal details)
- Part B Representations Form (please complete a separate part B form for each representation)

The consultation documents and all the supporting documents can be downloaded from the [Revised Publication Draft SADPD Evidence Base page](#).

For those without access to the Internet/email

If you are not able to access the consultation portal or download the PDF forms and return by email, you can collect printed copies of the representations forms from any library in Cheshire East (including the mobile library). In line with regulations to prevent the spread of Covid-19, all libraries will be closed between 5 November and 2 December. Outside of these dates, opening hours may be restricted due to Covid-19 and you are advised to check the [current libraries opening times](#) on our website or telephone the 24 hour library information service on 0300 123 7739.

Please complete one Part A Representations Form (personal details) and then a separate Part B Representations Form for each representation you wish to make. The return postal address is included on the Part A Representations Form.

The consultation documents plus the draft policies map are also available for inspection in libraries.

For those not able to visit a library

If you are not able to access the consultation portal, download the PDF forms and return by email, or collect printed copies of the representations forms from a library, we will endeavour to make the representations forms and consultation documents available to you by an alternative means. Please contact us for assistance on 01270 685893, leaving a message with your full name and address details, plus the documents that you require.

Please be aware that members of the Strategic Planning Team are currently working from home and do not have easy access to printing and postage facilities. If requesting printed copies of documents, there may be a short delay in sending these out and a reasonable charge may be made to cover printing and postage costs.

Further information

Representations must be made using the [consultation portal](#), by email (localplan@cheshireeast.gov.uk), or by post (SADPD Representations, c/o Print Unit, Cheshire East Council, Town Hall, Macclesfield SK10 1EA). The deadline for making responses has been extended and all representations must now reach us by **5pm on Wednesday 23 December 2020**. Representations made by any other means cannot be accepted (including by social media or by telephone). We are not able to accept anonymous representations and you must provide us with your name and contact details.

Your personal information will be processed in line with our [Strategic Planning Privacy Notice](#) and your name, town and comments will be published on this consultation portal.


We have published a [Consultation Guidance Note](#) to explain more about the SADPD and to assist in making effective representations for the inspector to consider.

As required by the relevant regulations, we have also published a formal "Statement of the Representations Procedure".


Event Information

Supporting Documents

Access:

 Login required

Status:

 open (From 26/10/20 07:00 to 23/12/20 17:00)


Privacy:

If you take part: your name may be displayed, your answers may be displayed, your town/city may be displayed

Description:

For those without access to the consultation portal, this page details the alternative methods for submitting representations on the Revised Publication Draft SADPD

**Screen shot of alternative response methods consultation portal page
(taken 19 Nov 2020)**



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[Consultation Home](#) > [Planning](#) > [Cheshire East Local Plan](#) > [Site Allocations and Development Policies Document](#) > **Revised Publication Draft SADPD Evidence Base**

Revised Publication Draft SADPD Evidence Base

In accordance with the requirements of the National Planning Policy Framework, the Revised Publication Draft Site Allocations and Development Policies Document (SADPD) is supported by an up-to-date, relevant and proportionate evidence base, which has informed the planning policies and site allocations proposed in the plan.

Key documents are available to download from this page and other related documents and links are also listed in Appendix A of the Revised Publication Draft SADPD.

Consultation on the Revised Publication Draft SADPD is taking place from 26 October to 5:00pm on Wednesday 23 December 2020.

Reference	Document	Format/Size	Date	Author
ED 01a	Revised Publication Draft Site Allocations and Development Policies Document (version showing tracked changes)	PDF/2.6MB	2020	Cheshire East Council
ED 01b	Revised Publication Draft Site Allocations and Development Policies Document ('clean' version)	PDF/2.2MB	2020	Cheshire East Council
ED 01c	Schedule of Changes to the Initial Publication Draft SADPD	PDF/341KB	2020	Cheshire East Council
ED 01d	Initial Publication Draft Site Allocations and Development Policies Document	PDF/3.0MB	2019	Cheshire East Council
ED 02	Draft adopted policies map (online interactive version) Draft adopted policies map (PDF booklet)	Webpage PDF/21.0MB	2020	Cheshire East Council
ED 03	Revised Publication Draft SADPD Sustainability Appraisal	PDF/5.6MB	2020	Cheshire East Council
ED 03a	Revised Publication Draft SADPD Sustainability Appraisal Non-technical summary	PDF/815KB	2020	Cheshire East Council
ED 04	SADPD Habitats Regulations Assessment (Revised Publication version)	PDF/2.5MB	2020	JBA Consulting
ED 05	The Provision of Housing and Employment Land and the Approach to Spatial Distribution	PDF/1.0MB	2020	Cheshire East Council
ED 06	Settlement and Infill Boundaries Review	PDF/13.7MB	2020	Cheshire East Council
ED 07	Site Selection Methodology Report	PDF/387KB	2020	Cheshire East Council
ED 08	Strategic Green Gaps Boundary Definition Review	PDF/2.1MB	2020	Cheshire East Council
ED 09	Ecological Network for Cheshire East	PDF/573KB	2017	Total Environment
ED 10	Cheshire East Landscape Character Assessment Landscape Character Assessment Appendices	PDF/52.0MB PDF/17.0MB	2018	LUC
ED 11	Cheshire East Local Landscape Designation Review	PDF/6.9MB	2018	LUC
ED 12	Employment Allocations Review	PDF/3.4MB	2020	Cheshire East Council
ED 13	Cheshire East, Cheshire West and Chester, Halton and Warrington Gypsy, Traveller and Travelling Showpeople Accommodation Assessment	PDF/3.2MB	2018	Opinion Research Services
ED 14	Gypsy, Traveller and Travelling Showpeople Site Selection Report	PDF/3.3MB	2019	Cheshire East Council
ED 15	Aircraft Noise Policy Background Report	PDF/1.2MB	2020	Jacobs
ED 16	Threshold Policy for Main Town Centres Uses Impact Test: Evidence and Justification Report	PDF/555KB	2018	WYG
ED 17	Cheshire East Retail Study Partial Update	PDF/17.2MB	2020	WYG
ED 18	Green Space Strategy Update Green Space Strategy Technical Appendices Outdoor Sports Technical Appendices	PDF/15.4MB PDF/1.5MB PDF/4.3MB	2020 2018 2019	Cheshire East Council
ED 19	Cheshire East Playing Pitch Strategy and Action Plan	PDF/2.7MB	2019	Knight, Kavanagh & Page
ED 19a	Playing Pitch Strategy Assessment Report Update	PDF/3.1MB	2019	Knight, Kavanagh & Page
ED 20	Cheshire East Indoor Built Facilities Strategy	PDF/842KB	2017	Knight, Kavanagh & Page
ED 20a	Indoor Built Facilities Strategy Progress and Evidence Review	PDF/424KB	2019	Cheshire East Council
ED 21	Alderley Edge Settlement Report	PDF/7.5MB	2020	Cheshire East Council
ED 22	Alsager Settlement Report	PDF/1.4MB	2020	Cheshire East Council
ED 24	Bollington Settlement Report	PDF/8.3MB	2019	Cheshire East Council
ED 25	Bunbury Settlement Report	PDF/1.4MB	2020	Cheshire East Council
ED 26	Chelford Settlement Report	PDF/3.3MB	2020	Cheshire East Council
ED 27	Congleton Settlement Report	PDF/5.0MB	2020	Cheshire East Council
ED 28	Crewe Settlement Report	PDF/12.0MB	2020	Cheshire East Council
ED 29	Disley Settlement Report	PDF/5.9MB	2020	Cheshire East Council
ED 30	Goostrey Settlement Report	PDF/7.15KB	2020	Cheshire East Council
ED 31	Handforth Settlement Report	PDF/4.4MB	2020	Cheshire East Council
ED 32	Haslington Settlement Report	PDF/1.9MB	2020	Cheshire East Council
ED 33	Holmes Chapel Settlement Report	PDF/769KB	2020	Cheshire East Council
ED 34	Knutsford Settlement Report	PDF/3.9MB	2020	Cheshire East Council
ED 35	Macclesfield Settlement Report	PDF/8.0MB	2020	Cheshire East Council
ED 36	Middlewich Settlement Report	PDF/4.2MB	2020	Cheshire East Council
ED 37	Mobberley Settlement Report	PDF/4.0MB	2020	Cheshire East Council
ED 38	Nantwich Settlement Report	PDF/4.4MB	2020	Cheshire East Council
ED 39	Poynton Settlement Report	PDF/1.3MB	2020	Cheshire East Council
ED 40	Prestbury Settlement Report	PDF/8.6MB	2020	Cheshire East Council
ED 41	Sandbach Settlement Report	PDF/5.1MB	2020	Cheshire East Council
ED 42	Shavington Settlement Report	PDF/1.7MB	2020	Cheshire East Council
ED 43	Wilmslow Settlement Report	PDF/5.8MB	2020	Cheshire East Council
ED 44	Wrenbury Settlement Report	PDF/1.2MB	2020	Cheshire East Council
ED 45	Call for Sites Report	PDF/28.3MB	2020	Cheshire East Council
ED 46	Other Settlements and Rural Areas Report	PDF/886KB	2020	Cheshire East Council
ED 47	Cheshire East Green Infrastructure Plan Green Infrastructure Plan Appendices	PDF/3.7MB PDF/7.9MB	2019	The Environment Partnership
ED 48	Heritage Impact Assessments of Sites in Local Plan Site Selection (1) Heritage Impact Assessments of Sites in Local Plan Site Selection (2)	PDF/8.0MB PDF/5.1MB	2018 2019	Cheshire East Council
ED 49	Cheshire East Residential Mix Assessment	PDF/1.0MB	2019	Opinion Research Services
ED 50	Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report	PDF/1.8MB	2020	Cheshire East Council
ED 51	SADPD Duty to Co-operate Statement of Common Ground	PDF/543KB	2020	Cheshire East Council
ED 52	Local Plan Site Allocations and Development Policies Viability Assessment	PDF/12.3MB	2020	HDH Planning and Development
ED 53	Local Service Centres Safeguarded Land Distribution Report	PDF/6.8MB	2020	Cheshire East Council
ED 54	Local Plan Monitoring Framework	PDF/266KB	2020	Cheshire East Council
ED 55	Green Infrastructure Assessment of Cheshire East	PDF/4.7MB	2018	The Mersey Forest
ED 56	SADPD Consultation Statement	PDF/5.0MB	2020	Cheshire East Council
ED 57	Nationally Described Space Standards	PDF/4.1MB	2019	Cheshire East Council
ED 58	The Approach Towards Small Sites	PDF/1.2MB	2020	Cheshire East Council

Event Information

Supporting Documents

Access: No login required

Status: open (From 26/10/20 07:00 to 23/12/20 17:00)

Screen shot of consultation portal evidence base page (taken 19 Nov 2020)

Representations forms (2020)

Cheshire East Local Plan Representation Form



Name of the Local Plan to which this representation relates:

Site Allocations and Development
Policies Document

Please return to:

localplan@cheshireeast.gov.uk
or by post to: SADPD Representations, c/o Print Unit,
Cheshire East Council, Town Hall, Macclesfield SK10 1EA

Please return by:

5pm, Wednesday 23 December 2020

This comment form has two parts:

- Part A – Personal details: need only be completed once
- Part B – Your representation(s): please fill in a separate sheet for each representation you wish to make

Part A: Personal Details

	1. Personal Details*	2. Agent's Details (if applicable)
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address (where relevant)	<input type="text"/>	<input type="text"/>
Your Reference No. (if known)	<input type="text"/>	<input type="text"/>

Please complete a separate [Part B form](#) for each representation that you would like to make. We are not able to accept anonymous comments and you must provide us with your name and contact details. Your personal data will be processed in line with our [Strategic Planning Privacy Notice](#). For further assistance in making representations please contact the Strategic Planning Team at localplan@cheshireeast.gov.uk. If you are not able to email, please telephone us on 01270 685893 and leave a message.

Part B: Representation

Please use a separate sheet for each representation. This form is adapted from the Planning Inspectorate's model form. We have also published a separate [guidance note](#) to explain the terms used and to assist in making effective representations. **One [Part A](#) form must be enclosed with your Part B forms.**

Name and
Organisation:

Office Use Only: AID:

PID:

RID:

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

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

To which part of the document does this representation relate?

Paragraph

Policy

Site

Policies
map

Q1. Do you consider the SADPD is:

- | | | |
|---|------------------------------|-----------------------------|
| (1) Legally compliant | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (2) Sound | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| (3) Compliant with the Duty to co-operate | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

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

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

(Continue on a separate sheet if necessary)

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

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

(Continue on a separate sheet if necessary)

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

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

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

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

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

☐ **Yes**, I wish to participate in hearing session(s)


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

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

Signature

Date

Printed representations form 2020

 These comments are for this paragraph (1.1)

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

This form is adapted from the Planning Inspectorate's model form, to invite representations in the format required by the planning inspector. We have also published a [guidance note](#) to explain the terms used and to assist in making effective representations.

The inspector will consider the representations to the initial Publication Draft SADPD made in 2019 as well as all the representations made to this Revised Publication Draft SADPD. If your views on the SADPD have not changed since the 2019 version, you do not need to submit your representations again.

Your personal data will be processed in line with our [privacy notice](#) and your name, town and full response will be published online.

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

Q1

Do you consider the SADPD is:

	Yes	No
(1) Legally compliant	<input type="radio"/>	<input type="radio"/>
(2) Sound	<input type="radio"/>	<input type="radio"/>
(3) Compliant with the Duty to co-operate	<input type="radio"/>	<input type="radio"/>

Q2

Please give details of why you consider the SADPD is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the SADPD or its compliance with the duty to co-operate, please also use this box to set out your comments.

Q3

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

Supporting information

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

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

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

Upload:

No file chosen

Title

Q4

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

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

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

Q5

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

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

Thank you for using the consultation portal. Please make sure you submit your representation before 5pm on Wednesday 23 December 2020, using the 'submit' button below. Once processed by the council, submitted representations will be available to view on the consultation portal. There may be a delay before your representation is processed dependent on the volume of representations submitted.

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

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

✖ Cancel if you want to disregard the answers/changes you have made since your last save.

 **Cancel**  **Save as draft**  **Submit**

Electronic (consultation portal) representations form 2020

Consultation guidance note (2020)

Cheshire East Local Plan

Revised Publication Draft Site Allocations and Development Policies Document: Guidance Note (updated 17 November 2020)



1. Introduction

- 1.1 Cheshire East Council previously published the Site Allocations and Development Policies Document (SADPD) to invite representations on it between 19 August and 30 September 2019. Following consideration of the representations received, the council has revised the SADPD and its evidence base.
- 1.2 The Revised SADPD has now been published to invite further representations before it is submitted for examination by a Planning Inspector. Under the Planning and Compulsory Purchase Act 2004 (PCPA), the purpose of the examination is to consider whether the plan complies with the relevant legal requirements and is sound. The Inspector will consider all representations on the plan that were made during the 2019 consultation period, as well as all further representations to the revised plan that are made by 5:00pm on Wednesday 23 December 2020.
- 1.3 To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process know who has made representations on the plan. We cannot accept anonymous representations and you must provide us with your name and contact details when making representations. Personal data will be processed in line with our Strategic Planning Privacy Notice, which is available on the council's website. Representations will be published on the council's consultation portal alongside the name and town of the representor. The council will also make the names and addresses of those making representations available to the Inspector.

2. Planning Inspectorate Guidance

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

Legal Compliance and Duty to Co-operate

- 2.2 You should consider the following before making a representation on legal compliance:
 - The plan should be included in the council's current Local Development Scheme (LDS) and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the council proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. The LDS should be on the council's website.
 - The process of community involvement for the plan in question should be in general accordance with the council's Statement of Community Involvement (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
 - The council is required to provide a Sustainability Appraisal (SA) report when it publishes a plan. This should identify the process by which the SA has been carried out,

and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended (the Regulations).

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

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

Soundness

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

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

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

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

General advice

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

- 2.7 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.
- 2.8 Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 2.9 Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

3. Making Representations

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

Published Documents

- 3.2 The following consultation documents have been published for representations:
- The **Revised Publication Draft SADPD** has been prepared to support the policies and proposals of the Local Plan Strategy by providing additional policy detail. It includes non-strategic planning policies and site allocations;
 - The **Sustainability Appraisal** assesses the extent to which the SADPD will help to achieve relevant environmental, economic and social objectives, when judged against the alternatives; and
 - The **Habitats Regulations Assessment** which considers the impact on internationally-designated nature conservation sites.
- 3.3 There are also number of supporting documents (listed in Appendix A of the SADPD) proposed to be submitted alongside the SADPD. All of the proposed submission documents can be viewed on the consultation portal at:
<https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd>.
- 3.4 In addition, the SADPD, Draft Policies Map, Sustainability Appraisal and Habitats Regulations Assessment are available to view at public libraries in Cheshire East. In line with regulations to prevent the spread of Covid-19, all libraries will be closed between 5th November and 2nd December. Outside of these dates, opening hours may be restricted due to Covid-19 and you are advised to check the current libraries opening times on our website or telephone the 24 hour library information service on 0300 123 7739. If you are unable to inspect copies of the documents, please contact us using the details below to make alternative arrangements to inspect the documents during the representations period.
- 3.5 You can also submit representations on any of the supporting documents, but it would be helpful if you would relate these representations to the resulting paragraph, policy or site in the SADPD.

Submitting Representations

- 3.6 The council's online consultation portal should be used to submit responses. For those without access to the consultation portal, we will accept representations by email or by post. In order to make effective representations in the format recommended by the Planning Inspectorate, we strongly recommend that all representations are submitted using the official representations forms (available online and in libraries). However, all representations will be accepted and submitted to the planning inspector, including those not made using the official representations forms.

Online: Via the consultation portal at <https://cheshireeast-consult.objective.co.uk/portal/planning/cs/sadpd/rpdsadpd> or scan this QR code using your smartphone or tablet

Email: To localplan@cheshireeast.gov.uk

By post: SADPD Representations, c/o Print Unit,
Cheshire East Council, Town Hall, Macclesfield SK10 1EA



- 3.7 The inspector will consider the representations to the initial Publication Draft SADPD made in 2019 as well as all the representations made to this Revised Publication Draft SADPD. If your views on the SADPD have not changed since the 2019 version, you do not need to submit your representations again.
- 3.8 Please make sure that your comments reach us by **5pm on Wednesday 23 December 2020**. We are not able to accept anonymous comments and you must provide us with your name and contact details. Your personal data will be processed in line with our Strategic Planning Privacy Notice, which is available on the council's website. Your name, town and comments will be published and made available to view on the consultation portal.

Discrimination

- 3.9 When making representations, please be mindful that the full representation will be published, alongside your name and town. Under the Equality Act 2010, the council has a duty to foster good relations between different community groups, eliminate discrimination and advance equality of opportunity. As such, the council should not publish any statement about any particular community group that could be discriminatory, racist or offensive (or misinterpreted to be discriminatory, racist or offensive).
- 3.10 Representations that may be considered discriminatory, racist or offensive include generalisations, stereotypes or negative perceptions of race, ethnicity or culture. Where a representation is identified as potentially containing discriminatory, racist or offensive content, the Head of Planning is the designated officer to determine whether the representation is discriminatory, racist or offensive. If it is, the author will be invited to amend and re-submit their representation prior to the close of consultation to focus on planning issues including the tests of legal compliance and soundness.
- 3.11 Representations that are deemed to be offensive, abusive, insulting, threatening or inciting racial hatred are matters for the police.

Next Steps

- 3.12 After the representations period, the council will consider all the representations made and produce a summary of the main issues raised. The decision to formally submit the SADPD to the Secretary of State will be considered and made by a meeting of the full Council.

Further Information

- 3.13 If you are not able to access the consultation portal, download the PDF forms and return by email, or collect printed copies of the representations forms from a library, we will endeavour to make the representations forms and consultation documents available to you by an alternative means. Please contact us for assistance on 01270 685893, leaving a message with your full name and address details, plus the documents that you require.
- 3.14 Please be aware that members of the Strategic Planning Team are currently working from home and do not have easy access to printing and postage facilities. If requesting printed copies of documents, there may be a short delay in sending these out and a reasonable charge may be made to cover printing and postage costs.
- 3.15 For further information and assistance with submitting representations, please contact the Strategic Planning Team by email localplan@cheshireeast.gov.uk or telephone 01270 685893 (please leave a message).

Libraries poster (2020)

Planning policy documents: Extension to consultation period



The council is currently consulting on the:

- Revised Publication Draft Site Allocations and Development Policies Document; and
- Draft Houses in Multiple Occupation Supplementary Planning Document

The consultation documents have been placed in all libraries for viewing but due to the current restrictions related to Covid-19, it is expected that libraries will be closed between 5th Nov and 2nd Dec. As a result, the consultation period has been extended to **5:00pm on Wednesday 23rd December 2020**.

The **Site Allocations and Development Policies Document** includes non-strategic planning policies and site allocations. It has been prepared to support the strategic policies of the Local Plan Strategy and will be used to help make decisions on planning applications in the borough up to 2030. The draft document has been amended since the previous consultation in 2019 and it has now been published to invite further representations before it is submitted for examination by a planning inspector.

The draft **Houses In Multiple Occupation Supplementary Planning Document** provides guidance around planning applications that involve the change of use (or extension) of buildings to HMOs across the borough.

Further information and the consultation documents can be viewed on our website by scanning this code on your smartphone or tablet or by clicking the link at www.cheshireeast.gov.uk/consultations. Printed copies can be viewed by visiting your local library once it has re-opened.



If you wish to view the consultation documents whilst the libraries are closed but are unable to access them on our website, please contact the Strategic Planning Team for assistance, by email to localplan@cheshireeast.gov.uk or by telephone on 01270 685893 (please leave a message).

Date of notice: 18 November 2020

All other enquiries **0300 123 5500**

www.cheshireeast.gov.uk

Poster displayed on closed library doors

Schedule 2: Summary of the main issues and responses

Introduction

This Schedule provides a summary of the main issues raised by the Regulation 20 representations (at both the initial Publication Draft stage and the Revised Publication Draft stage).

The main issues are set out in plan order, followed by the main issues related to the Sustainability Appraisal and Habitats Regulations Assessment. Within the Chapter 12: Site Allocations section of the plan, the main issues are set out for each proposed site, for each named settlement in the settlement hierarchy (Principal Towns, Key Service Centres and Local Service Centres) and for the Other Settlements and Rural Areas.

For each main issue, the council has provided a brief response and indicated whether a change was made to the SADPD in response to that issue, prior to publishing the Revised Publication Draft SADPD.

The following abbreviations are used throughout the summary of the main issues and responses in this Schedule.

Abbreviation	Meaning
AMR	Authority Monitoring Report
AQMA	Air Quality Management Area
CHAAP	Crewe Hub Area Action Plan
CIL	Community Infrastructure Levy
GVA	Gross value added
HMO	Houses in multiple occupation
HRA	Habitats Regulations Assessment
HS2	High Speed 2 Rail
KSC	Key Service Centre
LDS	Local Development Scheme
LLD	Local landscape designation
LOAEL	Lowest observed adverse effect level
LPS	Local Plan Strategy
LSC	Local Service Centre
MWDPD	Minerals and Waste Development Plan Document
NPPF (2019)	National Planning Policy Framework 2019
NPPG	National Planning Practice Guidance
OSRA	Other Settlements and Rural Areas

PT	Principal Town
SA	Sustainability Appraisal
SACBH	Self and custom build housing
SADPD	Site Allocations and Development Policies Document
SCI	Statement of Community Involvement
SGG	Strategic green gap
SOAEL	Significant observed adverse effect level
SPD	Supplementary Planning Document
SSM	Site selection methodology
SuDS	Sustainable Drainage Systems
UOAEL	Unacceptable observed adverse effect level
WHS	World Heritage Site

Chapter 1: Introduction / general issues

Summary of the main issues raised	Revised SADPD amended?	Council response
The initial Publication Draft SADPD consultation process was not accessible to all (online only); did not allow for support of the non-inclusion of sites; and was unreasonably short. The form was too complicated, and no guidelines were published to assist people; there was little publicity.	No	The consultation was carried out in accordance with the Regulations and the council's SCI. It ran for six weeks and printed copies of documents were available in several locations, including libraries. The representations form and guidance note were based on the Planning Inspectorate's templates and representations could be made on any aspect of the plan. This consultation statement [ED 56a] sets out how the council has involved residents and key stakeholders when preparing the SADPD in accordance with Regulation 19 (the publication stage).
The SADPD has been prepared in the absence of a strategic spatial strategy for minerals. LPS Policy SE 10 'Sustainable provision of minerals' requires the SADPD to address minerals issues; it does not comply with the NPPF (2019) (¶¶204 and 208) as minerals are not afforded adequate protection. The SADPD risks the unnecessary sterilisation of nationally significant mineral resources.	No	As set out in the LDS, the council is preparing the MWDPD to bring forward minerals and waste policies and to identify specific sites for minerals/waste management. Minerals issues in the context of site selection are considered in the Chapter 12: Site allocations (general) section of this consultation statement appendix.
The SADPD fails to address the impacts of fracking on local communities, particularly with regards to environmental safeguards and traffic generation.	No	The LPS includes environmental and infrastructure policies, which are supplemented by further detailed policies in the SADPD. The MWDPD will consider the issue of hydraulic fracturing.
Saved policies from existing local plans should be retained, including the areas of special county value for landscape and the Macclesfield Borough Local Plan Policy H12 'Low density housing areas'.	No	Locally-designated landscapes are shown on the policies as 'Local landscape designations' and up-to-date policy is set out in LPS Policy SE 4 'The landscape'. Issues around low-density housing areas are considered in the Policy HOU 12 'Housing density' section of this consultation statement appendix.

SADPD proposals conflict with some neighbourhood plan policies.	No	Neighbourhood plans are considered in each of the settlement reports [ED 21-ED 44] and the Other Settlements and Rural Areas Report [ED 45]. The SADPD has been prepared to accord with their policies as far as possible. The SADPD policies are in conformity with the strategic policies of the LPS, but there is no test of soundness that requires conformity with neighbourhood plan policies. The NPPF 2019 (¶30) explains which policies will take precedence where they conflict with neighbourhood plan policies.
The SADPD seeks to meet housing numbers prescribed in the LPS, rather than the lower numbers set out in the national methodology. The SADPD underestimates the contribution that will be made from windfall sites.	No	The overall development strategy for the borough is set out in LPS Policy PG 1 'Overall development strategy'. The non-strategic policies in the SADPD are in accordance with the strategic policies of the LPS and it is not the role or purpose of the SADPD to revise strategic policy. Issues around housing land supply (including windfalls) are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The council's policy approach in the SADPD is incompatible with the current CIL charging schedule.	No	SADPD proposals are supported by appropriate and proportionate viability evidence. As confirmed by ¶2.38 and ¶10.6 of the Site Allocations and Development Policies Viability Assessment [ED 52], CIL is incorporated into the viability appraisals as a cost. Since the viability evidence to support CIL was prepared, both values and costs have increased. However, values have increased somewhat more than costs indicating, at a high level, an improvement in viability. The Land Registry records a 25.13% increase in average values in Cheshire East (February 2017, £204,709 to December 2020, £256,160). The Building Cost Information Service shows a 12.13% increase (Estate Housing – Generally, 04/02/17 £1,055psm to 13/03/21 £1,183psm).
The additional policy requirements in the SADPD will have a viability impact upon schemes which are required to accord with these policies. This will have an overall negative impact	No	The SADPD is a non-strategic plan prepared to be consistent with the LPS. 'The Provision of Housing and Employment Land and the Approach to Spatial Distribution' report [ED 05] explains

<p>on the council's ability to meet affordable housing needs and the level of affordable housing delivered across the borough. Allocations in the SADPD should be focused therefore on higher value areas to support delivery across the borough.</p>		<p>the approach taken towards housing in the SADPD. The viability implications of policies included in the SADPD have been appropriately considered through the supporting evidence contained in the Site Allocations and Development Policies Viability Assessment [ED 52]. The affordable housing requirement is borough-wide and is not disaggregated to individual settlements. LPS Policy SC 5 'Affordable homes', criterion 7 includes reference to the circumstances where additional site-specific viability evidence can be used to evidence lower affordable housing provision, where relevant to do so. The level of affordable housing delivery is set out in the latest AMR and is in line with the identified need across the borough. Progress of these indicators are monitored, and actions considered to address issues when necessary.</p>
<p>Infrastructure costs (largely through Section 106 contributions) have not been adequately factored into the council's viability assessment. The viability modelling assuming £5,202/unit towards infrastructure through Section 106. Query as to how a developer can make an informed decision on land pricing if the costs for infrastructure provision are not known.</p>	<p>No</p>	<p>The Site Allocations and Development Policies Viability Assessment [ED 52] has used typologies whilst having appropriate regard to the proposed allocations in the draft SADPD and the unconsented allocations contained within the adopted LPS. This is in line with guidance contained within the NPPG (ID: 10-004-20190509). The approach has had regard to average costs and values to make assumptions about the viability impacts of relevant policies. Assumptions included in the assessment are transparently set out. The approach to infrastructure costs (£5,202/unit) utilised in the Viability Assessment is consistent with the evidence presented (in the CEC document position statement on CIL and Planning Obligations) during the examination of the CIL Charging Schedule, as representing an average contribution towards infrastructure for schemes in the borough. The NPPG (ID: 10-007-20190509) refers to the cost of infrastructure as being one of the reasons why a viability assessment may be required at the planning application stage.</p>

SADPD draft Policy ENV 2 'Ecological implementation', criterion 1 – biodiversity net gain has not been tested in the viability assessment.	No	As confirmed in the Site Allocations and Development Policies Viability Assessment [ED 52] (¶¶8.11 - 8.15) assumptions around the viability implications of requirements for biodiversity net gain have been tested.
SADPD draft Policy ENV 6 'Trees, hedgerows and woodland implementation' requires at least three new trees for every tree removed. This indicates that the council could seek a higher provision than the three to one ratio. Without a clear explanation as to when a higher provision would be required, it is not possible to ascertain the impact the policy would have upon the development potential and viability of sites.	No	The policy refers to only the circumstance of the loss of a 'significant' tree when at least three new trees are required. The impact of the provision of an additional tree is not considered to make a significant and material impact to the viability of schemes in the borough.
SADPD draft Policy ENV 7 'Climate change', criterion 2 – the viability impact of a 19% reduction below Building Regulations standards does not appear to have been properly considered and may harm the delivery of development contrary to the NPPF (2019) ¶59.	No	The Site Allocations and Development Policies Viability Assessment [ED 52] includes reference to the government consultation on the introduction of a future homes standard. The viability assessment considers the viability implications of several scenarios, as set out in ¶¶8.62-8.66, including Option 1 'Future Homes Fabric' which is closely aligned with the policy approach proposed in the Revised Publication Draft SADPD. It is noted that the government is consulting on an alteration to Building Regulations to increase standards to the Future Homes Standard Option 2. This was also tested as above.
SADPD draft Policy HOU 3 'Self and custom dwellings' - There is a reference to a 5% allowance that has been considered but there is no detail on how this impacts land value and how such provision is treated in relation to other planning obligations when considering viability.	No	The Site Allocations and Development Policies Viability Assessment [ED 52] confirms that assumptions including a 5% requirement on self and custom build on schemes 30 and larger has been included within the viability assessment (¶¶8.48-8.49).
SADPD draft Policy HOU 6 'Accessibility and wheelchair housing standards' - the cost of providing a Category 2 dwelling have not been adequately accounted for in the council's Viability Assessment Update.	No	The Site Allocations and Development Policies Viability Assessment [ED 52] confirms that 30% Category 2 (Accessible and Adaptable) and 6% Category 3 (Wheelchair Adaptable) dwellings have been factored into the viability appraisals (¶¶8.50-8.53).

Request for revised viability testing to be undertaken to accommodate the costs of the construction of a garage(s) within the viability appraisal / testing.	No	Garages are not included within the base viability appraisals as they are an over extra provided by the developer and are not a direct planning policy requirement.
Detailed issues were raised in respect of the plan viability assessment which supported the initial Publication Draft SADPD in 2019.	No	The Site Allocations and Development Policies Viability Assessment [ED 52] has considered the issues raised by representations in respect of the Plan viability assessment (in section 3 of report [ED 52] onwards) made to the initial Publication Draft SADPD in 2019 and assumptions have been adjusted, where appropriate to do so.
<p>The policies map should:</p> <ul style="list-style-type: none"> • Show specific sites as being allocated. • Show specific sites as being within settlement boundaries. • Show specific sites as being outside of the Green Belt. • Show specific sites as being outside of the SGGs. • Show the ecological networks. • Not show specific areas of protected open space as such. • More closely align with the LPS policies map in respect of sites LPS 26; 27; 46; and 53. • Show the saved policies from the Cheshire Minerals Plan and the minerals safeguarding areas. • Fully integrate with the LPS adopted policies map so they can be read as one. • Show the area to which Policy GEN 5 'Aerodrome safeguarding' applies. • Show the Manchester Airport Public Safety Zone. • Show the retail allocation within the Congleton Local Plan (under Policy DP4). • Show revised retail boundaries in some cases. 	No (but the policies map has been amended)	The draft adopted policies map [ED 02] reflects the policies and proposals in the plan. Issues related to specific sites and settlement boundaries are considered in the relevant settlement's section in this consultation statement appendix. Issues around the SGGs boundaries are considered in the Policy PG 13 'Strategic green gaps' section. Issues around individual areas of open space are considered in the Policy REC 1 'Green/open space protection' section. The online interactive version of the map has been amended to show the ecological network more prominently. The map includes the LPS site allocations and policies, so can be read as one. The existing adopted policies map shows the saved policies from the Cheshire Minerals Local Plan. Upon adoption of the SADPD, any remaining saved policies will be shown on the final version of the policies map. Policy GEN 5 'Aerodrome safeguarding' applies to development across the borough. The Manchester Airport Public Safety Zone issue is considered in the Policy GEN 6 'Airport public safety zone' section. Policy DP4 of the Congleton Local Plan will be deleted on adoption of the SADPD and should not be shown. Issues around retail boundaries are considered in the Policy RET 1 'Retail hierarchy' section and the relevant settlement's section of this consultation statement appendix.

The SADPD should be considered in light of the government's proposed planning reforms. Its policies are not sufficiently clear to guide development in renewal areas and wording is too loose to protect the protected areas.	No	The proposed reforms have not yet been finalised following the consultation. There will be a period of policy development, followed by the preparation and progression of legislation, which will take some time. The Ministry for Housing Communities and Local Government strongly encourages local planning authorities to continue to prepare and adopt local plans in the meantime.
The method of showing tracked changes in the revised document is too confusing and the document should have been presented clearly without changes.	No	The Revised Publication Draft SADPD was the second draft published in accordance with Regulation 19. Representations submitted to both the initial Publication Draft SADPD and Revised Publication Draft SADPD will be considered through the examination, and representors did not need to re-submit representations if their views had not changed. Therefore, it was important to show all the changes that were made. A 'clean' version of the Revised Publication Draft SADPD [ED 01b] was also published to show the revised document without the changes.
Circumstances have changed since the adoption of the LPS: Cheshire East Council has declared a climate emergency; there has been no growth in GVA; there has been a reduction in the overall number of jobs; there has been very limited take-up of employment land; we are now in an economic downturn; the decline of town centres has increased.	No	The non-strategic policies in the SADPD are in accordance with the strategic policies of the LPS and it is not the role of the SADPD to revise strategic policy. As evidenced in the 2019/20 AMR, there has been an average net jobs growth rate of 1.6% per year since the start of the plan period.

Chapter 2: Planning for growth (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
There is no need to make allocations at the LSC tier of the settlement hierarchy.	Yes	Housing site allocations in LSCs have been removed from the Revised Publication Draft SADPD. This issue is considered

		further in the Policy PG 8 'Development at Local Service Centres' section of this consultation statement appendix.
Further sites should be allocated across the plan area. The LPS was found sound on the basis that the SADPD would allocate further sites and the plan would be subject to early review to account for the implications of HS2. The SADPD does not plan positively for growth.	No	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. It allocates sufficient land to deliver the overall development strategy set out in the LPS. The LPS does not address the full land use implications of HS2 and this issue falls outside the scope of the SADPD. The full implications of HS2 on the wider area will be considered through a review of the plan strategy, which will take place within five years of its adoption as required by the NPPF (2019).
The housing supply plus proposed allocations is insufficient to meet overall housing needs. It is overly reliant on large sites, risking deliverability particularly in the short term. The overall housing provision should be increased, particularly on small sites. There is insufficient flexibility in the trajectory and no five-year supply of deliverable housing sites.	No	Issues around housing land supply are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Circumstances have changed since the adoption of the LPS: climate change has become more serious; more homes have been built than expected; population growth predictions have reduced; the number of jobs has decreased.	No	The non-strategic policies in the SADPD accord with the strategic policies of the LPS and it is not the role and purpose of the SADPD to revise strategic policy. The LPS will be reviewed within five years of its adoption as required by the NPPF (2019).
The housing flexibility factor should continue to be applied at all tiers of the settlement hierarchy.	No	Issues around housing land supply (including flexibility) are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The SADPD should disaggregate the housing requirement figure for the OSRA, at least for the designated neighbourhood area in accordance with NPPF (2019) ¶65.	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas Report [ED 46] explain why it is not necessary to disaggregate the indicative housing figure for the OSRA. The NPPF (2019) ¶65 requires strategic policies to set out a housing requirement for designated neighbourhood areas. The strategic policy for the spatial distribution of development is already set out in LPS Policy PG 7 'Spatial

		distribution of development'. As strategic policies have already been adopted, the council will provide indicative figures, if requested to do so by the neighbourhood planning body, as required by the NPPF (2019) ¶66.
Sites should be allocated in the OSRA tier. The housing requirement is a minimum figure and there is no guarantee that commitments will be delivered. Reliance on neighbourhood plans to allocate sites is not an effective strategy and there is no requirement for them to do so. Sites are needed to meet the overall housing requirement; to maintain a five year housing land supply; to accommodate dwellings envisaged on larger strategic sites but which will now not be delivered during the plan period; to provide flexibility in the event that HS2 comes to Crewe by 2027; to assist with the requirement to identify 10% of the housing requirement on small sites; to boost the supply of housing generally; to provide affordable housing. The LPS (¶8.34) is clear that allocations in OSRA will be made through the SADPD and / or neighbourhood plans.	No	The LPS ¶8.73 confirms that the indicative housing figure for the OSRA of 'in the order of 3,500 new homes' is a guide and is neither a ceiling nor a target. LPS ¶8.34 states that in LSCs and OSRA, development will be restricted to locations well related to the built-up extent of these settlements. The identification of such sites will be achieved through the allocation of suitable sites and/or the designation of settlement boundaries addressed as part of the SADPD and/or neighbourhood plans. The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Other Settlements and Rural Areas Report [ED 46] have considered the need for site allocations and they conclude that there is no need for allocations in the OSRA. Issues around housing land supply and affordable housing are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Further land for various uses should be allocated in the PTs and KSCs tier of the settlement hierarchy.	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the various settlement reports consider the need for further housing and employment land allocations in each settlement. Where there is need for further allocations, these are proposed in the SADPD. The need for retail allocations is considered in the Policy RET 2 'Planning for retail needs' section of this consultation statement appendix.
There is significant uncertainty whether C2 element of the objectively assessed need can be delivered in the plan period.		Issues around C2 uses are considered in the Policy HOU 2 'Specialist housing provision' section of this consultation statement appendix.

Policy PG 8 ‘Development at local service centres’

This policy was titled PG 8 ‘Spatial distribution of development: local service centres’ in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
The plan presumes that an aging population is not mobile and has no willingness to move out of their area to access greater and more convenient services.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then, but not in response to these initial representations. The rationale for those changes is set out in ‘The provision of housing and employment land and the approach to spatial distribution’ report [ED 05].
Concerns raised over capacity of infrastructure, flooding, air quality, Green Belt and village setting in LSCs. The approach disaggregates a larger amount of development to LSCs that perform less well in terms of access to services and facilities. Prestbury GP services are an offshoot of the Alderley Edge Medical Practice. There are LLD Areas to the northwest, south and southeast of Prestbury, and Prestbury Parish has two Conservation Areas (village centre and Butley Town). No account has been taken of employment, out-commuting, environment, or housing density.	Yes	
There is a lack of published, up-to-date evidence. There is no proper strategic approach to linking the proposed LSC spatial distribution to the proposed Draft Economic Policy.	Yes	A comprehensive evidence base has been published to accompany the Revised Publication Draft SADPD. The evidence was the most up-to-date evidence available at the time of drafting the initial Publication Draft SADPD. All evidence has been reviewed and updated where appropriate to inform the Revised Publication Draft SADPD, including housing and employment monitoring data at 31/03/2020. The Economic Strategy is in draft form and was in the early stages of development when the SADPD was being prepared. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then, but not in response to this initial representation. The rationale for those changes is set out in

		'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The 200 houses planned for the Green Belt can be provided for by windfall sites before 2030. It is not clear why sites are being allocated in the LSCs for 3,500 houses when figures show that the authority is on course to deliver its housing numbers without further allocations.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. The residential site allocations in the Green Belt have been removed from the Revised Publication Draft SADPD.
Exceptional circumstances have not been demonstrated for the release of Green Belt.	Yes	The 'Provision of housing and employment land and the approach to spatial distribution' report [ED 05] has considered the issue of Green Belt boundary alterations, including consideration of exceptional circumstances; concluding that the exceptional circumstances required to alter Green Belt to accommodate new housing development no longer exist. The 'Local Service Centres Safeguarded Land Distribution Report' [ED 53] concludes that exceptional circumstances do exist to justify alteration of Green Belt boundaries to accommodate the residual amount of safeguarded land. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
Various representations setting out that the indicative figures for individual LSCs should be higher or lower, and that how the figures came about is unclear (flawed methodology, illogical, and they don't represent not modest growth to meet locally arising needs – LPS ¶8.30). Inadequate justification as to why further development is to be limited in locations such as	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then, but not in response to these initial representations. The rationale for those changes is set

Haslington (Hybrid Option), rather than planning for higher growth (Constraint Led Option).		out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
Clear and robust justification is needed as to the change of approach to Goostrey and Mobberley.	Yes	
There is no recognition that there are no sewage networks in many rural areas, for example PRE 2 and PRE 3 are not connected to sewage networks.	Yes	<p>These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then, but not in response to this initial representation. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. United Utilities were consulted during the site selection process and raised no concerns with regards to this issue and Site PRE 2. With respect to Site PRE 3, United Utilities have said there may be potential difficulties trying to obtain a wastewater connection from United Utilities, which would result in required lead times that need to be accounted for. There is also no wastewater sewer network in the immediate area of Site PRE 3 according to United Utilities, with the nearest connection point being on Prestbury Road approximately 300m to the north. However, guidance from the Environment Agency states that as a rule of thumb, connection to the public foul sewer should be potentially feasible where the distance from the development site is less than the number of properties multiplied by 30m. PRE 3 is proposed as safeguarded land and the site would only need 10 dwellings for a connection to the public foul sewer to be potentially feasible at a distance of 300m, and for PRE 2, connection to the public sewer should be feasible up to a distance of 1.05km (30m * 35 dwellings).⁷</p>

⁷ http://ecab.planningportal.co.uk/Uploads/EA_LPA_advice_non_major_dev_non_mains_drainage_2019.pdf

The SADPD conflicts with Bollington Neighbourhood Plan Policies HO.P1, HO.P2, HO.P3, HO.P4, V1 and EGB.P1.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then, but not in response to these initial representations. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The preferred approach results in more development in the Green Belt or on sites that have a range of constraining factors; this does not accord with the NPPF (2019), which seeks to direct development away from more sensitive areas where possible.	Yes	
Concern that there is no definition of "in the order of"; some certainty of any additional numbers should be clearly defined, and the words amended to read "no more than". The housing requirements in each LSC should be expressed as a minimum.	Yes	
That Goostrey is now expected to meet its own housing needs is contrary to ¶8.34 of the LPS.	Yes	¶8.34 of the LPS states that 'In the case of Goostrey ..., it is anticipated that development needs will largely be provided for in Holmes Chapel' [emphasis added]. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then, but not in response to this initial representation. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The approach relies on the disaggregation of a potentially ever diminishing residual requirement from the minimum requirement for the LSCs; this could risk the SADPD failing to allocate sufficient development to Green Belt settlements at the time of adoption.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then, but not in response to these initial representation. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The overall approach taken in the Local Service Centre Spatial Distribution Disaggregation Report [PUB 05] does not reflect the aim of the LPS, which emphasises the importance of	Yes	

making sure that the places where development takes place have good access to jobs, services and facilities.		
Aircraft noise can represent a constraint to new development; however, it is not as severe the council or its advisers, Jacobs, have characterised it.	Yes	The council has sought expert advice regarding the approach to be taken towards managing development in the vicinity of Manchester Airport, specifically the effect of noise from aircraft landing and taking off. The justification for the policy is set out in a specific evidence report, 'Aircraft Noise Policy Background Report' [ED 15]. The policy has been amended taking account of a range of available evidence. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then, but not in response to this initial representation. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
Green Belt should be treated as a special case in the options.	Yes	As set out in ¶4.3 of the 'Local Service Centre Spatial Distribution Disaggregation Report' [PUB 05] the options were developed to explore the different ways that additional housing and employment land could be distributed around the LSCs. Green Belt was considered in Options 4, 5 and 7. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then, but not in response to the initial representations. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
Constraints identified in Option 4 are unlikely to affect all of Alderley Edge and will be site specific – development could be mitigated.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then, but not in response to this initial representation. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].

There is no justification to reject Options 1 and 2 on Green Belt grounds as it has been established through the LPS that there are exceptional circumstances for Green Belt release.	Yes	The 'Provision of housing and employment land and the approach to spatial distribution' [ED 05] report has considered the issue of Green Belt boundary alterations, including consideration of exceptional circumstances; concluding that the exceptional circumstances required to alter Green Belt to accommodate new housing development no longer exist. The 'Local Service Centres Safeguarded Land Distribution Report' [ED 53] concludes that exceptional circumstances do exist to justify alteration of Green Belt boundaries to accommodate the residual amount of safeguarded land. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
Option 7 does not encourage development and growth in some of the most sustainable settlements in the borough or where there is a pressing requirement to deliver new housing to help address a large, and widening, affordability gap	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD; the policy has changed substantially since then, but not in response to this initial representation. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
LSC locally arising needs have not been identified.	Yes	There is no requirement for the council to identify the objectively assessed need for additional homes in LSCs. The only objectively assessed need required is that for the Plan area as a whole (36,000 homes). These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].

Make allocations in the OSRA to address the 1,735 windfall allowance. Re-assess growth levels across Green Belt villages and apportion specific growth figures to OSRA that have been subject to limited levels of growth and where it is not possible to allocate instead to the most appropriate nearby settlement.	Yes	Issues around OSRA are considered under the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The LPS and SADPD have not fully addressed the implications of HS2; Crewe's housing figure should be higher.	Yes	The issue of HS2 is considered under the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The SADPD should not be constrained by the minimum figure of 3,500 dwellings and should make sure that each of the LSCs receives sufficient development to meet its local needs and priorities.	Yes	LPS Policy PG 7 is clear that the 3,500 figure is expressed as 'in the order of' and is neither a ceiling nor a target. These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
There is no evidence to support the assertion that housing development in one settlement will benefit another (e.g. in respect of affordability and settlement/service vibrancy and	Yes	Issues around housing land supply (including flexibility) are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix. These

vitality). Concern that the flexibility built into the LPS for the distribution of development at the LSCs is lost through the SADPD. Various representations setting out that the LSCs should have a flexibility allowance. The increase in supply necessary to provide flexibility at the LSCs is insignificant at a borough-wide level and would not result in unsustainable patterns of development.		representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
Development should be apportioned based on a bottom-up assessment of LSC needs, considering demographic changes and their effect on maintaining the population of each LSC as a minimum, affordable housing needs, and trends of decline of local services or facilities that should be addressed through additional development.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The contracting working age population and shortage of family-sized accommodation identified in the Housing Topic Paper (2016) for the Bollington Neighbourhood Plan have not been addressed through the SADPD.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The SADPD should allocate land for 3,335 dwellings as per Table 8.2 and ¶E.6 of the LPS and the expectation of the LPS Inspector to provide flexibility, choice and consistency with the LPS.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The allocation of only 665 dwellings means that the Local Plan will not have considered its strategy of only allocating sites of a strategic size against the reasonable alternative of allocating smaller sites instead of or in addition to those strategic sites.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. The issue is considered under Chapter 8:

		Housing (general issues) section of this consultation statement appendix.
The approach of the LPS to deliver development towards the LSCs should not be replaced through an over-delivery in higher order settlements. There is no evidence to say that this approach would support and meet LSC housing needs.	Yes	These representations are related to the version of Policy PG 8 in the initial Publication Draft SADPD, which took a different approach towards spatial distribution and warranted some allocations to be made in some settlements; the policy has changed substantially since then. The rationale for those changes is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
The adoption of the Neighbourhood Plan should not be used to limit or stifle the growth of Bollington, particularly when the LPS envisages growth to the LSCs in any event.	Yes	
Predominantly meet Green Belt settlements needs through SADPD allocations where settlements cannot rely on windfall development to meet their development needs.	Yes	
The approach may not deliver the amount of affordable homes or mix of tenures needed in each settlement, undermining the delivery of sustainable development.	No	The affordable housing requirement is borough-wide and is not disaggregated to individual settlements. The level of affordable housing delivery is set out in the 2019/20 AMR and is in line with the identified need across the borough. Progress of these indicators are monitored, and actions considered to address issues when necessary.
The unplanned approach for housing development at the LSCs will compound issues of supply and lack of access to properties.	No	Issues around housing land supply (including flexibility) are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Many LSCs don't have the space and ability (e.g. Green Belt constraints) to rely on windfall in the settlement boundary. The level of expected windfall development is small and does not represent a significant change in circumstances. Windfalls can't be relied upon.	No	The supply is in the order of 3,500 dwellings. There is no significant reliance on future windfall permissions to address the 3,500 figure. It is evident from 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] (pp13-14 and Table 13 (pp23-24)) that land is being recycled in the LSCs, and there is no evidence that this will stop. A small sites allowance is applied, which is being met and substantially exceeded. Plan flexibility increase the likelihood that the housing requirement will be met in full over the Plan period.

The commitment to disaggregating the housing requirement is partly the basis on which the LPS was found sound.	No	The approach to disaggregation of the indicative development figures to the LSCs and the OSRA is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
There is not a revised trajectory to show that the supply is sufficiently flexible, and Middlewich and Poynton are not LSCs.	No	Issues around housing land supply (including flexibility) are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The approach is not sound and contrary to previous evidence – disaggregation would avoid an imbalance of housing distribution in the north and south of the borough, ensure LSCs provide for their own needs and not exacerbate existing issues (e.g. affordability) (these concerns were also raised regarding the initial Publication Draft version of Policy PG 8).	No	Based on the distribution of supply at LSCs shown in Table 17 of 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], a slightly higher proportion of new dwellings in LSCs will be provided in settlements inset within the North Cheshire Green Belt compared to the proportion of expected levels of development at those PTs and KSCs inset in the Green Belt. This supports the council's conclusion that the exceptional circumstances required to make Green Belt boundary alterations (the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so) do not exist to justify making further boundary alterations to allocate sites for development during this plan period.
Additional sites should be allocated in LSCs to address housing need and housing supply issues.	No	Issues around housing land supply (including flexibility) are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Reliance on additional windfall allowance for LSCs would be double counting as the LPS provides a windfall allowance of 125dpa from 2019/20 for settlements outside Crewe and Macclesfield.	No	The supply is in the order of 3,500 dwellings. There is no significant reliance on future windfall permissions to address the 3,500 figure. It is evident from 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] (pp13-14 and Table 13 (pp23-24)) that land is being recycled in the LSCs during the start of the plan period, and there is no evidence that this will stop. A small sites allowance is applied, which is being met and substantially

		exceeded. The allowance doesn't include gardens or sites of more than 9 dwellings, so there are additional sources of windfall not dealt with through the allowance.
Recent delivery, and suggested oversupply do not warrant a change in strategy that is contrary to the LPS.	No	The council is properly addressing the indicative LSC figure through completions and commitments as set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05].
At least 250 dwellings should be allocated to Alderley Edge, and land allocated around it.	No	The approach to spatial distribution at LSCs is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
20% flexibility should be applied to the SADPD to ensure the delivery of sufficient housing land.	No	The issue of flexibility in the housing land supply is considered under Chapter 8: Housing (general issues) section of this consultation statement appendix.
¶2.5 should be reinstated to align with the Framework, the LPS, significantly boost the supply of housing and to clearly define what the policy means for LSCs.	No	The approach to spatial distribution at LSCs is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
As HCH 1 is owner expansion land there is a need to find more employment land allocations at the LSC tier.	No	Investment to create employment floorspace creates jobs, whether that's through the expansion of a local business or a new business. The proposed allocation Site HCH 1 would not fall neatly into the categories of either owner expansion land or generally available employment land; development could be led or significantly influenced by other companies, albeit working collaboratively and commercially with Recipharm. As a Contract Development and Manufacturing Organisation

		Recipharm's business model is to supply Contract Development and Manufacturing Organisation services to third parties. Their standard model is that the customer invests to establish capability on the site to complete the specific activity for them. For example this could include: establishing 'Development Capability' to produce material for the medical approval process, completing testing of material or devices to support the development phase for a new product, taking a product through its medical approval process and establishing full scale manufacturing capability on the site, or taking an existing product and establishing full scale manufacturing capability on the site.
'In the order of' means the policy doesn't positively seek opportunities to meet the borough's development needs; it should state 'at least'. 'In the order of' is vague – replace with 'up to'.	No	The use of 'in the order of' is consistent with LPS Policy PG 7 'Spatial Distribution of Development'.
Smaller schemes at windfall sites are preferable for custom/self-build housing, helping to meet a significant portion of localised needs.	No	Revised Publication Draft SADPD Policy HOU 3 'Self and custom build dwellings' supports proposals for self and custom-build dwellings in suitable locations.
By not allocating land in LSCs the SADPD is unjustified and doesn't suitably consider the most appropriate strategy when having regard to reasonable alternatives.	No	The council considers that the strategy is appropriate in accordance with NPPF 2019, ¶35. The reasons for the progression of the strategy are set out in Table 30 (p56) of 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and Table 3.8 (p27) of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03].
Allocations should be provided in Shavington to meet the shortfall in housing provision in Crewe; consistent with the LPS.	No	Issues around housing land supply (including flexibility) are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix. The approach to spatial distribution at LSCs is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. Given the high level of housing completions and commitments and the lack of suitable

		employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Include allocations at Ashbrooke Road/Greg Avenue/Moss Brow, Bollington, which are below the 150 unit LPS strategic threshold.	No	Policies relating to the allocation of sites are set out in Chapter 12 of the Revised Publication Draft SADPD.
Expand the policy to include allocations at KSC/PTs that are below the 150 unit LPS strategic threshold.	No	
The approach will fail to ensure that the LSC shortfall will be distributed to the LSCs as the council will have no control over the location and amount of development.	No	The approach to spatial distribution at LSCs is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Circa 150 dwellings should be allocated to Goostrey to deliver most of its need.	No	¶8.34 of the LPS states that 'In the case of Goostrey ..., it is anticipated that development needs will largely be provided for in Holmes Chapel'. The approach to spatial distribution at LSCs is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. Given the high level of housing completions and commitments and the lack of suitable employment sites in LSCs, it is not proposed to disaggregate the overall LSC housing and employment figures to individual LSCs.
Housing delivery across the wider borough is of limited relevance to the LSC's as the LPS requires LSC locally arising needs to be met.	No	The approach to identifying local needs is set out in 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05]. The council is properly addressing the indicative LSC figure through completions and commitments. Based on the distribution of supply at LSCs shown in Table 17 of 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05], a slightly higher proportion of new dwellings in

		LSCs will be provided in settlements inset within the North Cheshire Green Belt compared to the proportion of expected levels of development at those PTs and KSCs inset in the Green Belt. This supports the council's conclusion that the exceptional circumstances required to make Green Belt boundary alterations (the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so) do not exist to justify making further boundary alterations to allocate sites for development during this plan period.
The LSC requirement is not a cap and therefore over-provision against this minimum requirement is not a justifiable reason to resist meeting the development needs of settlements.	No	It is acknowledged that the LSC figure of 'in the order of 3,500 new homes' is neither a ceiling nor a target, however it is intended as a guide, which is confirmed in ¶8.73 of the LPS.
Amend the policy to delete reference to windfall and include reference to policies in Neighbourhood Plans.	No	There is no necessity to refer to Neighbourhood Plans in the policy. Neighbourhood Development Plans form part of the Development Plan once made and are therefore the starting point in considering planning applications.
The supporting statements should reflect that no further housing would be expected of Holmes Chapel without significant long-term plans associated with infrastructure provision being agreed.	No	No housing allocations are proposed at Holmes Chapel. A moratorium on additional housing development in Holmes Chapel could not be justified. Proposals within the settlement boundary may be acceptable subject to the application of relevant planning policies. The impact of each scheme on infrastructure would need to be assessed and appropriately mitigated.
A reliance on windfall development alone will increase the pressure on smaller sites to come forward and lead to the over-development of green spaces and gardens, impacting on settlement character and local distinctiveness.	No	The windfall development relied on is already built or permissioned. There will be additional small site windfall development too, yet to be permissioned. The reliance on windfall sites will not have the effects stated. When other windfall development is applied for there is no reason why policies relevant to good design, local character and greenspace protection would not be properly applied to it.

Proceeding with 7ha of employment land and 3,500 new homes in the LSCs and in the order of 69ha of employment land and 2,950 new homes for OSRA implies that need and spatial distribution has not been reassessed considering current economic circumstances.	No	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS and to complete the matters left over from it. The reassessment of need or spatial distribution is not necessary or appropriate.
Housing numbers and mix should be determined through area specific SPDs or Neighbourhood Plans.	No	It is appropriate for the Local Plan to address both of these matters. Neighbourhood Plans, which form part of the development plan once made, can also address these matters through non-strategic policies, subject to them meeting the basic conditions. SPDs do not form part of the development plan and therefore carry less weight but can usefully add guidance to support the implementation of local plan policies.
Some Neighbourhood Plans have permissive and flexible policies to meet needs. By limiting development to only windfall will bring conflict between the policies of the Neighbourhood Plans and SADPD.	No	Windfall development refers to development that is not identified in the development plan (i.e. unallocated). Neighbourhood Development Plan policy can promote additional housing development or allocate sites where the Local Plan has not, subject to compliance with the basic conditions. This would not necessarily result in a conflict between the two plans. However, should a conflict arise between different policies in the development plan, that conflict, by law, would be resolved in favour of the most recently adopted policy.
Concern that cumulative impact of development locally has not been considered in terms of traffic levels.	No	Cheshire East Highways has been involved throughout the site selection process and will be consulted during the development management process, where relevant. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 'Travel Plans and Transport Assessments' and SADPD Policy INF 3 'Highway safety and access'.
It is illogical to include neighbouring parishes in the definition of Goostrey LSC and it is inconsistent with the 'Housing and Completions' document relied on by the SADPD and the Local Plan – the Goostrey Settlement Report [ED 30] should use the	No	The Lower Super Output Area-based (settlement hierarchy) definitions are preferable to ones based on parish boundaries for planning policy purposes, as the data available for Lower

Goostrey Parish Office for National Statistics figures (i.e. a population of 2,058).		Super Output Areas is wider ranging and more robust (more accurate) than the data available for parishes.
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Policy PG 9 ‘Settlement boundaries’

Summary of the main issues raised	Revised SADPD amended?	Council response
Several representors have requested that the settlement boundary be amended or extended at various locations (at PTs, KSCs and LSCs locations).	No	The Settlement and Infill Boundaries Review [ED 06] sets out the methodology and justification for the approach to settlement boundaries in the SADPD. This methodology has been applied and the outcomes documented in the individual settlement reports for PTs, KSCs and LSCs [ED 21-ED 44].
Locations in the OSRA tier of the settlement hierarchy should be recognised as a settlement and a settlement boundary identified on the policies map.	No	As evidenced in the Settlement and Infill Boundaries Review [ED 06] and confirmed by criterion 2 of the policy, settlements in the OSRA tier are not proposed to have a defined settlement boundary (unless determined through a neighbourhood plan) and would therefore remain in the open countryside. The Other Settlements and Rural Areas Report [ED 46] demonstrates that there is no need for housing or employment sites to be allocated in the SADPD as the indicative levels of development for OSRA can be exceeded by completions and existing commitments. LPS policies PG 6 ‘Open countryside’ and PG 3 ‘Green Belt’ both allow for ‘limited infilling in villages’, as does the NPPF (2019). The evidence contained in the Settlement and Infill Boundaries Review [ED 06] has defined infill villages and the policy approach is set out in Policy PG 10 ‘Infill villages’.
The detailed settlement boundaries (including detailed Green Belt boundaries) should be reviewed as part of this SADPD. In Green Belt locations - why is the settlement boundary review limited to stage 1 only?	No	The Settlement and Infill Boundaries Review [ED 06] ¶¶4.3-4.5 sets out the council’s approach to detailed Green Belt boundaries. For the settlements inset within the Green Belt, the settlement boundary will continue to be the same as the

		Green Belt inset boundary (except for where there is safeguarded land). The issue of reviewing Green Belt boundaries is further considered in the deleted Policy PG 11 'Green Belt boundaries' and Policy PG 12 'Green Belt and safeguarded land boundaries' sections of this consultation statement appendix.
The settlement boundary methodology should not limit consideration to sites with commitments/completions adjoining the settlement. The assessment does not allow for sites that have a high level of containment or a strong functional relationship with the existing settlement.	No	The Settlement and Infill Boundaries Review [ED 06] sets out a clear methodology and justification for the approach to defining settlement boundaries. It considers a number of relevant factors including: i) review of boundary in light of existing or proposed site allocations; ii) consideration of extant planning consents and the relationship of land to the built-up area; and iii) review of the relationship of settlement boundaries to physical features. This methodology has been applied and the outcomes documented in the individual settlement reports for PTs, KSCs and LSCs [ED 21-ED 44].
The approach to settlement boundaries in the SADPD is contrary to LPS ¶8.34 (supporting text to Policy PG 2 'Settlement hierarchy').	No	LPS ¶8.34 states that small scale growth <u>may</u> be appropriate where it supports the creation of stronger local communities and where a clear need exists, which is not more appropriately met in a larger nearby settlement (emphasis added). As evidenced in The Provision of Housing and Employment Land and the Approach to Spatial Distribution Report [ED 05], it is not necessary for the SADPD to allocate sites in the LSCs or OSRA tiers of the hierarchy to meet the indicative spatial distribution set out in LPS Policy PG 7 'Spatial distribution of development'. The Settlement and Infill Boundaries Review [ED 06] sets out the methodology and justification for the approach to settlement boundaries in the SADPD. This methodology has been applied and the outcomes documented in individual settlement reports for LSCs. Criterion 2 of the policy notes that settlement boundaries for settlements in the OSRA tier of the settlement hierarchy may be defined in neighbourhood plans, where appropriate.

The approach is contrary to footnote 34 to LPS Policy PG 6 'Open countryside', which states that settlement boundaries will be reviewed and defined through the SADPD.	No	The Settlement and Infill Boundaries Review [ED 05] considers which settlements should have a settlement boundary, and which should have an infill boundary. It also sets out the methodology for the review and definition of settlement boundaries, which has been applied (and the outcomes documented) in the individual settlement reports for PTs, KSCs and LSCs [ED 21-ED 44].
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Policy PG 10 'Infill villages'

Summary of the main issues raised	Revised SADPD amended?	Council response
The approach would restrict any new additional dwellings being built in smaller settlements not identified under this policy and contrary to NPPF (2019) ¶78. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness, as required by the NPPG (¶009 ID:67-009-20190722). It is too restrictive and will prevent otherwise sustainable development from coming forward. It is inconsistent with LPS Policy PG 2 'Settlement hierarchy', which allows for "proportionate development" in the OSRA tier of the settlement hierarchy	Yes	The policy accords with the NPPF (2019), NPPG and LPS Policy PG 2 'Settlement hierarchy'. It defines where 'limited infilling in villages' will be allowed under LPS policies PG 6 'Open countryside' and PG 3 'Green Belt', but it is not a blanket restriction on housing development elsewhere. In the open countryside, other development allowed under Policy PG 6 can come forward outside of the infill boundaries (including the infill of a small gap with one or two dwellings; re-use of existing rural buildings; replacement buildings; extensions; development essential for an existing business). In the Green Belt, there are additional restrictions, but some development (including extensions; replacement buildings; limited affordable housing for local community needs; and limited infilling/redevelopment of previously developed sites) may not be inappropriate outside of the infill boundaries. Additional words have been added to ¶2.13 to confirm this.
The following infill boundaries should be amended: <ul style="list-style-type: none"> Church Minshull (include land opposite Weaver View at Old Rd and the curtilage of Frog Manor). 	No (but the policies map has	The justification for each infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06]. A minor adjustment has been made to the proposed Styal infill boundary and the Higher Poynton boundary has been amended to mirror

<ul style="list-style-type: none"> • Gawsworth (revert to the infill boundary in the Macclesfield Borough Local Plan 2004). • Higher Poynton (reflect the boundary in the Poynton Neighbourhood Plan). • Langley (exclude all of Langley Pool). • Mow Cop (exclude land at the corner of Castle Rd and High St, and land within the setting of Folly Castle). • Pickmere (exclude Green Belt land). • Styal (include outbuildings in curtilage of 1 Hollin Lane). • Sutton (exclude the verge beyond the curtilage of 82 Walker Lane). • Winterley (include land off Crewe Road and utilise the boundary proposed in the evidence base). • Wybunbury (include land between Sally Clarke's Lane and the brook). 	been amended)	the neighbourhood plan boundary. The other requested amendments have been considered against the published methodology, and the proposed boundaries should remain as drafted. The boundary for Winterley shown on the policies map is the boundary taken from the Settlement and Infill Boundaries Review [ED 06]. Langley Pool is excluded from the Langley Boundary. The verge beyond the curtilage of 82 Walker Lane is excluded from the Sutton boundary.
Ashley; Bucklow Hill; Church Minshull; Worleston; and Winterley should have a defined settlement boundary. Burleydam; Little Bollington; Marton; Rostherne; and Walgherton should be identified as infill villages. Bucklow Hill and Worleston should be identified as infill villages if they do not have defined settlement boundaries.	No	Each of these settlements has been considered through the Settlement and Infill Boundaries Review [ED 06] in accordance with the published methodology. The review concludes that these settlements should not have defined settlement boundaries and should not be designated as infill villages.
Higher Hurdsfield; Lyme Green; Wychwood Park; and Wychwood Village should not be identified as infill villages.	No	Each of these settlements has been considered through the Settlement and Infill Boundaries Review [ED 06] in accordance with the published methodology. The review concludes that Wychwood Park should not be designated as an infill village (which it is not); and the other settlements should be designated as infill villages.
Broomedge should be considered in the Settlement and Infill Boundaries Review [ED 06]. Whilst the village boundary is in Warrington Borough, an integral part of the village is in Cheshire East.	No	There is a significant undeveloped gap between the administrative boundary and the Broomedge Green Belt village boundary identified in the Warrington Core Strategy. The small clusters of development within Cheshire East do not have a

		coherent spatial form with the defined village boundary in Warrington Borough.
Wybunbury and Hough are already included in Table 8.3 of the LPS so do not need to be included in Policy PG 10 'Infill villages'.	No	Footnote 34 to LPS Policy PG 6 confirms that settlement boundaries will be reviewed and defined through the SADPD and neighbourhood plans. The consideration of which settlements should have a settlement boundary, and which should have an infill boundary is set out in the Settlement and Infill Boundaries Review [ED 06].
The boundaries are drawn tightly, allowing very few (if any) opportunities for infill development, restricting windfall development in locations that the council is reliant on to meet the requirements. The boundaries do not account for future growth and do not include sites submitted to the call for sites. The policy does not give sufficiently flexibility for the plan to adapt to rapid change as required by the NPPF (2019) ¶11a and boundaries should be extended to include additional deliverable sites. The removal of the flexibility factor and reliance on windfalls means it is unlikely that the OSRA requirement will be met during the plan period.	No	The boundaries are defined in accordance with the methodology set out in the Settlement and Infill Boundaries Review [ED 06], reflecting the existing built-up area, physical features, and any planning consents. As demonstrated in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05], it is not necessary to allocate further sites in the OSRA tier of the settlement hierarchy and the number of dwellings already completed or committed in this tier now significantly exceeds the 2,950 dwelling indicative figure set out in LPS Policy PG 7 'Spatial distribution of development'.
The policy should apply to the growth of small Traveller sites in these areas and consideration for Traveller site development should not be constrained by Green Belt policy. Gypsy and Traveller sites should be considered a 'use appropriate to a rural area' under LPS Policy PG 6 'Open countryside'.	No	The definition of limited infilling is "the development of a relatively small gap between existing buildings" and is not restricted to conventional housing only. The specific policy approach to Gypsy and Traveller sites is set out in LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople' and SADPD Policy HOU 5a 'Gypsy and Traveller site provision'.
The NPPF (2019) ¶145e allows for limited infilling in villages as it does not harm the purpose of Green Belt. The methodology to select infill villages is mainly based on their sustainability, which has no direct relevance to Green Belt policy. Case law has established that whether a settlement is a 'village' for the purposes of the NPPF (2019) ¶145 is a matter of planning judgement dependent on a range of factors to be made on a case-by-case basis. An assessment	No	The NPPF (2019) advises that plans should "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals"; and that "non-strategic policies should be used... to set out more detailed policies for specific areas, neighbourhoods or types of development" (¶28). Defining villages and infill development within the SADPD is consistent with these principles. Case law establishes that the assessment of what constitutes a village is

as to whether proposals constitute infill development should not be prescribed by the local plan and can only be made with due regard for site specifics.		a case-sensitive planning judgement when applying the NPPF (2019) definition directly in the circumstances of the case. It does not establish that it is inappropriate for a local plan to list villages for the purpose of applying NPPF (2019) policy.
The policy downgrades established settlement boundaries to allow infill only development or, in some cases, deleting the settlement boundaries altogether, claiming that the built form of these settlements is now open countryside.	No	The methodology to determine which settlements have settlement and infill boundaries is set out in the Settlement and Infill Boundaries Review [ED 06]. This provides a consistent approach across the borough, rationalising the three differing approaches in the saved policies of the legacy local plans.
There is no justification for limiting development to infilling; other forms of development such as rounding off may be acceptable. Infilling should also include small groups of buildings and rounding off.	No	The policy accords with LPS policies PG 3 'Green Belt' and PG 6 'Open countryside'; both of which allow for 'limited infilling in villages' but do not permit 'rounding off'. The policy defines limited infilling as "the development of a relatively small gap between existing buildings". The glossary also defines 'infilling' and notes that the scale of infill development will depend on the location of the site.
The supporting information to LPS Policy PG 2 'settlement hierarchy' states that site allocations in the OSRA tier of the settlement hierarchy will be brought forward through the SADPD and/or neighbourhood plans and the council is relying solely on neighbourhood plans to deliver any future housing growth in this tier. The council is departing from the approach agreed with the LPS inspector to make allocations in rural areas; this is on the basis that they have allocated too many houses in the upper tiers of the settlement hierarchy. This is despite there being a persistent undersupply of new homes.	No	The LPS makes no commitment to making site allocations in the OSRA tier of the settlement hierarchy. The inspector's final report (¶91) concludes that, for the OSRA, " <i>since some development has occurred in the recent past, the balance of development (1,250 homes and 4 ha of employment land) would be identified in the SADPD and forthcoming Neighbourhood Plans</i> ". The issue of making site allocations in OSRA is further considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
The Settlement and Infill Boundaries Review [ED 06] does not provide sufficient reasoning for discarding settlements with populations of less than 500.	No	The methodology for the Settlement and Infill Boundaries Review [ED 06] uses the level of service/facility provision; the availability of public transport; and whether the settlement has a coherent spatial form to determine if a settlement should be classed as an infill village. Only where this assessment provides a borderline result is the population of a settlement considered.

The approach is similar to the 'sustainable villages' approach in the LPS, which was regarded as unsound.	No	An early draft of the (then titled) Core Strategy included a concept of sustainable villages, but this was deleted before publication and submission as the evidence base at the time was not sufficiently detailed to identify the sustainable villages. The Settlement and Infill Boundaries Review [ED 06] sets out the justification and evidence for the approach to defining infill villages in the SADPD.
Within the inset boundaries, this policy limits development to the infill of a relatively small gap and does not allow for change of use, extensions, redevelopment etc.	No	The policy defines where 'limited infilling in villages' will be allowed under LPS policies PG 6 'Open countryside' and PG 3 'Green Belt' but it does not restrict other types of development already allowed under those policies, including the re-use of existing buildings, extensions, replacement buildings etc.
The SADPD should consider whether each of the Green Belt infill villages should be washed over or inset from the Green Belt as required by NPPF (2019) ¶140.	No	This issue is considered in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
Development should also be allowed in locations adjacent to the infill boundary.	No	The policy seeks to allow limited infilling within the infill boundaries, which reflect the existing built form. It is not intended to allow development beyond the existing built form.
Infill development would be damaging to the character of some villages and give potential to expand beyond the defined infill boundaries. The policy should require full consideration of the impacts on the landscape and heritage settings.	No	The policy defines where 'limited infilling in villages' will be allowed under LPS policies PG 6 'Open countryside' and PG 3 'Green Belt'. It does not allow for 'limited infilling in villages' outside of the defined infill boundaries. The plan is intended to be read as a whole and its policies on landscape and heritage will apply to proposals for limited infilling.
LPS Policy PG 6 'Open countryside' defines limited infilling in villages as 'the infill of a small gap with one or two dwellings in an otherwise built up frontage' and this policy now seeks to widen that definition.	No	LPS Policy PG 6 'Open countryside' allows for "limited infilling in villages" as well as "the infill of a small gap with one or two dwellings in an otherwise built up frontage elsewhere" (i.e. outside of villages). It does not define limited infilling in villages as the infill of a small gap with one or two dwellings in an otherwise built up frontage.

Deleted Policy PG 11 'Green Belt boundaries'

Summary of the main issues raised	Revised SADPD amended?	Council response
The spatial distribution of development to individual LSCs does not adequately consider Green Belt issues.	Yes	The Revised Publication Draft SADPD no longer disaggregates the LSC development requirements to individual settlements. This issue is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix.
The housing requirement for LSCs can be met without amendments to Green Belt boundaries, given the level of commitments and completions to date. The remaining requirement can be met from brownfield, infill, or windfall sites. The exceptional circumstances required to alter Green Belt boundaries have not been demonstrated, given that there are alternative options for accommodating development outside of the Green Belt.	Yes	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD. The issue of altering Green Belt boundaries to identify safeguarded land is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section.
The 2019 housing monitoring figures show that the overall plan housing figure plus 10% flexibility can be achieved from LPS allocations, commitments, and completions to date, indicating that no Green Belt land should be released for development or for safeguarded land.	Yes	The Revised Publication Draft SADPD no longer proposes to alter Green Belt boundaries to accommodate development in this plan period. The issue of altering Green Belt boundaries to identify safeguarded land is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.
The housing figures used to inform the SADPD are out of date and inaccurate.	Yes	The Revised Publication Draft SADPD no longer proposes to alter Green Belt boundaries to accommodate development in this plan period. The initial Publication Draft SADPD was largely informed by the monitoring data at 31/03/18, which was the most up-to-date available at that time. The Revised Publication Draft SADPD was informed by the 31/03/20 data.

Safeguarded sites should not be included in the list of sites removed from the Green Belt because they are also referred to in Policy PG 12.	Yes	Policy PG 11 has been deleted and merged with Policy PG 12 in the Revised Publication Draft SADPD, so there is no repetition.
Information on the compensatory improvements to the environmental quality and accessibility of the remaining Green Belt (as required by NPPF (2019) ¶138) is lacking.	Yes	All proposed Green Belt site allocations have been removed from the Revised Publication Draft SADPD, but Policy PG 12 'Green Belt and safeguarded land boundaries' has been amended to include requirements for compensatory improvements, should safeguarded land sites come forward for development in the future.
The SADPD proposes to release Green Belt land in Bollington that makes a 'significant contribution' to the purposes of Green Belt, when alternative non-Green Belt or lower contribution Green Belt sites are available elsewhere.	Yes	As set out in the Site Selection Methodology [ED 07], Green Belt sites that are previously developed and/or well served by public transport are considered before those that are not (as required by NPPF (2019) ¶138). Within each of these categories, Green Belt sites are considered in order of their contribution to Green Belt purposes, to prioritise those making a lower contribution. Some sites making a lower contribution to Green Belt purposes may be unsuitable for other planning reasons, which are documented in the individual settlement reports. The Revised Publication Draft SADPD no longer proposes to alter Green Belt boundaries to accommodate development in this plan period but the issue of altering Green Belt boundaries to identify safeguarded land is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.
Further Green Belt site allocations are required in LSCs to deliver the figures set out in Policy PG 8 and for flexibility.	No	The Revised Publication Draft SADPD no longer disaggregates the LSC development requirements to individual settlements and this issue is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix. Issues around housing land supply are considered in the Chapter 8: Housing (general issues) section.
There are exceptional circumstances to justify further Green Belt boundary alterations for site allocations in KSCs and the PT of Macclesfield. These include: the lack of brownfield sites;	No	The provision of housing and employment land and the approach to spatial distribution report [ED 05] and each of the individual settlement reports consider the need for further

unmet development requirements; lack of flexibility; lack of opportunity to allocate non-strategic sites; strategic sites may not deliver as expected; and affordability issues.		allocations in each settlement in the PTs and KSC tiers of the hierarchy. Where further allocations are proposed, the settlement reports demonstrate that these can be accommodated without further Green Belt boundary alterations. Issues around housing land supply (including flexibility) and affordability are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The council has downgraded the Green Belt contribution of several sites from that in the Green Belt Assessment Update 2015. The Green Belt contribution of several sites has been downgraded from the 2013 Green Belt Assessment.	No	All Green Belt sites considered through the respective settlement reports have been subject to a Green Belt Site Assessment, carried out in line with the methodology set out in the Green Belt Assessment Update 2015. The difference is that the Green Belt Site Assessments consider the sites put forward for the SADPD, whereas the Green Belt Assessment Update 2015 considered the wider parcels of land around each settlement. The LPS examining inspector found several shortcomings in the 2013 Green Belt Assessment and its findings were superseded by the 2015 Green Belt Assessment Update.
The SADPD should consider whether each of the Green Belt infill villages should be washed over or inset from the Green Belt as required by NPPF (2019) ¶140. The current Green Belt boundary for smaller settlements was considered against the guidance set out in Planning Practice Guidance (1988) and the NPPF (2019) has significantly amended the guidance for villages located within the Green Belt. The decision to include a village in the Green Belt ('washed-over') or exclude it ('inset') was previously based on the degree of new development that was to be allowed. The NPPF (2019) now requires this decision to be based on whether the village has an open character that makes an important contribution to the openness of the Green Belt. Retaining villages within the Green Belt that do not have an open character that makes an important contribution to openness is contrary to NPPF (2019) ¶140 as well as ¶139, which confirms that Green Belt	No	As stated in the NPPF (2019) ¶133, one of the essential characteristics of Green Belts is their permanence. The NPPF (2019) (¶136) requires that <i>"once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..."</i> The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations, where required, to meet identified development requirements. There are no identified exceptional circumstances that would justify altering existing Green Belt boundaries to create new inset boundaries and remove entire settlements from the Green Belt (or to include entire settlements that are currently excluded). In addition, LPS Policy PG 3 is clear that the extent of the existing Green Belt remains unchanged, apart from the removal of land

boundaries should not include land which it is unnecessary to keep permanently open. It is also contrary to NPPF (2019) ¶¶83 and 84, which require policies to support a prosperous rural economy. The evidence base should include an assessment to determine the contribution that each village makes to the openness of the Green Belt.		from the Green Belt associated with the listed sites. It also raises the prospect of further non-strategic sites to be removed from the Green Belt through the SADPD. Any wider, more general review of Green Belt boundaries to release land for any other purpose than identifying sites would not be in accordance with LPS Policy PG 3.
The SADPD should review smaller Green Belt parcels to remove land that no longer fulfils the purposes of Green Belt (irrespective of the need for allocations) in line with NPPF (2019) ¶139, which is clear that plans should not include land which it is unnecessary to keep permanently open. Existing Green Belt boundaries should be reviewed.	No	As stated in the NPPF (2019) ¶133, one of the essential characteristics of Green Belts are their permanence. The NPPF (2019) (¶136) requires that <i>“once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries...”</i> The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify altering existing Green Belt boundaries for other reasons. In addition, LPS Policy PG 3 is clear that the extent of the existing Green Belt remains unchanged, apart from the removal of land from the Green Belt associated with the listed sites. It also raises the prospect of further non-strategic sites to be removed from the Green Belt through the SADPD. Any wider, more general review of Green Belt boundaries to release land for any other purpose than identifying sites would not be in accordance with LPS Policy PG 3.
An area of protected open space to the south of Macclesfield should be included within the Green Belt.	No	Associated with Site LPS 17, this area was removed from the Green Belt on adoption of the LPS in 2017 to define a new Green Belt boundary using physical features that are readily recognisable and likely to be permanent.
Green Belt policy should acknowledge that brownfield sites in the Green Belt can be suitable for development to account for NPPF (2019) ¶145g.	No	LPS Policy PG 3 allows for limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt.

Several issues were raised in respect of specific Green Belt sites where it is considered that either: the site should be released from the Green Belt and allocated for development; or where the site should remain in the Green Belt.	No	Main issues for specific sites are summarised and considered in the section for the relevant settlement in this consultation statement appendix.
Exceptional circumstances exist to release land from the Green Belt and further site allocations are needed to: meet housing needs; significantly boost the supply of new homes; identify the minimum 3,335 homes that the LPS commits the SADPD to finding; provide a realistic prospect of meeting the overall housing requirement; achieve and maintain a 5 year deliverable housing land supply; identify a minimum 10% of housing requirements on small sites; prevent further house prices increases; provide affordable housing; retain young people and key workers; prevent an increasingly ageing population; maintain the number of working age people; attract inward investment and economic growth; prevent increases in commuting and congestion; maintain vibrancy of town centres, services and facilities; and to provide flexibility in the event that HS2 comes to Cheshire East. The long-term sustainability of settlements will be undermined without planned future housing development.	No	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD. Issues around housing land supply (including flexibility) and affordable housing are considered in the Chapter 8: Housing (general issues) section. The exceptional circumstances were identified through the strategic policies of the LPS and allow for alterations, where required, to meet identified development requirements. Development requirements in this plan period can be met without further changes to Green Belt boundaries and there are no identified exceptional circumstances that would justify altering existing Green Belt boundaries for other reasons.
It cannot be assumed that additional supply from small sites will continue to come forwards over the remaining years of the plan period. Brownfield land is an ever-diminishing asset. Reliance on windfall development will not ensure development is located where it is required.	No	Housing land supply issues are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix. The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section.
Reliance on small sites and brownfield land will not deliver comparable levels of affordable housing when compared to greenfield sites.	No	Affordable housing issues are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The LPS highlights that directing additional development to locations beyond the Green Belt would lead to unsustainable patterns of development and would not provide development in areas of need. Without Green Belt allocations, the	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution Report [ED 05] shows that, based on the distribution of supply at LSCs, a slightly higher proportion of new dwellings in LSCs will be provided in

commitments and completions approach means that LSCs beyond the Green Belt are to deliver over 67% of the total development for LSCs.		settlements inset within the North Cheshire Green Belt when compared to the proportion of expected levels of development at the PTs and KSCs inset in the North Cheshire Green Belt.
The LPS only considers sites of 150 homes/5 ha and above on the basis that non-strategic sites would be found in the SADPD. The plan is unsound as the reasonable alternative of allocating smaller sites has not been considered.	No	This issue is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Due to significant slippage on LPS sites, further sites should be allocated in the SADPD.	No	This issue is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
There are no exceptional circumstances to justify the release of Green Belt for safeguarded land.	No	The issue of altering Green Belt boundaries to identify safeguarded land is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.

Policy PG 12 'Green Belt and safeguarded land boundaries'

This policy was titled PG 12 'Safeguarded land boundaries' in the initial Publication Draft SADPD. Main issues that are specific to individual sites are summarised site by site, in the later sections of this consultation statement.

Summary of the main issues raised	Revised SADPD amended?	Council response
Aircraft noise should not prevent Mobberley from being recognised as a suitable location for new housing. The level of safeguarded land to be provided in Mobberley is low due to the low level of housing proposed.	Yes	The approach to distributing safeguarded land in the Revised Publication Draft SADPD is based on consideration of services and facilities; constraints; Green Belt impact; and opportunities (rather than on the spatial distribution of development in this plan period). This is explained in the LSC Safeguarded Land Distribution Report [ED 53]. Site specific issues are considered in the relevant settlement sections later in this consultation statement appendix, but as demonstrated in the Mobberley Settlement Report [ED 37], there are no suitable safeguarded land sites in Mobberley. Aircraft noise issues are also

		considered in the Policy ENV 13 'Aircraft Noise' section of this consultation statement appendix.
The re-allocation of Bollington's safeguarded land to Chelford is not justified. It should be re-allocated to Mobberley; it should be re-allocated to Alderley Edge. The re-allocation approach does not address the issues of Bollington.	Yes	In the initial Publication Draft SADPD, no suitable safeguarded land sites could be found in Bollington. In the Revised Publication Draft SADPD, suitable sites for safeguarded land in Bollington can be found (from those sites previously proposed for development in this plan period) and safeguarded land is now identified in Bollington.
More safeguarded land should be identified: to provide greater flexibility and secure the longevity of the Green Belt boundary; to identify the full 24ha of safeguarded land for LSCs identified in the LPS evidence base; to provide reserve sites to provide for future housing need arising from neighbouring authorities and Constellation Partnership growth ambitions; and due to the diminishing amount of brownfield land.	No	The Local Service Centres Safeguarded Land Distribution Report [ED 53] considers the remaining amount of safeguarded land to be provided in the SADPD. The sites identified in the SADPD enable the total of 200ha safeguarded land to be identified. As evidenced through the LPS, this gives sufficient confidence that Green Belt boundaries will not need to be altered again at the end of the plan period.
There are no exceptional circumstances to justify altering Green Belt boundaries to identify safeguarded land.	No	The NPPF (2019) ¶136 requires that Green Belt boundaries should only be altered where exceptional circumstances have been established through strategic policies. Once established, detailed amendments to the boundaries can be made through non-strategic policies. As confirmed in the LPS Inspector's report (at ¶99), <i>"CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land"</i> .
LPS Policy PG 4 'Safeguarded land' is based on weak data as to housing land need post 2030 and those data were wrongly interpreted and applied, meaning that the 200ha of safeguarded land referenced in the LPS is incorrect.	No	LPS Policy PG 4 is part of an up to date development plan that was found sound at examination. The approach to determining the amount of safeguarded land, and the data underpinning that approach were fully considered through that examination. The LPS Inspector's final report (at ¶99) confirms that <i>"The CELPS-PC proposes to release some 200ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence"</i> and ¶100 notes that <i>"CEC has taken a balanced and cautious approach to the amount of</i>

		<i>Safeguarded Land to be identified, which seems to be logical, rational, effective and justified by the supporting evidence; CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land”.</i>
There is no need for any further safeguarded land as the Cheshire East requirement for 1,800 dwellings per year has become 1,068 dwellings per year because of the government’s revised figures for the annual requirement for new dwellings published on 16/12/20. The LPS was based on an over-optimistic view of economic growth (7% per year) and 30,000 jobs resulting in an increased housing figure to cater for jobs growth. There has been underperformance in jobs growth and limited employment land take-up.	No	The minimum housing requirement for Cheshire East is for an average 1,800 net additional dwellings per year, as set out in the up-to-date adopted development plan. The figures for Cheshire East under the government’s standard method have changed significantly with each revision to the standard method and the current figure does not indicate what the need might be post 2030. In any case, NPPG (¶010 Reference ID: 2a-010-20201216) is clear that “ <i>The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour</i> ”. The current minimum housing requirement in the LPS was significantly uplifted from its baseline to account for a predicted 0.7% per year growth in the number of jobs. In reality, jobs growth has averaged 1.6% per year since the start of the plan period (as evidenced in the 2019/20 AMR) and it is likely that any future minimum housing requirement figure set through the development plan would need to account for a degree of jobs growth. The minimum housing requirement for Cheshire East remains at an average 1,800 dwellings per year and it cannot be assumed that this would be reduced post-2030. Any updated minimum starting point published by the government for determining the number of homes needed should not be equated with the minimum housing requirement adopted through a future plan review. Far greater reliance should be placed on the minimum housing requirement figures in the up to date LPS than on the government’s minimum starting point for determining the number of homes needed. This minimum starting point for

		<p>determining the number of homes has not been translated into a minimum housing requirement for the borough, following consideration of the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour (in accordance with NPPG). A new minimum housing requirement for the borough has not been proposed or considered through a plan review. Furthermore, even if, following consideration of all the other factors as required, the minimum starting point translated into a new minimum housing requirement of 1,068 dwelling per annum and was found sound through a future examination, this would apply to the borough as a whole and the future plan would also need to set a new spatial distribution of development. As set out in the LPS (¶18.45), <i>“a proportion of the proposed development arising from development needs within areas inset within the North Cheshire Green Belt is already channelled to locations within Cheshire East beyond the outer Green Belt boundary. Directing additional development to locations beyond the outer Green Belt boundary would lead to unsustainable patterns of development and would not provide sufficient new development in the areas of need”</i>. Therefore, even if the overall minimum housing requirement was reduced, it cannot be assumed that the same proportion of development needs arising in the northern areas could continue to be channelled to locations beyond the Green Belt whilst maintaining sustainable patterns of development and providing sufficient development in the areas of need. It cannot be assumed that a lower borough-wide minimum housing requirement would result in lower levels of development in the areas in the North Cheshire Green Belt. The publishing of a new borough-wide minimum starting point for determining the number of homes needed does not indicate that the amount of safeguarded land required in the northern part of the borough should be reduced from the amount evidenced through the up to date strategic plan. The reason for safeguarding land is to give the Green Belt boundary a sufficient</p>
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		<p>degree of permanence and to avoid a further review of Green Belt boundaries in the next plan period post 2030 and up to 2045. As set out in the NPPF (2019) ¶133, one of the essential characteristics of Green Belts are their permanence. If the minimum housing requirement post 2030 proves to be lower than the current requirement, and the spatial distribution of development continues to channel an equal or greater proportion of development needs arising in the northern part of the borough to locations beyond the Green Belt, then the effect of this would simply be to enable the 200ha of safeguarded land identified now to afford the Green Belt boundary an even greater degree of permanence.</p>
<p>The data used to evidence the need for safeguarded land in the LPS should be revisited, specifically in terms of: the apportionment of development requirements to the northern sub-area; the approach to employment land in the LSCs; and the housing need, which is no longer the same due to 'overperformance' in delivery in the first half of the current plan period or expected overperformance in the remainder of the plan period. There is already a projected surplus of 5,270 dwellings by the end of the plan period meaning that there is no need for additional safeguarded land.</p>	No	<p>As set out in LPS (¶8.57), 200ha of safeguarded land is considered to be the minimum amount needed to make sure that Green Belt boundaries do not need to be altered again in the next plan period. The evidence for the 200ha of safeguarded land is set out in the Safeguarded Land Technical Annex [PS 031a.5 in the LPS examination library]⁸.</p> <p>The Technical Annex highlights the lack of advice in the NPPF or NPPG on quantifying an appropriate amount of safeguarded land, and the inconsistencies in approaches that have been found sound at examination. The Technical Annex calculates the requirement for safeguarded land by projecting forwards the LPS development requirements (pro-rated to the requirements for the northern sub-area which largely corresponds to the North Cheshire Green Belt area) and assuming that Green Belt boundaries should not be altered again before 2045 (a further 15-year period beyond the current strategic plan end date of 2030). Following an Arup review of approaches elsewhere, the Technical Annex establishes that starting point for the amount of safeguarded land should be sufficient to meet 10 years of future</p>

⁸ The Safeguarded Land Technical Annex is available at <http://cheshireeast-consult.limehouse.co.uk/file/3478919>

		<p>projected development requirements, unless it can be determined that there is a high level of brownfield recycling and windfall sites and these are likely to be a continued reliable source in the future, then it may be possible to reduce the amount of safeguarded land to be sufficient to meet 5 years of projected future requirements.</p> <p>Providing safeguarded land to meet fewer years of projected requirements implies that there will be more reliance on other sources of land. The Technical Annex considers various potential sources to give an indication of potential land supply beyond 2030, including: over-provision of housing land in this plan period; urban potential sites; windfall development; SHLAA sites; and Brownfield Local Development Orders. Other ways of meeting future needs were also considered, including channelling development to locations within the inner Green Belt boundary, and channelling development to locations beyond the outer edge of the Green Belt boundary in Cheshire East.</p> <p>Given the uncertainties involved in the future timescales beyond 2030, it would be difficult to quantify a specific reduction from the 10 years forward projection with robust evidence. As a result, the technical annex does not attempt to calculate a specific reduction, but instead uses professional judgement to conclude that there are sufficient grounds to reduce the timescale by a modest amount, to between 8 and 10 years.</p> <p>The amount of safeguarded land required to meet 8-10 years of future development requirements will also depend on the density of housing development coming forward in the future. Whilst the LPS makes general assumptions that 30 dwelling per hectare is a reasonable average development density, the technical annex considered a range of factors that may affect densities in the future. These factors included an ageing population, different housing mix, increased emphasis on urban</p>
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		<p>design and the finite land resource, with the technical annex concluding that there are sufficient grounds to factor in a modest increase in the standard 30dph assumption to between 30dph and 40dph in the safeguarded land calculation.</p> <p>Using these assumptions (between 8-10 years' worth of land with future housing densities of between 30-40dph), gives the range of between 155ha and 244ha of land. The technical annex notes that overdependence on any single influence is unwise, given the variables involved; and a mid-point of 200ha should be adopted that takes account of all the factors concerned. The annex is clear that the approach should not be any more specific about the likely variables – because to do so might render a calculation with a spurious level of fine-grained accuracy. Instead, a broader strategic view of the issue should be taken. In the context of a long-term strategic designation such as safeguarded land, it is considered that the evidence remains relevant, up to date, adequate, and proportionate.</p> <p>Given that the approach should not be any more specific about the likely variables (to avoid a spurious level of fine-grained accuracy), there are no relevant factors that would change the calculation of 200ha.</p> <p>The LPS development requirements (LPS Policy PG 1) and the spatial distribution of development (LPS Policy PG 7), which inform the figures to be projected forwards remain the same as were used in the Technical Annex calculation.</p> <p>At the time of the calculation, the significant uncertainties involved in the timescales beyond 2030 meant that it would be difficult to quantify a specific reduction from the 10 years forward projection with robust evidence of likely future sources of land. Whilst it might be said that there is now more up to date information on the likely future sources of land, there are still</p>
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		<p>significant uncertainties involved in the timescales between 2030 and 2045. It remains appropriate to use professional judgement on the matter and there has not been any substantial change in the likely future sources of land to alter the conclusion that, using professional judgement, there are sufficient grounds to reduce the timescale by a modest amount, to between 8 and 10 years.</p> <p>The Technical Annex also considered factors that may affect housing density in the future, using professional judgement to conclude that an ageing population, different housing mix, an increased emphasis on urban design, and a finite land resource meant that there were sufficient grounds to factor in a modest increase in density to between 30 and 40 dwellings per hectare in the calculation. Whilst it may be said that densities may increase further due to various factors, this cannot be said with any certainty. The SAPDD does include a new policy on housing density, which intends that residential developments will generally achieve a density of at least 30 dwellings per hectare. This is compatible with the modest increase of between 30 and 40 dwellings per hectare in the calculation and a significant uplift from current densities. As evidenced in the 2019/20 AMR, 74% of new dwellings in 2019/20 were built at densities of less than 30 dwellings per hectare. There has not been any substantial change in issues surrounding density to alter the conclusion that, using professional judgement, there are sufficient grounds to factor in a modest increase in density of between 30 and 40 dwellings per hectare.</p> <p>Safeguarded land is not identified for any particular use and could be utilised for housing, employment or any other use that may be appropriate to a particular site if needed for that use in the future. There has not been 'overperformance' in housing delivery in the first half of the current plan period and there remains a modest backlog of dwellings against requirements.</p>
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		<p>'Flexibility' in the housing supply should not be confused with 'overperformance'. The current dwelling requirement is a minimum figure and not all sites will deliver as expected. A degree of flexibility in the supply is required to make sure that the minimum figure is achieved. Safeguarded land may be required to assist in meeting development needs in the next plan period, but other sources of land will also be needed. Issues related to housing land supply are considered further in the Chapter 8: Housing (general issues) section of this consultation statement appendix.</p>
<p>LPS Policies PG 3 and PG 4 require the SADPD to make an assessment of whether or not it is necessary to release further land from the Green Belt to be designated as safeguarded land; and this policy requirement is not altered by the reference to 200ha in the supporting text. This approach was endorsed by the LPS Inspector and is consistent with the NPPF (2019) (¶139) but the council has not conducted an up-to-date assessment of the need for release of further land from the Green Belt to be designated as safeguarded land.</p>	No	<p>The LSC Safeguarded Land Distribution Report [ED 53] considers the approach to be taken to safeguarded land through the SADPD. It considers the need for safeguarded land and the exceptional circumstances required to make alterations to the Green Belt boundary, within the parameters of the strategic approach set out through the LPS. The need for 200ha of safeguarded land was established through the LPS evidence base, accepted through the examination and forms part of the plan strategy. The LPS identified 186.4ha of safeguarded land so, in order to be able to demonstrate that Green Belt boundaries will not need to be altered again at the end of the plan period (as required by NPPF (2019) ¶139), there is a need for the SADPD to identify the remaining 13.6ha safeguarded land.</p> <p>The LPS Inspector's final report is also consistent with the requirement to identify 200 ha of safeguarded land. At ¶5, he notes "<i>The CELPS-PC made some significant changes to the CELPS-SD. These included... amending the green belt boundary and identifying an increased amount of safeguarded land (200 ha) ...</i>". At ¶99, the report states "<i>The CELPS-PC proposes to release some 200ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence (SLTA) [PS/E031a.5]</i>". ¶100 of the</p>

		<p>Inspectors final report confirms that <i>“Some participants are concerned that the overall amount of proposed Safeguarded Land is inadequate to meet future development needs, but as confirmed in my Further Interim Views (Appendix 2), I consider CEC has taken a balanced and cautious approach to the amount of Safeguarded Land to be identified, which seems to be logical, rational, effective and justified by the supporting evidence; CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land.”</i></p> <p>The Inspector’s final report (at ¶102) also confirms that <i>“the SADPPD will consider the need to provide a modest amount of Safeguarded Land at the LSCs, if necessary, in line with the spatial distribution of Safeguarded Land envisaged in the supporting evidence [RE/F010; Appx 2]”</i></p> <p>¶102 of the Inspector’s final report also makes the important point that <i>“Of course, identifying Safeguarded Land does not necessarily mean that it will be developed in the future, but offers the potential for development to be considered in future reviews of the CELPS without needing to alter the Green Belt. The amount and location of development that would be needed on Safeguarded Land would also be based on an assessment of needs at that time.”</i></p> <p>It is clear from reading the inspector’s final report that the amount of safeguarded land that will be needed for development in the next plan period is a matter for that future plan, but it was accepted through the examination that 200ha is a sufficient amount to avoid a further review of Green Belt for the next plan period.</p> <p>Safeguarded Land is a strategic designation required to protect the permanence of the Green Belt boundary in the long-term.</p>
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No safeguarded land should be identified. The Housing Delivery Test 2018 showed that twice as many houses as required were delivered between 2015-18; there was a record number of net house completions in 2018/19 (3,062). The 200 houses provided by the 8 sites in the Green Belt will be met in the immediate future from windfall sites.	No	Safeguarded land is not allocated for development and is intended to meet longer term development needs, stretching well beyond the plan period. Whilst housing delivery has exceeded the annual average requirement in recent years, there remains a modest backlog due to the delivery being below the annual average requirement in the early years of the plan period. Issues related to housing land supply are considered further in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
There is no need for further safeguarded land due to the high number of windfall sites; more high-density housing will come forward in town centres resulting from the decline in retail; SADPD Policy HOU 12 promotes increased densities; further employment allocations will be re-allocated to housing.	No	The need for 200ha of safeguarded land was established through the LPS evidence base, accepted through the examination and forms part of the plan strategy. The LPS identified 186.4ha of safeguarded land so, in order to be able to demonstrate that Green Belt boundaries will not need to be altered again at the end of the plan period (as required by NPPF (2019) ¶139), there is a need for the SADPD to identify the remaining 13.6ha safeguarded land. The use of land from other sources and an uplift in housing densities is already factored into the calculation.
The safeguarded land should be identified for development in this plan period. More housing land is needed to provide	No	LPS Policy PG 4 'Safeguarded land' is clear that "safeguarded land is not allocated for development at the present time". In line

greater flexibility and secure the longevity of the Green Belt boundary. Safeguarded land should provide a pool of reserve sites that could come forward should other sites in the supply not be able to deliver. These sites should be distributed to reflect the adopted spatial strategy and not just in the northern part of the borough.		with the NPPF 2019 (¶139d), safeguarded land should only come forward for development if the development is proposed through a plan update. The issue of flexibility in the housing land supply is considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix. Safeguarded land is defined as “land between the urban area and the Green Belt”. Settlements in the southern part of the borough are beyond the Green Belt and do not require safeguarded land.
The emphasis should be on meeting longer-term development needs. There are significant growth proposals in Crewe and Alsager is also within this core growth area. The SADPD should prepare for this direction of growth and ensure sufficient land is available to maximise potential.	No	Safeguarded land is defined as “land between the urban area and the Green Belt”. It is intended to meet longer-term development needs stretching well beyond the plan period, without the need to alter Green Belt boundaries again. Crewe and Alsager are located beyond the Green Belt and do not require safeguarded land.
Several issues were raised in respect of specific Green Belt sites, where it is considered that either: the site should be released from the Green Belt and allocated for development; the site should be released from the Green Belt and identified as safeguarded land; or where the site should remain in the Green Belt.	No	Main issues for specific sites are summarised and considered in the section for the relevant settlement in this consultation statement appendix. The issue of altering Green Belt boundaries to accommodate development in this plan period is considered in the section for deleted Policy PG 11 ‘Green Belt boundaries’.
Further Green Belt site allocations are needed.	No	This issue is considered in the deleted Policy PG 11 ‘Green Belt boundaries’ section of this consultation statement appendix.
The LPS only considers sites of 150 homes/5ha and above on the basis that non-strategic sites would be found in the SADPD. The plan is unsound as the reasonable alternative of allocating smaller sites has not been considered.	No	This issue is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
There are exceptional circumstances to justify further Green Belt boundary alterations for site allocations in KSCs and the PT of Macclesfield. These include: the lack of brownfield sites; unmet development requirements; lack of flexibility; lack	No	This issue is considered in the deleted Policy PG 11 ‘Green Belt boundaries’ section of this consultation statement appendix.

of opportunity to allocate non-strategic sites; strategic sites may not deliver as expected; and affordability issues.		
There is a need to release Green Belt land to allocate sites for retirement living schemes/C2 uses.	No	The need to allocate sites for older persons accommodation is considered in the Policy HOU 2 'Specialist housing provision' section of this consultation statement appendix.
More safeguarded land is needed in Wilmslow because there is insufficient safeguarded land identified to meet its development needs post 2030 and there has been no opportunity to consider strategic sites.	No	The LPS identifies two safeguarded land sites in Wilmslow, providing 24 ha safeguarded land. This meets the safeguarded land requirement for Wilmslow set out in the LPS evidence base.
The settlement boundaries and Green Belt boundaries of inset settlements should be reviewed. The NPPF (2019) ¶139 requires that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open; and define boundaries clearly using physical features that are readily recognisable and likely to be permanent. "When defining Green Belt boundaries" does not distinguish between the initial setting of a boundary and the revision in the context of exceptional circumstances. Therefore, in both cases the plan must not include land which it is unnecessary to keep permanently open and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. If it is not necessary to keep land permanently open (for example, development on the ground does not match the Green Belt boundary), then this alone can comprise the exceptional circumstances to justify GB release.	No	As stated in the NPPF (2019) ¶133, one of the essential characteristics of Green Belts are their permanence. The NPPF (2019) (¶136) requires that Green Belt boundaries are only altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries and where strategic policies have established such a need, detailed amendments to boundaries can be made through non-strategic policies. The exceptional circumstances to justify the need for changes were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements. There are no identified exceptional circumstances that would justify a more general review of Green Belt boundaries. In addition, LPS Policy PG 3 'Green Belt' is clear that the extent of the existing Green Belt remains unchanged, apart from the removal of land from the Green Belt associated with the listed sites. It also raises the prospect of further non-strategic sites to be removed from the Green Belt through the SADPD. Any wider, more general review of Green Belt boundaries to release land for any other purpose than identifying sites would not be in accordance with LPS Policy PG 3 'Green Belt'.

The SADPD proposes to release land from the Green Belt in Bollington that makes a 'significant contribution' to the purposes of Green Belt, when alternative non-Green Belt or lower contribution Green Belt sites are available elsewhere.	No	As set out in the Site Selection Methodology [ED 07], Green Belt sites that are previously developed and/or well served by public transport are considered before those that are not (as required by NPPF (2019) ¶138). Within each of these categories, Green Belt sites are considered in order of their contribution to Green Belt purposes, to prioritise those making a lower contribution. Some sites making a lower contribution to Green Belt purposes may be unsuitable for other planning reasons, which are documented in the individual settlement reports.
Highways England have requested that CEC undertake an evidence-based transport study to assess the cumulative highway traffic impacts of the safeguarded sites contained in the SADPD.	No	In accordance with the Site Selection Methodology [ED 07], Highways England have been consulted on each of the sites proposed through the infrastructure providers / statutory consultees consultation at stage 6. This is set out in each of the relevant settlement reports. Safeguarded land is not allocated for development.
The council has downgraded the Green Belt contribution of several sites from that in the Green Belt Assessment Update 2015. The Green Belt contribution of several sites has been downgraded from the 2013 Green Belt Assessment.	No	This issue has been considered in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
The SADPD should consider whether each of the Green Belt infill villages should be washed over or inset from the Green Belt as required by NPPF (2019) ¶140.	No	This issue has been considered in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
The re-allocation of Mobberley's safeguarded land to Chelford is not justified as there is a suitable site in Mobberley.	No	The Mobberley Settlement Report [ED 37] demonstrates that there are no suitable sites to meet the initial preferred option for distribution of safeguarded land to Mobberley (2.16ha). Main issues that are specific to the sites considered in Mobberley are set out in the Mobberley (general issues) section of this consultation statement appendix.
The approach of distribution safeguarded land across LSCs is flawed and ignores sustainable development factors and the vision for LSCs. Disley should have no safeguarded land as it	No	The approach to distributing safeguarded land in the Revised Publication Draft SADPD is based on consideration of services and facilities; constraints; Green Belt impact; and opportunities.

has no public transport or major direct road links to employment centres in Cheshire East; development here would not help to reduce out-commuting; cross-boundary impacts have not been considered; additional housing in Disley will not serve needs arising in Cheshire East; Disley is the only LSC with an AQMA. Alderley Edge is more sustainable with a higher population, more growth, more employment opportunities.		This is explained in the LSC Safeguarded Land Distribution Report [ED 53].
Various sites in Alderley Edge and Mobberley should be identified as safeguarded land instead of the land at Disley.	No	Sites have been selected in accordance with the Site Selection Methodology [ED 07] to meet the distribution of safeguarded land set out in the LSC Safeguarded Land Distribution Report [ED 53] wherever possible. As demonstrated in the Disley Settlement Report [ED 29], there are suitable sites to identify as safeguarded land in Disley.
The land allocated to Chelford should be re-distributed to Alderley Edge as it is a more sustainable location.	No	The approach to distributing safeguarded land in the Revised Publication Draft SADPD is based on consideration of services and facilities; constraints; Green Belt impact; and opportunities. This is explained in the LSC Safeguarded Land Distribution Report [ED 53].
The amount of safeguarded land proposed for Chelford does not meet the LPS vision for Chelford, as a LSC for “some modest growth in housing and employment will have taken place to meet locally arising needs and priorities”.	No	This issue is considered in the Chelford (general issues) section of this consultation statement appendix.
The policy should make clear that the requirement for compensatory improvements only applies to the sites identified in the policy and not to the safeguarded land sites identified in Policy PG 4 of the LPS as these were released from the Green Belt prior to the introduction of this requirement to the NPPF (2019) at ¶138.	No	The requirement for compensatory improvements in Policy PG 12 applies only to those sites listed in Policy PG 12.
Cheshire East Council designated a climate emergency in May 2019; and the identification of safeguarded land is not compatible with this.	No	Safeguarded land is not allocated for development but could be allocated if required in the future. Sustainable development includes economic, social, and environmental objectives. The

		identification of safeguarded land to assist in meeting future needs (if required) is compatible with those aims.
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Policy PG 13 ‘Strategic green gaps boundaries’

Summary of the main issues raised	Revised SADPD amended?	Council response
The Settlement and Infill Boundaries Review and Strategic Green Gap Boundary Definition Review fail to assess reasonable alternative sites other than those that have been allocated or committed. No consideration has been made to existing sites and the relationship to the physical form of the built environment. The policy is unsound on this basis.	No	The SSM [ED 07] sets out the approach used to consider potential sites for allocation (including those within SGG). The application of the SSM is documented in each of the individual settlement reports.
The approach of following, as closely as possible, the extent of the SGG shown hatched in the LPS Figure 8.3 is flawed as those boundaries were not considered or examined by the LPS Inspector. Consideration should be given to whether the detailed boundaries fulfil the objectives of LPS Policy PG 5 ‘Strategic Green Gaps’.	Yes	As set out in SGG Boundary Definition Review [ED 08] the broad extent of the SGGs was confirmed through the LPS. The LPS Inspector confirmed that the general extent of the SGGs was addressed in the LPS supporting evidence and that the purpose and proposed approach to the designation of SGGs was appropriate, fully justified, effective, positively prepared, soundly based and consistent with national policy. Detailed boundaries would be subsequently addressed through the SADPD. The definition of detailed boundaries is a limited exercise that does not involve a review of whether the land shown as broadly comprising the SGG in the LPS should continue to form part of it. The SGG Review [ED 08] includes a methodology for assessing SGG boundaries, including whether the SGG includes land that does not contribute to the three main functions of the SGG as set out in LPS Policy PG 5 ‘Strategic Green Gaps’.
Unclear of the necessity for Policy PG 13 as it appears to refer to and repeat the policy contained in the LPS.	Yes	¶108 of the LPS Inspector’s report states: “ <i>The general extent of the SGGs policy has been addressed in the supporting</i>

		<i>evidence [BE/011], and whilst ideally its detailed boundaries should be defined in the CELPS, the revised policy provides sufficient strategic guidance and spatial direction to determine such boundaries in the subsequent SADPPD, when concerns about the detailed boundaries and extent of the gaps can be addressed.”</i> The boundary review is set out in the SGG Boundary Review [ED 08] and includes recommendations of boundary changes.
<p>Recent appeal decisions concluded that harm would be limited, therefore it is justifiable to release further sites from the SGG:</p> <ul style="list-style-type: none"> • Land off Oakleaf Close, Shavington • Land south of Bradeley Hall Farm • Land at Hunters Lodge, • Land north of Cheerbrook Road, Willaston • Two adjoining sites west of Crewe Road, north of the settlement of Shavington. • Land south of LPS 8 South Cheshire Growth Village • Land at Newcastle Road, Willaston • Land to the north of Sydney Road, Crewe • Land east of Crewe Road and immediately north of the A500 • Shukers Farm, Haslington • Land south of Park Road Willaston 	No	The SGG Boundary Review [ED 08] has assessed the boundaries of the SGG in accordance with a defined methodology and changes to the boundary are proposed as appropriate. The cumulative effect of amending the SGG to incorporate these sites would significantly compromise the main functions of the SGG.

Policy PG 14 ‘Local green gaps’

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD has not identified any localised green gaps that require additional policy protection through a Local Green	No	LPS ¶8.64 notes that the SADPD will consider whether there are further, more localised gaps that require additional policy

Gaps policy. There is no purpose for this policy. A sound approach is for neighbourhood plans to set specific policies for any local green gaps identified, which can be tailored to the local green gap in question. The policy fails to make clear that it does not apply to existing local green gaps/green wedges identified in NPs. It would be illogical to apply an additional tier of policy protection to local green gaps/green wedges that have already been designated.		protection through a Local Green Gaps policy. The SADPD is prepared to be consistent with the LPS and has considered this issue further. Policy PG 14 states that the identification of local separation policies will be supported in neighbourhood plans. The policy provides additional detail to explain how planning proposals that affect any designations made will be considered.
LPS Policy PG 3 'Green Belt' states that buildings for agriculture and forestry are the exception in the Green Belt. Policy PG 14 'Local green gaps' states that in local green gaps/green wedges identified in neighbourhood plans, LPS Policy PG 6 'Open countryside' will apply. Exceptions to the policy will be defined locally or considered where no suitable alternative location is available. The policy could provide a barrier to farmers developing their business. It could also lead to a different approach depending on the policies in different neighbourhoods across the county.	No	Policy PG 14 'Local green gaps' does not preclude agricultural development subject to the criteria defined in the policy. There is provision for exceptions to be made if no suitable alternative location is available. Through the Development Management process, development will be deemed appropriate or inappropriate according to its location, not different interpretations of the same policy.
The proposed policy is not sound as it does not meet the requirements of NPPF ¶35.	No	LPS ¶8.64 notes that the SADPD will consider whether there are further, more localised gaps that require additional policy protection through a Local Green Gaps policy. The SADPD is prepared to be consistent with the LPS and has considered this issue further. Policy PG 14 states that the identification of local separation policies will be supported in neighbourhood plans. The policy provides additional detail to explain how planning proposals that affect any designations made will be considered.

Chapter 3: General requirements (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised.	N/A	N/A

Policy GEN 1 ‘Design principles’

Summary of the main issues raised	Revised SADPD amended?	Council response
United Utilities preference would be to include the following additional text: <i>‘the design of new development should ensure that there is space within the development layout to incorporate sustainable drainage with multi-functional benefits and include water efficiency measures for new buildings and their layouts to reduce the impact of the development as part of a high quality green and blue water environment’</i> .	Yes	Additional text has been added to the supporting information to emphasise the importance of taking opportunities to incorporate sustainable drainage and water efficiency measures within the development layout, in line with policy ENV 16 ‘Surface water management and flood risk’. The supporting information refers to Policy ENV 7 ‘Climate change’, which also refers to water efficiency measures.
The Environment Agency considers that Policy GEN 1 would be strengthened by ensuring the inclusion of a principle which states development proposals should; <i>‘Interact positively with the natural environment – incorporating measures to ensure proposals enhance habitats and natural features on and within the vicinity of the development site. Where enhancement cannot be provided, preference should first be given to ensuring that impacts upon the natural environment are avoided. If enhancement or avoidance cannot be achieved then any negative impacts caused by the development to the natural environment should be appropriately mitigated against’</i> .	Yes	Policy GEN 1, when read as a whole, appropriately requires the consideration of the interaction of development with the natural environment. The supporting information to policy GEN 1 also refers to SADPD policy ENV 7 ‘Climate change’. An additional reference has been included within policy GEN 1 (criterion 13), for development to interact positively with the natural environment in line with the mitigation hierarchy set out in criterion 2 of policy ENV 2 ‘Ecological implementation’ of the SADPD.
There is a potential absence of any detailed design guidance carried forward from legacy local plans following the adoption of the SADPD. Unclear on the relationship of policy GEN 1 with the Cheshire East Borough Design Guide.	No	When read alongside LPS policies SD 1 ‘Sustainable Development in Cheshire East’ and SE 1 ‘Design’, it is considered that there is a sufficiently detailed policy context in relation to design and quality of place in the borough. The supporting information to policy GEN 1 notes that proposals should take account of any formally adopted SPDs (including the Cheshire East Borough Design Guide), area specific design guidance, masterplans, character appraisals or area specific

		management plans. The supporting information to the policy also refers to the role of neighbourhood plans to help identify the special and distinctive qualities of a local area.
Policy GEN 1 essentially adds further design principles to Policy SE 1 'Design' in the LPS. Concerned that the plan is becoming somewhat burdensome, repetitive and fragmented. Policy GEN 1 'Design Principles' would overlap with adopted LPS Policy SD 1 'Sustainable Development in Cheshire East'.	No	Policy GEN 1 builds on the content of strategic LPS policies SD 1 'Sustainable Development in Cheshire East' and SE 1 'Design'. The policy provides further guidance and design principles for an applicant to consider at an early stage. Policy GEN 1 acknowledges the importance placed on design to contribute to the borough's quality of place and local identity, including through inclusive design principles.
The criteria should be prefaced that they 'must' be met - or at least 'these criteria are expected to be met' - rather than 'should' be met	No	The word 'should' is considered sufficiently robust in relation to the future application of this policy.
Density, mass and spaces between buildings are critical design features and should be referenced in the design principles policy. Policy lacks specificity in respect of climate change and the level of environmental design required.	No	Policy GEN 1 refers to density and the appropriate consideration of mass in criterion 1, as an example. The SADPD should be read as a whole, alongside the strategic policies of the LPS. References to density are included in policy HOU 12 'Housing density' of the SADPD. Reference to policy ENV 7 'Climate change' is included in the supporting information to policy GEN 1. Policy ENV 7 includes environmental design and adaptation considerations alongside standards related to energy efficiency and decentralised, renewable and low carbon energy sources.

Policy GEN 2 'Security at crowded places'

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised.	N/A	N/A

Policy GEN 3 ‘Advertisements’

Summary of the main issues raised	Revised SADPD amended?	Council response
In the supporting information section, there should be cross referencing to Policies RET 4; RET 9 and ENV 14.	Yes	The Plan is intended to be read as a whole. However, in the ‘Supporting information’ section (¶3.15) there is cross reference to Policy RET 4 (Shop fronts and security) as applications for shop fronts and advertisements are generally submitted together. Criterion 6 has been amended, to avoid policy being repeated, and states “Illuminated advertisements should be discreet and comply with the requirements of Policy ENV 14 ‘Light Pollution’.
To preserve the character of buildings and the area, hanging shop signs should be installed at a consistent height within the area and are not detrimental to the character of the building.	No	It is considered that criterion 2 appropriately supports this issue which states: “the proposal is not out of keeping with the style or character of a building or its surroundings.” If the hanging sign is at a significant height to other surrounding advertisements in the vicinity, then it would be considered to be out of style/character with its surroundings.
Local authorities should ensure that distracting advertisement hoardings are not erected alongside major roads and commit to remove any illegal ones appearing.	No	Criterion 1 seeks to make sure that amenity and public safety are maintained. When considering ‘public safety’ factors, the planning authority will normally consult other relevant bodies during the application process, for example the highway authority, if the advertisement is alongside a major road. Any advertisement that is put up that has not obtained the necessary consent will be dealt with by the enforcement team, as will any other illegal development. It is not considered necessary to insert within planning policy a commitment to remove any illegal advertisement, or any other development that has not obtained the necessary consent.
¶3.16 should be included within the policy as this would strengthen it in relation to the Authority’s historic town	No	Applications for advertisements on listed buildings are subject to listed building consent and separate requirements in terms of

centres, many of which are Conservation Areas and/or contain listed buildings.		safeguarding the significance of the heritage asset and minimising any harm. To ensure certainty for those submitting applications for advertisements, the policy states within the 'Supporting information' section (¶3.16) that any applications affecting a designated heritage asset will be dealt with using the policies contained in Chapter 5 of the Plan.
To strengthen the policy there should be reference to 'A' boards, especially in conservation areas and wherever pavement space is limited. There are two issues - the visual impact of a proliferation of floor-standing advertising boards and the safety aspect, especially for those with sight impairment.	No	The policy relates to all forms of advertisements including 'A' boards. The policy makes clear under criterion 1 that any proposal should not be detrimental to amenity or safety. Criterion 4 also states that the cumulative impact of the advertisements should not be detrimental to the character of the building on which they are to be displayed and/or the general characteristics of the locality.
The policy fails to mention internally illuminated and halo illumination of advertisements. They are an intrusive element in historic settings. Some policy guidance on both these matters are required in this policy, in an SPD, or by inclusion in neighbourhood plans as appropriate.	No	The policy is considered sound as written. Criterion 1 states the proposal would not be detrimental to amenity or safety, byamount and type of text or degree of illumination and luminance. Criterion 3 also provides guidance on illumination and states that illuminated advertisements should be discreet and comply with the requirements of Policy ENV 14 'Light pollution'. In addition, any applications affecting a designated heritage asset will be dealt with using the policies contained in Chapter 5 of the Plan.
The policy includes some specifics on the design of advertisements but insufficient detail to provide sure and certain guidance. Some of the old boroughs had SPDs on advertising and shop front design and many neighbourhood plans have similarly detailed guidance. These latter should be referenced with a commitment that the LPA will consolidate and revise the SPDs and apply the replacement across the Authority.	No	The policy is considered sound as written. The council will consider the preparation of new SPDs from time to time.

Policy GEN 4 ‘Recovery of forward-funded infrastructure costs’

This policy was titled GEN 4 ‘The recovery of infrastructure costs and planning obligations reduced on viability grounds’ in the initial Publication Draft SADPD. Main issues related to the recovery of planning obligations reduced on viability grounds are now summarised in the table for Policy GEN 7.

Summary of the main issues raised	Revised SADPD amended?	Council response
Implementation of the policy is unclear in terms of who will be expected to pay a contribution towards forward funded infrastructure, how this will be calculated and at what point further infrastructure contributions will no longer be required as costs would have already been fully met by other consented development. The lack of a detailed mechanism / basis for calculating contributions means that it is unsound.	Yes	The revised Policy GEN 4 outlines the general framework within which the policy will operate and indicates that further details will be provided in a scheme specific SPD. It is not necessary, appropriate or practical for the policy to give a detailed explanation of how it will operate so that all eventualities and circumstances are covered. The number of cases where forward funded infrastructure is provided by the council within the remit of this policy is expected to be limited, and it is more appropriate that these details are scheme specific and agreed prior to any planning approvals so developers are aware at an early stage of the obligation costs that will apply.
There is insufficient clarity about how the forward funding element of the policy meets the planning obligations test in the NPPF (2019) and the CIL Regulations.	Yes	The requirement to meet the appropriate CIL regulations has now been made explicit in the policy itself. The policy and supporting information has been written to meet the requirements of the CIL tests and a detailed explanation of how it conforms with the tests is not required as part of the policy. The principle of forward funding infrastructure is compatible with government guidance and is specifically mentioned as an acceptable approach for education infrastructure in ¶008 of the planning obligations NPPG (Reference ID: 23b-008-20190315).
The funding for key infrastructure projects should be delivered through CIL rather than from developers via a forwarded funding policy mechanism.	No	¶003 of the NPPG on planning obligations advises that “Authorities can choose to pool funding from different routes to fund the same infrastructure” (Reference ID: 23b-003-20190901). CIL will not fund all the main infrastructure

		<p>requirements identified as being necessary to deliver the proposals in the LPS by the council's Infrastructure Delivery Plan. The Infrastructure Delivery Plan identifies an infrastructure funding gap of between £373m and £451m, with the highest priority infrastructure schemes alone costing around £68m. The council estimated for the CIL examination that the levy was expected to generate an income over the plan period to 2030 of some £38.7m. In reality this amount is likely to be less as the proposed CIL rates were reduced in one zone following the CIL examination and the council has to transfer up to 25% of the CIL money raised to local town and parish councils. This demonstrates that there will be a significant funding gap between the cost of the infrastructure in the Infrastructure Delivery Plan and the amount of money that is anticipated will be raised through CIL. It is appropriate that developers who require infrastructure to make their development acceptable in planning terms, in line with ¶56 of the NPPF (2019) and the related CIL regulation tests, should make a suitable contribution towards its provision. Therefore, the policy is not about who should pay for infrastructure or the extent of their contribution. Instead, it is about providing a mechanism which enables key infrastructure, particularly on larger schemes involving multiple owners, to be provided at an earlier stage than it would otherwise have happened. This represents a positive approach to achieving sustainable development.</p>
<p>The infrastructure projects and sites to which the forward funding element of the policy applies are not identified. This information should be available alongside the SADPD with details on what the costs are for each site, together with how they have been calculated and justified.</p>	No	<p>The proposed policy is seeking to establish the general mechanism for providing forward funded infrastructure in Cheshire East. It is not considered appropriate that it should only identify specific schemes as new schemes may come forward during the plan period.</p>

Policy GEN 5 'Aerodrome safeguarding'

Summary of the main issues raised	Revised SADPD amended?	Council response
The draft policies map does not show the extent of the Manchester Airport operational area.	No (but the policies map has been amended).	The Manchester Airport operational area does not define the spatial extent to which Policy GEN 5 'Aerodrome safeguarding' applies. The interactive online draft adopted policies map correctly showed the extent of the Manchester Airport operational area and it is now also shown on the printed version.

Policy GEN 6 'Airport public safety zone'

Summary of the main issues raised	Revised SADPD amended?	Council response
The draft policies map does not show the extent of the Manchester Airport operational area.	No (but the policies map has been amended).	The Manchester Airport operational area does not define the spatial extent to which Policy GEN 6 'Airport public safety zone' applies. The interactive online draft adopted policies map correctly showed the extent of the Manchester Airport operational area and it is now also shown on the printed version.
The Manchester Airport Public Safety Zone should be shown as a designation on the policies map	No.	The Manchester Airport Public Safety Zone is referred to by the plan but not defined by it. It could be shown on the policies map for information, but to keep the map readable, it is not possible to show all additional information. The addition of the public safety zone to the policies map is not required to make the plan sound.

Policy GEN 7 'Recovery of planning obligations reduced on viability grounds'

Policy on the recovery of planning obligations reduced on viability ground was included within Policy GEN 4 'The recovery of infrastructure costs and planning obligations reduced on viability grounds' in the initial Publication Draft SADPD. Main issues related to the recovery of forward-funded infrastructure costs are now summarised in the table for Policy GEN 4.

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Planning obligations need to be known and agreed at the outset with landowners so that developers can agree an appropriate price for the land. Taking account of additional obligations later is difficult to accommodate within this process both financially and legally.</p>	No	<p>The main planning obligations are already known and form part of the LPS, which is the strategic plan in the borough and was recently adopted in July 2017, together with any other relevant elements of the adopted statutory development plan. The LPS policies were viability tested as part of the examination process and found to be sound. Unfortunately, developers who overpay for land often seek to reduce known planning obligations, such as levels of affordable housing, to make schemes viable so that their required returns can be achieved. However, as ¶006 of the government's viability guidance states "Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan" (Reference ID: 10-006-20190509). It is entirely appropriate for the planning authority to seek to deliver policy requirements that were previously determined not to be deliverable as this prioritises benefit for the wider community ahead of enhanced developer profit.</p>
<p>The SADPD should be supported by an evidence base that demonstrates that the policies and allocations it contains can be viably delivered.</p>	No	<p>The council's SADPD Viability Assessment [ED 52] shows that the accumulative costs of the obligations and policies in the LPS and SADPD would not render development unviable.</p>
<p>A policy requiring further viability assessments would be costly for the developer, contrary to national planning policy, as well as cause uncertainty and additional risk for developers.</p>	No	<p>The council does not agree that the requirement for further viability assessment is contrary to national planning policy and provides additional risk for developers. In fact, ¶009 of the government's viability guidance allows for the possibility of review mechanisms, as follows: "<i>As the potential risk to developers is already accounted for in the assumptions for developer return in viability assessment, realisation of risk does not in itself necessitate further viability assessment or trigger a review mechanism. Review mechanisms are not a tool to protect a return to the developer, but to strengthen local</i></p>

		<i>authorities' ability to seek compliance with relevant policies over the lifetime of the project"</i> (Reference ID: 10-009-20190509).
Some form of review mechanism is only appropriate for a small proportion of development sites (of around 500 units or more) and should not be applied to all developments where reduced planning obligations have been agreed on viability grounds.	No	It is for the planning authority to determine the appropriateness of recovering reduced planning obligations. Requiring a reduction to known planning obligations in an adopted plan should only be considered exceptionally and in a limited number of instances. It is appropriate that each one of these exceptions is individually reviewed should the council consider this to be appropriate.
Review mechanisms should be limited to pre-implementation reviews only for sheltered housing providers where development must be 100% complete before sales are realised, as such providers have other specific circumstances, which means this proposal will negatively impact on their operation.	No	The council does not consider that the circumstances highlighted justify a special approach for sheltered housing providers within the policy. It is assumed that a development that has received planning permission is viable, particularly where normal planning obligations have been reduced in exceptional circumstances to ensure viability. The provisions of this policy will only apply where development has proved to be more viable than assumed at the time that permission was granted. It is appropriate for the planning authority to seek to deliver policy requirements that were previously determined not to be deliverable as this prioritises benefit for the wider community ahead of enhanced developer profit.
<p>The reduced viability element of the policy is too broad. The policy should establish parameters so that the relevant principles do not have to be established within the context of every affected planning decision. It should include the grounds where a material change in circumstances may be expected such as:</p> <ul style="list-style-type: none"> • The passage of time until a start on site; • Whether the development contains separate and distinct phases; and • The overall scale of the site and the anticipated delivery period. 	No	It is the responsibility of site promoters to ensure that proposals for development are policy compliant. Seeking a reduction to known planning obligations in an adopted plan should only be considered exceptionally and in a limited number of instances. It is appropriate that each one of these exceptions is individually reviewed in accordance with the general mechanism detailed in the policy should the council consider this to be appropriate. The council intends to produce a planning obligations SPD, which will provide further information to assist with the implementation of the policy.

A further requirement should be added to ¶3.24 to require a viability assessment associated with any land being developed by the council to be reviewed by an independent expert and made publicly available as part of the planning application assessment.	No	This is not considered necessary. It is very unlikely that the council would propose a development that is not policy compliant with its own Local Plan. Nevertheless, LPS Policy SC 5 'Affordable homes' already requires an independent review of viability studies submitted to justify any alternative affordable housing provision to that required by policy. This requirement applies to everybody including the council.
If the infrastructure required to support an application is not viable then the application should not proceed. Affordable housing obligations should never be reduced. Omitting important elements of development on viability grounds will not create quality and balanced communities. Public funding must not be used to support failing developers or unviable applications.	No	¶38 of the NPPF (2019) requires local planning authorities to approach decisions on proposed development in a positive and creative way i.e. they should seek to approve applications for sustainable development where possible. There may be exceptional circumstances where the local planning authority considers that a proposal provides net benefits to the community that outweigh the fact that not all policy obligations have been met on viability grounds. As ¶010 of the government's viability guidance states: " <i>In plan making and decision making viability helps to strike a balance between the aspirations of developers and landowners, in terms of returns against risk, and the aims of the planning system to secure maximum benefits in the public interest through the granting of planning permission</i> " (Reference ID: 10-010-20180724). The council considers that this policy helps to best achieve that balance.

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

Summary of the main issues raised	Revised SADPD amended?	Council response
Planning policy needs to recognise that a balance needs to be struck between protecting and enhancing the environment and the need to produce food.	No	It is considered that the SADPD achieves an appropriate balance, supporting and protecting the natural environment and a sustainable rural economy; objectives that are not mutually exclusive.

Policy ENV 1 ‘Ecological network’

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data.	No (but the policies map has been amended)	The Interactive Policies Map has been updated with 2019 data.
The policy does not adequately reflect the NPPF (2019) and the Chancellor’s 2019 Spring Statement.	No	The policy is sound and does reflect the overarching aims of the Environment Bill and is consistent with the NPPF (2019) and NPPG regarding seeking enhancement and net gain for biodiversity.
Further guidance is needed on how policy will be implemented (probability that mandatory 10% Biodiversity Net Gain will be required for all development). The policy needs to set out how the potential for greater impacts of development within the Ecological Network will be mitigated and measured – suggest the use of a ‘strategic position multiplier’ when undertaking Biodiversity Net Gain calculations.	No	As set out in Policy ENV 2 ‘Ecological Implementation’ criterion 2(iii) the Ecological Network map is used to target areas where the best ecological benefits can be achieved. A mandatory level has been proposed in the Environment Bill (10%). The policy is sound as written but further detail around ecological implementation and net gain could be set out in an Ecological SPD.
Comments made regarding wildlife corridors in Neighbourhood Plans.	No	Made Neighbourhood Plans are part of the Development Plan so policies concerning wildlife corridors will be taken into account.
A clear explanation should be provided to clarify how parts of the ecological network have been defined; plus more detail around how development can meet the requirements of the policy.	No	The justification and background evidence for the policy is set out in ‘Ecological Network for Cheshire East’ [ED 09].
Concern that the policy is restrictive/onerous/will stifle development and requiring ecological enhancement above what is required by national policy; proposals to be considered	No	The policy is consistent with the NPPF (2019) as it seeks to secure net gain for biodiversity (¶174a ecological networks; ¶174b measurable net gain); and it includes the word “proportionate” (criterion 4). Proposals are considered on a

on a case-by-case basis. No detailed site-specific assessments and field surveys carried out.		case-by-case basis as explained in ¶4.3 of the supporting information. Site specific assessments are carried out at the planning application stage.
Stronger policy is needed to achieve inter-connectivity of sites that are of ecological, landscape or amenity importance; add detail regarding non-invasive species.	No	Policy ENV 1 'Ecological network' is consistent with the NPPF (2019) and NPPG regarding seeking enhancement and net gain for biodiversity. There are other policies in the plan that cover landscape and amenity.
Policy ENV 1 overlaps with LPS Policy SE 3 'Biodiversity and geodiversity' and should be removed from the plan.	No	Policy ENV 1 provides the finer detail required by ¶174a of the NPPF (2019): "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks,..."
Incorporation and reference of Nature Improvement Area Meres and Mosses area in south of the borough. Add to Figure 4.1 all meres and mosses within the borough.	No	This is covered in LPS Policy SE 3 'Biodiversity and geodiversity'. There is no more data to add to this network layer at present.
The ecological network should be clearly and easily identifiable.	No (but the policies map has been amended)	Local Plan designations including the ecological network are shown on the Interactive Policies Map [ED 02]. A clearer interactive map has been provided.
Restrictive land designations which assume that the land is of ecological value.	No	The policy is consistent with the NPPF (2019) as it seeks to secure net gain for biodiversity (¶174a ecological networks; and ¶174b measurable net gain).

Policy ENV 2 'Ecological implementation'

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data.	No (but the policies map has been amended)	The Interactive Policies Map has been updated with 2019 data.

The policy does not adequately reflect the NPPF (2019) and the Chancellor's 2019 Spring Statement. For clarity the policy should state the amount of Biodiversity Net Gain required for each development (mandatory Biodiversity Net Gain may be 10%).	No	The policy is sound and does reflect the overarching aims of the Environment Bill, the NPPF (2019) and NPPG regarding seeking enhancements and net gain for biodiversity. A mandatory level has been proposed in the Environment Bill (10%). The policy states that "development proposals must deliver an overall net gain for biodiversity". Any subsequent mandatory requirement at a national level would still apply when the legislation is passed.
Update reference to Defra metric.	No	¶4.13 of the policy supporting information does state "or any subsequent publication."
The policy is premature in advance of legislation setting any specific parameters.	No	Net gain is required in the NPPF (2019) ¶174b.
The requirement to deliver net gains across all developments is considered not to be consistent with national policy; may impact on the delivery of sites; policy too onerous (some representations suggest deletion of criterion 1 and criterion 3(iv)); alternative wording suggesting encouraging biodiversity improvements in and around development; should clarify whether a separate site in the local area/borough could be used for biodiversity gains; Biodiversity metric calculation a subjective tool; should be used alongside desk based assessments.	No	Need a measurable element. Measurable net gain is required by the NPPF (2019) ¶174b. The policy is sound as written but a future Ecological/Nature conservation SPD could provide further detail around net gain being achieved at a separate 'off-site' location. The biodiversity metric is an objective tool produced by government to measure biodiversity losses and gains in an objective, consistent and transparent manner. All metric submissions will be checked by the council's nature conservation officer.
The policy does not define how the management/maintenance of habitats will be monitored to ensure ongoing success.	No	This detail is not required for soundness and would be more appropriate in a SPD. Some information is included in the Green Space Strategy [ED 18].
Stronger policy is needed to achieve inter-connectivity of sites that are of ecological, landscape or amenity importance.	No	Policy ENV 2 is consistent with the NPPF (2019) and NPPG regarding seeking enhancement and net gain for biodiversity. There are other policies in the plan that cover landscape and amenity.
Tree replacement should count towards net environmental benefits.	No	This may form part of a net gain package.

Compensation should be delivered on an equivalent (like-for-like) basis. Further detailed wording on ecological assessments suggested.	No	Ecological compensation will be achieved through the biodiversity net gain calculation and will achieve more than like-for-like (in terms of total area of habitat). The policy is sound as written but further detail on ecological assessments could be provided in an Ecological SPD.
More detailed requirements needed such as swift bricks, hedgehog highways etc; needs to be consistent with delivery of sustainable development; use more information from neighbourhood plans.	No	This additional level of detail is not required to for soundness. Further detail could be provided in an Ecological SPD. This is all part of the planning balance. Made neighbourhood plans are part of the Development Plan.
The requirements of the policy have not been tested through viability work; flawed to introduce additional standards and not revisit CIL; implications in relation to sites allocated in LPS.	No	Viability work was carried out regarding the SADPD policies in the Local Plan SADPD Viability Assessment' [ED 52]. The CIL was also taken into account in this work. Issues related to the viability assessment [ED 52] are considered in the Chapter 1: Introduction/general issues section of this consultation statement appendix.
All development (major and minor) will be required to achieve Biodiversity Net Gain; suggest that policy states that only those minor developments affecting semi-natural habitat will be required to achieve Biodiversity Net Gain. Minor developments on all habitats will be required to achieve Biodiversity Net Gain. There may be some exemptions for small extensions or conversions.	No	The policy as worded is consistent with the NPPG and NPPF (2019). Criterion 1 states that "development proposals must deliver an overall net gain for biodiversity" and then goes on to clarify which types of proposals would require the completion of the Defra metric (see supporting information ¶4.13).

Policy ENV 3 'Landscape character'

Summary of the main issues raised	Revised SADPD amended?	Council response
There is conflict between the policy and allocations in the SADPD; plus conflict with neighbourhood plans.	Yes	Landscape is one of the criteria looked at as part of the Site Selection Methodology [ED 07]. The policies of the Local Plan and any made neighbourhood plans would be applied to any

		development proposals for any Local Plan allocations (including safeguarded land if brought forward in the future). Some previous allocations are now safeguarded land in the Revised Publication Draft SADPD.
The Peak Park Fringe LLD area around the Sutton area should be extended up to the A523 London Road as this area between the canal and the main road provides open views of the Peak District and provides a setting for the town.	No	All the areas are evidenced in the LUC Reports (Cheshire East Landscape Character Assessment [ED 10] and Cheshire East Local Landscape Designation Review [ED 11]). This area was carefully considered, and the following statement is in the evidence base: "Exclude built up area at Lyme Green and lower lying areas to the west of the settlement, and west of the canal" (page 15 [ED 11]).
Land north and south of Prestbury Lane should be included in the LLD area due to the importance of this area to the landscape setting of Prestbury.	No	All the areas are evidenced in the LUC Reports - Cheshire East Landscape Character Assessment [ED 10] and Cheshire East Local Landscape Designation Review [ED 11].
Policy ENV 3 overlaps with LPS Policy SE 4 'The landscape' and should be removed.	No	Policy ENV 3 builds upon LPS Policy SE 4 'The landscape' particularly as it draws upon and uses the new robust evidence in the LUC Reports Cheshire East Landscape Character Assessment [ED 10] and Cheshire East Local Landscape Designation Review [ED 11].
Peak Park Fringe boundary around Mow Cop should be amended (Odd Rode PC outline detailed amendments to boundary).	No	LLDs robustly produced; All the areas are evidenced in the LUC Reports Cheshire East Landscape Character Assessment [ED 10] and Cheshire East Local Landscape Designation Review [ED 11]. The Peak Park Fringe LLD was extended to include the steep areas below Congleton Edge – but the built-up areas of Mow Cop, The Bank and Mount Pleasant to the south are excluded.
Detailed representations around the application of LLDs and LPS Policy SE 4 'The landscape' and ENV 3; suggest that each LLD should have its own bespoke policy or LLDs should be removed from the proposals map.	No	Policies are supposed to be succinct. The Statements of Significance for each LLD in the Cheshire East Local Landscape Designation Review [ED 11] list the special qualities that support each designation. Policy ENV 3, with its robust evidence base, is considered adequate for planning application

		decision-making, but further detailed guidance could be included in a SPD if appropriate.
Comments regarding Bollin Valley LLD (welcome creation of new LLD for the parkland area); Bollin Valley LLD should be removed (due to absence of designation in Trafford); Yarwood Heath Farm in its entirety should come out of the LLD; detailed comments regarding Rostherne/Tatton Park LLD.	No	LLDs robustly produced. All the areas are evidenced in the LUC Reports Cheshire East Landscape Character Assessment [ED 10] and Cheshire East Local Landscape Designation Review [ED 11]. All areas worthy of retention documented. For example: Bollin Valley – page 13 of [ED 11]: “Extend western-most extent of ASCV southward to cover more undeveloped, rural floodplain, also resulting in extended coverage of the wider setting of Dunham Massey to the north.”

Policy ENV 4 ‘River corridors’

Summary of the main issues raised	Revised SADPD amended?	Council response
There is need for protection of significant brooks and river tributaries that provide irreplaceable wildlife corridors.	No	This aspect is covered in LPS Policy SE 6 ‘Green Infrastructure’, Policy ENV 1 ‘Ecological Network’ and Policy ENV 16 ‘Surface water Management and flood risk’ (criterion 7).
The policy should provide additional recognition that many waterbodies in Cheshire East are failing their ecological objectives (water quality and hydromorphological concerns); policy should highlight opportunities as to how riparian developments have the ability to provide improvements – to provide valuable new assets for people and wildlife alike (detailed information provided regarding development guidelines).	No	Water quality concerns etc are discussed under the supporting information to Policy ENV 17 ‘Protecting Watercourses’. Improvements to the blue and green infrastructure are covered by LPS Policy SE 6 ‘Green Infrastructure’ and ENV 1 ‘Ecological Network’ as well as this policy. The policy is considered to be sound as written.
Policy ENV 4 criterion 3 should be altered to read “promoting sustainable access with consideration given to the natural environment and flood risk” (because of buffer zone constraints).	No	Note concerns and buffer zone condition that is often applied to planning applications. The first part of the policy states that “Development proposals must make sure that river corridors are protected” and the words “where appropriate” are also in

		the policy. The policy is considered sound as the current wording would give sufficient protection where public access could not be achieved.
Stronger worded policy should be provided and more guidance around policy implementation.	No	The policy as worded is succinct and accords with the NPPF (2019). The documents referred to under the Supporting Information and under Related Documents provide more background information for implementation.

Policy ENV 5 ‘Landscaping’

Summary of the main issues raised	Revised SADPD amended?	Council response
The following reference should be added: the need for new landscaping to be shaped by the outcomes of ecological assessments.	Yes	Ecology and landscaping requirements are considered together as part of any assessment of a development proposal. But to increase the link between ecological assessments and soft landscaping an additional paragraph has been added to the supporting information (¶4.29a) which also links to soft landscaping discussions below.
The following addition should be added to the sentence: “Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge as part of a high-quality green and blue water environment. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge.”	Yes	LPS Policy SE 13 ‘Flood risk and water management’ refers to SuDS (criterion 4), which could include permeable paving for example. SADPD Policy ENV 16 ‘Surface water management and flood risk’ seeks to manage and discharge surface water through a sustainable drainage system (criterion 3) and Policy ENV 7 ‘Climate change’ criterion 1(iii) refers to blue and green infrastructure and trees. However, to emphasise the role of trees, in particular as part of soft landscaping, an additional paragraph has been added to the supporting information of ENV 5.
Policy ENV 5 overlaps with LPS Policy SE 4 ‘The landscape’ and should be deleted.	No	Policy ENV 5 is a detailed development management landscaping policy that builds upon LPS Policy SE 4 ‘The landscape’.

Policy ENV 5 criterion 6 should be altered to read: “makes satisfactory financial and resource provision for the maintenance and aftercare of the scheme, to ensure it reaches maturity and thereafter”.	No	It is considered that the current wording secures future maintenance.
New criteria should be added regarding mitigating impact on local air quality and inclusion of cycle/pedestrian routes to local town centres, schools and workplaces.	No	Policy ENV 12 ‘Air quality’ covers local air quality and Policy INF 1 ‘Cycleways, bridleways and footpaths’ plus LPS Policy SE 6 ‘Green Infrastructure’ cover green links.
All developments should provide a landscaping scheme – words “where appropriate” should be removed from the policy.	No	The policy as worded provides proportionate flexibility.

Policy ENV 6 ‘Trees, hedgerows and woodland implementation’

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD is unsound as the Policies Map does not contain the 2019 Local Wildlife Site spatial data.	No (but the policies map has been amended)	The Interactive Policies Map has been updated with 2019 data.
The policy does not adequately reflect the NPPF (2019) and the Chancellor’s 2019 Spring Statement.	No	The policy as written is sound and reflects the aspirations of the Environment Bill, the NPPF (2019) and NPPG.
The policy will not adequately protect priority habitat woodland from the effects of adjacent development for example root damage, air pollution etc). The policy should stipulate that a minimum buffer of 15m is required around all areas of priority woodland and ancient woodland.	No	Current standing advice is for a minimum 15m buffer. It would appropriate to argue for larger buffers in some circumstances (as suggested in government advice), so the policy is sound as worded. ¶4.38 of the policy provides cross-reference to standing advice. The government standing advice from the Forestry Commission and Natural England can be found in “Ancient woodland, ancient trees and veteran trees: protecting them from development”.
The policy should specify that buffer zones around ancient or veteran trees should be at least 15 times larger than	No	The policy appropriately requires adequate buffer zones and appropriate protection and references relevant guidance so that

the diameter of the tree and 5m from the edge of the tree's canopy.		an acceptable approach can be achieved in relation to each individual case where such issues arise. It is unnecessary for the policy to incorporate detailed aspects of the guidance.
The requirement of three replacement trees for the loss of every tree is too onerous and not justified; it may limit development potential of sites in the SADPD. One for one replacement should be the default position.	No	The requirement is three replacement trees for the loss of every significant tree (not every tree) and this is not considered onerous given the importance of significant trees and the fact that the replacement trees will be smaller and take time to become established. One for one replacement would not achieve an ecological net gain. Ecological net gain is promoted by Natural England and the NPPF (2019) (¶170 a-f).
The policy should be amended to simply state that net environmental gains should be sought; tree planting one of the measures to improve the environment; tree replacement part of overall assessment of biodiversity enhancement.	No	Tree planting may be part of an ecological net gain package, but it is important that net gains are achieved if significant trees are lost as part of development proposals. The Green Space Strategy Update [ED 18] explores the challenges regarding tree loss and the need to increase the tree canopy. As the government's 25 Year Environment Plan states: "Planting more trees provides not just new habitats for wildlife – it also helps reduce carbon dioxide levels and can reduce flood risk".
The policy should be redrafted to state that any loss of protected hedgerows should be offset by mitigation; further guidance needed on balance to achieve replacement and offsetting and unavoidable hedgerow loss; policy overlaps with LPS Policy SE 5 'Trees, hedgerows and woodland' and should be deleted. Criterion 7 should terminate at "retained" so that there is no scope for removal of important hedgerows.	No	This part of the policy links with LPS Policy SE 5 'Trees, hedgerows and woodland' and applies where hedgerow loss is unavoidable under Policy SE 5 and there are clear overriding reasons for the development. The policy builds upon LPS Policy SE 5 in providing additional information around implementation when development proposals are assessed.
An Arboricultural Impact Assessment is not required in all cases so words "where relevant" should be added.	No	Arboricultural Impact Assessments are required as part of Local Validation Requirements and are currently under review in accordance with the NPPF (2019). Meets statutory requirement as trees are a material consideration.
The policy is not considered in the council's Viability Assessment June 2019.	No	Viability work was carried out in regard to the policies as shown in the 'Local Plan Site Allocations and Development Policies

		Viability Assessment' [ED 52]. Issues around viability are addressed in the Chapter 1: Introduction/general issues section of this consultation statement appendix.
Reference to CAVAT and DEFRA compensation metrics should be removed.	No	It is important that the council is transparent regarding the types of tools available to assist the calculation of off-site contributions. This forms part of the supporting information to the policy.
There should be reference to a pro-active strategy for woodland development; need for more woodland planting to improve carbon capture and mitigate the carbon footprints of the developments themselves; more needs to be made of retention and protection of trees and hedgerows.	No	The approach to the replacement of significant trees with a three for one replacement ratio will assist in the provision of more trees to combat climate change. A woodland strategy would be more appropriate in a separate, albeit related, document to the Local Plan.

Policy ENV 7 'Climate change'

This policy was titled ENV 7 'Climate change mitigation and adaptation' in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
All major housing schemes on former Green Belt land should be required to achieve a reduction in energy use compared to standard new build construction.	Yes	In the Revised Publication Draft SADPD, a new criterion 2 includes reference to new build residential development achieving reductions in CO ₂ emissions of 19% below the target emission rate of the 2013 edition of the 2010 building regulations (part L).
Policy ENV 7 should promote and facilitate emerging energy technologies. The site allocations section of the SADPD should consider allocating appropriate areas for renewable energy/storage hubs. Sites promoted for allocation at Warmingham.	No	The SADPD includes several criteria-based policies related to the consideration of schemes for renewable energy generation, including policies ENV 9 'Wind energy', ENV 10 'Solar energy' and ENV 11 'Proposals for battery energy storage systems'. The policy approach builds on the strategic policies in the LPS: policies SE 8 'Renewable and low carbon energy' and SE 9 'Energy efficient development'. There are also examples of

		recent planning approvals for solar farm development at Warmingham, e.g. 20/2576N, at Drury Lane, which highlights that such schemes are being approved.
Policy ENV 7 should be an overarching mantra to the whole Local Plan and it should be clearly defined as a strategic policy, headlining the plan to achieve the strategic priorities of the area.	No	The SADPD contains non-strategic policies and is the second part of the Local Plan, following the adoption of the LPS in 2017. The approach in Policy ENV 7 is consistent with the LPS strategic policies SE 8 'Renewable and low carbon energy' and SE 9 'Energy efficient development'.
The proposed policy requirements are inconsistent with national planning policy and guidance, which makes clear that the only additional technical requirements exceeding the minimum standards required by Building Regulations that can be sought are the optional technical standards as detailed in the NPPG. No clear evidence has been provided to confirm why a 19% reduction has been identified and why it is justified.	No	<p>Provisions in the Planning and Energy Act 2008 allow local authorities to set local energy efficiency standards for new homes. The Written Ministerial Statement on Plan Making dated 25 March 2015, clarified the use of plan policies and conditions on energy performance standards for new housing developments. The statement sets out the government's expectation that such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes (this is approximately 20% above current Building Regulations across the build mix). Policy ENV 7 refers to 19% below the target emission rate of the 2013 edition of the 2010 building regulations (part L). Criterion 2 of this policy could also be superseded by the move towards the government Future Homes Standard, currently anticipated in 2025.</p> <p>The council has declared a climate emergency and prepared an environment strategy, which sets out its key strategies and action plans towards an ambition to becoming carbon neutral by 2025. This is in line with the government, which has passed into law, a target of 'net zero' greenhouse gas emissions by 2050. Provisions in the Planning and Energy Act 2008 also allow development plan policies to impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development.</p>

The policy should be amended to state that development is 'encouraged' (rather than required) to incorporate the various measures and standards.	No	As noted in the SADPD (¶4.43), many measures can be included at little or no additional cost in the design and layout of development proposals, if considered at an early enough stage. The potential for schemes to include these measures would be assessed on a case-by-case basis. The policy (particularly criteria 2 and 3) includes appropriate references to viability and feasibility in its implementation. The policy approach contained in the SADPD is supported by proportionate and appropriate viability evidence contained in the SADPD Viability Assessment [ED 52].
Note that the council has produced an updated viability assessment [ED 52]. The council's approach is incompatible with the current CIL charging schedule, and in any event shows that numerous sites within the borough cannot support the proposed additional policy requirements.	No	Proposals contained in the SADPD are supported by appropriate and proportionate viability evidence. The SADPD Viability Assessment [ED 52] includes the appropriate consideration of the current CIL Charging Schedule. Policy ENV 7 includes appropriate references to feasibility and viability considerations in the implementation of the policy.

Policy ENV 8 'District heating network priority areas'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should remove the reference to "large scale" to accommodate and encourage schemes on other beneficial sites.	No	Policy ENV 8 'District heating network priority areas' is consistent with LPS Policy SE 9 'Energy efficient development', which refers to development in district heating network priority areas or in large scale development elsewhere. Policy ENV 8 identifies the location of district heating priority areas, on the policies map, for the purposes of the implementation of the policy. This approach was confirmed by the LPS, in footnote 69, of LPS Policy SE 9 'Energy efficient development', which confirmed that the SADPD would identify the location of district heating priority areas.

Policy ENV 9 'Wind energy'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should limit restrictions on wind energy to those factors set out in the NPPF (2019).	Yes	The policy approach is consistent with that set out in Policy SE 8 'Renewable and Low Carbon Energy' in the LPS and NPPF (2019) footnote 49, in identifying areas suitable for wind energy development in the development plan and associated Policies Map. However, to avoid duplication between policy documents and national guidance, criterion 2 of the policy has been moved to the supporting information of the policy (in ¶4.46).
Manchester Airport - to strengthen the policy wording, at criterion 1(iv) replace the text "... Proposals should not have an impact on aircraft safety ..." with "... Proposals should not have a detrimental impact on air traffic safety ...".	Yes	Noted, amendments have been made to criterion 1(iv) and the supporting information to policy ENV 9 to refer to air traffic safety rather than aircraft safety.
Whilst 'the fringe' of the National Park is identified for the purposes of restricting wind turbine development, the Peak District National Park Authority would encourage the use of the Landscape Strategy ⁹ to assist in decision making.	No	Comment noted.
The policy should make specific reference to visitor accommodation, tourism and visitor attractions.	No	The policy suitably addresses the impacts identified by national planning policy and builds on the strategic context set by LPS Policy SE 8 'Renewable and low carbon energy'.
The policy wording should be relaxed under criterion 1(iii) and the second half of the criterion be deleted.	No	It is considered that criterion 1(iii) seeks to minimise the impact of proposed wind energy development on key landscape characteristics. This policy has been suitably informed by the Landscape Sensitivity to Wind Energy Developments (2013) study.

⁹ https://www.peakdistrict.gov.uk/_data/assets/pdf_file/0010/90829/landscape-strategy-south-west-peak.pdf

The policy should be deleted and instead apply: “All opportunities for on-shore wind generation will be supported – regardless of land use designation, including green belt and open countryside.”	No	Policy ENV 9 suitably addresses the impacts identified by national planning policy and builds on the strategic context set by LPS Policy SE 8 ‘Renewable and low carbon energy’.
¶4.54 should be amended to require airport operators and Jodrell Bank to engage in pre-application discussions.	No	The SADPD cannot mandate external bodies to engage in pre-application discussions. It is considered that ¶4.54 is suitably worded, to encourage applicants to initiate consultations with airport operators and Jodrell Bank, where necessary.

Policy ENV 10 ‘Solar energy’

Summary of the main issues raised	Revised SADPD amended?	Council response
Criterion 7 is supported (photovoltaics etc). The section omits the role of the layout of new developments to take best advantage of orientation of roofs towards the sun.	Yes	Support for criterion 7 is noted. Additional text has been added to criterion 7 to encourage schemes to consider how best to maximise solar gain.
To strengthen the policy wording and to be consistent with Manchester Airport’s recommendation for the wording of policy ENV 9, criterion 5 should be amended to say, “Proposals should not have a detrimental impact on air traffic safety ...”.	Yes	Noted, criterion 5 of the policy has been amended to read “...Proposals should not have an impact on air traffic safety”.
Object to the reference within criterion 1 that solar farm/arrays should be sited on previously developed land wherever possible. ¶117 of the NPPF (2019) states that, in making effective use of land, strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land. However, to require opportunities for solar development to effectively 'rule out' all previously developed land before looking towards non-previously developed land imposes a significant risk that opportunities would be missed in attempts to meet our current climate change targets. Higher yielding development can	No	Policy ENV 10 ‘Solar energy’ in the SADPD states that proposals for solar farms/parks should be located on previously developed land, wherever possible. This appropriately focuses schemes to previously developed land but acknowledges that this is not always possible. This approach is consistent with LPS Policy SE 2 ‘Efficient use of land’ and planning practice guidance (¶013 reference ID 5-013-20150327); which encourages large scale ground mounted solar photovoltaic farm proposals to consider previously developed land and non-agricultural land in the first instance.

effectively 'squeeze' out any opportunities for development such as a solar farm on previously developed land.		
Remove 'wherever possible' in criterion 2 and 'as and when appropriate' in criterion 3 and substitute 'will be required' for 'will be used' in the same criterion. Substitute 'must' for 'should' throughout. Strengthen the use of photovoltaic tiles in the policy.	No	The policy is suitably worded and consistent with the intention of LPS Policy SE 8 'Renewable and low carbon energy'.

Policy ENV 11 'Proposals for battery energy storage systems'

Summary of the main issues raised	Revised SADPD amended?	Council response
Criterion 1 should be deleted and left to the application to justify its location. This approach would ensure the plan is justified in adopting the most appropriate strategy when considered against alternatives.	No	Policy ENV 10 'Solar energy' states that proposals for solar farms/parks should be located on previously developed land, wherever possible. This appropriately focuses schemes to previously developed land but acknowledges that this is not always possible. This approach is consistent with LPS Policy SE 2 'Efficient use of land'.
To ensure the plan is considered 'sound', the council should consider the inclusion of an appropriate allocation of sites for the development of renewable energy 'hubs' and energy storage facilities. Site(s) promoted at Warmingham.	No	The SADPD includes several criteria-based policies related to the consideration of schemes for renewable energy generation, including proposals for battery energy storage systems. The policy approach appropriately builds on the strategic policies in the LPS – policies SE 8 'Renewable and low carbon energy' and SE 9 'Energy efficient development'.

Policy ENV 12 'Air quality'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy would overlap with adopted LPS Policy SE 12 'Pollution, Land Contamination and Land Instability'.	No	The policy is in accordance with the strategic policy set out in the LPS and adds further detail to it. The LPS policy does not

		specifically mention the need for an Air Quality Assessment. LPS Policy SE 12 states “development should support improvements in air quality, not contradict Air Quality Strategy or Air Quality Action Plan and seek to promote sustainable transport policies.”
Could it include a strategy to address existing AQMAs such as those in Sandbach? Given that any additional development close to an AQMA will add to traffic flows and pollution levels, all development should contribute towards measures in the appropriate air quality action plan.	No	The council is required to undertake a regular review and assessment of the air quality within the borough and assess levels of air pollution against the air quality objectives. Where levels are found to be in excess of these objectives, the council must declare an AQMA and through the action plan, set out the measures to take to work towards achieving the objectives. The council has declared 12 AQMAs and developed an Air Quality Strategy and Air Quality Action Plan, which details remedial measures to tackle the problem. The supporting information to the policy refers to these.
The policy should be amended to state that: <ul style="list-style-type: none"> the air quality assessments are undertaken by the council or by appointment of it, funded by the developer; and air quality assessments are considered for all developments, and not just those on a ‘large’ scale. 	No	Applicants will be required to submit an air quality assessment with an application to make the development acceptable. The policy is not limited to large scale development and covers all proposals.
The policy is weak as it does not take sufficient account of Manchester Airport, which is a major contribution to poor air quality	No	Any proposal for development at Manchester Airport (within Cheshire East) would be subject to this policy.
The policy only seems to consider the cumulative effects in relation to other developments. It is also unclear what is required for effective mitigation. What is the evidence that Air Action Plans have reduced or made any difference to air quality in the AQMAs already in existence, other than through external changes in patterns of travel or car use locally?	No	The policy states “all proposals that are likely to have an impact on local air quality will be required to submit an air quality assessment”. Mitigation measures will be locationally specific, dependent on the proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions and obligations can also be used to secure mitigation where the relevant tests are met.

It is recognised that rising house numbers, car numbers and congestion will have significant air quality implications, especially in more urban areas. However, rural locations are at risk and this has not been as well recognised. The policy needs to be sufficiently 'flexible' to address new AQMAs as soon as and wherever they arise.	No	It is considered that the policy is sufficiently flexible to address new AQMAs.
The policy is weak and does not comply with EU air quality legislation. No proposed development in Cheshire East has been refused on air quality grounds whatever limited mitigation is offered. As a result, there are more AQMAs being declared and an air quality action plan which is ineffective. No development should be permitted that may cause deterioration in air quality, however small, in any declared AQMAs.	No	Separate legislation exists for emissions of air pollutants. The Environment Act 1995 requires local authorities to review and assess current and future air quality in their areas and designate AQMAs if improvements are necessary. The council has 12 AQMAs and developed an Air Quality Strategy and Air Quality Action Plan, which detail remedial measures to tackle the problem. LPS Policy SE 12 'Pollution, Land Contamination and Land Instability' supports improvements to air quality, and states development should not contradict the Air Quality Strategy or Air Quality Action Plan.
The SADPD does not propose any effective remedies for mitigating Macclesfield's 5 AQMAs. Air pollution causes annually at least 30 deaths in Macclesfield which are presently not identifiable. The recent London Coroner's Court ruling is likely to change that, where the council could be held liable for air pollution deaths unless effective mitigating remedies are in place for each AQMA. Most controllable air pollution is traffic derived. An effective remedy would therefore be road schemes that would keep the most polluting vehicles out of the town centre.	No	The plan takes proper account of air quality matters including the presence of AQMAs in selecting site allocations and policy on air quality. The policy supports LPS Policy SE 12, which seeks development to support improvements in air quality, not contradict the Air Quality Strategy or Air Quality Action Plan and seek to promote sustainable transport policies. At the time of publishing the initial Publication SADPD, there were 19 AQMAs in Cheshire East. However, from 26/01/21, seven AQMAs have been revoked across the borough, including at Park Lane, Macclesfield. There are now three AQMAs in Macclesfield. The AQMAs have been revoked due to several years of monitoring data (not including 2020) being below the annual air quality objective. Concentrations are most likely down due to improvements in vehicle technology and highways works in the area.

Policy ENV 13 ‘Aircraft noise’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy is overly restrictive and incorrectly sets the levels of SOAEL and UOAEI. Proper consideration should be given to acoustic design solutions.	Yes	The policy has been substantially revised between the initial Publication Draft and Revised Publication Draft SADPD, supported by an updated Aircraft Noise Policy Background Report [ED 15] (August 2020), prepared by Jacobs for the council. In the light of this updated evidence, the SOAEL level has been increased, which substantively addresses this particular objection.
The aims of aviation noise policy and planning policy and guidance require that unacceptable noise effects that cannot be offset by the economic and social benefits of a development proposal are to be prevented. The policy wording of ENV 13 does not make it clear that this is a matter to be considered within the planning balance exercise. As such, the policy constrains development that would potentially be acceptable and desirable, and in locations where there is strong market demand.	No	<p>The policy strikes an appropriate balance between allowing development to take place in areas most affected by aircraft noise, whilst making sure that the living conditions of residents and other occupiers of noise sensitive developments are appropriately protected. The policy is consistent with the NPPF (2019) ¶16(d), which says that “Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.”</p> <p>The area in which the policy seeks to prevent residential and other noise sensitive development in principle is very small. The area in which the policy allows such development, subject to necessary noise mitigation, is also limited. The approach of the policy is consistent with the government’s general aim that the adverse effects on people from aviation noise should be limited and, where possible, reduced. It is justified and based on appropriate evidence set out in an Aircraft Noise Policy Background Report [ED 15] (August 2020) prepared by consultants Jacobs for the council. The report considers and draws from a number of sources including a review of the legal and policy framework relevant to aircraft noise and development. It explores the policy practice on this subject amongst other local planning authorities, examines a number of planning appeal decisions (including a dismissed appeal for residential development on the Harman Technology site in Mobberley on the basis of noise levels within outdoor amenity spaces) and</p>

		has regard to a range of other relevant reports and studies including guidelines from the World Health Organisation and other bodies.
The need for acoustic, ventilation and overheating strategies not to rely upon continuous mechanical extract (MEV) or continuous mechanical supply and extract with heat recovery (MVHR) ventilation systems that require energy use unless these can be powered by renewable energy generation within the development is an energy policy not an aircraft noise policy matter.	No	The provision of systems to address aircraft noise need to address the issues of ventilation and overheating in an integrated way. These matters are connected. The development of new homes with greater energy dependency involving greenhouse gas emissions would be inconsistent with the LPS Strategic Priority 3(3) to reduce the borough's impact on climate change and the LPS Policy SE 1 'Design' criterion 3(iii) aim of reducing energy usage through appropriate design. ¶4.75b of the supporting information to the policy also highlights that its approach is consistent with the government's statutory target for reducing UK greenhouse gas emissions and the council's declaration of a climate change emergency and commitment to tackling climate change.
The setting of a noise limit of 55dB L _{Aeq,16hour} for private gardens, sitting out areas and balconies that are intended to be used for relaxation and also for external amenity areas associated with hospices and residential care homes in criteria 1(ii)(b) and 1(iv)(c) is inconsistent with BS8233:2014 and should be expressed as an ideal to aim for and a guideline, not an absolute limit. The SONA14/CAP1506 study shows that people's expectation has a substantial effect in moderating the effects of noise, with those who know and expect a location is noisy being significantly less annoyed than those who had no expectation of such conditions.	No	<p>Aviation noise is a source of constant annoyance to those who live under airport flight paths. This form of noise pollution is explicitly excluded from general noise nuisance legislation so it is critical that new noise sensitive development in these locations include appropriate measures so that the effect of noise on the living conditions of residents and people's health can be reduced to an acceptable level.</p> <p>This aspect of the policy doesn't require a noise level of 55dB L_{Aeq,16hour} or less to be achieved across an entire garden, sitting out area or balcony. It requires this to be achieved over a reasonable proportion of them. The evidence-based rationale for this is set out in Section 7.3 of the Aircraft Noise Policy Background Report [ED 15] and takes account of BS 8223:2014, ProPG Planning and Noise and NPPG on noise which states:</p> <p><i>"where external amenity spaces are an intrinsic part of the overall design, the acoustic environment of those spaces should be considered so that they can be enjoyed as intended"</i>.</p> <p>This clearly indicates that noise in external amenity spaces is a material planning matter, and the dismissed appeal for residential development on the Harman Technology site in Mobberley is an example of where the adverse</p>

		<p>effect of noise from overhead aircraft on the external amenity areas of the residential development with impacts on health and quality of life was considered an unacceptable and overriding material planning consideration.</p> <p>The council is conscious that even at this level, the occupants of the properties will have less than ideal living conditions in terms of noise disturbance from overhead aircraft. However, it represents a balanced approach, supported by relevant and appropriate evidence, that positively enables further development to take place in areas affected by aircraft noise whilst ensuring that an appropriate level of noise mitigation is achieved in the interest of residents' living conditions.</p> <p>Whilst noting that the policy still enables housing development to take place in areas affected by aircraft noise, it is relevant to consider, in determining what noise protection standard should be applied to new dwellings, that the Plan's housing requirement can be met without any reliance on further housing development being permitted in the area affected by this policy. In the light of these local circumstances, the council is justified requiring that the acoustic environment enables outdoor amenity spaces to be enjoyed as intended, and that the design of any development protects the health and wellbeing of future residents by achieving reasonable internal noise levels.</p> <p>Whilst it is being argued that people's expectation moderates the effects of noise, and prospective residents would know what they were buying, a central purpose of the planning system is to set appropriate standards associated with new development in the public interest. And not all future residents would necessarily have that the same level of choice regarding the location of their new home, for example, those in need of affordable housing.</p>
In criterion 1(iii), the night-time LOAEL should be reduced from 48 dB $L_{Aeq,8hr}$ to 45 dB $L_{Aeq,8hr}$ which would be consistent with the Air Navigation Guidance 2017 and reflect practice in respect of recent planning applications at Leeds Bradford, Bristol and Stansted Airports.	No	<p>It is acknowledged that for the purposes of assessing and comparing the noise impacts of airspace changes, the Government has set a LOAEL of 51dB $L_{Aeq,16hr}$ for daytime noise and 45dB $L_{Aeq,8hr}$ for night-time noise and that the Civil Aviation Authority should ensure that these metrics are considered. However, as clarified recently (2020) in paragraph 7.55 of the Governments' representation to the Court of Appeal hearing on the Airports National Policy</p>

		<p>Statement, the lower daytime LOAEL recommended in the Government's response to the consultation on UK Airspace Policy (51 dB LAeq,16hr) "is specifically for comparing different options for airspace design". The same intent is considered to apply to the lower value (45 dB LAeq,8hr) adopted as the night-time LOAEL in the Air Navigation Guidance 2017.</p> <p>This point has been raised by Manchester Airport Group who acknowledge that they have not published a 45dB LAeq,8hr noise contour but intend to in the future.</p> <p>The LOAEL stated in Policy ENV 13 corresponds to the lowest night-time noise contour produced by Manchester Airport Group at the time of drafting the policy. It is noted that there is still expert debate as to whether 45 dB LAeq,8hr at night is an appropriate LOAEL, not least because it becomes more difficult to estimate noise exposure accurately at lower thresholds (since it is difficult to measure aircraft noise levels at greater distances from an airport where aircraft noise levels are closer to those of other noise sources), and, due to variability in aircraft position in the air at greater distances from the airport, noise contours have a lower level of certainty.</p>
The table at criterion 1(ii)(a) states that the ambient noise level for dwellings during night-time (23.00 - 07.00) should be 30dB LAeq,16hr, when it should state 30dB LAeq,8hr.	No	This is a typographical error and the figure should indeed read 30dB LAeq,8hr. This is proposed to be addressed through a minor modification as set out in Schedule 3.
At criterion 1(ii)(b) reference is made to 55dB LAeq,16hr noise contour. This level isn't represented on the annual noise contours that are issued to Local Planning Authorities for development management purposes.	No	This 55dB LAeq,16hr figure does not relate to a specific noise contour. It is a maximum noise level to be achieved across a reasonable proportion of private gardens, sitting out areas and balconies intended to be used for relaxation regardless of where noise contours are drawn relative to such areas.
At criterion 1(iii): The bracketed comment reference to 'typically a number of weeks' should be removed to ensure the policy is effective.	No	This adds useful information to the policy to clarify what a representative period should comprise. The removal of this text would make the policy less effective.

Policy ENV 14 'Light pollution'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy does not recognise that in rural areas where there is limited or no street lighting, the impact of light pollution is immediate. More recognition of the material differences between urban and rural light pollution would reduce potential future conflicts.	Yes	The issue between rural and urban areas is covered by criterion 4 which states "there will be no significant adverse effect either individually or cumulatively on the character of the area." However, additional information has been added to the supporting information ¶4.82 regarding lighting proposals in rural areas.
The policy shows no commitment to a Dark Skies policy; it does not specify 'full cut-off' street lighting which eradicates virtually all of the light spillage in the sky; nor does it seek to reduce the intrusive security lighting on private residences by insisting on passive infrared sensor control on new developments.	Yes	The commitment to a Dark Skies policy is covered by criterion 4. However, additional information has been added to the supporting information ¶4.82 regarding lighting proposals in rural areas. Passive infrared sensors are not always the answer and can sometimes cause problems as they can lead to lighting switching on and off frequently if they are set up incorrectly or are in a busy area. Additional wording has been inserted in the supporting information at ¶4.81 to include 'angle of lights' as a possible condition to mitigate any significant impact. Mitigation measures will be locationally specific, depend on the proposed development, and should be proportionate to the likely impact. The applicant should provide mitigation measures as part of the application to make any scheme acceptable. Planning conditions can be used to secure mitigation where the relevant tests are met.
With reference to criterion 3, the words 'as possible' should be removed to promote the universal use of energy efficient lighting.	No	It is considered that removing the words 'as possible' would weaken the policy.
The policy contains vague statements that can be improved upon. 1. "minimum required..." who decides? 2. "light spillage will be minimised..." The light fittings should be designed to be shaded to prevent spillage into neighbouring areas.	No	1. Planning applications will be considered by the council's Development Management Planning Officers, in consultation with the Environmental Health Team where appropriate. 2. This is covered by criterion 2, which states "light spillage and glare will be minimised" and criterion 4, which states "there will be no

<p>3. The policy should include a requirement that lighting should be sensor controlled where reasonably practical to achieve minimisation of pollution, energy efficiency, loss of amenity etc.</p> <p>4. Floodlighting of buildings and trees, especially in dark rural locations, should be prohibited (excepting 1st Dec to 6th Jan).</p>		<p>significant adverse effect either individually or cumulatively on residential amenity...".</p> <p>3. Movement sensors, daylight sensors and time controls are covered by criterion 3, which requires the lighting to be "as energy efficient as possible" and ¶4.81 notes that "conditions may be used to mitigate any significant impact such as hours of illumination...".</p> <p>4. This is covered by criterion 4 which states "there will be no significant adverse effect either individually or cumulatively on the character of the area."</p>
<p>It is not clear the extent to which this policy will apply to floodlighting of buildings and sports facilities, and advertising. Who decides what is an 'acceptable level' in criterion 2?</p>	No	<p>The supporting information (at ¶4.80) provides examples to which the policy will apply. It references illuminated advertisements and shop windows; private and school sports facilities; and spaces for community use. Policy RUR 6 'Outdoor sport, leisure and recreation outside of settlement boundaries' also provides information on lighting schemes and refers to policy ENV 14. Whether spillage and glare are at acceptable levels will be considered by the council's Development Management Planning Officers, in consultation with the Environmental Health Team where appropriate. It will involve professional judgement given the circumstance of each case. As mentioned in ¶4.81 proposals that include significant external lighting will require a lighting impact assessment prepared by a lighting specialist.</p>

Policy ENV 15 'New development and existing uses'

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>The policy should be reworded to include the following: "...submit appropriate information to demonstrate that the proposed development will be acceptable and, if necessary, provide suitable mitigation measures, without any change or impact on the existing business/facility. Development proposals..."</p>	Yes	<p>The wording in the policy has been amended.</p>

The policy does not adequately define "existing facilities" and indicate how proposals will be dealt with. The policy needs to make clear that it applies to new development likely to be a receptor for pollution from nearby road traffic particularly in AQMAs; and mitigation will not result in undue loss of amenity for future occupants by explicit cross reference to Policy HOU 10 and by making clear that mitigation involving an absence of natural ventilation in habitable rooms is unacceptable.	Yes	The supporting text (¶4.83) has been amended to include additional information to clarify what business and community facilities include. Policy provision for assessing proposals that are likely to be a receptor for pollution can be found in LPS Policy SE 12 'Pollution, Land Contamination and Land Instability'. Mitigation measures will be locationally specific, depend on the proposed development, and should be proportionate to the likely impact. The policy requires applicants to demonstrate that no adverse impacts will arise or can be prevented through suitable mitigation. Details of those mitigation measures would be submitted as part of the application process and assessed to ensure that the scheme is acceptable. Planning conditions and obligations can also be used to secure mitigation where the relevant tests are met.
Further clarification is required on how this policy could be applied and enforced. It is unclear how this would be achieved on third party land.	No	The onus would be on the applicant to demonstrate how the significant adverse effect can be avoided or mitigated through the planning application process. If planning permission is approved and there is a subsequent breach of planning control this would be a matter for investigation/ enforcement.
The supporting text refers to the NPPF's (2019) 'agent of change' principle however, it is considered that this principle should be explicitly referenced within the policy itself.	No	The policy as written is considered legally compliant and sound.

Policy ENV 16 'Surface water management and flood risk'

Summary of the main issues raised	Revised SADPD amended?	Council response
¶4.91- the first sentence should be altered to reference <u>sufficient</u> levels of treatment.	Yes	¶4.91 was amended in the Revised Publication Draft SADPD to acknowledge this point.
Add additional flexible wording into the policy to further clarify that surface water management	No	The policy is clear in its requirements to manage surface water runoff and reduce the risk of flooding.

schemes are tailored to meet the specific constraints of individual sites.		
Criterion 2(i) - remove 'where possible' to make sure every effort is made by the developer to manage and reduce run off.	No	The policy acknowledges that, on greenfield sites, it may not always be possible to reduce runoff rates. The policy requires 'at least no increase in runoff rates'. ¶4.88 requires 'clear evidence of existing positive operational connections from the site with associated calculations on rates of discharge ... to make sure that development does not increase flood risk'.
Criterion 5 - remove 'where relevant and appropriate' to safeguard risk mitigation.	No	The policy recognises that it may not always be relevant or appropriate to address and mitigate known risks in relation to critical drainage areas. As acknowledged in ¶4.94 'the Environment Agency has not identified or allocated any critical drainage areas in Cheshire East'.
Criterion 6 - amend wording to reflect that Cheshire East Council or specialists appointed by it will provide guidance on whether culverting open watercourses is necessary.	No	The policy's stance is clear in relation to the culverting of open watercourses in that this '...will not be permitted unless it is adequately demonstrated that there is an overriding need to do so.'
Support for an additional/amended policy that could help make a step improvement in any currently failing waterbody, through a more environmentally and multifunctional design approach.	No	Revised Publication Draft SADPD Policy ENV 17 'Protecting water resources' seeks to protect the quality of groundwater and surface water.
Further detail is required in the supporting evidence to robustly protect rare and fragile ecological sites.	No	The impacts of development on ecologically sensitive and designated sites are covered in LPS Policy SE 3 'Biodiversity and Geodiversity', and Policies ENV 1 'Ecological network' and ENV 2 'Ecological implementation'.
Need a condition to make sure that development does not increase the flood risk of neighbouring farmland - there has been an increase in the rate of water runoff into the farmland drainage system resulting in crop losses.	No	The policy is clear in its requirements to manage surface water runoff and reduce the risk of flooding. Specific situations would be considered at planning application stage. LPS Policy SE 13 'Flood Risk and Water Management' requires a flood risk assessment to be submitted to demonstrate that development proposals at risk of flooding will not increase flood risk on site or elsewhere.

The policy is inconsistent with national policy as it overlaps with adopted LPS Policy SE 13 'Flood Risk and Water Management'.	No	We don't consider that that makes the SADPD policy unsound. The SADPD adds detail to the strategic policy; to ensure policies are clearly written, occasionally it may be unavoidable for SADPD (non-strategic) policies to overlap with LPS (strategic) policies. The Environment Agency have been consulted and they have not raised any issue regarding consistency with national policy.
'Should' should be removed and replaced with 'must'.	No	The wording as drafted is considered sound.

Policy ENV 17 'Protecting water resources'

Summary of the main issues raised	Revised SADPD amended?	Council response
The Environment Agency request that the reference to GP3 should be updated to "the Environment Agency guidance and position statements as set out in its document entitled 'The Environment Agency's approach to groundwater protection'. This reference should also be included in the related documents section.	Yes	This has been amended to the Environment Agency guidance and position statements as set out in its document entitled 'The Environment Agency's approach to groundwater protection' February 2018 Version 1.2.
Specific protection of ground water sources is not mentioned for those areas where licences have been granted for shale gas (fracking) exploration. Given the confirmed pollution of some water sources from this source, this would seem to be a sensible inclusion.	No	There is now a moratorium on fracking and therefore the suggested amendment is deemed unnecessary.

Chapter 5: The historic environment (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Historic England suggests some textual amendments to the policies to strengthen their robustness and to ensure that they reflect the requirements of the NPPF (2019). The council's	No	The main issues raised to policies in the SADPD from Historic England have been considered through this consultation statement appendix. Amendments to the text have been made

assessment of the site allocations is considered suitable, in terms of the historic environment. However, reference to the council's two Heritage Impact Assessments is advised within individual site policies to ensure mitigation/enhancement measures.		and reflected in the Revised Publication Draft Site Allocations and Development Policies document where appropriate. A response on the main issue raised on the Heritage Impact Assessments is included in the Chapter 12: Site Allocations section of this consultation statement appendix.
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Policy HER 1 'Heritage assets'

Summary of the main issues raised	Revised SADPD amended?	Council response
Confusing terminology. Key descriptions should be defined in the glossary and should be in inverted commas or in capital letters consistently. "Listed buildings" is in the glossary but also used as common English. "Heritage assets" and "Historic assets" are used interchangeably. Only 'Heritage Asset' and 'Designated Heritage Asset' are defined in the glossary. Heritage assets are described in ¶5.2, but a different description is used in the glossary. This could lead to difficulties in enforcing the policy in contentious cases.	Yes	The policy has been amended to refer to heritage asset(s) rather than historic asset(s) to ensure consistency. Key terms are defined in the glossary.
Historic England considers that proposals can affect more than one heritage asset and or affect the setting. The policy should refer to "assets" under criterion 1. Criterion 2 refers to 'listed building'. This should be amended to include 'heritage asset' for consistency	Yes	The policy has been amended to refer to heritage asset(s) to ensure consistency.

Policy HER 2 'Heritage at risk'

Summary of the main issues raised	Revised SADPD amended?	Council response
Policy HER 2 must include, (or make reference to), appropriate and robust guidelines to act as informed 'checks and balances' to ensure that the benefits of any proposed development intended to	Yes	Criterion 2 has been amended to avoid confusion that the policy might allow for 'enabling development'. This is not a policy about enabling development and additional words

secure the future of a heritage asset are not outweighed by the disbenefits. The policy should be strengthened by the inclusion of the 8 criteria in the guidance published by English Heritage.		at ¶5.9a have been added for to confirm this. The suggested reference to the English Heritage published Guidance <i>Enabling development and the conservation of significant places</i> (Revised 2012) is not required.
¶5.8 of the supporting text refers to neglect, this may not be deliberate. The policy should be amended to either remove reference to 'deliberate' or add a statement that indicates, whatever the cause, an investigation or enforcement action will be taken to prevent further deterioration.	No	The reference to "deliberate neglect" is required in the policy and is consistent with ¶191 of the NPPF (2019). Where there is such evidence of deliberate neglect, the deteriorated state of the asset should not be taken into account when considering development proposals.
Criterion 4 should be reworded, it appears to relate to enabling development as outlined at ¶202 of the NPPF (2019), although this is not explicit in the policy. Requiring all works to the listed building to be undertaken prior to the occupation of any new building in all cases may limit the ability for enabling development to take place and therefore the potential to save heritage assets at risk.	No	¶5.9a of the supporting text states that "this policy does not allow for 'enabling development' that would usually be considered harmful. However, any resulting benefits from enabling development that outweigh harm may be a material consideration in the determination of planning applications".

Policy HER 3 'Conservation areas'

Summary of the main issues raised	Revised SADPD amended?	Council response
There is no justification for arbitrarily requiring the retention of all buildings that make a positive contribution; there may be circumstances for such buildings to be demolished or substantially altered. The reference to certain conditions prior to any demolition of a building would be subject to the planning application, or conservation area consent process and there is no requirement for such detail to be prescribed through the local plan.	No	The policy states that the demolition of buildings making a positive contribution in Conservation Areas will not be supported unless... It then sets out the broad circumstances in which demolition might be supported. This is deemed to be sound as written.
The council's response given in [ED 56] is incorrect to state that Policy HER 3 "sets out the broad circumstances in	No	The policy allows sufficient flexibility presenting a number of scenarios and opportunities for weighted judgements to be made. The main policy objective is to preserve and enhance the

which demolition might be supported and instead imposes a restrictive requirement.		character or appearance of an area, ensuring that a building or buildings that positively contribute to the character or appearance of a conservation area are only demolished when due consideration has been given to “the broad circumstances”. The policy is deemed sound as written.
¶5.1 – Several Conservation Areas include registered Parks and Gardens, while other Conservation Areas include important but currently non-designated parks and gardens. Propose the following amendment - Many conservation areas within Cheshire East have a sylvan character or designed landscape character and therefore...	No	This is supporting information and the inclusion of this specific wording is not deemed necessary. All parks and gardens are covered by policies HER 5 and HER 7.

Policy HER 4 ‘Listed buildings’

Summary of the main issues raised	Revised SADPD amended?	Council response
Criterion 4(iii) explains that in relation to change of use or conversion of a listed building, this will be supported where 'the proposed use is necessary to ensure the long-term preservation of the building'. Delete criterion 4(iii).	Yes	Criterion 4(iii) has been deleted in the Revised Publication Draft SADPD.
Macclesfield Borough Plan Policy B19 is clear that change of use of listed building will be permitted if 'the use would not lead to a demand for large scale extensions or for additional buildings in the grounds'. Reinstate Policy B19 from the Macclesfield Borough Local Plan	Yes	This issue is covered by criterion 4(iv) with a change to the word “setting” to “significance”. Criterion 4(ii) refers to the need for schemes to demonstrate that they are able to accommodate the new use without changes that harm its character or historic significance.
HER 4 does not accord with the NPPF (2019) and criterion 2 should be reworded to read ‘Applications affecting a listed building involving alterations (including partial demolition and extensions) and development in its setting will only be supported where the works conserve the building and /or setting in a manner appropriate to the significance of the	Yes	The policy is sound as written. This issue has been addressed by the removal of the word “setting” and the replacement with the word “significant” in criterion 4(iv).

heritage asset. Particular regard will be given to the original plan form, roof construction and interior features and the exterior of the building’.		
Development proposals affecting a listed building must be considered in the context of the legal duty conferred by s16 (2) and s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. There is no mention in statute of “enhancement” of the building or its setting.	No	The policy is considered sound as written. Criterion 1 includes the words “wherever possible”.
Change of use may not be necessary for a Listed Building, but simply desirable. The lack of reference to weighing the balance of harm in decision making as per the requirements of the NPPF (2019). Accordingly, we recommend that Policy HER 4 is revised to ensure consistency with the NPPF (2019).	No	The legal duty conferred by s16 (2) and s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 16 (2) relates to the grant of Listed Building consent and section 66(1) relates to the grant of planning permission. Section 66 (1) states: <i>“In considering whether to grant planning permission for development which affects a Listed Building or its setting, the local planning authority or, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”</i> Therefore, the reference to “preserve” is justified. Criterion 4(i) refers to the historic significance of the building.

Policy HER 5 ‘Registered parks and gardens’

This policy was titled HER 5 ‘Historic parks and gardens’ in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
Historic England considers that the significance of an asset can be made up of a wide variety of different elements. To make sure that none are excluded, the word ‘including’ should be inserted into criterion 1(i). The policy title refers to ‘Historic parks and gardens’,	Yes	Criterion 1(i) has been amended to refer to ‘matters including’. This highlights that the matters stated are not an exhaustive list. The policy covers only designated assets and its title has been amended to reflect this. Supporting

but the policy only covers 'registered' parks and gardens. The supporting text (¶5.24) refers to non-designated heritage assets as well. It is not clear whether the policy covers both designated and non-designated assets or just the former? If it only covers designated assets, then the title should be amended to reflect this.		text ¶5.24 has been amended to confirm that other locally recognised parks and gardens will be afforded protection under Policy HER 7 'Non-designated heritage assets'.
Clearer definition of 'respect' and what constitutes harm' required.	No	The policy is sound as written.

Policy HER 6 'Historic battlefields'

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised.	N/A	N/A

Policy HER 7 'Non-designated heritage assets'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should make clear that where a heritage asset cannot be saved, it should be replaced by a building of equal or greater architectural quality.	No	The policy seeks to retain non-designated assets as set out at ¶5.27. Not all non-designated assets are buildings, and they include archaeological sites or landscapes that could not be replaced once lost. The supporting information to LPS Policy SE 7 'The historic environment' (¶13.70) emphasises the importance of high-quality design.
The policy should include the term 'balanced judgment' within its wording to ensure clear consistency with national policy.	No	The balanced judgement is expressed by the policy wording "where the benefits of the development outweigh the harm."
The Local List of historic or architecturally important buildings is now out of date. Other candidates have been identified through neighbourhood plans and they need to be evaluated and included where approved. Additionally, the exact status of buildings of 'townscape merit' identified in some conservation	No	The Local List of Historic Buildings SPD dates from 2010 and is referred to in the 'Related documents' section. The listing of non-designated assets through a SPD allows the list to be updated at an appropriate time. The supporting information (at ¶5.26) recognises that non-designated heritage assets are

area appraisals should either be defined precisely or preferably upgraded as appropriate to Locally Listed status. The SADPD should include detail of all locally listed buildings as an appendix.		covered by this policy, whether or not they are documented on any local list.
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Policy HER 8 ‘Archaeology’

Summary of the main issues raised	Revised SADPD amended?	Council response
Criterion 1 could be strengthened by substituting 'should' for "must". Criterion 3 is often not triggered either because the developer does not realise or has not investigated whether the site has archaeological significance and/or the case officer is similarly unaware of archaeological potential in the area. Some mechanism needs to be put in place to ensure these omissions do not occur.	No	“Should” offers some flexibility however criterion 3 says applications “must be accompanied by an appropriate archaeological assessment.”

Policy HER 9 ‘World heritage site’

Summary of the main issues raised	Revised SADPD amended?	Council response
Object to this restrictive policy in relation to proposals in this location. This additional level of protection is not necessary and is not appropriate.	No	Jodrell Bank is now a World Heritage Status which should be recognised in a development plan policy that affords it appropriate protection.
Omit the phrase “outstanding universal value” from criterion 1 as it replicates national guidance. Include it in the explanatory text.	No	The ‘outstanding universal value’ of a World Heritage Site is key to its effective protection and reference to it in the policy is necessary and appropriate. The statement of outstanding universal value that has been prepared for Jodrell Bank describes the reasons for its inscription, its integrity and authenticity and the requirements for its protection and management.

<p>The policy wording should be revised to confirm that an assessment of the immediate setting of the WHS is separate to the UNESCO buffer zone, which is based on the JBO consultation zone for radio inference. Criterion 2 should be amended - Development proposals within the WHS at Jodrell Bank (or within its buffer zone) <u>or its immediate setting</u> that would cause harm to the significance of the heritage asset (including elements that contribute to its outstanding universal value) will not be supported unless there is a clear and convincing justification; and an appropriate heritage impact assessment has evaluated the likely impact of the proposals upon the significance of the asset and the attributes that contribute to its outstanding universal value.</p>	<p>No</p>	<p>This wording is considered unnecessary and inappropriate. The policy rightly refers to development proposals within the WHS or its buffer zone. The present-day scientific value of Jodrell Bank is integral to its heritage significance so it would be incorrect to draw or infer a distinction between them. In addition, development proposals in the buffer zone may affect the significance of the heritage asset in ways other than through radio interference.</p>
<p>World Heritage Sites are of the highest significance, and Historic England considers the policy should be strengthened to reflect this.</p> <ul style="list-style-type: none"> • Criterion 1: reference should be made to <u>authenticity and integrity</u>. • Criterion 2: delete because it slightly weakens the protection to the WHS in that it asks for a clear and convincing justification and the submission of a Heritage Impact Assessment to warrant the harm to a WHS. However, it is the public benefits that applies as outlined in criterion 3. • Add two criteria to the policy: state that development causing harm to the significance of the WHS will not be supported; • require Heritage Impact Assessments so the effect of development proposals on the significance of the WHS can be judged. 	<p>No</p>	<p>Whilst the council has no strong objection to the addition of 'authenticity and integrity' to criterion 1, this is not considered necessary as they are integral to the Outstanding Universal Value of the asset and are highlighted in the supporting information to the policy (¶5.31). In terms of the points raised about the two other policy criteria, these would both apply to schemes that would cause harm to the significance of Jodrell Bank. Both would need to be addressed and met. With this in mind, the concern about criteria 2 slightly weakening protection to the WHS is unfounded because it would not be applied alone, and it is agreed by Historic England that criterion 3 applies the appropriate public benefits test. The council does not agree with the suggested additional criterion – that development causing harm to the significance of the WHS will not be supported. Such an absolute policy position is not supported in national planning policy. However, ¶193 of the NPPF (2019) makes it clear that when considering the impact of proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation – and</p>

		the more important the asset, the greater the weight should be. In the case of Jodrell Bank this weight will be reflective of its WHS status. ¶194b then goes on to say that any substantial harm to a WHS should be wholly exceptional.
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Chapter 6: Rural issues (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD should account for the impacts of the LPS's high growth strategy on the character of local areas; wider landscapes and vistas; and environmental capacity.	No	The LPS and SADPD both contain policies to address issues around local character, landscapes and environmental issues.
The rural policies focus primarily on buildings and businesses and there is no recognition of the need to retain sufficient agricultural land (including lower quality land).	No	The NPPF (2019) (¶170b) recognise the economic and other benefits of the best and most versatile agricultural land. LPS policies SD 1 'Sustainable development in Cheshire East', SD 2 'Sustainable development principles'; SE 2 'Efficient use of land'; and SADPD Policy RUR 5 'Best and most versatile agricultural land' seek to protect the best and most versatile agricultural land.

Policy RUR 1 'New buildings for agriculture and forestry'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy will unnecessarily constrain the growth of rural businesses. It is a 'do minimum' approach and does not accord with NPPF (2019) ¶83, which seeks to support a prosperous rural economy. The emphasis should be on enhancement and reasonable expansion.	No	The policy allows for development to support the existing or planned operation of an enterprise. However, it is appropriate to prevent new buildings in the open countryside that are not required for an existing or planned business operation.

The restrictive approach means that permitted development rights will be utilised by agricultural businesses instead, to deliver the new buildings and floorspace they need. This will lead to a series of smaller, uncontrolled development that cause greater harm than a single development.	No	The policy allows for new buildings and floorspace where they are required for the existing or planned operation of an enterprise. However, it is appropriate to prevent new buildings in the open countryside that are not required for an existing or planned business operation.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
The policy should require that new agricultural and forestry buildings remain in that use in perpetuity and changes of use should only be approved in exceptional circumstances.	No	It would not be a sound approach to restrict all changes of use of agricultural and forestry buildings, particularly when extensive permitted development rights exist. However, the policy does require the design of new buildings to be appropriate to their function and the approach to the re-use of rural buildings is set out in a number of SADPD policies (including RUR 6, RUR 7, RUR 8, RUR 9, RUR 10 and RUR 14).
The wording of the policy restricts the opportunities for new entrants into agriculture where no buildings or enterprise currently exists.	No	The policy is not intended to apply only to established enterprises and refers to existing or planned operations.

Policy RUR 2 'Farm diversification'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy is too restrictive and will hinder the agricultural industry's ability to diversify. Requiring development to be necessary to support the continued viability of the existing agricultural business allows only for the minimum level of diversification, which will not	No	The farm diversification policy is intended to support the continued operation of agricultural businesses. The plan should be read as a whole and where development is proposed in excess of that necessary to support the continued viability of an existing agricultural business, there are other policies supportive of appropriate development in rural

secure the long-term future of the agricultural business and will lead to further diversification later.		areas, including LPS Policy EG 2 'Rural economy'; and SADPD policies RUR 6, RUR 7, RUR 8, RUR 9 and RUR 10.
The policy fails to recognise instances where an existing agricultural business has already ceased operations and therefore a new use for the farmstead/farm buildings needs to be found.	No	The farm diversification policy is intended to support the continued operation of agricultural businesses. Where a business has already ceased operations, there are other policies to guide proposals for alternative uses, including LPS Policy EG 2 'Rural economy'; and SADPD policies RUR 6, RUR 7, RUR 8, RUR 9, RUR 10 and RUR 14.
For farm shops, restricting goods to be mainly produced on site does not account for the wider supply chains often at work for farm shops, the wider economic benefits to the rural economy, or the potential to attract visitors as a leisure/tourism destination.	No	The farm diversification policy is intended to support the continued operation of agricultural businesses and requires that for farm shops, the majority of goods sold should be produced on site. The dictionary definition of "majority" is "the greater number or the greater part". Therefore, the policy allows for almost 50% of goods sold to be sourced from the wider supply chain. The plan should be read as a whole and where proposals form an important component of a leisure or tourism development, there are other policies supportive of appropriate development in rural areas, including LPS policies EG 2 'Rural economy' and EG 4 'Tourism'.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 3 'Agricultural and forestry workers dwellings'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy conflicts with the NPPF (2019) ¶79, which is permissive of rural workers dwellings, including those taking majority control of a farm business.	No	The NPPF (2019) ¶79 requires planning policies to avoid the development of isolated homes in the countryside unless particular circumstances apply, including where there is an essential need for a rural worker, including those taking majority

		control of a farm business, to live permanently at or near their place of work in the countryside. The policy is in accordance with this requirement.
The policy should have regard to the factors in the NPPG (¶10 reference ID: 67-010-20190722), particularly whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process.	No	Where a dwelling is essential for the continued viability of a farming business through the farm succession process, this would provide the justification that there is an existing functional need for an additional worker to live permanently at the site under criterion 1(i) of the policy.
The NPPF (2019) does not suggest that size restrictions should be imposed. The size of dwelling can also relate to what the enterprise can sustain, rather than an individual's income. It is unfairly prescriptive over the size of accommodation and does not account for the range of people who may comply with the need for on-site accommodation. Dwellings need to be of a size and scale to attract and retain labour.	No	This policy allows for new dwellings in circumstances where they would not usually be permitted, where there is the functional need for an additional agricultural or forestry worker to live at the site. The supporting information explains why it is necessary to limit the size of dwellings allowed under this exceptions policy, to keep the dwellings available and affordable to the local workforce.
The figures in the nationally described space standard are minimum figures but are being used as maximum figures for the purposes of the policy. They do not account for non-standard accommodation required by rural workers, e.g. decontamination room, boot room and farm office. Rural workers dwellings also need to accommodate relief worker(s) during absences. The table does not consider a greater number of bedrooms required within the dwelling commensurate with the existing functional need.	No	The gross internal floorspace figures set out in Table 6.1 are not maximum figures, but the policy does require that dwellings allowed under this exceptions policy do not "significantly exceed" the figures in the table. This allows for additional non-standard accommodation or additional bedrooms where justified. The figures are also expressed as a range to allow for a degree of flexibility.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to include to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 4 ‘Essential rural worker occupancy conditions’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy is unlawful as it applies unreasonable burdens on owners of properties with occupancy restrictions as compared to owners of other types of rural buildings originally permitted in exceptional circumstances that now wish to convert them to residential use. National policy and the LPS allow for conversion of rural buildings to dwellings without such restrictions and permitted development rights allow for the change of use of former agricultural buildings to open market dwellings.	No	Essential rural workers dwellings are those that have been allowed in circumstances where dwellings would not usually be permitted, where there is a functional need for an essential rural worker to live at or near the site. They are permitted, to meet a specific local need for housing as an exception to normal policy requirements for general market housing. Where that specific local need for essential rural workers housing no longer exists, it is appropriate to consider whether the dwelling could assist in meeting other local needs for affordable housing that cannot be met by general market housing.
The term ‘in the surrounding area’ is vague and should be replaced with ‘in the locality’ which is the phrase used in model condition (no. 45) for agricultural occupancy conditions set out in the Annex to former Circular 11/95 (the Annex remains extant even though the Circular has been withdrawn).	No	The policy is considered to be sound as written.
The owner of a dwelling subject to an occupancy condition cannot be forced to dispose of that property as a result of making a planning application. The policy requires a marketing exercise to be undertaken. However, it is unlawful under the Consumer Protection from Unfair Trading Regulations, 2008, to offer for sale (or rental) a property that is not, in fact, available to purchase or rent, but is being advertised as an “exercise” to test the market. Therefore, evidence of a marketing exercise cannot be a requirement in all circumstances.	No	The policy is not asking for the market to simply be “tested”. Its purpose is to require genuine attempts to sell before planning permission can be granted without the occupancy condition. The marketing exercise it requires would have to relate to a property that is properly available to buy or rent subject to the occupancy condition. That is the purpose of the policy. Further, the policy does not actually force a disposal. It simply provides that the property be made available to buy or rent and then considers the results of that exercise in deciding whether to grant permission.

Policy RUR 5 ‘Best and most versatile agricultural land’

Summary of the main issues raised	Revised SADPD amended?	Council response
It may be difficult to mitigate the overall impact of development on best and most versatile land under criterion 2(ii), which may prevent development coming forward even where the benefits clearly outweigh the loss of the agricultural land under criterion 2(i).	No	The policy requires that “every effort” is made to mitigate the overall impact of the development on best and most versatile land, which allows for circumstances where it can be demonstrated that mitigation cannot be achieved. Some potential forms of mitigation are set out in the supporting information.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 ‘Flood risk and water management’; and SADPD policies ENV 16 ‘Surface water management and flood risk’ and ENV 17 ‘Protecting water resources’.
The policy should include a requirement to demonstrate that no suitable alternative sites are available that would have a lesser impact on best and most versatile land.	No	Given the limited data available on land quality, it is likely to be difficult for applicants to demonstrate that there are no suitable alternative sites available that would have a lesser impact on best and most versatile land. To do so is likely to require extensive investigations and surveys on third party land.
It is considered that outside of sites specifically allocated for development, proposals must avoid the loss of best and most versatile land.	No	The policy requires that outside of sites allocated for development, proposals should avoid the loss of best and most versatile land.

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

Summary of the main issues raised	Revised SADPD amended?	Council response
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to	No	These issues are addressed through LPS Policy SE 13 ‘Flood risk and water management’; and SADPD policies

include the provision of new high quality and multifunctional surface water drainage systems.		ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
Given the identified need for additional provision, the council should explore further site options to accommodate football and rugby pitches and other sports-related development in Knutsford.	No	This policy sets out a criteria-based approach to permitting outdoor sport, leisure and recreation facilities outside of settlement boundaries.
The SADPD should allocate land adjacent to Agden Mount Farm for a development of holiday lodges, which would support access to sports/leisure/recreation facilities in the area in accordance with NPPF (2019) ¶141.	No	Proposals for the development of visitor accommodation outside of settlement boundaries would be considered against Policy RUR 8 'Visitor accommodation outside of settlement boundaries'.

Policy RUR 7 'Equestrian development outside of settlement boundaries'

Summary of the main issues raised	Revised SADPD amended?	Council response
The requirement for ancillary development to be well-related to existing buildings is unjustified as there may not be any existing buildings.	Yes	The word "any" was added to criterion 1(ii) in the Revised Publication Draft SADPD to confirm that ancillary development should be well-related to any existing buildings. This accounts for circumstances where there are no existing buildings.
The requirement to make best use of existing buildings is unjustified and would not enable the development and diversification of agricultural and other land-based rural businesses; or sustainable rural tourism and leisure developments which respect the character of the countryside as required by NPPF (2019) ¶83.	No	The policy allows for new buildings for equestrian purposes, but it is entirely appropriate to give first consideration to existing infrastructure. Where existing infrastructure is not suitable for the proposals then new infrastructure (including buildings) can be allowed under the policy.
NPPF (2019) ¶¶83 & 84 are supportive of the development of rural businesses. Equestrian facilities require a countryside location and criterion 2 of the policy would prevent new equestrian businesses of any scale. There should be no requirement to assess the potential for conversion of existing buildings in the first instance.	No	The policy allows for the sustainable growth and expansion of businesses in rural area as required by the NPPF (2019). It allows additional buildings and structures for existing businesses where no suitable existing buildings or structures exist. The policy does not allow for new buildings to be constructed for a new business; however, this does not prevent

		new businesses. New commercial enterprises can utilise existing buildings and structures under this policy. This is consistent with the NPPF (2019) and LPS Policy PG 6 'Open countryside', which allows "for development that is essential for the expansion or redevelopment of an <u>existing</u> business".
The requirement for buildings to be constructed of temporary materials such as timber is unjustified. Accommodation requirements will depend on the type and number of horses; welfare of the animal should be determined on a case-by-case basis and the policy would prohibit the provision of essential stables to the detriment of the rural economy.	No	Temporary materials such as timber are appropriate for equestrian uses to meet the requirements set out in the Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids (2017, DEFRA) and the policy is sound as written.
The policy should be strengthened to prevent equestrian buildings being converted to residential use only to be replaced a short time later.	No	The policy requires new equestrian buildings to be appropriate to their intended equestrian use and to be constructed of temporary materials such as timber. Any proposals to convert rural buildings for residential use would be considered against the requirements of SADPD Policy RUR 14 'Re-use of rural buildings for residential use'.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 8 'Visitor accommodation outside of settlement boundaries'

Summary of the main issues raised	Revised SADPD amended?	Council response
Proposals should not be restricted to small scale and larger facilities may be appropriate. 'Development appropriate to the location and setting' would be more appropriate.	Yes	The policy has been amended to refer to 'development of a scale appropriate to the location and setting'.

The restriction for development to be limited to the minimum level required for the operation of the accommodation is unreasonable and is inconsistent with the planning for growth of rural businesses.	Yes	The policy has been amended to confirm that additional buildings, structures and ancillary development are restricted to the minimum level reasonably required for the “existing or planned” operation of the accommodation. This clarifies that development to support growth plans can be allowed. In the open countryside, it is appropriate for the policy to restrict development that is not required for the existing or planned operation of the accommodation.
The policy makes no reference to supporting existing visitor accommodation.	Yes	The policy is intended to be supportive of new facilities as well as new development related to existing facilities. It has been amended to confirm that additional buildings, structures and ancillary development are restricted to the minimum level reasonably required for the “existing or planned” operation of the accommodation. This confirms that development associated with existing accommodation can also be allowed under this policy.
Policy should allow for new-build hotels and guest houses as there may be instances where these could meet specific localised needs (not related to links with the countryside) in locations outside settlement boundaries. Examples include hotels on out-of-centre business parks, demand arising from key transport infrastructure such as airports or HS2, or as part of roadside facilities to serve motorists. Hotels are already subject to a sequential test, which sees them directed to town centres where possible.	No	LPS Policy PG 6 ‘Open countryside’ usually only allows development that is essential for uses appropriate to a rural area, but it does make a series of exceptions in criterion 3 to allow development that is not essential for uses appropriate to a rural area. Policy RUR 8 confirms the instances when visitor accommodation is a use appropriate to a rural area. New hotels and guest houses are not considered to be uses appropriate to a rural area but would still be allowed in some cases under the PG 6 criterion 3 exceptions, including the re-use of existing buildings; replacement of existing buildings; and development that is essential for the expansion or redevelopment of an existing business.
The policy should be less prescriptive, using terms such as ‘appropriate scale’; ‘cannot best be met’; and ‘not generally’.	No	As required by the NPPF (2019) (¶16d), policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

There should not be a test requiring existing buildings to be considered in the first instance as this is contrary to the NPPF (2019) and LPS Policy PG 6 'Open countryside'.	No	The policy is considered sound as drafted. The policy does allow for new buildings, but it is considered entirely appropriate to give first consideration to existing buildings. Where existing buildings are not suitable for the proposals then new buildings can be allowed under the policy.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
The amended policy restriction for development to be limited to the minimum level required for the existing or planned operation of the accommodation remains an unreasonable restriction and is inconsistent with the planning for growth of rural businesses. When extending or redeveloping a site, a growing business needs to plan for the future and ensure that it does not immediately need to extend again if the business grows further.	No	The amended policy allows for development to support the planned operation of the accommodation. It does not limit this to the planned operation in the immediate future, but it is appropriate for the policy to restrict development in the open countryside that is not required for the existing or planned operation of the accommodation.
The policy should allow for visitor accommodation in the Green Belt, subject to providing access to outdoor sports/recreation/leisure activities.	No	As set out in the NPPF (2019) and LPS Policy PG 3 'Green Belt', the construction of new buildings is inappropriate development in the Green Belt (with several defined exceptions). Allowing further exceptions through this policy would not be in accordance with the NPPF (2019) or the LPS.

Policy RUR 9 'Caravan and camping sites'

Summary of the main issues raised	Revised SADPD amended?	Council response
Proposals should not be restricted to small scale and larger facilities may be needed and be acceptable, subject to the location and details of the site.	Yes	The policy has been amended to refer to "development of a scale appropriate to the location and setting" instead of "small scale development".

The restriction for development to be limited to the minimum level required for the operation of the facility is an unreasonable restriction and is inconsistent with the planning for growth of rural businesses.	Yes	The policy has been amended to confirm that additional buildings, structures and ancillary development are restricted to the minimum level reasonably required for the “existing or planned” operation of the facility. This clarifies that development to support growth plans can be allowed. In the open countryside, it is considered appropriate for the policy to restrict development that is not required for the existing or planned operation of the facility.
There should not be a test requiring existing buildings to be considered in the first instance, as this is contrary to the NPPF (2019) and LPS Policy PG 6.	No	The policy is considered sound as drafted. The policy allows for new buildings, but it is considered entirely appropriate to give first consideration to existing buildings. Where existing buildings are not suitable for the proposals then new buildings can be allowed under the policy.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 ‘Flood risk and water management’; and SADPD policies ENV 16 ‘Surface water management and flood risk’ and ENV 17 ‘Protecting water resources’.
The amended policy restriction for development to be limited to the minimum level reasonably required for the existing or planned operation of the facility remains an unreasonable restriction and inconsistent with planning for the growth of rural businesses. A growing business needs to plan for the future and ensure that it does not need to extend again should it grow further.	No	The amended policy allows for development to support the planned operation of the facility. It does not limit this to the planned operation in the immediate future, but it is appropriate for the policy to restrict development in the open countryside that is not required for the existing or planned operation of the facility.
The policy should allow for camping and caravan sites in the Green Belt where they provide access to leisure and recreation opportunities. It should also allow for holiday lodges, which are similar to caravans in that they can be removed at any time, thereby reducing any perceived impacts on the setting of the area.	No	Proposals for static accommodation (whether permanent or temporary in nature) including static caravans and holiday lodges would be considered in accordance with Policy RUR 8 ‘Visitor accommodation outside of settlement boundaries’. As set out in the NPPF (2019) and LPS Policy PG 3 ‘Green Belt’, the construction of new buildings is inappropriate development in the Green Belt (with several defined exceptions). Allowing further exceptions through this policy would not be in accordance with the NPPF (2019) or the LPS.

Policy RUR 10 ‘Employment development in the open countryside’

Summary of the main issues raised	Revised SADPD amended?	Council response
The restriction for development to be limited to the minimum level required for the operation of the business is an unreasonable restriction and is inconsistent with planning for the growth of rural businesses.	Yes	The policy has been amended to confirm that additional buildings, structures and ancillary development should be restricted to the minimum level reasonably required for the “existing or planned” operation of the business. This clarifies that development to support growth plans can be allowed. In the open countryside, it is considered appropriate for the policy to restrict development that is not required for the existing or planned operation of the business.
The policy should refer to a wider range of employment uses. The NPPF (2019) encourages all types of businesses in rural areas, not just small scale. Business and logistics parks are often located near road infrastructure in the open countryside, providing local employment opportunities. Emerging technologies to tackle climate change (e.g. energy storage and other battery storage opportunities within salt cavities) should not be prevented by a restrictive policy.	No	The policy is relevant to employment uses, which are defined as B1, B2 and B8 uses in the LPS (now class E(g)(i), E(g)(ii), E(g)(iii), B2 and B8). There are other policies relevant to proposals for other types of businesses in the open countryside, including LPS Policy EG 2 ‘Rural economy’ and SADPD policies RUR 2; RUR 6; RUR 7; and RUR 8. There are also energy and climate change policies including LPS Policy SE 8 ‘Renewable and low carbon energy’ and SADPD policies ENV 7; ENV 9; ENV 10; and ENV 11.
Limiting the scale and types of employment development is inconsistent with the NPPF (2019), which sets out that planning policies should enable the sustainable growth and expansion of all types of business in rural areas. It is also inconsistent with LPS Policy PG 6 ‘Open countryside’, which allows for development that is essential for the expansion or redevelopment of an existing business, not requiring it to be small scale or appropriate to a rural area.	No	The NPPF 2019 (¶83a) requires policies to enable the sustainable growth and expansion of businesses in rural areas. The terms ‘growth’ and ‘expansion’ refer to existing businesses. In line with the NPPF (2019), LPS Policy PG 6 ‘Open countryside’ allows for expansion of existing businesses (of any scale) as an exception to the usual restrictions in the open countryside. In addition, Policy PG 6 also allows for ‘other uses appropriate to a rural area’ and this policy (RUR 10) gives further detail by confirming that small scale employment development (not restricted to existing businesses) can be

		considered to be appropriate to a rural area, therefore allowing small scale employment development for new enterprises.
There should not be a test requiring existing buildings to be considered in the first instance, as this is contrary to the NPPF (2019) and LPS Policy PG 6.	No	The policy allows for new buildings, but it is considered entirely appropriate to give first consideration to existing buildings. Where existing buildings are not suitable for the proposals then new buildings can be allowed.
The requirement for new buildings to be appropriate to their intended function and not designed to be easily converted to residential use in the future should not rule out the buildings that are of permanent and substantial construction. The wording means that any proposal would be subject to an arbitrary and unnecessary judgement over whether it might at some point potentially be converted to residential use. The issues should be dealt with by removing development rights through an Article 4 Direction.	No	The policy allows for small scale employment premises where a countryside location is essential, and they provide local employment opportunities to support the vitality of rural settlements. It is important that the policy is not a 'back door' for residential development that would not otherwise be allowed. It is not unreasonable that the design of new buildings should be appropriate to their intended function and the policy does not prevent buildings of permanent and substantial construction (unless such construction is not appropriate to the intended function).
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
Historic uses of a site should not be used as justification for new and fundamentally different businesses moving in that are not appropriate to a rural area.	No	The policy sets out the circumstances where employment development can be considered appropriate to a rural area. The plan is intended to be read as a whole, and other policies will also apply to prevent unsuitable proposals, including SADPD policies GEN 1 and ENV 15.
The amended policy restriction for development to be limited to the minimum level reasonably required for the existing or planned operation of the business remains an unreasonable restriction and is inconsistent with planning for the growth of rural businesses. A growing business needs to plan for the future and ensure that it does not immediately need to extend again should it grow further.	No	The amended policy allows for development to support the planned operation of the business. It does not limit this to the planned operation in the immediate future, but it is appropriate for the policy to restrict development in the open countryside that is not required for the existing or planned operation of the business.

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

Summary of the main issues raised	Revised SADPD amended?	Council response
The test of openness is not included in the NPPF (2019) ¶145c and should be removed from the policy.	Yes	The policy has been amended to remove the reference to the openness of the Green Belt.
Case law has established that an assessment of the openness of the Green Belt should not be confined to quantitative impacts and NPPG confirms that openness can have both spatial and visual aspects. Therefore, it is wrong to specify certain percentage uplifts to define what is disproportionate and an assessment should be carried out on a case-by-case basis.	No	The initial Publication Draft SADPD policy was clear that the assessment of whether something is disproportionate is a separate test to whether it harms the openness of the Green Belt. There were no quantitative considerations set out to determine whether a proposal would harm the openness of the Green Belt. However, in any case the reference to openness of the Green Belt has been deleted in the Revised Publication Draft SADPD.
Inappropriate development is, by definition, harmful to the Green Belt but the same presumption against development does not apply in the open countryside and the two policy designations should be separated in this regard.	No	In accordance with the NPPF (2019), LPS Policy PG 3 ‘Green Belt’ allows for the extension or alteration of a building if it does not result in disproportionate additions over and above the size of the original building. LPS Policy PG 6 ‘Open countryside’ allows for extensions to existing dwellings where the extension is not disproportionate to the original dwelling. SADPD Policy RUR 11 gives further guidance on circumstances where extensions may be disproportionate.
An increase in a building’s height is part of the consideration of bulk, mass and prominence; and essentially the visual dimension as referenced in case law. To usually consider increases in height as disproportionate is not justified.	No	The word ‘usually’ allows the decision-maker to exercise professional judgement in cases where an overall increase in height is not disproportionate given the site context and comparison of existing and proposed built form.
The restriction meaning any extension greater than 30% of original floorspace comprises inappropriate development in the Green Belt is unjustified and whilst 30% has historically been used by a number of councils, the NPPF (2019) includes no such threshold and the assessment of whether	No	The policy states that proposals will ‘usually’ be disproportionate where they exceed those thresholds. This allows the decision maker to exercise professional judgement considering the merits of each case having regard to the context of the site. The use of percentage figures as a guide to what might be

an extension is disproportionate requires consideration on a case-by-case basis.		disproportionate is an established feature of local policy and up-to-date Local Plans in other areas also use such an approach, having been found sound at examination.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.
Proposals that do not increase the size of the original building by the percentage thresholds set out should usually be considered as proportionate. Only where the proposals are above the threshold should the matters at criterion 2 be considered.	No	The matters set out in criterion 2 are important considerations in determining whether a proposal represents disproportionate additions.
The policy should confirm that the original building relates to the original planning consent, not the original building constructed on site.	No	The definition of "original building" is consistent with the definition in the NPPF (2019) Annex 2.

Policy RUR 12 'Residential curtilages outside of settlement boundaries'

Summary of the main issues raised	Revised SADPD amended?	Council response
The curtilage of a property can only relate to an area in residential land use. It is a factual determination that can change in an instant, for example by the removal of a fence. This policy should only concern garden extensions, which represent a change of use of land.	No	The policy confirms that it applies to residential garden or curtilage extensions involving a material change of use of the land. Extensions to curtilages that do not involve a material change of use of land would not require planning permission.
A 'reasonable sitting out area' should be defined in terms of size, orientation and impact on wider character and amenity of the area. It should not be left to subjective determination.	No	Professional judgement will need to be applied to a 'reasonable sitting out area' but criterion 2 limits this to the minimum amount of land reasonably required.
The key consideration in assessing a garden extension should be the character and appearance of the open countryside.	No	LPS Policy PG 6 'Open countryside' defines the open countryside as the area outside of any settlement with a defined

Criterion 1 is overly restrictive and material changes in the use of land in the Green Belt are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.		settlement boundary. Policy PG 6 only allows development for a limited number of uses, including uses appropriate to a rural area. Some areas of the open countryside are also in the Green Belt, but the policy defers the consideration of whether proposals represent inappropriate development to the Green Belt policy.
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Policy RUR 13 ‘Replacement buildings outside of settlement boundaries’

Summary of the main issues raised	Revised SADPD amended?	Council response
Case law has established that the term ‘building’ in NPPF 2012 ¶89 (¶145 in NPPF 2019) can also include ‘buildings’ and should not mean only a singular building. Case law has established that outbuildings may be incorporated into such calculations subject to site specific circumstances.	Yes	The policy has been amended to allow floorspace from detached outbuildings to be considered in certain circumstances.
The term ‘materially larger’ only applies to Green Belt and is not a relevant concept in the open countryside.	No	LPS Policy PG 6 ‘Open countryside’ allows for the replacement of existing buildings (including dwellings) by new buildings not materially larger than the buildings they replace. This policy gives further guidance on the circumstances under which replacement buildings may be materially larger.
Under criterion 1(ii), the tests of impact on the rural character of the countryside duplicate the assessment of ‘materially larger’ and should be deleted.	No	Whilst there may be some similarities in the issues to be considered, the tests are different.
Under criterion 2, all factors may affect whether a building is materially larger; therefore, it is not appropriate to say that increases in height or footprint will usually be considered to be materially larger.	No	The policy gives guidance in that increases in overall building height and extending notably beyond the existing footprint will usually be considered materially larger. But the word ‘usually’ allows the decision maker to exercise professional judgment, considering the circumstances of each case.

The NPPF 2019 provides no prescriptive threshold of what is materially larger, and the policy should allow for planning judgement on a case-by-case basis.	No	The policy gives guidance that proposals in excess of the percentage size increase will usually be considered to be materially larger. However, it does not place an absolute limit on the percentage increase that would be permissible before a proposal is considered to be materially larger and the word 'usually' allows the decision maker to exercise professional judgment, considering the circumstances of each case.
The percentage increase in size for replacement properties in the Green Belt should be amended to reflect NPPF (2019) ¶145g to allow for development where there is not a substantial impact on openness where there is affordable housing provision to meet local needs included on site. A greater percentage increase should be allowed where affordable housing is provided.	No	This policy is specifically related to replacement buildings (for all uses) and is in line with NPPF (2019) ¶145d, which involves no test related to openness. The provisions under ¶145g(ii) relates to the limited infilling or redevelopment of previously developed land for affordable housing and does involve a test related to openness. Whilst this policy does not refer to affordable housing on previously developed land, it does not preclude it.
Case law establishes that materially larger cannot be defined by a simple consideration of an increase in floorspace. It hinges on factors that go beyond size alone and in addition to spatial considerations, perceptual considerations also form part of the assessment. The percentage ceilings are not justified or supported by evidence. If a figure is considered necessary, then it should be no less than 30% to be consistent with the policy for extensions.	No	The policy does not define 'materially larger' by a simple consideration of an increase in floorspace. Criterion 2 requires matters including height, bulk, form, siting, design, floorspace and footprint to be considered before criterion 3 gives further guidance on the percentage thresholds above which proposals will usually be considered to be materially larger. These are not absolute limits and the word 'usually' allows the decision maker to exercise professional judgement considering the merits of each case having regard to the context of the site. There are many examples where local plans use percentage figures significantly lower than 30% to define what is materially larger. The test for replacement buildings is whether the replacement is materially larger than the building it replaces (the existing building). The test for extensions under Policy RUR 11 is whether the extension would result in disproportionate additions over and above the size of the original building. The guidance percentage figures for replacement dwellings cannot be directly compared to the guidance percentage figures for extensions.

Case law has established that an assessment of the openness of the Green Belt should not be confined to quantitative impacts and NPPG confirms that openness can have spatial and visual aspects. It is wrong to specify certain percentage uplifts to define what is materially larger and assessments should be carried out on a case-by-case basis.	No	The policy requires no consideration of the openness of the Green Belt.
By using floorspace to determine the increase in size ignores other dimensions of size such as height, volume, footprint, width, and depth.	No	The policy confirms that usually, the increase in size will be determined by assessing the net increase in floorspace because this is often the most appropriate and straightforward method. The word 'usually' means that the decision-maker can exercise professional judgement and consider other dimensions of size considering the merits of each case.
The statement that the existing building is as it exists when making a planning application implies that any fallback position will not be considered. This is a material consideration that should be taken into account and the policy should not pre-determine what matters are material considerations.	No	The policy is that the existing building is as it exists when making a planning application. Planning decisions should be made in accordance with the development plan unless material considerations indicate otherwise. There could be any number of material considerations (potentially including a fallback position), but the policy does not seek to define what those may or may not be.
Not all householders wish to have a garage and where there is no such existing provision, it is unreasonable for an applicant to trade living space for a garage in a replacement dwelling.	No	The policy requires appropriate provision for domestic storage and garaging. Where it is appropriate not to include garaging (such as where there is no existing provision), the policy does not require such provision.
Waterbodies in rural areas are affected by water quality issues and the policy should be amended to require new development to include the provision of new high quality and multifunctional surface water drainage systems.	No	These issues are addressed through LPS Policy SE 13 'Flood risk and water management'; and SADPD policies ENV 16 'Surface water management and flood risk' and ENV 17 'Protecting water resources'.

Policy RUR 14 'Re-use of rural buildings for residential use'

Summary of the main issues raised	Revised SADPD amended?	Council response
The statement that modern agricultural buildings are generally not capable of conversion to residential use is not supported by evidence and is inconsistent with national policy. There are a number of planning appeals where the conversion of modern agricultural buildings has been allowed.	Yes	The supporting information has been amended to note that modern agricultural buildings are often not capable of conversion for residential re-use because the nature of their construction means they would require extensive alteration, rebuilding or extension. This may not apply in every case and the policy allows for conversion of modern agricultural buildings where this can happen without extensive alteration, rebuilding or extension.
The policy is inconsistent with the NPPF (2019) as it only allows for the re-use of rural buildings for residential uses when no such restrictions apply in the NPPF (2019).	No	The policy gives guidance on the re-use of rural buildings for residential purposes but does not restrict their re-use to residential only. The re-use of rural buildings for other uses is covered by several other policies, including LPS policies PG 6 'Open countryside' and EG 2 'Rural economy'; and SADPD policies RUR 6; RUR 7; RUR 8; and RUR 10.
The policy should not restrict the conversion of outbuildings, as such development may comprise sustainable development and contribute to housing supply.	No	The policy does not restrict the conversion of outbuildings.
The policy should be strengthened to only allow conversion of agricultural or equestrian buildings where there is no realistic other use.	No	Such a requirement would be overly restrictive, particularly given the extension permitted development rights that exist for the conversion of rural buildings.
Where an agricultural or equestrian building is converted to residential use, the policy should confirm that a replacement of the converted building will not be allowed for a minimum period of 10 years.	No	Such a requirement would be overly restrictive, particularly given the extension permitted development rights that exist for the conversion of rural buildings.

Chapter 7: Employment and economy (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD should include exceptions policies for proposals relating to the television and film industry.	No	LPS Policy EG 1 'Economic prosperity' is supportive of employment proposals within settlement boundaries. LPS Policy EG 2 'Rural economy' sets the approach to proposals that support the rural economy. SADPD Policy RUR 10 'Employment development in the open countryside' adds detail regarding employment development in the open countryside.
Fast and reliable digital infrastructure should be a priority to support home-based businesses.	No	This issue is addressed through LPS Policy CO 3 'Digital connections' and SADPD Policies GEN 1 'Design principles' and INF 8 'Telecommunications infrastructure'.
Quality public realm improvements are important to support local businesses.	No	This issue is addressed through LPS Policy SE 1 'Design' and SADPD policies GEN 1 'Design principles' and RET 9 'Environmental improvements, public realm and design in town centres'.
Visitor accommodation in Alderley Edge should be maintained as there is an unmet need.	No	LPS Policy EG 4 'Tourism' is supportive of appropriate facilities in LSCs.
It is considered that the SADPD takes no account of the need to support employment in LSCs.	No	LPS Policy EG 1 'Economic prosperity' is supportive of proposals for employment development in LSCs. The need for site allocations in LSCs is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
The SADPD is not aligned with the draft economic policy, which seeks to build on opportunities arising from HS2, the M6 corridor and links to Manchester Airport. Therefore, it is considered that only modest housing development should be provided in LSCs in the northeast of the borough.	No	LPS Policy PG 7 'Spatial distribution of development' determines the overall level of development to be provided in LSCs. The approach towards site allocations in LSCs is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].

Policy EMP 1 ‘Strategic employment areas’

Summary of the main issues raised	Revised SADPD amended?	Council response
Radbroke Hall is listed as a strategic employment area in the policy but is not shown as such on the policies map.	No (but the policies map has been amended)	The policies map was amended for the Revised Publication Draft SADPD to correctly reflect the strategic employment areas designated in the policy.
The British Salt factory in Middlewich should be included in the list of strategic employment sites listed.	No	The sites included in the policy are those listed as key employment areas in the justification to the LPS Policy EG 3 ‘Existing and allocation employment sites’. Existing employment sites not covered by the ‘strategic employment areas’ designation are still protected for employment use under LPS Policy EG 3.

Policy EMP 2 ‘Employment allocations’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should require any application for non-compliant non-employment use to be accompanied by detailed evidence.	No	Allocated employment sites are protected for employment use under LPS Policy EG 3 ‘Existing and allocated employment sites’. Applications for non-employment uses would need to provide a clear and convincing justification.
The policy should require clear evidence that ancillary (non-employment) uses are essential for the delivery of a wider employment scheme.	No	The policy allows for ancillary uses, where they are compatible with the employment use of the site and are delivered as part of a comprehensive employment scheme.
There is a need for further employment sites in Knutsford, which will necessitate a further review of Green Belt boundaries around the town. The land at Moorside Car Park should be allocated for employment uses.	No	Policy EMP 2 lists those employment sites allocated in existing saved policies that will continue to be allocated once these saved policies are deleted. Moorside Car Park is not an existing allocation and the need for further sites in Knutsford is considered in the Knutsford (general issues) section of this consultation statement appendix.

Site EMP 2.1 conflicts with one of the proposed Southern Link Road Bridge route options suggested within the CHAAP Development Strategy and Further Options document.	No	Part of the site is identified as one of the route options for the Southern Link Road bridge and this issue is considered in the Employment Allocations Review [ED 12].
As required by the LPS and NPPF (2019), the employment land supply must consist of viable sites. Detailed viability assessments show that site EMP 2.5 cannot be viably developed for employment uses; a view endorsed by the inspector and Secretary of State at the public inquiry held into the proposals for retail development at the site. It is considered that the evidence does not fully consider contamination issues; overestimates the market interest in the site; and does not properly consider the viability issues.	No	As set out in the Local Plan SADPD Policies Viability Assessment [ED 52] (¶¶11.5-11.9 and 12.93-12.97), office and industrial development in general is not shown as viable. This is reflective of the wider area and development is only being brought forward to a limited extent on a speculative basis. Where development is coming forward, it tends to be from existing businesses for operational reasons, rather than to make a return through property investment. It is also notable that local agents have reported that over the past two years or so, there has been a change in sentiment and an improvement in the market and this is expected to continue.
Land at Radway Green Alsager should be allocated for B1, B2 and B8 uses under this policy.	No	The land at Radway Green is an existing, operational employment site and is protected for employment use under LPS Policy EG 3 'Existing and allocated employment sites'. LPS Policy EG 1 'Economic prosperity' is supportive of proposals for employment development in KSCs.
Land adjacent to the Highways England M6 Smart Motorways Programme Junction 16-19 Site Compound should be allocated for employment use.	No	It is not clear as to which specific site this representation relates. However, the former Saxon Cross Hotel site to the south of the compound has consent for B1/B8 uses and is currently under construction. As an existing employment site, it is protected for employment use under LPS Policy EG 3 'Existing and allocated employment sites'.
There are questions as to whether the employment land supply in Crewe is genuinely available, viable, attractive to the market and capable of delivering the required quantum over the plan period. The SADPD should allocate further sites in Crewe including land at Newcastle Road, Willaston.	No	The need for further employment sites in Crewe is considered in the Crewe (general issues) section of this consultation statement appendix. As demonstrated in the Crewe Settlement Report [ED 28], significantly more employment land has been identified in Crewe than the indicative figures set out in LPS Policy PG 7.

The site on London Road, Holmes Chapel at the old Bengers/Fisons site should be allocated as employment land as it has an extant permission for commercial/industrial use.	No	The site has consent for A1 retail uses.
The former Manchester Metropolitan University campus in Crewe should be allocated for higher educational uses or office and ancillary facilities such as a conference centre and hotel.	No	The site remains in higher education use as the Apollo Buckingham Health Science Campus.
Additional employment land is required in Alsager and the land at Fanny's Croft should be allocated for employment purposes.	No	Policy EMP 2 lists those employment sites allocated in existing saved policies that will continue to be allocated once these saved policies are deleted. Land at Fanny's Croft is not an existing allocation and the need for further employment sites in Alsager is considered in the Alsager (general issues) section of this consultation statement appendix.
The policy should cross-refer to policies ENV 1 and ENV 2 and confirm that substantial areas of habitat creation will be required for site EMP 2.6.	No	The plan is intended to be read as a whole and SADPD policies ENV 1 and ENV 2 will apply to all proposals where relevant.
The issue of minerals sterilisation in Minerals Safeguarding Areas has not been given due consideration and should have been considered properly before proposing sites for allocation.	No	This issue is considered in the Chapter 12: Site allocations (general issues) section of this consultation statement appendix.
The cumulative impact of employment development at site EMP 2.8 on the Jodrell Bank Observatory should be considered to make sure that it doesn't prevent affordable housing from coming forward.	No	Site EMP 2.8 is a redevelopment site that now benefits from planning permission for employment development and is under construction.
The SADPD should include exceptions policies for proposals relating to the television and film industry.	No	This issue is considered in the Chapter 7: Employment and economy (general issues) section of this consultation statement appendix.
The council has failed to consider potential new employment allocations as part of the SADPD's evidence base.	No	Policy EMP 2 lists those employment sites allocated in existing saved policies that will continue to be allocated once these saved policies are deleted. Potential new employment sites are considered for allocation in the SADPD Chapter 12 in each of the individual settlement reports in the evidence base.

The SADPD should consider allocations and a specific policy for roadside facilities.	No	This issue is considered in the Chapter 10: Transport and Infrastructure (general issues) section of this consultation statement appendix.
Given the current challenging economic situation, the policy should be amended to allow for parts of employment sites to be given over to housing, where appropriate.	No	The rate of net jobs growth in Cheshire East has averaged 1.6% per year since the start of the plan period. Whilst there are current economic difficulties associated with the Covid-19 pandemic, the implications of these are not yet clear. It is likely that a range of quality employment sites will assist in facilitating any subsequent economic recovery.

Chapter 8: Housing (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Representations have been received about the adopted housing requirement set out in the LPS. The issues raised include:</p> <ul style="list-style-type: none"> • The housing requirement is a minimum, not a target or ceiling; • The LPS housing requirement is out of date. There have been changes in circumstance since the LPS was adopted, including population and economic growth. The local housing need figure calculated using the standard method is lower than the LPS annual requirement; • Further sites should be allocated for housing in the SADPD to ensure that the housing requirement can be met/boost supply; • No additional sites should be allocated for housing in the SADPD given that supply exceeds the adopted requirement. Allocating further sites is at 	No	<p>As set out the NPPF (2019), it is the role of strategic plans to provide a strategy for the pattern, scale and quality of development in the area, which as a minimum, seeks to meet the area's objectively assessed need.</p> <p>The LPS is the strategic plan for the borough and Policy PG 1 'Overall development strategy' identifies the housing requirement of 36,000 new dwellings over the plan period, sufficient to meet the objectively assessed needs of the area.</p> <p>The SADPD is a non-strategic plan prepared to be consistent with the LPS and to complete tasks left over from the preparation of the LPS. NPPF (2019) ¶36 states that tests of soundness are to be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with strategic policies for the area.</p> <p>Any re-assessment of the adopted housing requirement identified in the LPS is beyond the scope and purpose of the SADPD and is a matter for the review of that strategic plan.</p>

<p>odds with climate change and environmental policies.</p>		<p>‘The provision of housing and employment land and the approach to spatial distribution’ [ED 05] explains the approach taken towards housing in the SADPD, including the reasons for the allocation of additional sites in Middlewich and Poynton (¶¶4.13-4.24). A housing supply of 41,270 dwellings (including sites to be allocated in the SADPD) exceeds the adopted housing requirement of 36,000 dwellings. Together, the LPS and SADPD provide an appropriate strategy to ensure that the minimum housing requirement identified in Policy PG 1 ‘overall development strategy’ in the LPS is met.</p>
<p>Various representations have been received about housing supply and flexibility. The issues raised include:</p> <ul style="list-style-type: none"> • Additional sites should be allocated in the SADPD to provide increased flexibility in the event that sites do not come forward as expected; • There is no justification to allocate any additional sites in the SADPD given levels of plan flexibility; • The council does not apply a lapse rate to its supply; • 20% housing supply flexibility should be applied on the overall housing requirement of 36,000 new dwellings. 20% flexibility has been endorsed by other Local Plan Inspectors – for example the Stratford-on-Avon Core Strategy (June 2016) and the Redland and Cleveland Local Plan (March 2018); • The Cheshire East Housing Monitoring Update (2017) shows that between 2010/11 and 2016/17, the number of dwellings on expired sites amounted to 1,609 dwellings. This is equivalent to 12% of the housing requirement for that period of 12,600 dwellings (1800 x 7); 	<p>No</p>	<p>‘The provision of housing and employment land and the approach to spatial distribution’ [ED 05] explains the approach taken towards housing in the SADPD, including the allocation of additional sites in Middlewich and Poynton. At 31 March 2020, housing land supply of 41,270 dwellings (including sites to be allocated in the SADPD) provides flexibility of 14.6%.</p> <p>There is no legal requirement to incorporate a 20% buffer to the housing requirement or to include a lapse rate nor is this contained within national planning policy. The LPS does not prescribe particular levels of flexibility at any settlement or tier. Flexibility (14.6%) has risen significantly since the LPS was adopted (9.9%). Supply flexibility increases further to 25.9% if it is calculated as a percentage of the number of dwellings left to be built (20,317). Levels of flexibility are sufficient to account for sites that do not come forward as expected.</p> <p>The Redland and Cleveland, and Stratford-upon-Avon examples provided are both strategic plans examined prior to the introduction of the NPPF (2019) and updated NPPG. They are not directly relevant to the examination of a non-strategic plan. Matters of housing supply and housing supply flexibility will also have been considered in the context of their own particular circumstances. As set out in ¶35 and ¶36 of the NPPF (2019), plans are ‘sound’ if they</p>

<ul style="list-style-type: none"> Levels of flexibility applied when the LPS was adopted to individual settlements/tiers should be retained. 		<p>provide a strategy that as a minimum, seeks to meet the area's objectively assessed needs. Tests of soundness are to be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with strategic policies for the area.</p>
<p>Various representations have been received about the housing trajectory set out in Appendix E of the LPS. The issues raised include:</p> <ul style="list-style-type: none"> The trajectory should be updated; Up-to-date information should be provided on lead in times and build rates for sites; Parties should be given the opportunity to comment on an updated trajectory. 	No	<p>¶73 of the NPPF (2019) identifies that strategic policies should include a trajectory illustrating the expected rate of delivery over the plan period. The SADPD is a non- strategic plan. Appendix E of the LPS includes the housing trajectory. Chapter 16 'Monitoring and Implementation' provides the monitoring framework for the LPS.</p> <p>A Local Plan Monitoring Framework [ED 54] has been prepared to detail the monitoring indicators that will appear in the council's AMR if the SADPD is adopted. This proposes to replace the monitoring table in Table 16.1 of the LPS. Several indicators will be reported on including housing completions, performance on delivering a five-year supply of housing land and other relevant indicators. ¶¶3.9-3.11 [ED 54] sets out the approach where targets are not being met. If delivery or supply falls below the targets indicated in the LPS monitoring framework, the council is required to consider various actions to address those issues, including policy review. The council reports annually on progress across the core indicators and actions set out in the LPS in its AMR, including an updated trajectory.</p> <p>It is also relevant that the NPPF (2019) sets out the actions required if delivery falls significantly below the number of homes needed (via the Housing Delivery Test Measurement) or if supply falls short of the five-year supply requirement.</p>
<p>Various representations have been received about progress on individual strategic sites.</p>	No	<p>Progress on strategic sites is reviewed annually through the AMR and the Housing Monitoring Update. The SADPD is a non-strategic plan prepared to be consistent with the LPS, to complete tasks left over from the LPS. NPPF (2019) ¶36 states that tests of soundness are to be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with</p>

		<p>strategic policies for the area. It is outside the scope and purpose of the SADPD to revisit strategic site allocations in the LPS. LPS Chapter 16 'Monitoring and Implementation' provides the monitoring framework for the LPS.</p> <p>A Local Plan Monitoring Framework [ED 54] has been prepared to detail the monitoring indicators that will appear in the council's AMR if the SADPD is adopted. This proposes to replace the monitoring table in Table 16.1 of the LPS. Several indicators will be reported on including housing completions, performance on delivering a five-year supply of housing land and other relevant indicators. ¶¶3.9-3.11 [ED 54] sets out the approach where targets are not being met. If delivery or supply falls below the targets indicated in the LPS monitoring framework, the council is required to consider various actions to address those issues, including policy review. The council reports annually on progress across the core indicators and actions set out in the LPS in its AMR, including an updated trajectory.</p> <p>It is also relevant that the NPPF (2019) sets out the actions required if delivery falls significantly below the number of homes needed (via the Housing Delivery Test Measurement) or if supply falls short of the five-year supply requirement.</p>
More sites should be allocated for housing to take advantage of HS2 and other growth initiatives.	No	This issue is considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
<p>Various representations have been received about five-year housing land supply. The issues raised include:</p> <ul style="list-style-type: none"> • The SADPD Examining Inspector will require confirmation that a deliverable five-year housing land supply can be demonstrated to ensure that the SADPD meets the tests of soundness; • The council's latest published five-year housing land supply assessment (the Cheshire East Housing Monitoring Update (base date 31 March 2019)) is out of date. An updated assessment 	No	<p>The provision of housing and employment land and the approach to spatial distribution [ED05] ¶¶3.34-3.27 explains that there is no requirement to confirm five-year housing land supply through the examination of a non-strategic plan. The council is not inviting the Inspector to confirm five-year housing land supply at the draft plan (Regulation 19) stage.</p> <p>LPS Chapter 16 'Monitoring and Implementation' provides the monitoring framework for the LPS. A Local Plan Monitoring Framework [ED 54] has been prepared to detail the monitoring</p>

<p>should be provided and interested parties should be given the opportunity to comment on it;</p> <ul style="list-style-type: none"> • The council is unable to demonstrate a deliverable five-year housing land supply because it has not provided clear evidence that major sites with outline planning permission or allocated sites without planning permission are 'deliverable' having regard to Annexe 2 of the NPPF (2019); • The SADPD should allocate further housing sites to ensure that the council can demonstrate/maintain a deliverable five-year housing land supply throughout the plan period; • The council cannot demonstrate a deliverable five-year housing land supply at the individual settlement level. 		<p>indicators that will appear in the council's AMR if the SADPD is adopted. This proposes to replace the monitoring table in Table 16.1 of the LPS. Several indicators will be reported on including housing completions, performance on delivering a five-year supply of housing land and other relevant indicators. ¶¶3.9-3.11 [ED 54] sets out the approach where targets are not being met. If delivery or supply falls below the targets indicated in the LPS monitoring framework, the council is required to consider various actions to address those issues, including policy review.</p> <p>In accordance with ¶73 of the NPPF (2019), the council continues to update annually its assessment of the five-year housing land supply requirement and the identification of specific sites to meet it. Progress across the core indicators and actions set out in the LPS are also updated annually in the AMR.</p> <p>It is also relevant that the NPPF (2019) also sets out the actions required if delivery falls significantly below the number of homes needed (via the Housing Delivery Test Measurement) or if supply falls short of the five-year supply requirement.</p> <p>As set out in NPPF (2019) ¶73, five-year housing land supply is assessed against adopted strategic housing requirements. The strategic housing requirement for Cheshire East is 36,000 new dwellings over the plan period, equivalent to an average of 1,800 dwellings per annum. There is no requirement in national planning policy to demonstrate deliverable five-year supply at the settlement level.</p>
<p>The SADPD does not address previous years of under-delivery</p>	<p>No</p>	<p>This is a matter for strategic policy making, monitoring and/or review. NPPG (Paragraph: ¶031 Reference ID: 68-031-20190722) states that where shortfalls in housing completions have been identified against planned requirements, strategic policy makers can consider what factors led to this and whether there are any measures that the authority can take.</p>

		<p>The council's approach to the allocation of additional sites for housing in the SADPD is set out in 'The Provision of Housing and Employment Land and the Approach to Spatial Distribution' [ED 05]. At 31 March 2020, housing land supply of 41,270 dwellings (including sites to be allocated in the SADPD) provides flexibility of 14.6%. Flexibility has risen significantly since the LPS was adopted (9.9%).</p>
<p>The Covid-19 pandemic will impact housing delivery. A review should be undertaken of the impacts of the pandemic upon housing supply.</p>	No	<p>Whilst it is accepted that the Covid-19 pandemic is likely to have short term effects on housing delivery arising from periods of lockdown, the longer-term effects are not known nor are any future government interventions that may be introduced to stimulate housing and economic growth. Any review of the strategic housing requirement taking account of longer-term market conditions is a strategic matter for the monitoring and/or review of the LPS. Such review would also take account of the standard method for assessing housing need and the latest available evidence in terms of population and jobs growth.</p>
<p>The LPS only considered the allocation of strategic sites (5ha or 150 dwellings or more) on the basis that smaller sites would be assessed and allocated through the SADPD. Small sites should be allocated for housing in the SADPD consistent with the LPS.</p>	No	<p>The development of the SADPD has been supported by opportunities for developers/landowners to submit sites (including smaller sites) to the council for consideration. Sites submitted to the council have been considered in line with the Site Selection Methodology [ED 07] through the preparation of individual settlement reports [ED 21 – ED 46]. Each settlement report has appropriately considered the role of commitments and completions.</p> <p>The council has set out its approach to the Provision of Housing and Employment Land and the Approach to Spatial Distribution in report [ED 05].</p> <p>The SADPD includes a clear monitoring and implementation framework [ED 54] to monitor the effectiveness of the plan in terms of a plan, monitor and manage approach.</p>

<p>Various representations have been received about the need to allocate 3,335 dwellings in the SADPD.</p>	<p>No</p>	<p>The council's approach to the allocation of sites for housing in the SADPD is set out in the Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].</p> <p>LPS Policy PG 1 "Overall Development Strategy" established the requirement for new housing in the borough between 2010 and 2030 namely a minimum of 36,000 new dwellings. Whilst the LPS supporting text makes reference to the contribution to be made through the SADPD (3,335 dwellings) this is not stipulated in any policy.</p> <p>The LPS reflected the housing monitoring position at the 31 March 2016 and took account of various components of housing supply including completions since 2010, commitments, allocations and the small sites windfall allowance in order to facilitate the overall levels of housing development envisaged by LPS Policy PG 1.</p> <p>The SADPD is being prepared half-way through the plan period and takes account of the latest housing land supply position at 31 March 2020. There have been significant increases in housing delivery and supply since the LPS was adopted and this position has informed the approach taken.</p> <p>Supply of 41,270 dwellings (including the contribution of 275 dwellings to be made through the allocation of sites in the SADPD) represents a robust level of supply and plan flexibility. Plan flexibility (14.6%) has increased significantly since the LPS was adopted (9.9%).</p> <p>Together, the LPS and SADPD provide an appropriate strategy to ensure that the minimum housing requirement identified in Policy PG 1 'overall development strategy' in the LPS is met.</p>
<p>Representations have been received about various aspects of the indicative housing figure for LSCs set out</p>	<p>No</p>	<p>These issues are considered in the Policy PG 8: Development at LSCs section of this consultation statement appendix.</p>

in LPS Policy PG 7 (Spatial Distribution of Development), disaggregation to individual settlements and other housing issues at LSCs.		
Representations have been received about various aspects of the indicative housing figure for the OSRA set out in LPS Policy PG 7 (Spatial Distribution of Development), disaggregation to individual settlements and other housing issues at the OSRA.	No	These issues are considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
The SADPD should disaggregate the housing requirement figure for designated neighbourhood areas in accordance with ¶65 of the NPPF (2019).	No	These issues are considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
Reliance on higher order settlements to meet the needs of the borough as a whole will not meet local needs.	No	These issues are considered in the Policy PG 8 'Development at LSCs' section of this consultation statement appendix.
<p>Various representations have been received about the NPPF (2019) ¶68 requirement to identify through the development plan and brownfield land registers, land to accommodate at least 10% of the housing requirement on sites no larger than 1ha; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The issues raised include:</p> <ul style="list-style-type: none"> • The council's approach (set out in ED 58) relies on existing commitments to meet the 10% figure. The brownfield register largely comprises of sites with planning permission (commitments); • The SADPD allocates small sites for a total of 70 dwellings. • More sites 1ha or less should be allocated to meet the 10% requirement; • There are anomalies in the data presented in [ED 58] and the completions and commitments data. 419 dwellings are disputed as a source of supply 	No	<p>'The Approach towards Small Sites' [ED 58] explains the approach towards NPPF (2019) ¶68. It is highlighted that the LPS was adopted prior to the introduction of this requirement. The SADPD is being prepared half-way through the plan period and to be consistent with the LPS, completing tasks left over from the LPS. If the 10% figure was applied retrospectively from the start of the plan period, 10% of the housing requirement of 36,000 dwellings would be 3,600 dwellings. To allocate an additional 3,600 dwellings in addition to the dwellings already completed, committed or allocated, would significantly exceed the levels of development expected by the LPS.</p> <p>Given that the SADPD is being prepared halfway through the plan period, it is a reasonable and proportionate approach to apply the 10% requirement to the number of homes left to build over the remaining years of the plan period.</p> <p>At 31 March 2020, net housing completions of 15,683 dwellings (of which 5,014 dwellings were on sites of 1ha or less) leaves a remaining requirement of 20,317 dwellings to be completed over the</p>

<p>on small sites. These anomalies should be considered at the examination.</p>		<p>remaining years of the plan period in order to meet 36,000. 10% of 20,317 dwellings is 2,032 dwellings.</p> <p>The council's evidence shows that there is an existing healthy supply of small sites of 1ha or less that is sufficient to meet the 10% figure. Taking into account the factors set out in this document and other policies in the plan that support small and medium sized sites, there is no further need to identify additional sites to meet this figure.</p> <p>A representation has been received disputing sites included in Table A1.5 of [ED 58], alleging anomalies amounting to 419 dwellings. These are being reviewed and if any changes are necessary these will be rectified through annual monitoring. It is unlikely that many changes will be necessary, however, even if the alleged anomalies were to be deducted in their entirety; supply on small sites would still exceed the 10% figure.</p>
<p>Various representations refer to affordability issues and the need to allocate more housing sites in the SADPD to ensure that affordable need is met. The issues raised include:</p> <ul style="list-style-type: none"> • The SADPD should include an entry-level exception site policy, as required by NPPF (2019) ¶71; • At 1 April 2020 there were 6,326 households on the housing register. Affordability indicators show that Cheshire East is less affordable than the wider North-West region; • An updated assessment should be undertaken of affordable need and further sites allocated to address existing shortfalls over the next five years. 	<p>No</p>	<p>The criteria-based approach to entry-level exception sites is set out in NPPF (2019) ¶71. Planning applications submitted as entry-level exceptions sites would have to address the criteria set out in the NPPF (2019) and will be considered on a case-by-case basis and on their own merits.</p> <p>The SADPD includes non-strategic policies and has been prepared to support the policies and proposals of the LPS by providing additional policy detail. The LPS is the strategic plan and Policy SC 5 'Affordable homes' provides the strategic policy context for affordable housing provision in the borough. Affordable housing delivery is monitored through the AMR and the Local Plan Monitoring Framework [ED 54], indicator SC7.</p>

Various representations received about supply and delivery of older persons accommodation. More sites should be allocated in the SADPD to address need.	No	This issue is considered in the Policy HOU 2: Specialist Housing Provision section of this consultation statement appendix.
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Policy HOU 1 ‘Housing mix’

Summary of the main issues raised	Revised SADPD amended?	Council response
The word ‘demand’ should be added to the second sentence of criterion 1 to ensure consistency.	Yes	The word ‘demand’ has been added to the second sentence of policy HOU 1 ‘Housing mix’ in the Revised Publication Draft SADPD for consistency.
Object to the wording of the explanatory text (¶8.5) that states: “It is expected that development achieves in the order of the housing mix, type and tenures set out in Table 8.1 Indicative house type tenures and sizes”. This does not reflect the wording of Policy HOU 1 ‘Housing mix’, which identifies Table 8.1 as “a starting point for analysis”.	Yes	¶8.5 in the supporting text has been amended to reflect the policy intention that Table 8.1 ‘indicative housing type, tenures and sizes’ is a starting point for the analysis of determining an appropriate housing mix in the borough.
The evidence required to support the housing mix should be proportionate to the development. Current requirements of the policy (i.e. housing mix statement) appear onerous/prescriptive. The collection of evidence required is likely to be time consuming and require different specialists.	No	The policy intention is for housing schemes to be supported by an appropriate mix to support and maintain sustainable communities. The policy builds on LPS Policy SC 4 ‘Residential mix’. The requirements of the policy relate to ‘major’ housing schemes at detailed planning/reserved matters stage. The housing mix statement is therefore requested at a stage where there is a clearer understanding of what a scheme is intending to deliver. The supporting information to the policy says that the housing mix statement should be a proportionate and up-to-date assessment.
A large proportion of the supply is already fixed because it already benefits from planning permission. The council’s powers to meet diverse housing needs are limited.	No	The policy builds on the strategic context set by LPS Policy SC 4 ‘Residential mix’. Its intention is to support the delivery of an appropriate housing mix for those schemes brought forward in the borough over the remaining Plan period.

The policy does not prescribe a mix for specific settlements. The Residential Mix Assessment [ED 49] does not assess the mix of housing required at particular locations or settlements.	No	Table 8.1 'Indicative housing type, tenures and sizes' presents a borough-wide 'starting point' for analysis on housing mix. Its content has been informed by the Residential Mix Assessment [ED 49], which includes an assessment of bedroom size and tenure of housing in Cheshire East up to 2030. The policy includes appropriate references to understanding of the local housing market, characteristics (criterion 1(ii)) and the character and design of the site and local area (criterion 1(iii)).
The Residential Mix Assessment [ED 49] provides a summary of the suggested mix at Figure 17 (which is used to inform Table 8.1). It is not clear whether this is a demographic assessment only, or whether it adequately considers market trends and demand.	No	The Residential Mix Assessment [ED 49] considers a myriad of information sources including Land Registry records, the Census, Local Authority Housing Records, Office for National Statistics and MHCLG data, the English Housing Survey and Valuation Office data. It considers both the impact of demographic changes across Cheshire East and also the affordability of housing options. The policy is clear that Table 8.1 is a 'starting point' for analysis. Criteria 1(ii) and 1(iii) refer to the housing mix statement, which should include an assessment of how the proposed mix responds to factors including the local housing market (and its characteristics) alongside the character and design of the site and local area.
It is important that the housing mix policy remains flexible to enable the plan to take account of any new evidence that may be published from time to time.	No	Table 8.1 'Indicative housing type, tenures and sizes' presents a starting point for analysis. The policy is structured to enable applicants and decision takers to take account of new evidence, where relevant and justified.
References to intermediate housing and low-cost rent are not terms recognised by the NPPF (2019) anymore. Table 8.1 should use the categories of Market Housing, Affordable Rent and Affordable Home Ownership	No	Table 8.1 and the terminology used are consistent with terms used in the Residential Mix Assessment [ED 49].
Policy HOU 1 should be amended so that the requirement to provide a housing mix statement does not apply to all major housing applications. Such statements should only be required where the proposed housing mix deviates	No	The policy provides clarity on the information requirements and expectations regarding the preparation of a housing mix statement at reserved matters/detailed planning stage.

significantly from the most up-to-date evidence of housing mix need.		The supporting information to the policy notes how the housing mix statement should be a proportionate and up-to-date assessment of local circumstances.
Table 8.1 should be replaced by bands of house sizes also taking account of market demand, and the requirement for a housing mix statement should be replaced with single Planning and Affordable Housing Statement.	No	Table 8.1 is supported by evidence set out in the Residential Mix Assessment [ED 49]. The supporting information to the policy notes how the housing mix statement should be proportionate and reflect an up-to-date assessment of local circumstances. Criteria 1(ii) and 1(iii) of the policy refer to the housing mix statement, which should include an assessment of how the proposed mix responds to factors including the local housing market (and its characteristics) alongside the character and design of the site and local area.
Object to criterion 1(iv), which requires all major housing schemes to provide a statement that responds to demand for self and custom build housing in line with Policy HOU 3.	No	The approach in Policy HOU 3 'Self and custom build dwellings' is justified and effective. As such, the cross reference to Policy HOU 3 'Self and custom build dwellings' in policy HOU 1 'Housing mix' is appropriate.
The policy quotes a 'Vulnerable and Older Persons Housing Strategy' dated 2014. There was a recent consultation on updating this strategy. Should the updated version of the Vulnerable and Older Persons Housing Strategy be the one referenced in the policy?	No	The council is currently preparing an update to the Vulnerable and Older Persons Housing Strategy, but this has not yet been approved (at the time of writing). As such, the policy in the SADPD appropriately refers to the 2014 Vulnerable and Older Persons Housing Strategy.

Policy HOU 2 'Specialist housing provision'

Summary of the main issues raised	Revised SADPD amended?	Council response
Initial Publication Draft SADPD, criterion 1 – The type of specialist accommodation traditionally delivered is 'specialist' and secured by condition or S106 agreement to be retained for the use of those 50/60 years of age or above. It would be inappropriate for the accommodation to	Yes	As noted in the supporting information to the policy, the term 'older people' covers a range of people with differing needs that can be addressed through a number of housing options. A minor amendment to the policy wording has been made to refer to specialist housing being adaptable and responsive to changing

be designed to be readily adaptable back to family housing, for example, which would have different amenity space requirements and would not require the same level of communal facilities, service charges or house managers to maintain the development.		needs over the lifetime of the development and meet the requirements of other relevant local plan policies.
The SADPD should allocate sites to meet the identified needs for specialist accommodation including older persons accommodation, such as nursing homes and elderly persons accommodation. The provision of homes for older people is part of the adopted LPS housing requirement. There is a significant shortfall in the supply of C2 accommodation against identified need.	No	<p>The SADPD is the second part of the Local Plan and its purpose and scope are limited. It follows the strategic lead of the LPS and sets out more detailed, non-strategic policies to guide planning application decision-making. The SADPD does not supersede policies in the LPS.</p> <p>The LPS establishes that a minimum of 36,000 homes will be provided in the borough between 2010 and 2030. There is no distinct 'requirement' for C2 accommodation. C2 accommodation forms part of the overall 36,000 figure and is considered as part of the overall housing supply in the borough. Policy HOU 2 builds on the strategic context of LPS Policy SC 4 'Residential mix' and sets out a clear and specific criteria-based policy approach to the consideration of specialist housing schemes in the borough. Policy HOU 1 'Housing mix' in criteria 2 and 3 set out how the housing mix statement should consider the accommodation needs of particular groups, including the needs of older residents in the borough.</p> <p>As set out in the supporting information to the policy, the Cheshire East Residential Mix Assessment (2019) [ED 49] considers the need for specialist older person housing across the borough up to 2030. The report identifies that it is unlikely that all of the identified needs for older people will be delivered by specialist accommodation alone. Many householders identified as needing specialist accommodation will choose to remain in their own homes with appropriate assistance from social care providers, assistive technology and appropriate adaptations or downsize to more suitable accommodation. Furthermore, the health, longevity and</p>

		aspirations of older people mean that they will often live increasingly healthier lifestyles and therefore future housing needs may be different from current identified needs.
<p>Criterion 3vii requires the provision of affordable housing in line with the thresholds set out in LPS Policy SC 5 'Affordable homes'. The policy wording is not sound or positively prepared to encourage growth in this sector and meet the unprecedented demand for this age profile.</p> <p>The requirement for C2 specialist care schemes to provide affordable housing has not been viability tested and therefore the policy is not based on proportionate evidence or justified.</p> <p>Requiring the provision of affordable housing in specialist housing schemes is likely to deter developers from providing specialist care due to the potential cost and uncertainty of either having to provide affordable housing or justify non-provision through a viability assessment submitted with a planning application.</p>	No	<p>Criterion 1 of LPS Policy SC 5 'Affordable homes' notes that in residential developments, affordable housing will be provided in line with the stated thresholds referenced in Policy SC 5.</p> <p>The SADPD has been supported by a viability assessment [ED 52], which has considered typologies of Use Class C2 'Residential Institution' provision.</p> <p>Criterion 7 of LPS Policy SC 5 'Affordable homes' notes that where scheme viability may be affected, developers will be expected to provide viability assessments to demonstrate alternative affordable housing provision.</p>
<p>How will 'need' be identified – will it be for the applicant or will the council identify a need by settlement? The supporting text to this policy, whilst referencing the Cheshire East Residential Mix Assessment [ED49], (2019), does not provide any clarity on this matter.</p>	No	<p>The Residential Mix Assessment 2019 [ED 49] considers the need for specialist older person housing across the borough up to 2030. The report identifies that it is unlikely that all of the identified accommodation needs for older people will be delivered by specialist accommodation alone.</p> <p>Criterion 3(i) notes that the type of specialised accommodation should meet identified needs and contribute to maintaining the balance of the housing stock on the locality.</p> <p>It is expected that the applicant provides an assessment of need with reference to the requirements for early engagement with appropriate providers (as set out in ¶8.13 of the supporting text).</p>

Consistent terminology should be used throughout the policy.	No	The policy considers a policy approach to several different forms of supported and specialist accommodation, as set in ¶8.6 (supporting information to the policy). It is considered that the terminology used is appropriate in this regard.
Supporting ¶8.13 adds in text that says ‘specialist older persons accommodation should also be registered with the CQC’ though there is no explanation why this is set out.	No	¶8.13, when read as a whole, sets out that early engagement should take place with the council, health service and other social care providers is recommended. As a continuation to that paragraph reference to “Specialist older persons accommodation should also be registered with the Care Quality Commission” could equally apply to service providers. The sentence is also prefaced with the word ‘should’ and not ‘must’.
The site selection process should be revised so that it provides for a different assessment methodology for older persons accommodation (including C2 accommodation).	No	The LPS establishes that a minimum of 36,000 homes will be provided in the borough between 2010 and 2030. There is no distinct ‘requirement’ for C2 accommodation. The site selection methodology [ED 07] is a proportionate and justified way of considering housing sites for allocation in the Local Plan. The approach set out in the SSM is largely consistent with the approach utilised in the LPS.

Policy HOU 3 ‘Self and custom build dwellings’

Summary of the main issues raised	Revised SADPD amended?	Council response
Criterion 2 objection: the council has not published its register or performance regarding the provision of ‘Self and Custom Build Housing’ (SACBH). Demand is therefore unknown.	Yes	¶8.18 has been amended to state that the council’s performance regarding its SACBH will be published annually in its AMR. The council’s 2019 performance was published on its SACBH webpage prior to the Revised Publication Draft SADPD consultation, where it was stated that <u>at least</u> 75 plots were permitted against a target of 34 (Part 1) registrations taken during the initial base period (2016). The council’s 2020 performance will be published in its AMR 2019/20, where it is set out that the council has continued to meet its duty by permitting at least 72 plots in excess of the

		targets for base periods 1 and 2. It has already met the target for base period 3. SACBH targets are currently being met through windfall alone. The policy has therefore been amended so that only 'unmet demand' is considered within Criteria 2. – i.e. any residual demand not otherwise being met through windfall.
Criterion 2 objection: Provision of SACBH should only be 'encouraged'. See NPPG (as quoted in representation).	No.	NPPG regarding SACBH was updated in February 2021. ¶025 Reference ID: 57-025-20210508 states that LPAs should consider using planning policy to deliver SACBH. Examples cited include <u>requiring</u> SACBH on certain types of site.
Criterion 2 objection: The council should allocate sites for SACBH instead.	No.	Current performance shows that allocations could not be justified as SACBH demand is currently being met through windfall. However, demand will fluctuate year-on-year. The current process of allocating and then permitting SACBH can also often take several years. Criterion 2 is therefore proposed as an additional/short term source of SACBH supply to rely on during years of excess demand.
Criterion 2 objection: It would make schemes unviable.	No.	An indicative 5% requirement on sites of 30 or larger has been considered viable in the council's Viability Assessment (ED 52). Viability concerns are noted however, and these can be raised with the council via a viability statement as per ¶8.19 in the SADPD.
Criterion 2 objection: Likely to create numerous practical/management issues (e.g. quality, insurance, maintenance, construction logistics, delays).	No	¶8.20 is included which states conditions and S106 will be used to help deliver SACBH, which will include many of the practical/management issues identified. It is not considered necessary to consider each scenario within the policy text.
SACBH should be treated as an exception to normal policy regarding location, given its status as a legal requirement.	No	This position is unnecessary, given that the council is currently meeting the legal requirement. Furthermore, the NPPF (2019) only lists rural affordable housing as worthy of exception to normal policy regarding location.

Policy HOU 4 ‘Houses in multiple occupation’

Summary of the main issues raised	Revised SADPD amended?	Council response
The supporting text should be amended to state that the council will use Article 4 Directions.	No	Any future decision to make additional Article 4 Directions would be evidence based and limited to situations where they are necessary to protect local amenity or the well-being of an area.
The policy should state that HMOs will be resisted in Conservation Areas unless it can be shown that the higher density involved is commensurate with the building to be converted and the area and that any means of escape for fire or emergency purposes does not harm designated or non-designated heritage assets.	No	Policy provision for considering the impact of development proposals within Conservation Areas can be found in LPS policies SD 1 'Sustainable Development in Cheshire East', SD 2 'Sustainable Development Principles', SE 7 'The Historic Environment' and SADPD policy HER 3 'Conservation Areas'.
The policy should require community and transport facilities to be in close proximity.	No	Policy provision for considering the location of development in relation to services can be found in LPS policies SD 1 'Sustainable Development in Cheshire East' and SD 2 'Sustainable Development Principles'.

Policy HOU 5a ‘Gypsy and Traveller site provision’

Policy on Gypsy and Traveller site provision was included within Policy HOU 5 ‘Gypsy, Traveller and Travelling Showpersons provision’ in the initial Publication Draft SADPD. Main issues related to Travelling Showperson site provision are now summarised in the table for Policy HOU 5b and main issues related to Gypsy and Traveller and Travelling Showperson site principles are now summarised in the table for Policy HOU 5c.

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>The initial Publication Draft SADPD did not set out how the need arising from Gypsies and Travellers who do not meet the Planning policy for Traveller sites definition will be met.</p>	<p>Yes</p>	<p>Policy HOU 5 has been restructured. Policy HOU 5a sets out the council's approach to Gypsy and Traveller provision. The policy makes appropriate reference to:</p> <ul style="list-style-type: none"> * the outcomes of the Gypsy and Traveller Accommodation Assessment ("GTAA") [ED13] (2018); * the proposed site allocations in the SADPD; and * the policy considerations that, when read alongside LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople', would apply to the determination of planning applications for site provision in the borough. <p>This would include circumstances where it is not possible to determine the travelling status of a Gypsy and Traveller household and/or for ethnic Gypsies and Travellers who fall outside the planning definition, but nevertheless still require culturally appropriate accommodation. This approach is confirmed in ¶¶8.28 and 8.29 of the revised Publication Draft SADPD.</p>
<p>Objection to the evidence base and policy approach set out in HOU 5a – including the 2018 Gypsy and Traveller Accommodation Assessment (2018) [ED13]. Concerns raised regarding:</p> <ul style="list-style-type: none"> - Unsatisfactory survey response in the 2018 Gypsy and Traveller Accommodation Assessment. - Policy HOU 5a refers only to the "known" need for 32 pitches between 2017 and 2032. As such it does not take into account of any of the 'unknown' households which meet the planning definition. - Challenge made to the number of 'unknown' households identified in the 2018 Gypsy and Traveller Accommodation Assessment and included in ¶8.28a of the revised publication 	<p>No</p>	<p>Figure 15 of the 2018 Gypsy and Traveller Accommodation Assessment [ED 13] sets out the sites and yards visited by Opinion Research Services ("ORS") in Cheshire East and provides reasoning for instances where interviews were not completed, where relevant. As noted in ¶6.2 [ED 13] up to 3 attempts have been made to interview each household, where the householder was not present.</p> <p>Whilst best endeavours to contact sites were made by ORS, unfortunately, there were 2 large private sites with a total of 41 pitches where the site owners refused to allow ORS on to their sites to complete interviews with residents. There were also a total of 25 vacant or unimplemented pitches.</p> <p>Section 4 of the Gypsy and Traveller Accommodation Assessment [ED 13] sets out the approach to contacting bricks and mortar households, including adverts on social media.</p>

<p>draft SADPD. The 2018 Gypsy and Traveller Accommodation Assessment should be updated.</p>		<p>Policy HOU 5a only includes a reference to need identified from households that met the Planning Policy for Traveller Sites (“PPTS”) planning definition of a Traveller, along with need for transit provision. This is consistent with ¶10 of the PPTS.</p> <p>¶8.28a then makes a specific reference to need from unknown households and that this will be considered against the criteria set out in Policy HOU 5a. This is consistent with ¶11 of the PPTS. At the time of completing the 2018 GTAA, it was recommended that the Council should consider 10% of need from unknown households alongside need from households that met the planning definition. It is considered that Policy HOU 5a can address the need from unknown households at 10%, or indeed a different figure, if it is the case that the figure has changed.</p> <p>¶8.28a also refers to need from households that did not meet the PPTS planning definition and that this will also be considered against the criteria set out in Policy HOU 5a. This is consistent with ¶61 of the NPPF (2019).</p> <p>¶¶8.28a – 8.28b of the supporting information to policy HOU 5a confirms that the criteria in the policy would apply to sites where it has not been possible to determine the travelling status of a Gypsy and Traveller household, through the Gypsy and Traveller Accommodation Assessment [ED 13].</p>
<p>The policy approach fails to provide sufficient sites. The council has deliberately chosen to rely on the minimum figure in the Gypsy and Traveller Accommodation Assessment.</p>	<p>No</p>	<p>The policy approach in the SADPD is supported by allocations that seek to meet and exceed the 5-year need, and to meet overall needs established through the 2018 Gypsy and Traveller Accommodation Assessment [ED 13]. As noted in the Gypsy, Traveller and Travelling Showperson Site Selection Report [ED 14]:</p> <ul style="list-style-type: none"> - 18 permanent pitches have been granted planning permission since the base date of the 2018 Gypsy and Traveller Accommodation Assessment [¶4.6, ED14].

		<ul style="list-style-type: none"> - A further 21 pitches are proposed to be allocated in the SADPD [¶6.3, ED 14]¹⁰ - Since the base date of the site selection report (31 March 2020), a further pitch has been granted planning permission (ref 18/2413c) (¶6.3, [ED 14]) at land at Meadowview Park, Dragons Lane, Moston. - The SADPD proposes to allocate 24 pitches at Three Oakes Caravan Park. This site was already included and factored into the 2018 Gypsy and Traveller Accommodation Assessment and figures and so does not represent 'new' provision. <p>Cumulatively, this amounts to 40 pitches compared to the Gypsy and Traveller Accommodation Assessment (2018) figure of 32 pitches for the remaining plan period. Policy HOU 5a sets out the policy considerations through a criteria-based approach. ¶¶8.28a – 8.28b of the supporting information to the policy confirms that the criteria in policy HOU 5a for 'unknown' households and households who require culturally appropriate accommodation who fall outside the planning definition of a Gypsy and Traveller will apply.</p>
The proposed allocations included in the SADPD are unacceptable as they rely on existing sites and offer no new sites for those seeking to self-provide and have no connection to any of these existing sites. The choice is very limited.	No	There is a mix of site and type of provision proposed for allocation in the SADPD. There are sites currently in both public and private ownership.
Proposed allocations are all concentrated in the southern part of the district with no provision in the north where applications have been made and dismissed.	No	The northern area of Cheshire East is predominately designated as Green Belt. The site selection process has implemented a clear methodology for the identification of proposed allocations in the SADPD, looking at several site sources, including sites in the council's ownership. Stage 5 of the site selection methodology includes a feedback stage, whereby Green Belt sites will only be considered in the event of there not being enough non-Green Belt sites to meet overall development needs.

¹⁰ 8 pitches have been granted planning permission at appeal at New Start Park, Wettenhall Road (ref 18/2925N, 28 January 2021). This is site G&T 3 in the Revised Publication Draft SADPD. It has been counted as an allocation for the purposes of the figures quoted above, to avoid double counting.

		Through the Gypsy, Traveller and Travelling Showperson Site Selection Report [ED 14] sufficient sites have been identified for allocation to meet the needs set out in the 2018 Gypsy and Traveller Accommodation Assessment [ED13] in non-Green Belt locations, and particularly to provide a 5 year supply.
Criterion 3 of the policy appears to assume no sites will be granted in the Green Belt. LPS Policy SC 7 did not rule out Green Belt locations and its criterion 3(ix) requires the impact on the Green Belt to be taken into consideration. There is some tension between what is adopted and what is now proposed.	No	Green Belt would be a factor that is taken into account in decision taking in line with the approach set out in LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople'. Footnote 59 of the LPS notes that Gypsy and Traveller sites are considered to be inappropriate development in the Green Belt. Policy E of the PPTS clearly states that inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances, and that Traveller sites in the Green Belt are inappropriate development. Criterion 3 of Policy HOU 5a is clearly related to schemes in the open countryside, outside of the Green Belt. It is considered therefore that the policy approach set out in the SADPD is consistent with the LPS and national planning policy.
The requirement for a "local connection"/"strong links" to Cheshire East in ¶3(i) of HOU 5a is contrary to the requirement in ¶24(e) of the Planning Policy for Traveller Sites (August 2015), which requires that applications for sites should be determined for any travellers, not just those with local connections.	No	Policy HOU 5a in the SADPD builds upon LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople'. When considered as a whole, the policy approach seeks to make suitable provision for Gypsy and Traveller sites in the borough, in line with national planning guidance, including through: - - Allocations included in the SADPD which, when considered alongside committed sites, provide for at least a 5 years supply of sites against a locally set target (established through policy HOU 5a). - The potential for appropriate sites, located within the settlement boundaries of PT, KSC and LSC and when in accordance with the policy requirements of the Local Plan - Sites in open countryside locations as noted in the first part of criterion 3 of policy HOU 5a, subject principally to the application of criterion 3(i) of LPS Policy PG 6 'Open countryside' and Policy PG 10 'Infill villages' in the SADPD, alongside other Local Plan policies, as appropriate.

		<p>Policy HOU 5a, when read alongside LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople,' seeks to make provision for all Travellers through the means outlined above, not just those with a local connection.</p> <p>The second part of Criterion 3 (delineated by the word 'or') then provides additional policy guidance for sites, in the open countryside (outside the Green Belt) consistent with Policy D 'Rural Exception Sites' (¶15) of National Planning Policy (PPTS).</p> <p>The policy approach in criteria 3 (i,ii,iii) appropriately seeks, in line with ¶25 of Planning Policy for Traveller Sites, to very strictly limit new Traveller site development in the open countryside that is away from existing settlements or outside areas allocated in the development plan.</p> <p>A rural exception site policy can be used to manage applications in these limited circumstances. In line with ¶15 of the PPTS, this approach seeks to address the needs of the local community by accommodating householders who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.</p> <p>There are several existing sites in the borough in open countryside locations. Applications for intensification / extensions to such sites would have to address Criterion 3 (i, ii, iii) of policy HOU 5a.</p>
Criteria ¶¶3(iii) and 4 of HOU 5a are contrary to the Public Sector Equalities Duty of the Equality Act 2010, because the focus on existing established sites rather than new small private family sites fails to reflect the needs of Travellers.	No	<p>¶3(iii) requires applicants reliant on the rural exceptions element of Criterion 3, (i, ii, iii) to evidence that they cannot meet their accommodation needs by occupying an existing pitch within an established, authorised Gypsy and Traveller site or a new pitch on an allocated site.</p> <p>This approach is comparable with LPS Policy SC 6 'Rural exception housing for local needs' where proposed rural exception sites for housing</p>

		<p>are required to demonstrate through a site options appraisal, why need cannot be met within the settlement (LPS Policy SC 6, Criterion 3).</p> <p>In respect of criterion 4, its policy intention is on a similar basis to planning policy on housing in the countryside. LPS Policy PG 6 'Open countryside' seeks to direct development towards established locations in existing settlements and does not allow for development in the open countryside beyond the controls set out in policy, the principles of which involve consolidating existing patterns of development as far as possible. Criterion 4 of policy HOU 5a seeks to echo that approach to new pitch provision, so that to ensure the form of development does not take place sporadically in the open countryside. The policy also contains an element of in-built flexibility (provided by the word 'wherever possible') to allow for the circumstances of individual cases to be considered.</p>
¶8.27a - it is not clear if this means infilling within existing settlements or infilling on existing sites.	No	¶8.27a and references to infilling refer to sites in open countryside locations and the application of criterion 3(i) of LPS Policy PG 6 'Open countryside' and Policy PG 10 'Infill villages' in the SADPD.
This policy should relate only to those sites identified in the Gypsy and Traveller Accommodation Assessment 2018 and LPS Policy SC 7 and should clearly state that applications for sites elsewhere in the borough will be resisted.	No	<p>The 2018 GTAA [ED 13] includes a site and yard list (in appendix D). LPS Policy SC 7 sets out a criteria-based approach to the consideration of sites but does not identify sites for allocation. ¶12.67 of the LPS notes that the SADPD will allocate sites for Gypsies and Travellers and Travelling Showpeople.</p> <p>Policies HOU 5a (Gypsy and Traveller Site Provision) and HOU 5b (Travelling Showpeople) in the Revised Publication Draft SADPD allocate sites and set out the proposed policy approach for planning applications submitted, building on the strategic approach set out in LPS Policy SC 7.</p> <p>Planning applications, when submitted, will be considered on their own merits in line with the policy requirements of the development plan and any other relevant material considerations.</p>

Site selection report comments: Most of the 'red' assignments to criteria are not 'deal breakers' and so should really be considered as 'deep orange'.	No	Appendix 2 of the site selection report [ED 14] sets out the detailed criteria for the red, amber, green suitability assessment of sites. These form part of the suitability assessment documented in the report. The site selection report documents that the suitability criteria used in the traffic light forms are not weighted. They provide a way of presenting information about the characteristics, constraints, capacities and circumstances of sites in a consistent way that enables this, along with other factors, to form part of the overall site selection process, and ultimately the recommendation of whether or not a site should be included in the SADPD. The outcomes and conclusions of the site selection process are clearly documented in the analysis presented for each individual site.
Site selection report comments: Different criteria or at least different weighting should apply dependent on whether the site is being considered as a transit site or a permanent site. A specific site selection process should be carried out for a transit site.	No	The site selection process, as documented in [ED 14], is considered to be equally applicable to both transit and permanent site provision in the borough.
Policy HOU 5a (and ¶8.30) should be amended to explicitly recognise the circumstances under which sites may appropriately be removed from the Gypsy and Traveller site supply, with occupancy restrictions lifted to enable viable alternative re-use. Such circumstances include where existing private sites have been under-occupied for several years, can demonstrate that they are economically unviable and are in locations that would not meet current site selection criteria.	No	The approach set out in ¶8.30 is consistent with the strategic approach of LPS Policy SC 7 'Gypsies and Travellers and Travelling Showpeople', criterion 3; there is a presumption against the loss of existing permanent consented Gypsy and Traveller sites where this would exacerbate or result in an identified shortfall unless suitable replacement provision is found. This approach is confirmed in ¶8.30 of the supporting text to policy HOU 5a.

Policy HOU 5b 'Travelling Showperson site provision

Policy on Travelling Showperson site provision was included within Policy HOU 5 'Gypsy, Traveller and Travelling Showpersons provision' in the initial Publication Draft SADPD. Main issues related to Gypsy and Traveller site provision are now summarised in

the table for Policy HOU 5a and main issues related to Gypsy and Traveller and Travelling Showperson site principles are now summarised in the table for Policy HOU 5c.

Summary of the main issues raised	Revised SADPD amended?	Council response
Site TS 1 is unsuitable for allocation.	No	This is a site-specific comment. Main issues raised that are related to site TS 1 are considered in section TS 1 (Lorry park, off Mobberley Road) of this consultation statement appendix.

Policy HOU 5c 'Gypsy and Traveller and Travelling Showperson site principles'

Policy on Gypsy and Traveller and Travelling Showperson site principles was included within Policy HOU 5 'Gypsy, Traveller and Travelling Showpersons provision' in the initial Publication Draft SADPD. Main issues related to Gypsy and Traveller site provision are now summarised in the table for Policy HOU 5a and main issues related to Travelling Showperson site provision are now summarised in the table for Policy HOU 5b.

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should also include additional criteria relating to local amenity, screening, numbers of units on site and occupancy conditions	No	The supporting information to policies HOU 5a (Gypsy and Traveller site provision) and HOU 5b (Travelling Showpeople) in the Revised Publication Draft SADPD include appropriate references to the use of occupancy conditions. Policy HOU 5c (Gypsy and Traveller and Travelling Showperson site principles) alongside LPS Policy SC 7 (Gypsies and Travellers and Travelling Showpeople) include references to design and amenity considerations relevant to site provision in the borough.

Policy HOU 6 ‘Accessibility, space and wheelchair housing standards’

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>M4(2) standard dwellings:</p> <p>The Residential Mix Assessment [ED 49] applies the illogical assumption that any person living in a home that is incapable of adaptation to M4(1) standard, needs a home built to M4(2) standard. The council’s evidence does not appear to consider the potential for the increased proportion of homes built to the M4(1) standard, as alternative accommodation, and the contribution of other forms of specialist accommodation (such as retirement homes, sheltered homes or care homes) over the coming years that could reduce the need for adaptable housing.</p>	No	<p>It is considered that the Residential Mix Assessment (¶¶ 3.18 – 3.52, [ED 49] suitably considers the likely future need for housing for older and disabled households. This study considers the impact of changing health needs over time and then makes an allowance for the number of households who may be able to make their existing home accessible to meet their own needs. For those who are unable to adapt their existing homes, it is assumed that they will require a different home suitable for their needs.</p> <p>The study recognises that there is uncertainty about how householders may meet future housing needs (¶3.42) and makes appropriate references to adaptation of existing properties/existing housing stock to inform an appropriate policy position in the SADPD. The need for adapted homes also links to the need for older person housing in Cheshire East and clearly any scheme for older person housing should be delivered to a higher level of built in adaption/adaptability.</p>
<p>M4(2) standard dwellings:</p> <p>Limited evidence has been provided on what the requirements are and how they differ across different parts of Cheshire East.</p>	No	<p>The justification for the introduction of the accessibility and adaptability standards is included in the Cheshire East Residential Mix Assessment [ED 49]. The evidence has been prepared at a borough wide level.</p>
<p>M4(3) standard dwellings:</p> <p>The proposed policy is inconsistent with the NPPG, which is clear that the requirement for wheelchair accessible homes (i.e. M4(3) standard) should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.</p>	No	<p>References to M4 (3) in criteria 1(i)(b) and 1(ii)(b) of the policy are followed by references to ‘regarding wheelchair adaptable dwellings’. The standard set out in policy is applicable to wheelchair adaptable dwellings only and not wheelchair accessible homes.</p>

<p>General:</p> <p>The proposed approach is inconsistent with the application of CIL in Cheshire East, which was adopted based on different (less costly) assumptions. In any event, the council's own viability assessment indicates that much development in the borough cannot viably support the proposed requirements.</p>	No	<p>The SADPD is supported by a Viability Assessment [ED 52] that has appropriately considered the costs associated with the introduction of this policy. The viability evidence [ED 52] includes appropriate consideration of the CIL charging schedule in Cheshire East.</p>
<p>Nationally Described Space Standard:</p> <p>Whilst the Nationally Described Space Standard report [ED57] identifies that many recent developments do not meet the Nationally Described Space Standard, the report does not identify a need, and it provides no local justification for applying the Nationally Described Space Standard in Cheshire East.</p> <p>The evidence in the Nationally Described Space Standard report [ED 57] shows that, in general, there are just as many homes delivered that comply with the Nationally Described Space Standard than those that do not.</p> <p>There is no evidence that these properties are failing to sell or that there is a lack of customer satisfaction with these properties.</p>	No	<p>As noted in the Nationally Described Space Standard report [ED 57], the council considers there is sufficient justification to support the introduction of the Nationally Described Space Standard in the borough. The report considered information on size and type of dwellings using a sample of planning applications approved in the borough. The work undertaken provides a broad guide or illustration as to how new build properties in the borough compare to Nationally Described Space Standard standards and to how compliance with these standards vary by dwelling size across the borough.</p>
<p>Nationally Described Space Standard:</p> <p>In terms of viability, there is a discrepancy between the evidence provided in the Nationally Described Space Standard report [ED 57] and the council's Viability Assessment [ED 52], which states that an analysis of the sizes of units currently for sale in the Cheshire East Council area indicates that most units are currently above these sizes. The Nationally Described Space Standard report [ED 57] suggests that this is not the case and the sizes of units assessed in the viability report may not provide a true reflection of house sizes across the borough. It is not clear whether the impacts of potentially larger dwellings on affordability and land supply have been properly considered.</p>	No	<p>¶8.19 of the SADPD Viability Assessment [ED 52] notes that the viability study assumes that units apply the Nationally Described Space Standard. The viability study has therefore appropriately considered the implications of the space standards through the viability appraisal.</p>

Nationally Described Space Standard: A transitional period should be applied to help enable developers to factor the cost of space standards into future land acquisitions and the requirements should not apply to planning permissions approved or submitted up to this date.	No	The Nationally Described Space Standard report [ED 57] has considered the need for a transitional period concluding that there are no issues of timing that affect whether the council should adopt internal space standards through the SADPD.
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Policy HOU 7 ‘Subdivision of dwellings’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should reference sustainability policies	No	The plan is intended to be read as a whole and sustainability policies will apply.
There should be additional policy on aggregation of two or more properties into a single dwelling.	No	The aggregation of two or more properties into a single dwelling is not considered to be a significant issue in Cheshire East.
Cycle storage could be made a requirement.	No	This issue is addressed by LPS Policy CO 1 ‘Sustainable travel and transport’ and SADPD Policy GEN 1 ‘Design principles’.

Policy HOU 8 ‘Backland development’

Summary of the main issues raised	Revised SADPD amended?	Council response
The housing density on a backland site should not be higher than in the surrounding area.	No	Issues around housing density are addressed by SADPD Policy HOU 12 ‘Housing density’.
The policy should reference sustainability policies.	No	The plan is intended to be read as a whole and sustainability policies will apply.
The policy should contain firmer commitments. It is not clear what is meant by some of the wording or who will judge whether proposals are in accordance with the criteria. The policy should	No	The policy is clear and sound as written. The council is duty bound to consider all applications submitted and decisions are made in accordance with the development plan unless material considerations indicate otherwise.

state that applications will only be considered where public benefit outweighs harm.		
Backland development leads to overdevelopment of sites, urban cramming, overlooking and loss of amenity. It changes the character of an area and is particularly damaging in conservation areas and low-density housing areas.	No	In addition to this policy, these issues are addressed through other policies including SADPD policies HOU 10 'Amenity'; HOU 11 'Residential standards'; HOU 12 'Housing density'; and HER 3 'Conservation areas'.
The criteria required to achieve sympathetic development should be defined. The 'other characteristics' of development should be defined.	No	'Other characteristics' could include any aspect of the development relevant in a particular circumstance. Whether a development is sympathetic to the character and appearance of the surrounding area will also depend on the circumstances of the case.

Policy HOU 9 'Extensions and alterations'

Summary of the main issues raised	Revised SADPD amended?	Council response
Amend policy wording to say that '...extensions and alterations will be supported only when they meet the following requirements...'	No	The word 'should' is considered sufficiently robust in relation to the future application of this policy.
Add a fourth criterion that seeks to avoid a 'terracing effect' when seen in relation to its neighbours.	No	It is considered that this is addressed in criterion 1. of the Policy where reference is made to the scale, character and appearance of surroundings and the local area.
The policy should be strengthened to meet the intentions of 'Build Better Build Beautiful' and retain high quality of design - delete 'should' and substitute 'must as minimum requirements'; add a clause giving weight to neighbourhood plans and design guides.	No	The plan (which includes Neighbourhood Development Plans) is intended to be read as a whole and design policies will apply. Revisions to the NPPF (2019) to implement policy changes in response to the Building Better Building Beautiful Commission "Living with Beauty" report were published for consultation on 30 January 2021, after the publication of the Revised Publication Draft SADPD. The Cheshire East Council Design Guide is a SPD and is a material

		consideration when determining planning applications. The wording as drafted is considered sound.
Sustainability policies should be referenced.	No	The plan is intended to be read as a whole, and sustainability policies will apply.

Policy HOU 10 ‘Amenity’

Summary of the main issues raised	Revised SADPD amended?	Council response
Add new criterion 6 that requires two car parking spaces per property to be provided.	No	Table C.1 ‘Car Parking Standards’ of the LPS sets out the recommended car parking standards for homes.
Add new criterion 7 that requires adequate spaces for charging plug-in and other ultra-low emission vehicles to be provided.	No	Revised Publication Draft SADPD Policy INF 3 ‘Highways safety and access’ requires development proposals to incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations. LPS Policy CO 2 ‘Enabling Business Growth Through Transport Infrastructure’ supports new major developments that provide recharging points for hybrid or electric vehicles.
The explanatory paragraphs should draw attention to neighbourhood plan policies that specifically identify and protect open spaces.	No	The plan (which includes Neighbourhood Development Plans) is intended to be read as a whole, and open space policies will apply.
The policy is weak, and the requirements lack detail. Delete ‘unacceptably’, ‘due to’ and substitute ‘as a result of’, and ‘or’ before the alternatives in criteria 4 and 5.	No	The existing wording is appropriate to protect the amenities of residential occupiers or sensitive uses in the vicinity of any new development.

Policy HOU 11 ‘Residential standards’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy is too prescriptive; there should be a more localised, site by site approach to design and residential standards.	No	The Policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility that could allow developments to be tailored to their circumstances.
¶8.46 – remove the minimum requirements to existing properties.	No	
Criterion 1 – remove ‘generally’ and replace with ‘must’ so the standards apply to all developments.	No	
Amend criterion 1(i) to read “unless the <u>nature</u> , design ...”, as different types of housing can influence the impact of relationships to adjoining properties.	No	This is considered to be covered under ‘design and layout’.
One set of residential standards should be set for the whole borough and be in line with the Design Guide.	No	The standards are considered to be in line with those used in the Design Guide.
Outline in further detail how the standards are to be implemented alongside the Design Guide, particularly in the instance where alternative standards may be deemed more appropriate on a site by site basis.	No	The Policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility that could allow developments to be tailored to their circumstances. The standards are considered to be in line with those used in the Design Guide.
Insert the requirement for ‘generally’ in criterion 2 as with criterion 1.	No	Criterion 2(i) of the Policy uses the caveat ‘normally’ to provide an element of flexibility.
New criterion 3: Explicitly cross-reference the Design Guide SPD and support for innovative design led approaches that may justify reduced distance standards.	No	This is covered by ¶8.46 of the Revised Publication Draft SADPD.
14m of separation between habitable and non-habitable rooms between dwellings is too great as it hinders designers with the efficient use of sites; 12m is a generally accepted industry standard.	No	The standards are considered to be in line with those used in the Design Guide. The policy uses the caveats ‘generally’, and ‘normally’, which provides an element of flexibility.

The policy should specify if the separation distance between habitable and non-habitable rooms applies to a blank gable.	No	¶8.48 of the supporting information states that the space criteria apply where the sole of principal window in the habitable room faces, in the case of a habitable room facing a non-habitable room, a blank wall.
18m separation distance between front elevations does not allow for variation in streets widths as set out in Manual for Streets.	No	The Policy uses the caveats 'generally', and 'normally', which provides an element of flexibility that could allow developments to be tailored to their circumstances. ¶8.46 refers to the Design Guide SPD (2017), which supports an innovative design led approach and promotes opportunities for reduced distance standards through good design.
The increased levels of car ownership in the rural areas and the demand for car parking over and above the council's outdated standards has not been addressed.	No	Table C.1 'Car Parking Standards' of the LPS sets out the recommended car parking standards for homes. It is not the role of the SADPD to revisit these standards; this is something that could be considered as part of a plan review.
The construction of garages and car parking spaces on new housing developments that do not accommodate the average family car has not been addressed.	No	
The requirement to place new houses side by side, front to front, or rear to rear with existing properties is not mentioned.	No	The Design Guide SPD (2017) considers the design of residential developments.
The differences in land levels should be on a sliding scale, on a pro rata basis from the figures given, otherwise developers can circumvent the requirements by proposing a 1.9m land level difference.	No	The policy is on a sliding scale, but the intervals are set at a workable, practical and effective level of 1 metre intervals.
The policy should cross-reference to Policy GEN 1 'Design principles'.	No	The plan is intended to be read as a whole, and design policies will apply.

Policy HOU 12 'Housing density'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should include reference to approach of schemes to low density areas to provide clarity for applicants and decision takers.	Yes	Additional text has been added to criterion 3(ii) to note that there are some areas of the borough with an established low-density character that should be protected.
Cheshire East Council should replicate Policy H12 of the Macclesfield Borough Local Plan (2004) in the SADPD, with the specific detailed guidance for each Low Density Housing Area. The boundaries of the Low Density Character Areas should be shown on the Policies Map.	Yes	Policy HOU 12 is consistent with ¶123 of the NPPF (2019) and LPS Policy SE 2 'Efficient use of land'. The policy includes reference to sites 'generally' being expected to achieve a net density of at least 30 dwellings per hectare. It also recognises that there are a number of different factors that will also be taken into account in determining an appropriate density, including (amongst others) the mix and type of housing proposed, the nature, setting and scale of the proposal including site constraints and local context, and also local market conditions and viability. The approach set out in Policy HOU 12 would encourage the efficient use of land within the authority area, whilst also allowing for consideration of other appropriate factors. As noted above, additional text has been added to criterion 3(ii) to note that there are some areas of the borough with an established low-density character that should be protected. Neighbourhood Plans policies are also able to provide additional detailed policies relevant to local areas, where evidenced and justified.
The policy is too prescriptive for sites within the existing settlement boundaries or close to existing or proposed transport nodes as it may not be possible to achieve higher densities in these locations due to design or site-specific issues. Housing density should be considered on a site-by-site basis.	No	In line with ¶123 of the NPPF (2019), the policy recognises that there may be opportunities for higher density development in settlement boundaries and/or close to existing or proposed transport routes. This is to support the efficient use of land. Criterion 3 of the policy lists a number of considerations that will influence and determine an appropriate density on the site.

Setting a blanket minimum density of 30 dwelling per hectare is not justified because it does not take into account the local demand for lower density family housing and is therefore not an appropriate strategy to meet the locally assessed need. With reference to criterion 1, remove the word 'generally' to preclude the density of 30 dwellings per hectare from being exceeded.	No	The policy does not set a blanket minimum density. It sets out an expectation that generally schemes will achieve a net density of 30 dwellings per hectare. The policy then goes on to note, in criterion 3, the relevant considerations to determine an appropriate density. The policy does recognise that there will be sites where higher or lower densities will be more appropriate and sets out the factors that should be taken into account in coming to that judgement.
The Goostrey Neighbourhood Plan Policy HOU7 states that "densities for new developments should not exceed 15 dwellings per hectare". The evidence for 15 dwellings per hectare was accepted by the Inspector including the evidence that the average density across Goostrey village is only 12.8 dwellings per hectare. This lower density policy for Goostrey should be noted in the Goostrey Settlement report [ED 30], otherwise there will be a conflict between Local Plan Part 1 (which includes the Neighbourhood Plan) and the SADPD.	No	Criterion 3 of Policy HOU 12 sets out the relevant considerations to determine an appropriate density. The policy does recognise that there will be sites where higher or lower densities will be more appropriate and sets out the factors that should be considered in coming to that judgement. The issue of compatibility with neighbourhood plans is also considered in the Chapter 1: Introduction (general issues) section of this consultation statement appendix.
Related Documents should include reference to the Three Wilmslow Parks (2004) document.	No	The Housing Character Areas (the three Wilmslow Parks) is currently supplementary planning guidance and remains a material consideration in decision making, where relevant until superseded or withdrawn. It is considered that policy HOU 12 provides a suitable policy approach to the issue of density and builds on the approach established with LPS Policy SE 2 'Efficient use of land'.

Policy HOU 13 'Housing delivery'

Summary of the main issues raised	Revised SADPD amended?	Council response
Supportive of measures to increase the efficiency of completing Section 106 Agreements. However, this is a two-way process. A	Yes	The justification text to LPS Policy IN 2 'Developer Contributions' (¶10.11) notes that Section 106 planning

significant amount of time would be saved if obligations were evidenced and clearly set out in response to the tests set out under Regulation 122 of the CIL Regulations (2010).		obligations must meet the tests set out from Regulation 122 of the CIL Regulations. Criterion 4 of policy HOU 13 has been revised. It now states that the council will consider imposing planning conditions where this would expedite the development without threatening its deliverability of viability.
Given the provisions of the 2019 NPPF, criterion 4 of the policy is not considered necessary and repeats national planning policy. If the council is to pursue such a policy, the policy should be expanded or clarified, and evidence based to take account of local or site-specific circumstances.	No	The supporting information to policy HOU 13 'Housing Delivery' notes that the council will work with key partners to expedite the delivery of housing and maintain at least a five-year deliverable supply of housing land and meet the overall development requirements of the Local Plan. It is considered that criterion 4 is an important part of the council's ability to maintain supply and delivery of housing in the borough.
HOU 13 should be modified (once it has been informed by detailed and robust evidence), to ensure sufficient contingency for each settlement in line with the requirements of the LPS. The policy should set out a list of allocated sites that should clearly be cross referenced to the site allocation detail later in the document, in order to be consistent with the approach to employment sites.	No	As evidenced in document [ED 05] (¶3.23) there is a robust level of flexibility in the council's housing land supply to achieve the adopted housing requirement of 36,000 dwellings over the plan period (2010 – 2030). Policy HOU 13 provides additional policy guidance to support the delivery of homes across the borough.
Delay in the determination of applications can be as a result of factors outside of control of the applicant and the Local Planning Authority, such as failure of statutory consultees to provide a response within the required timescales.	No	Criterion 4 of policy HOU 13 notes that the council will 'consider' imposing planning conditions only where this would expedite the development without threatening its deliverability or viability.
Larger scale strategic sites give rise to a much more complex range of issues that need to be dealt with through conditions, or through future reserved matters submissions. Work can take time and can be affected by changes to the economy, site conditions, planning conditions/obligations or changes to funding. Requiring shorter timescales to make a start on consents needs to be backed up by the necessary resources and experience of the planning authority.	No	Criterion 4 of policy HOU 13 notes that the council will 'consider' imposing planning conditions only where this would expedite the development without threatening its deliverability or viability. The supporting information to the policy notes that the council will work with key partners to expedite the delivery of housing and maintain at least a five-year deliverable supply of housing land and meet the overall development requirements of the Local Plan.

The policy should make meaningful commitments for the council to undertake pre-application discussions and follow this up with a written response, and to minimise the number of pre-commencement conditions to facilitate an early start on site.	No	A pre-application service for 'major' applications is provided by the council. The service helps to ensure a better understanding of planning issues and requirements and speeding up of the development process.
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Policy HOU 14 'Small and medium-sized sites'

Summary of the main issues raised	Revised SADPD amended?	Council response
The necessity of the policy is questioned as it does not set out any policy requirements.	No	The policy is positively worded and reflects the emphasis given in ¶68 of the NPPF (2019) to the contribution that small and medium sized sites can make towards housing delivery. The inclusion of a figure of up to 30 homes in the policy is intended to give a clear direction to decision makers about when the policy should be applied. This is in line with ¶16.d) of the NPPF (2019), which states that 'Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals...'. The use of the terminology '...given positive weight...' is deliberate to make clear that the fact that housing is being proposed on small and medium sized sites will not override other policies in the plan such as those governing the location, impacts and quality of new housing development proposals.
The policy should be more flexible and not limited to sites of up to 30 dwellings. The NPPF (2019) provides no absolute limit on what can be regarded as a small or medium site.	No	The identification of a figure in the policy has the benefit of giving a clear direction to decision makers. This benefit is lost in the absence of specifying a figure. Leaving this judgement to individual applications could result in protracted discussions on this point, potentially delaying application decision making. Whilst accepting that there is no universally accepted definition of what constitutes a small site, the figure that the council has identified is based on a report prepared by the Local Government Information Unit and the Federation of Master Builders published in 2016, as noted in the supporting information to the policy.
The policy should clarify that it does not apply to the subdivision of larger sites.	No	This would be contrary to ¶68.d) of the NPPF (2019), which encourages local planning authorities to work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. The council would,

		however, resist proposals for sub-division where it had the effect of avoiding affordable housing or other planning requirements.
The policy should also give priority to sequentially preferable sites on previously developed land within existing settlements.	No	¶68.c) of the NPPF (2019) says, in relation to small and medium sized sites, that local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes. However, this does not indicate that a sequential approach should be applied that prioritises suitable previously developed sites over other suitable sites within existing settlements.

Chapter 9: Town centres and retail (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
This chapter should include a policy that allows existing retail development within existing settlements to expand.	No	Policy RET 2 'Planning for retail needs' sets out how retail convenience and comparison floorspace need arising in the borough over the remaining plan period will be met.
A new policy should be added that addresses town centre developments, specifically in support of sustainable transport that is not reliant on car ownership	No	Criterion 3 of Policy RET 9 'Environmental improvements, public realm and design in town centres' considers ease of movement around town centres. Criterion 3(ii) of Policy RET 9 seeks to encourage and facilitate active travel and make provision for all forms of transport, giving priority to walking, cycling and public transport.

Policy RET 1 'Retail hierarchy'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy omits consideration of whether LPS allocations (which incorporate local centres) should be	No	The approach to the retail hierarchy in the SADPD is consistent with the hierarchy of retail centres identified in LPS Policy EG 5 'Promoting a town centre first approach to retail and commerce'. The policies

identified within the centre hierarchy, such as Site LPS 33 'North Cheshire Growth Village'.		contained in the LPS in relation to local centres, such as at Site LPS 33 'North Cheshire Growth Village', provide an appropriate planning policy context for the site and includes references to the scale of retail uses expected on those sites. SADPD Policy RET 2 'Planning for retail needs', criterion 1 refers to the delivery of sites allocated in the LPS that include an element of retailing to meet local needs as a way that retail convenience and comparison floorspace arising in the borough over the remaining plan period is anticipated to be met.
Object to the identification of neighbourhood parades within the defined hierarchy as such facilities do not accord with the NPPF (2019) and its definition of 'town centres'. Suggest that Policy RET 1 confirms that Policy RET 3 'Sequential and impact tests' will not be applied in the context of the neighbourhood centres identified.	No	¶9.6 in the supporting information states that neighbourhood parade of shops do not fall within the definition of town centres in the glossary of the NPPF (2019). Policy RET 3 'Sequential and impact tests' confirms the defined centres where the policy would apply are principal town centres, town centres, local centres or local urban centres (as set out in the footnote to criterion 1). In ¶9.6, the council's intention was for reference to 'local urban centres' to be deleted from the last sentence of the paragraph. This change was recorded in the schedule of changes document [ED 01c] but due to a typographical error this change was not made to the tracked change version of the Plan [ED 01a].
The detailed boundaries of Poynton town centre shown in the SADPD should align with those in the Poynton Neighbourhood Plan as confirmed by the Plan Examiner in his report of June 2019. Cheshire East Council is now proposing that two different boundaries be used, one for the Neighbourhood Plan and one for the SADPD. This is likely to cause confusion in the determination of planning applications.	No	This matter is considered in the Poynton Settlement Report [ED 39], ¶5.30 concluding that, based on the evidence set out in the settlement report, a separate town centre boundary for the purposes of the SADPD policies is justified.
Criterion 4 identifies "Hightown, Biddulph Road" as a neighbourhood parade of shops. No material evidence has been provided by the council to assess the role of this centre or its vitality and viability.	No	The evidence for the identification of Hightown, Biddulph Road, Congleton as a neighbourhood parade of shops is included within the Congleton Settlement Report [ED 27], ¶¶5.32-5.34 and Table Congleton 11.
Dean Row Road (Wilmslow) should be a local centre in the retail hierarchy.	No	The approach to the retail hierarchy in the SADPD is consistent with the hierarchy of retail centres identified in LPS Policy EG 5 'Promoting

		a town centre first approach to retail and commerce'. Dean Row Road (Wilmslow) is proposed to be a local urban centre as evidenced in the Wilmslow Settlement Report [ED 43].
All principal town centres and town centres should be subjected to a complete reappraisal exercise that, amongst other things, looks at where it might be possible to re-assign areas and buildings for residential use. Policy RET 8 only appears to view living accommodation in town centres as something that would utilise the upper floors of retail units and/or be part of 'mixed use development schemes', not to be considering re-classifying whole sections for housing.	No	Settlement reports have been prepared for PTs, KSCs and LSCs, which have considered the retail function and defined appropriate boundaries, where necessary in those locations. The approach in the SADPD is consistent with LPS Policy EG 5 'Promoting a town centre first approach to retail and commerce', in which the justification text noted that the SADPD would define retail boundaries and include detailed policies (¶11.43 of the LPS).
The policy should cross refer to Policy HOU 13 on housing delivery and the support for the use of masterplans, design codes and area-wide design assessments to help bring forward and co-ordinate the delivery of housing sites and infrastructure in the borough.	No	The local plan is intended to be read as a whole. SADPD Policy HOU 13 'Housing delivery' (criterion 1) supports the use of masterplans, design codes and area-wide design assessments to help bring forward and co-ordinate the delivery of housing sites and infrastructure in the borough.

Policy RET 2 'Planning for retail needs'

Summary of the main issues raised	Revised SADPD amended?	Council response
Additional land should be allocated for retail development within or around Knutsford.	No	The Policy sets out that the anticipated retail convenience and comparison floorspace arising in the borough will be met principally through the delivery of sites allocated in the LPS that include an element of retailing to meet local needs; further retail development in Crewe and Macclesfield town centre(s) and the delivery of site LPS 47 'Snow Hill, Nantwich'. The supporting information to the policy recognises that expenditure growth forecasts in the longer term (and certainly beyond ten years)

		should be treated with caution, given the inherent uncertainties in predicting the economy's future performance and the pattern of future trading.
The policy identifies opportunities for retail development in other parts of the borough (including LPS 47 – 'Snow Hill, Nantwich') but makes no reference to North Cheshire Garden Village, which is a Plan-led development to meet the retail needs of the LPS 33 allocation, which will deliver 1,500 new homes and a significant boost to resident spend over the Plan period.	No	Policy RET 2 (criterion 2) specially refers to 'the delivery of sites allocated in the LPS that include an element of retailing to meet local needs'. Such a reference in the policy would apply to the North Cheshire Garden Village (as LPS 33) and the South Macclesfield Development Area (LPS 13) as allocations in the LPS.

Policy RET 3 'Sequential and impact tests'

Summary of the main issues raised	Revised SADPD amended?	Council response
Object to the floorspace threshold of 300 sq m applied to the town centres and do not consider this is robustly justified in the context of the national threshold of 2,500 sq m.	No	WYG (now trading as Tetra Tech) considered the updated evidence presented in the Retail Study Partial Update (2020) [ED 17] and concluded that the recommended retail impact policy thresholds originally proposed in the 2017 impact threshold policy report [ED 16], reflected in Policy RET 3 'Sequential and impact tests', were still appropriate (¶¶6.2.1 - 6.2.8, [ED 17]).
The amendment made to Footnote 22 unfairly ignores the role of neighbourhood centres in the retail hierarchy. The effect of this is to now consider parades as sequentially inferior. The lack of consistency applied to local urban centres and neighbourhood parades is concerning. The exclusion of neighbourhood parades as defined centres and the need for a Sequential Test for retail development in them in Policy RET 3 'Sequential and impact tests' cannot be considered sound, as per ¶35 of the NPPF (2019).	No	The amendment to footnote 22 appropriately reflects evidence and recommendations from the Retail Study Partial Update [ED 17] (¶7.4.1 – 7.4.5). Neighbourhood parades of shops do not fall within the definition of town centres in the glossary of the NPPF (2019).

Seek that Cheshire East Council as opposed to the developers are able to demonstrate that out of town retail developments do not have an adverse impact on town centres, with reference to criterion 2.	No	The policy wording is consistent with the requirements of national planning policy. It is for development proposal(s) for retail and leisure uses that are located on the edge or outside of a defined centre and that exceed the relevant floorspace thresholds to demonstrate that they would not have a significant adverse impact on the policy considerations set out in criterion 2.
The approach taken in criterion 2 is for a sequential test to be required for all “retail and leisure uses that are located on the edge or outside of a defined centre”. The policy should make specific reference to the uses and parts of the revised Use Class Order that it relates to, for example Class E(a-d) and Sui Generis (k-t).	No	The Policy is consistent with ¶89 of the NPPF (2019) in the inclusion of references to ‘retail and leisure’ development when making reference to the requirements of the impact test.
Policy RET 3 does not adequately reflect the approach required by ¶87 of the NPPF (2019) for flexibility when undertaking a sequential test.	No	The requirements of ¶87 of the NPPF (2019) are reflected in the supporting information to the policy (¶9.14).
Criterion 3 requires that a retail impact assessment is only required to an extension of an existing store unless the extension is above the thresholds set in criterion 2 of the Policy. Policy RET 3 therefore currently fails to control extensions to existing out of centre stores that are below that threshold even though these could result in equal harm to designated centres by creating a unit that may facilitate the relocation of an existing town centre tenant to an out-of-centre location.	No	Criterion 3 of the policy is consistent with ¶89 of the NPPF (2019).

Policy RET 4 ‘Shops fronts and security’

Summary of the main issues raised	Revised SADPD amended?	Council response
Add ‘existing features of historical or architectural significance are to be retained’ to	Yes	Additional wording has been inserted into Policy RET 4 at criterion 1(v) to state: “Existing features of historical or architectural significance are to be

<p>criterion 1(ii) as well as reference to policies in neighbourhood plans and design guides on shop fronts.</p>		<p>retained". Neighbourhood Plans are part of the adopted development plan and therefore policy does not need to be repeated in the SADPD. The design guides are also a material consideration in the determination of planning applications.</p>
<p>Historic England considers there should be additional wording in criterion 1(v) referring to the repair and restoration of such features where possible.</p>	No	<p>Although there is no objection to the wording it is considered that the policy is sound as written. The policy already covers 'retaining' which could necessitate 'repair or restoration'. Furthermore, criterion 1(i) states that the design and materials must be of high quality for new or altered shop fronts.</p>

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

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Criterion 3 is not justified by evidence. The supporting text fails to provide a link between incidence of obesity and proximity of hot food takeaways to secondary schools and sixth form colleges. ¶9.19 fails to provide evidence to support the claim that the most popular time for purchasing food from takeaways is after school.</p>	Yes	<p>The Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report [ED 50] sets out the facts and figures on the impacts of obesity; the food environment contribution to obesity; the local context and how obesity and the number of hot food takeaways have been on the rise recently.</p>
<p>400m rule - does this without any reference to how many may already be present, the effect of those or of any reduction. No evidence of a distance at which effects may occur is provided.</p>	No	<p>The Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report [ED 50] sets out that the 400m exclusion zone around schools is now an accepted standard applied by many Local Planning Authorities.</p>
<p>Criterion 3 is negative in its assumptions, using the concept of 'unhealthy food'. It assumes all hot food takeaways offer little choice and serve the same type and standard of food. Class E retail outlets and food and drink uses can also sell food that is high in calories, fat, salt and sugar. Hot food from Class E can be delivered to a wide range of locations, including schools.</p>	No	<p>Although unhealthy food is purchased from other uses, a significant amount is still purchased from A5 use classes. Further detail of how this is a contributing factor can be seen in the Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report [ED 50].</p>

The 400m ban is disproportionate to the circumstances when the concern underlying the policy may arise – schools are not open for most days in the year and many schools prevent children from leaving the school grounds.	No	The policy focusses on secondary schools and sixth form colleges due to increased level of independence and autonomy that secondary school pupils enjoy. Secondary school children are more likely to make their own decisions when purchasing food items.
Criterion 3 fails to acknowledge the wider benefits that restaurants can have, including benefits relevant to community health and wellbeing. McDonald's is an example of a restaurant operation that supports sustainable development through the use of renewable energy, the promotion of recycling, the use of energy and water saving devices. There are also economic benefits in supporting town centres and providing employment opportunities and training.	No	The council acknowledges the wider benefits that restaurants provide but also consider there are sufficient opportunities for this type of business beyond 400m of secondary schools.
There is significant difficulty in using distance radii in that it takes account of no real barriers, physical or perceptual. It is better to use real walk isochrones.	No	The 400m exclusion zone around schools is now an accepted standard across many planning policies and SPDs. Further detail of this can be seen in The Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report [ED 50]. The supporting information section does provide some flexibility to the 400m rule and states “although the 400 metre distance (as the crow flies) will be taken from the school's entrance, site specific factors such as physical barriers to pedestrian movement and the number and location of other takeaways along the school route will be taken into consideration”.
Criterion 3 is inconsistent with the NPPF (2019) ¶¶ 11, 80 - 81 and NPPG.	No	The policy is consistent with the NPPF, NPPG and other policy publications. Further detail on this can be seen in The Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report [ED 50].
Examination of other plans have found similar approaches in criterion 3 to be unsound. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity.	No	The Restaurants, Cafés, Pubs and Hot Food Takeaways Background Report [ED 50] provides a list of other councils that have recently adopted similar policy either in their Local Plans or through the adoption of SPDs. Waltham Forest's AMR 2011/12 (December 2012) includes an indicator on the number of hot food takeaways in the borough. Since the adoption of its

		Hot Food Takeaway SPD in March 2009, 25 planning applications for hot-food-takeaways were refused and 6 were allowed under special circumstances. There was a decrease of 2 takeaway premises between 2010/11 and 2011/12 on the Waltham Forest Food Premises Register. A fall in childhood obesity rates has also been reported and the success in implementing the SPD is seen as a contributory factor.
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Policy RET 6 ‘Neighbourhood parades of shops’

Summary of the main issues raised	Revised SADPD amended?	Council response
Suggest that part 1 of the policy is amended to read “The role of existing and new neighbourhood parades of shops, to provide facilities that serve a local catchment will be supported”.	No	The SADPD, through policy RET 1 ‘Retail Hierarchy’ has identified several neighbourhood parades of shops. The existing wording in criterion 1 of policy RET 1 ‘Retail Hierarchy’ is appropriately worded to reflect this position.
The HJ Lea Oakes site should be included in the boundary of Hightown, Biddulph Road Neighbourhood Parade of Shops, Congleton.	No	The boundary of the proposed Hightown Neighbourhood Parade of shops has been considered through the Congleton Settlement Report [ED 27] (¶¶ 5.32 – 5.34 and table Congleton 11).
LPS Policy EG 5 states that: “Small parades of shops will be protected where they are important to the day-to-day needs of local communities.” The intention of Policy EG 5 is to ensure that the SADPD Policies that were to follow the LPS would fully take into account the extent and contribution of proposed local centres. Policy RET 3 bestows policy protection from alternative uses in small parades, but also impedes retail growth by considering neighbourhood parades as sequentially inferior. This would cause stagnation, undermine their long-term health and would not be consistent with the spirit of LPS	No	LPS Policy EG 5 ‘Promoting a town centre first approach to retail and commerce’ sets out the retail hierarchy in Cheshire East, using the settlement hierarchy set out in LPS Policy PG 2 ‘Settlement hierarchy’ (PTs, KSCs and LSCs). The SADPD, using evidence from settlement reports has led to the identification of local urban centres and neighbourhood parade of shops. It is considered that the designation of neighbourhood parade of shops and policy RET 6, support the policy intention of LPS Policy EG 5 ‘Promoting a town centre first approach to retail and commerce’ in supporting small parades of shops important to local communities (with

Policy EG 5. There has been no assessment of the roles of these centres in the Revised Publication Draft SADPD.		reference to criterion 5 of LPS Policy EG 5 'Promoting a town centre first approach to retail and commerce').
At a time when there is clear need for the 'high street' to diversify, the notion of restricting/limiting the ability to diversify in neighbourhood parades runs contrary to future requirements/need and ¶85 of the NPPF (2019). This policy should provide flexibility for other uses within Use Class E and Use Class F. The restrictive nature of this policy is contrary to what the government are trying to achieve by relaxing the Use Class Order and creating jobs and investment. Delete ¶2.	No	The policy approach builds upon the strategic approach set out in LPS Policy EG 5 'Promoting a town centre first approach to retail and commerce'. The policy seeks to protect small parades of shops where they are important to the day-to-day needs of local communities. Local facilities, located in neighbourhood parades of shops continue to play an important role for day-to-day convenience shopping and for those residents who have difficulty accessing superstores or the town centre.

Policy RET 7 'Ensuring the vitality of town and retail centres'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy does not mention that the direction in which prospering town centres are moving is to combine retail provision (which clearly meets demands) with other 'experiences' (food and drink, heritage and other attractions e.g. a street or craft market, and leisure activities). Nor does the policy mention the evening economy.	Yes	LPS Policy EG 5 'Promoting a town centre first approach to retail and commerce' (criterion 6) refers to the evening and night-time economy in the borough. SADPD Policy RET 7 refers to main town centre uses, recognising that this definition includes a number of different town centre related uses. The supporting information to policy RET 7 notes the changing retail market, recognising that the focus of town centres may change but also the importance of retaining a retail function in town centres. An additional reference has been added to the supporting text to emphasise the evening/night-time economy.
Objection to primary shopping area boundary proposed for Knutsford town centre. Object to the strategy to contract rather than expand the boundary. The proposed Town Centre boundary should be amended to retain the OKA/Hooked on the Heath buildings, their associated car park and the Bowling	No	The analysis and justification for the town centre/primary shopping centre boundaries for Knutsford is presented in the Knutsford Settlement Report [ED 34].

Green to the rear (as per the currently adopted position) and be expanded, as appropriate.		
Policy RET 7 should be reworded to be more flexible, in order that it is supportive of changes in town centre composition that are a reasonable response to market conditions. It is considered this is particularly relevant to (and important for) centres that are at the lower levels of the proposed retail hierarchy.	No	Criterion 3 of policy RET 7 is seeking to support and retain town centre uses, as defined by the NPPF (2019), and is appropriately focused in primary shopping area, local centre or local urban centre locations in the borough. The policy is responsive to market conditions and refers to testing market demand.
There is concern that areas such as Wesley Place, St. Mary's Church and Milton Park are excluded from the Alsager town centre boundary.	No	The analysis of the proposed town centre boundary for Alsager is presented in the 'Alsager Settlement Report' [ED 22].
This policy has not been adapted to recognise the reality of the present situation, which is that town centres have been decimated by both internet shopping and the coronavirus. The Retail Study Partial Update (July 2020) [ED 17], is based on health checks undertaken before February 2020, i.e. prior to the first Covid-19 lockdown (¶2.1.3).	No	The 'Retail Study Partial Update' [ED 17] recognises that the full implications of Covid-19 are not yet known and understood. However, on the basis of information at the time of preparing the report, it is considered that the majority of centres in Cheshire East are vital and viable. Policy RET 7 seeks to support the retail function of relevant centres in the borough.
Master planning schemes previously drawn up for the centres of Crewe and Macclesfield bear no resemblance to current day needs. They should be reviewed, and master plan exercises also need to be conducted for the retail areas of all the KSCs. Parts of some centres that are failing might be better being re-allocated for housing. The occupants of such housing would then bring much needed business to the remaining retail and commercial units. This policy and Policy RET 8, 'Residential accommodation in town centres', should commit to drawing up master plans of all the borough's town retail centres with a view to reclassifying failing parts of those centres for housing.	No	Settlement reports have been prepared for PTs, KSCs and LSCs that have considered the retail function and defined appropriate boundaries. The approach in the SADPD is consistent with LPS Policy EG 5 'Promoting a town centre first approach to retail and commerce', which in the justification text noted that the SADPD would define retail boundaries and include detailed policies (¶11.43 of the LPS).

Policy RET 8 ‘Residential accommodation in the town centre’

Summary of the main issues raised	Revised SADPD amended?	Council response
An extra line should be added that refers to Policy RET 7 in the same way that it makes reference to Policy ENV 15.	Yes	A new paragraph has been added to the supporting information to make an appropriate cross reference from policy RET 8 to policy RET 7 (¶9.36a).
The Policy is unsound on the basis that it relates to a set of circumstances in the retail sector that no longer exist and that is not going to return. Policy RET 8 only appears to view living accommodation in town centres as something that would utilise the upper floors of retail units and/or be part of ‘mixed use development schemes’, not to be considering re-classifying whole sections for housing.	No	The policy appropriately considers the provision of residential accommodation in town centre environments. It is recognised that town centre living can be beneficial to residents in terms of access to services and facilities. It also adds to the vitality of town centres, through providing additional surveillance and supporting the evening economy. However, policy RET 8 also recognises the importance of town centres, particularly primary shopping areas retaining a focus on retail uses to support their vitality and viability.
Policy RET 8 would not prevent the introduction of residential accommodation at ground floor level in the town centre. Clearly the introduction of residential accommodation at ground floor level in a predominantly commercial area could result in the fragmentation of key retail frontages to the detriment of a centre’s viability and vitality.	No	The supporting information notes that proposals for new residential uses should consider the impact on the primary shopping area, in line with the requirements of policy RET 7, to make sure that the primary shopping area remains the focus for retail uses in town centres to support their vitality and viability.
Policy RET 8 does not adequately consider the “agent of change” principle and fails to place the onus on the developer of a residential scheme to demonstrate (and provide appropriate mitigation to ensure) that such a use will not prejudice the continuation of existing operations.	No	Criterion 2 refers to SADPD policy ENV 15 ‘New Development and Existing Uses’, which considers the need for residential accommodation to be integrated effectively with existing businesses and community facilities.

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

Summary of the main issues raised	Revised SADPD amended?	Council response
Proposals should include evidence of a maintenance regime in order to maintain a high-quality public realm. No reference is made to the provision of built-in servicing infrastructure (e.g. litter bins). Therefore, recommend including a statement: ‘appropriate infrastructure which supports the maintenance and servicing of installations in the public realm’.	Yes	Additional text has been added to criterion 2(viii) to note that development proposals relating to the high-quality public realm should ‘evidence clear management and servicing regimes to maintain the quality of the public realm’.
Policy is superfluous given that the LPS already contains a number of design policies whilst a clear vision for Macclesfield town centre is included within the Macclesfield Town Centre Strategic Regeneration Framework, which was approved in October 2019 (since the consultation on the initial Publication Draft SADPD).	No	Policy RET 9 builds on LPS Policy SE 1 ‘Design’ and SADPD policy GEN 1 ‘Design principles’ in setting out a number of specific principles for town centre developments.

Policy RET 10 ‘Crewe town centre’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy relates to a set of circumstances in the retail sector that no longer exist and that is not going to return. Every town centre in Cheshire East, i.e. the two main towns of Crewe and Macclesfield and the KSCs, should be subjected to a complete reappraisal exercise that, amongst other things, looks at where it might be possible to re-assign areas and buildings for residential use.	No	In respect of the Royal Arcade scheme, a Development Agreement between the council and Peveril Securities was signed in October 2020. Demolition of the former retail units commenced in October 2020 and are expected to be completed in spring 2021. A planning application on the scheme is expected in the spring/summer of 2021.

An additional sentence should be added to ¶6(i) to make it clearer that additional green spaces, and the use of features such as green walls, will be supported.	No	Criterion 6 refers to improving the quality of public spaces, including green spaces, in the town centre.
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Policy RET 11 ‘Macclesfield town centre and environs’

Summary of the main issues raised	Revised SADPD amended?	Council response
The inclusion of this policy in the SADPD is superfluous and should be removed from the Plan.	No	The policy provides guidance for the town centre and reflects the aims and aspirations of the ‘Macclesfield Town Centre Strategic Regeneration Framework’.
Would welcome as part of the regeneration in the Sunderland Street Areas that more attention is paid to the River Bollin as a key green infrastructure asset (at the moment in a poor environmental state in this area). (A range of measures suggested).	No	The River Bollin, as a key green infrastructure asset, is covered by LPS Policy SE 6 ‘Green Infrastructure’ plus other policies in the Revised Publication Draft SADPD covering ecology and water quality. It is also referenced in the Macclesfield Town Centre Strategic Regeneration Framework.
Object to the omission of the Christ Church area from the list of Macclesfield town centre character areas and the text of RET 11 and therefore from the list of priority areas for regeneration. The existing boundary to the west of Churchill Way (as shown on the Saved Town Centre Proposals Map in the Macclesfield Borough Local Plan 2004) should be retained so as to include the whole of the Christ Church Conservation Area. (July 2019 NPPG references included in justification for Christ Church Residential Area to remain in Town Centre – residential can add to the vitality of town centres)(Roe-naissance Project Macclesfield’s Representation also calls for the need for a new Conservation Appraisal, discusses regeneration, the HARP project, the role of housing and compares Christ Church in Crewe with Christ Church in Macclesfield.) Representation	No	As stated in the ‘Macclesfield Settlement Report’ [ED 35] this area consists predominantly of residential properties which are not main town centre uses and do not function as part of the centre’s shopping and service offering. Whilst appreciating that residential uses in a town centre do add to the function of the town centre, large residential areas should not be included in the town centre boundary. Christ Church is referenced in the policy (criterion 7) and in the supporting document – the ‘Macclesfield Town Centre Strategic Regeneration Framework’. In terms of Christ Church as an important Heritage asset, this is dealt with through the various LPS and SADPD Heritage Policies (LPS Policy SE 7 ‘The Historic Environment’ and Policies HER 3 ‘Conservation Areas’ and HER 4 ‘Listed Buildings’).

added to in response to the Revised Publication Draft SADPD and the changing retail environment.		
Concern about any possible residential proposals and relationship to Royal Mail landholding (criterion 8 – Jordangate east).	No	Any policy has to be read in conjunction with other policies in the Local Plan. For example, policy ENV 15 'New Development and Existing Uses' would make sure that effective integration with adjacent uses is achieved with any development proposals. The policy also reflects the Macclesfield Town Centre Strategic Regeneration Framework (¶5.6, page 25).
The town centre should be subject to a complete re-appraisal exercise including re-assigning areas and buildings for residential use; need for change of direction with decline of town centres.	No	The policy as worded provides opportunities for residential development in line with national guidance.

Chapter 10: Transport and infrastructure (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD needs a replacement policy for Crewe and Nantwich policy TRAN12 in respect of roadside facilities. The development of roadside facilities must be properly planned for in accordance with NPPF (2019) ¶11, including roadside facilities serving the A500.	No	Footnote 42 of the NPPF states that policies for facilities such as roadside services should be developed through collaboration between strategic policy making authorities and other relevant bodies. The non-strategic policies of the SADPD have been prepared to be consistent with the strategic policies of the LPS. The A500 within Cheshire East is not part of Highways England's trunk road network. The strategic trunk road network in Cheshire East is limited to the M6, M56 and A556 between the M6 and M56. Additionally, there are already roadside facilities on the A500 nearby to Crewe, accessed off the A500 at its junction with the M6.
The transport and infrastructure policies do not consider key supporting infrastructure such as motorway service facilities and are not in accordance with the NPPF (2019), e.g. ¶ 104e and footnote 42. A policy	No	Footnote 42 of the NPPF states that policies for facilities such as roadside services should be developed through collaboration between strategic policy making authorities and other relevant bodies. The non-strategic policies of the SADPD have been prepared to be consistent with the strategic policies of the LPS. Additionally, there is no evidence pointing to the need for new motorway service

should be added to the Plan that recognises the strategic importance of motorway service areas and that there is a deficiency in provision.		facilities in the borough. There are two existing motorway service areas in the borough (Sandbach Services M6 between Junctions 16 and 17 operated by Roadchef; and Knutsford Services M6 between Junctions 18 and 19 operated by Moto) and one adjacent to the borough boundary (Lymm Poplar 2000 Services located at M6 Junction 20 and M56 Junction 9 and operated by Moto).
The traffic data for Cheshire East should be revisited to ensure that the infrastructure plan is fit for purpose and will adequately support the 36,000 homes needed in Cheshire East.	No	This is a strategic matter addressed through the LPS. Only a limited number of allocations are proposed in the SADPD, consistent with the strategic policies of the LPS. Since the adoption of the LPS, the monitoring and updating of transport priorities and investment across all transport modes has been continuous. The Local Transport Plan 2019-24. considers all forms of transport and provides a framework for how transport will support wider policies to improve our economy, protect our environment and make attractive places to live, work and play. It takes account of and supports the delivery of LPS including its growth proposals and strategic allocations that require an integrated sustainable transport network.

Policy INF 1 ‘Cycleways, bridleways and footpaths’

Summary of the main issues raised	Revised SADPD amended?	Council response
The reference to the diversion of canal towpaths should be removed from criterion 2 as diversion of a canal towpath would not be acceptable in any circumstance.	Yes	The reference to the diversion of canal towpaths has been removed from criterion 2.
Under criterion 4, development proposals should also provide links to canal towpaths where feasible.	Yes	Criterion 4 now includes wording that development proposals should also provide links to canal towpaths, where feasible.
Criterion 2 is too onerous and may unduly constrain development by requiring diversions to provide clear and demonstrable benefits for the wider community. The wording should be revisited and amended to support diversions that are necessary to facilitate development and/or where public benefits are delivered if feasible and viable.	No	The wording is considered sound as written.

The diversion or stopping up of a public footpath, bridleway or other public road is subject to a separate process to planning. This process may not be entered into by an applicant until after a planning application has been granted or there is a resolution to grant permission.	No	Supporting information ¶10.3 says “The diversion or stopping up of a public footpath, bridleway or other public road in association with a planning application must be considered before the granting of planning permission”.
Add at the end of criterion 4 – ‘and include new cycle/pedestrian routes to local town centres, schools and workplaces’.	No	Criterion 5 covers this through the use of design and access statements being accompanied by maps showing links to community facilities as per the Active Design guide principle in the Cheshire East Design Guide SPD. The Local Plan is intended to be read as a whole. Policies in the LPS including CO 1 'Sustainable travel and transport' seek to support cycle and pedestrian movement in the borough.
The policy should go further to include the standard of construction, materials and fencing as well as pedestrian and cyclists safety	No	Criterion 5 references further guidance on Active Design guide principles in the Cheshire East Borough Design Guide SPD.

Policy INF 2 ‘Public car parks’

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised	N/A	N/A

Policy INF 3 ‘Highway safety and access’

Summary of the main issues raised	Revised SADPD amended?	Council response
The plan contains no policies regarding the provision of electric car charging points on every new development notwithstanding the government’s stated objective to support a shift to electric vehicles over the next 20 years.	Yes	Charging points are mentioned in LPS Policy CO 2 ‘Enabling business growth through transport infrastructure’. The installation of electrical charging outlets is also covered under Schedule 2, Part 2, Class D of The Town and Country Planning (General Permitted Development) (England) Order

		2015 (as amended). Additional wording has been inserted under Criterion 1(vi) and under the Supporting Information section (¶10.5) with regard to electric car charging points. Charging points in new buildings and buildings undergoing material change of use and major renovation. will also be covered by new Building Regulation requirements ¹¹ .
<p>It is not necessary for Policy INF 3 to specify the provision of electric vehicle charging points for the following reasons:</p> <ul style="list-style-type: none"> • The government is proposing to introduce requirements for charging points through Building Regulations. • The council's Viability Assessment Update recommends against a policy requirement for charge points: • As noted in the Roger Hannah response to the council's Viability Assessment Update (Appendix 3), typically, the provision of car charging points will require higher voltage cabling to be installed throughout the site resulting in higher abnormal off-site infrastructure costs. It is also possible that capacity for such voltage will not be available on the current network and therefore the costs to upgrade the network can be significant. An allowance should be made in the Viability Assessment Update to take account of increased off- site abnormal costs. 	Yes	<p>It is important that the council does what it can to address the impact of climate change. The SADPD Viability Assessment [ED 52] presented several scenarios. This included a consideration of costs without electric vehicle charging points but equally, and included in the main appraisal, costs associated with providing EV charging points. The cumulative cost of policy requirements in the SADPD is presented in Table 12.7 of the viability study [ED 52]. The conclusions of the viability assessment, in ¶¶12.98-12.101 note that Cheshire East has a vibrant and active property market. In the current market, the analysis in the report shows that the additional policies in the SADPD (including EV charging points) are unlikely to prejudice the allocations in the SADPD and adopted LPS. The report does also note that there is continued uncertainty around the impacts of Covid 19 and Brexit on the wider economy and it is important for the council to monitor these changes. It should also be noted that the policy wording in criterion 1(vi)(a) notes that a ChargePoint should be provided, unless not feasible because of excessively high grid connection costs.</p>
No action has been forthcoming for improvements to local traffic routes. If some action is not done, congestion and road accidents will ensue and cause social problems in the near future.	No	<p>Criterion 2 states that all development proposals that generate a significant amount of movement should be supported by a travel plan and either a transport statement or transport assessment. Section 106 agreements help secure infrastructure required to mitigate site-specific impacts arising</p>

¹¹ <https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>

		from development. S106 agreement(s) include three key tests in that it must be (a) necessary, (b) directly related, and (c) related in scale and kind to the proposed development. The CIL Regulation 123 List sets out infrastructure projects that Cheshire East Council currently intends may be wholly or partly funded by CIL.
Add the following requirement: “not significantly reduce the safety of road users or pedestrians in the vicinity of and approaches to the development and, wherever possible, they should increase safety. The likely effects on highways and pedestrian safety should be analysed in a report produced by CEC, or where they have a pecuniary interest, by an independent assessor.”	No	The policy as written is considered legally compliant and sound.
With reference to criterion 1(vi)., add the need for charging points in the town centre locations where residents do not have off-street parking. Add new criterion 3 - provide two car parking spaces per property along with a prohibition of parking on the pavement.	No	The policy is considered sound as written. Criterion 1(vi) covers charging points. Charging points are also mentioned in LPS Policy CO 2 ‘Enabling business growth through transport infrastructure’. Charging points will also be covered by new Building Regulation requirements ¹² LPS Policy SD 1 ‘Sustainable development in Cheshire East’ states development should wherever possible “7. Provide safe access and sufficient car parking in accordance with adopted highway standards.” Provision should be based on the car parking standards set out in Appendix C of the LPS. It is not the purpose or role of the SADPD to revisit these standards.
The whole issue of traffic safety and parking in Bollington requires serious attention. The SADPD needs to be seen to be taking account of the recommendations of the Bollington Neighbourhood Plan as described in policies MA.P1 and MA.P2 with respect to traffic safety and parking.	No	The Bollington Neighbourhood Plan is part of adopted development plan and therefore policy does not need to be repeated in the SADPD.

¹² <https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>

INF 3 requires strengthening. The planning criteria cited must be mandatory. These are not options. Travel Plans must also be mandatory as part of the justification for development. If they are ineffective permission should be refused. Policy should be amended to spell out what is expected of Travel Plans and reject those that do not show the efficacy of the public transport services.	No	The word 'should' is considered sufficiently robust in relation to the future application of this policy. The Department for Transport has produced guidance on Travel Plans – 'Good Practice Guidance: Delivering Travel Plans through the Planning Process' ¹³ .
Concern over INF 3 criterion 1(vi). It is recommended that the policy is modified to allow for greater flexibility: "Development proposals that include electric charging facilities for electric vehicles will be supported."	No	The policy wording in criterion 1(vi) is sufficiently flexible, encouraging electric vehicle charging points in all developments and for major development. Criterion 1(vi)(a) notes that a chargepoint should be provided, unless not feasible because of excessively high grid connection costs.
More flexibility should be added to the policy to take account of circumstances where it may not be possible to achieve such provision on individual sites. Whilst costs are mentioned in the policy wording, it is recommended that the wording is amended to also take account of any site-specific considerations that may not allow for 100% provision. For Part A this would include 'A chargepoint for every new dwelling (whether new build or change of use) with an associated car parking space, unless this is not feasible because of excessively high grid connection <u>costs or other site-specific considerations</u> ' For Part B this would include: 'One chargepoint for every five car parking spaces in the case of new, non-residential buildings, <u>where feasible</u> .'	No	The policy is considered sound as written. The policy follows the government's proposed approach through building regulations. It also reflects the government proposal to ban the sale of new petrol and diesel-engined cars and vans by 2030.
The policy sets a requirement for 20% of parking spaces to be fitted with electric vehicle charging points in the case of new, non-residential buildings. It is unclear whether this requirement would be a ratio of all existing parking spaces or just new parking spaces This policy does not appear to be	No	The policy is considered sound as written and applies to new development proposals. It is not considered necessary to amend the policy to clarify that position.

¹³ <http://www.greensuffolk.org/assets/Travel-Plans/Documents/Travel-Planning/Good-Practice-Guidelines-travel-plans-and-planning.pdf>

<p>linked to any evidence base to justify the 20% requirement or allow for a viability case to be considered. As such the policy is not justified.</p> <p>The governments paper on electric vehicle charging sets a target for non-residential developments to have at least one chargepoint and cabling routes for one in five spaces. Therefore, it sets a 20% requirement for cabling and not provision. To make the policy sound the following is suggested: "...one chargepoint and cabling in one in every five new car parking spaces in the case of new, non-residential buildings unless it is demonstrated to be unviable or a phased implementation is proposed".</p>		
<p>Fails to address the increasing levels of car ownership across the plan area as the provision, frequency and reliability of public transport falls. With the increase in reliability on the private car not enough car parking is provided within domestic curtilages and garages on new developments, are not constructed large enough to accommodate the family sized SUVs which have increased in popularity.</p>	No	<p>Criterion 1(i) states that proposals should comply with the relevant Highway Authority's and other highway design guidance which seeks to promote sustainable transport modes. The Council Environment Strategy 2020-2025 (section 5) provides further detail on increasing sustainable transport and active travel in the borough.</p> <p>With regard to car parking, LPS Policy SD 1 'Sustainable development in Cheshire East' states development should wherever possible "7. Provide safe access and sufficient car parking in accordance with adopted highway standards."</p> <p>Provision should be based on the car parking standards set out in Appendix C of the LPS, which includes size, layout and requirements for bays and garages (Table C.4). It is not the purpose and role of the SADPD to revisit these standards.</p>
<p>There should be a requirement for the provision of electric vehicle charging points on every new development and in car parks across the plan area in order to deliver the government's ambitious timescale for the shift to electronic vehicles.</p>	No	<p>The Policy would apply to every new development and new car parks whereby it states to "incorporate appropriate charging infrastructure for electric vehicles in safe, accessible and convenient locations" (criterion 1(vi)). The policy provides more detail for 'major' developments which is consistent with LPS Policy CO 2 'Enabling business growth through transport infrastructure' (criterion 2(vi)), which seeks to provide</p>

		recharging points for hybrid or electric vehicles in major developments in order to reduce carbon emissions.
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Policy INF 4 ‘Manchester Airport’

Summary of the main issues raised	Revised SADPD amended?	Council response
Development proposals at Manchester Airport should be critically considered instead of ‘usually permitted’.	No	Within the defined airport operational area the policy is supportive of development that is necessary for the operational efficiency and amenity of the airport. The plan is intended to be read as a whole, and all relevant policies will also apply.
The policy does not mention the control of drone activity adjacent to the airport or under the flight paths.	No	Unless the flying of drones is dependent on development, it is outside the scope of the planning system; however SADPD Policy GEN 5 seeks to prevent development that would adversely affect the operational safety of the airport.

Policy INF 5 ‘Off-airport car parking’

Summary of the main issues raised	Revised SADPD amended?	Council response
A table of the airport car parks and the lawful off-site car parks should be included in the plan with their approved capacity. In the absence of such, it will not be possible for potential future operators to be able to determine whether demand is met. No evidence is provided to justify the requirement to demonstrate that demand regularly exceeds supply. It is not clear whether monitoring is carried out to be able to assess the position.	No	The policy does not intend that applicants provide a numerical calculation of the capacity/occupancy of existing car parks but some evidence that car parks are regularly at or near capacity would be required, e.g. a parking survey. The inclusion of a table of existing car parks would be difficult as they have a wide geographical spread in several different authorities and some only operate during irregular periods. In addition, such a table would inevitably become out of date very quickly.
The current Manchester Airport surface access plan aims to provide car parking on-site; therefore the delivery of off-airport car parking cannot be in accordance with criterion 2.	No	Criterion 2 does not rule out locations not identified in the surface access plan. If there is a need for new car parking but the Sustainable Access plan does not identify off-airport locations, then

		preference cannot be given to those locations and effectively criterion 2 would not apply.
The policy should identify locations/areas of search considered suitable for off-airport car parking.	No	There is no identified requirement for off-airport car parking that would necessitate allocations or areas of search being included in the plan.
The requirements in terms of Green Belt effectively introduce a sequential approach and it is not clear how the council would assess proposals in terms of openness.	No	The Green Belt requirements are in line with the NPPF (2019) and LPS Policy PG 3 'Green Belt' in respect of local transport infrastructure. These policies require such infrastructure to demonstrate a requirement for a Green Belt location. If the proposal could be accommodated outside of the Green Belt, then it cannot demonstrate a requirement for a Green Belt location. These policies also require proposals to preserve openness and not conflict with the purposes of including land within the Green Belt.
There should be a clear definition of what "forecast to do so in the near future" means.	No	The policy is considered to be clear and sound as written.

Policy INF 6 'Protection of existing and proposed infrastructure'

Summary of the main issues raised	Revised SADPD amended?	Council response
The Wilmslow – Manchester Airport Bus Rapid Transit Scheme should be added to the list of protected infrastructure – improved connectivity to the airport should be supported to facilitate economic growth and development.	No	The schemes listed under criterion 2 of the policy are those where there is an identified route/area that needs to be protected to facilitate their delivery. No defined map currently exists for the Wilmslow – Manchester Airport Bus Rapid Transit Scheme.
Initial site preparations for the construction of the Poynton Relief Road are currently underway and the road is expected to open to traffic in autumn 2022. However, as the scheme has yet to be delivered and brought to use, the safeguarded area should be re-instated in Policy INF 6 and on the Policies	Yes	The route of the Poynton Relief Road was protected in the version of this policy as it appeared in the initial Publication Draft SADPD. However, it has been removed from the list of schemes in the policy as it now appears in the Revised

Map so the route of the scheme and its relationship to allocated and safeguarded land on the western side of Poynton is clear.		Publication Draft SADPD because it is now under construction and no longer needs its route protecting.
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Policy INF 7 ‘Hazardous installations’

Summary of the main issues raised	Revised SADPD amended?	Council response
Hazardous substances and industrial processes from Macclesfield Borough Local Plan policy DC3 Hazardous substances and processes still needs to be in.	No	INF 7 is deemed sound as written. It covers and expands on the saved Macclesfield Borough Local Plan DC3 “Amenities” policy.

Policy INF 8 ‘Telecommunications infrastructure’

Summary of the main issues raised	Revised SADPD amended?	Council response
Cheshire East Council, parish councils and telecoms operators should develop a strategic plan for the siting of infrastructure for future infrastructure requirements. Significant planning problems have been caused by the apparent lack of advice from Cheshire East Council to telecoms developers on where they might best place their future infrastructure needs. Developers seem to be left to make planning proposals without any helpful guidance. This is very wasteful of resources. A strategic plan for future telecoms infrastructure is particularly important given the imminent roll out of 5G communications.	No	The government has recently consulted on proposals to simplify planning rules to improve rural mobile coverage. This consultation seeks views on the principle of amending permitted development rights to support deployment of 5G and extend mobile coverage. The results are not yet known therefore a prescriptive policy would be premature.
Replace current text “there will be no interference with air traffic services” with “there will be no detrimental impact on air traffic safety”.	Yes	The reference to there being no detrimental impact on air traffic safety has been included in the Revised Publication Draft SADPD. The plan is intended to be read as a whole.

		These points are already covered by policy GEN 5 Aerodrome Safeguarding.
This policy is cited as a supplement to LPS Policy CO 3. Neither policy contains specific guidelines with respect to the impact of telecommunications infrastructure upon heritage assets. This is in contrast to the saved policy DC60 of the Macclesfield Borough Local Plan. The recommendation is to add 'particularly in relation to the impact on heritage assets' to criterion 1(iii) of policy INF 8.	No	The plan is intended to be read as a whole, the suite of heritage policies already cover all forms of potentially harmful development on heritage assets and their settings. This would include telecommunications infrastructure.
As part of the criteria to this policy, there is the addition of a criteria that requires that there is no impact upon local skylines (particularly in towns) and also important local views into and out of towns and villages by telecommunications infrastructure.	No	The policy is deemed to cover this point at criterion 1(iii): "there will be no significant adverse impact on visual and residential amenity, or on the character of any building or the wider area"

Policy INF 9 'Utilities'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy is unsound as it fails to differentiate between types of development. Only major development proposals should be required to demonstrate that infrastructure capacity will be sufficient to meet forecast demands and the policy text should reflect this. The word 'major' should be added in ¶1 as the second word of the paragraph. For larger major schemes add "and where necessary" this will require a site wide utilities master plan to establish principles during the construction process and early liaison with infrastructure providers.	Yes	Under criterion 1 of the policy the word ' <u>major</u> ' has been added to replace 'large'. Criterion 1 covers all development proposals being able to demonstrate that they can meet forecast demands. For major schemes, requiring a site wide master plan is justified and necessary. The policy is considered sound as written.
Remove the word 'generally' under criterion 2 to prevent existing utilities from being impacted.	Yes	The word "generally" has been removed to prevent existing utilities from being impacted.
Utility companies have a statutory duty to provide these services. There is a cogent argument for developers seeking to build in rural areas to submit	No	The supporting information at ¶10.24 is considered sufficient to cover this point.

reserved matters applications from the outset in order that fiscal viability can be ascertained before approval is given (which better adheres to the NPPF 2019). Consider the introduction of 'reserved matters only' applications in rural areas where Utilities provision is a significant risk to the fiscal viability of the development.		
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Policy INF 10 'Canals and mooring facilities'

Summary of the main issues raised	Revised SADPD amended?	Council response
The promotion of a mooring facility serving the Shropshire Union Canal and its associated branches is not possible within the settlement boundaries. Even if there was a suitable location, it is unlikely that a mooring/marina use would be viable within the settlement boundary as higher land value uses such as residential development would be favoured especially along canal frontages. The policy also conflicts with Policy PG 9 'Settlement boundaries', which is supportive of development proposals where they are in keeping with the scale of that settlement. An infrastructure development (such as a permanent mooring facility) is unlikely to be in accordance with Policy PG 9. Criterion 2(i) should be removed, which requires proposals for permanent moorings to be located in a settlement boundary, or amended to allow mooring facilities in the open countryside, where other criteria in the policy are met and there is a need for such facilities.	Yes	The policy has been amended to confirm that the requirement for new moorings to be in settlement or infill boundaries relates only to new moorings for permanent residential use. ¶10.31 has been added to the supporting information to confirm that proposals for tourist accommodation will also be subject to Policy RUR 8 'Visitor accommodation outside of settlement boundaries'. Policy PG 9 'Settlement boundaries' is supportive of development proposals within settlement boundaries (including mooring facilities) where they are in keeping with the scale, role and function of that settlement.
It would not be practical for development of Site MID 2 to comply with criteria 1(vi) or 1(vii) of Policy INF 10 and criterion 3 of Site MID 2 which requires the preservation of hedgerows around the site. Criteria 1(i), 1(vi) and 1(vii) of the policy should be amended to include the words "where possible" at the start of each criterion. A further clarification paragraph should be added	No	The wording in respect of these criteria already allows for a degree of flexibility. The wording 'seek to provide', 'integrate' and 'optimise' is considered to allow flexibility, rather than using words such as 'must provide', 'connect' to the waterway, towpath and canal environment to the public realm; and 'provide' views to and from the waterway. To

to the supporting information text to note that where a site is allocated for development adjacent to the canal network, the site-specific requirements set out within the relevant policy for that site will take preference over the generic requirements set out in Policy INF 10.		insert 'where possible' in other parts of this policy would not help encourage active use of the waterway. The Plan is intended to be read as a whole and Policy INF 10 would apply to both allocated and non-allocated sites.
Policy INF 10 has been reworded to recognised that waterside developments should contribute towards improvements to towpaths where this is necessary or viable and such improvements could comprise a variety of measures. The same approach should be adopted in Policy MID 2.	No	This issue is considered in the Site MID 2 'East and west of Croxton Lane' section of this consultation statement appendix.
Criterion 3 limits 'new moorings for permanent residential use' to be located within settlement boundaries and infill boundaries only. If this restriction includes the change of use of existing (non-residential) moorings to permanent residential use then this would conflict with the NPPF 2019 (¶146) as there is a reasonable planning case to be made that the change of use of moorings should be viewed as 'not inappropriate' development in the green belt.	No	Criterion 3 requires 'new' moorings for permanent residential use to be located within settlement and infill boundaries. This would not apply to the change of use of existing moorings. Criterion 4 refers to LPS Policy PG 3 'Green Belt' which provides guidance on the types of development that are appropriate in the Green Belt. It will be for the decision maker to determine whether proposals constitute inappropriate development in the Green Belt, in accordance with LPS Policy PG 3 and the NPPF 2019 (¶¶145-146).
There is no explanation why six of the sub-criteria under criterion 2 included in the initial Publication Draft SADPD have been deleted. If it is because some are repeated in section 1 then it should be made explicitly clear that they also apply to proposals for new moorings under criterion 2.	No	The policy in the initial Publication Draft SADPD contained some repetitive wording and some of the repetition has been removed from criterion 2. It is not necessary to re-insert this wording, as proposals for 'new moorings' (referred to in criterion 2) will also be 'development proposals affecting the borough's canals' (referred to in criterion 1). Applications for new moorings would be assessed against criteria 1 and 2.
The supporting text should make it clear that the separate consent of the Canal & River Trust would be required for all new moorings/marinas as inferred under the 'related documents' at the end of the policy.	No	The supporting information ¶10.28 refers to the need for The Canal & River Trust's separate agreement to connect and gain access to the waterway network and refers to its off-line mooring and marina developments application process.

Chapter 11: Recreation and community facilities (general)

Summary of the main issues raised	Revised SADPD amended?	Council response
Need reference in policies that Neighbourhood Plans may contain sports facility needs and opportunities assessments.	No	Made Neighbourhood Plans are part of the Development Plan.

Policy REC 1 ‘Green/open space protection’

Summary of the main issues raised	Revised SADPD amended?	Council response
Policy should be amended to refer to open space only – not green/open space; criterion 2 should be amended so that wording properly reflects ¶197 of the NPPF (2019).	No	The reference to green/open space links with the strategic policy for green infrastructure, set out in LPS Policy SE 6 ‘Green infrastructure’. The wording reflects the NPPF (2019) ¶197, regarding open space protection. The word “green” is appropriate to reference the many open spaces that are also green. The NPPF (2019) and NPPG definitions are in the glossary of the Green Space Strategy [ED18].
Requested that the open space status of land to the rear of 43 London Road, Poynton is removed as the site has no recreational value, no amenity value and is surplus to open space requirements in Poynton. The site is wholly in private ownership and is not accessible to the general public, plus there is sufficient publicly accessible open space within the immediate locality.	No	The general approach is to change policy designations on the interactive map once developments have taken place. The two parcels that make up this open space are high quality garden areas that are part of the wider green infrastructure. They do perform green infrastructure functions – urban heat island effects, air pollution absorption, ecology, absorption to combat localised flooding etc. The presence of green space within the urban area is so important for health and well-being.
Objection to the designation of land bound by Brook Street, Hollow Lane and Mobberley Road as green/open space – site not designated as Local Green Space; no public views; Tree Preservation Order and conservation area status provide sufficient protection.	No	The site warrants being designated as open space. It is an important open space both in terms of its visual amenity value, historic value and as part of the wider green infrastructure for the following reasons:

		<ul style="list-style-type: none"> • Visual amenity open space – both for surrounding residents and as an attractive green area adjoining the southern and north eastern routes into Knutsford; • Wooded nature and open nature of open space – both important for ecology, air pollution absorption (at junction of busy roads plus under flight path) and screening; • Important stepping stone open space linking with Sanctuary Moor to the south; • Within Cross Town Conservation Area – important green area within the Conservation Area forming a backdrop to houses on Mobberley Road (mentioned in Conservation Appraisal 2006); • Adjoins Legh Road Conservation Area; • Any development would affect the integrity of the open space
First part of policy should be deleted; second part of policy additional criterion recommended regarding community benefits of development (representation made in regard to Dyers Mill pond, Bollington and development proposals)	No	The policy reflects the NPPF (2019) ¶97 regarding proposals affecting open space.
The sports courts at Total Fitness within Site LPS 33 North Cheshire Growth Village' should not be shown as protected open space as they are private sports courts.	No	Green/open space designations do include private sports facilities such as tennis courts, bowling greens, sport pitches etc.
Other requests for amendments to open space designations: Land at Waterworks House, Dingle Lane, Sandbach – extant permission for 12 houses (16/3924C); Goddard Street, Crewe (19/4896N); Pownall Park, Wilmslow – permission for 4 dwellings (19/1067M).	No	The general approach is to change policy designations on the interactive map once developments have taken place.
Policy should state that where an area of open space has been shown to offer limited or no public benefit, development should be supported subject to compliance with the other policies of the plan.	No	The policy reflects the wording in the NPPF (2019) ¶97 as stated in the supporting information to the policy.

Policy should request more green space; concerns around development of privately owned open space; need for stronger protection and open space definitions; consideration of Local Green Spaces and open space in Neighbourhood Plans.	No	As well as SADPD Policy REC 1, LPS Policy SE 6 'Green Infrastructure' and SADPD policy ENV 3 'Green Space Implementation' deal with these issues. The Glossary provides definitions of open space and Green Infrastructure as does the Green Space Strategy Update 2020 [ED 18].
Amend wording so only applies to public open space.	No	Open space can include areas that are privately owned for example sports clubs

Policy REC 2 'Indoor sport and recreation implementation'

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy needs to be amended to clearly distinguish between the types of housing development to which the policy requirements would apply.	No	The policy needs to apply to all types of housing development as indoor sport and recreation facilities are attended by an increasing range of users to improve their health outcomes, irrespective of the type of accommodation they live in.
Policy should be modified so that a contribution is only required if there is an identified deficiency or where development would lead to a deficiency.	No	Contributions are sought in line with the requirements set out in the adopted Indoor Built Facilities Strategy [ED 20]. This Strategy has been based on the numbers generated per dwelling. All developments generate additional demand.
Contributions should not be required simply for upkeep/maintenance.	No	Contributions will only be sought in line with the requirements set out in both the Indoor Built Facility Strategy Assessment and Strategy [ED 20]. They will be based on the requirement for a contribution to a facility nearest to the development. Requests are made for improved facilities based on the increased demand from a development and not to maintain an existing facility.
Further clarification is required on the policy's relationship with CIL payments.	No	Contributions for sport and recreation are based on the adopted Indoor Built Facilities Strategy [ED 20] and the majority of requests are made as part of a Section 106 Agreement as appropriate.

Applicants should be directed to read the sports assessments in the Local Plan and, where applicable, Neighbourhood Plans, to demonstrate that they are providing the necessary facilities to make their development sustainable.	No	Noted. The relevant documents are referenced in the Policy under Related Documents. Made Neighbourhood Plans are part of the Development Plan.
Suggested amended wording for ¶11.7: Where development proposals are of a particularly large scale, or where they would involve the loss of existing indoor sports and recreation facilities, applicants are required to demonstrate how they are providing the required new and or replacement sports and recreation facilities.	No	The current wording reflects Sport England Guidance and links with LPS Policies SC 1 'Leisure and Recreation' and SC 2 'Indoor and Outdoor Sport Provision'.
Neighbourhood plans should be referenced for any sports facility assessment evidence.	No	Made Neighbourhood Plans are part of the Development Plan. The adopted Indoor Built Facilities Strategy [ED 20] assessment of need was prepared independently for the council by Knight, Kavanagh & Page, in line with Sport England guidelines. This remains the central evidence document used by the policy as required by Sport England.
Include reference to the consideration of the pooling of contributions.	No	This was added to the policy after the First Draft SADPD consultation– in ¶11.8.
Policy needs to clarify what happens when the nearest facility is in private ownership and where a s106 contribution could not be provided.	No	Section 106 contributions can be allocated to a private facility. The policy is sound as written but the council is preparing a Section 106 Contributions SPD, which could include further guidance on the matter.

Policy REC 3 'Green space implementation'

Summary of the main issues raised	Revised SADPD amended?	Council response
Policy should be amended to refer to open space rather than green space.	No	The reference to green/open space links with the term green infrastructure.

The policy needs to be amended to clearly distinguish between the types of housing development to which the policy requirements would apply.	No	The policy needs to apply to all types of housing development as green/open space facilities are used by a range of users to improve their health outcomes, irrespective of the type of accommodation they live in.
Clarification on what has informed the 20-year term on strategic open space to be transferred to the council. Typically, the maintenance of open space will be undertaken by the developer during the construction phase, with management responsibilities subsequently transferred to a Management Company to maintain the open space for the lifetime of a development. Important that the policy is written in this context.	No	This requirement regarding the transfer of some strategic areas of green space to the council is referred to in ¶11.12 of the supporting information and is expanded upon in the 'Green Space Strategy Update 2020' [ED 18] (Section 12 Maintenance of Green Space). There are various options available for the maintenance of green space (including transfer to a Management Company) but in terms of achieving strategic additions to the network and safeguarding key sections for the community and its users there will be instances where the transfer of a piece of green space to the council together with a minimum 20 year commuted sum may be the optimum way/solution.
Object to the requirement that major employment and other non-residential developments provide green space – it is overly restrictive.	No	This aspect of the policy reflects the fact that there is the need for green space associated with major commercial and other non-residential developments as stated in ¶10.19 of the 'Green Space Strategy Update 2020' [ED 18].
Consider policy to be too inflexible regarding off-site provision.	No	The policy as worded does allow for on-site and off-site provision. This flexible approach is explored in more detail in Section 11 (Implementation/Funding) of the 'Green Space Strategy Update 2020' [ED 18].
Wording has failed to adequately draw attention to Neighbourhood plan policies and evidence in relation to sports.	No	Made Neighbourhood Plans are part of the Development Plan. Sport England requires that the policy be built around the adopted evidence in the Playing Pitch Strategy [ED 19 & 19a].
Concerns expressed around shortages of open space and need for additional policies.	No	This aspect is already covered in LPS Policy SE 6 'Green Infrastructure'.

Policy REC 4 ‘Day nurseries’

Summary of the main issues raised	Revised SADPD amended?	Council response
Delete ‘should’ and substitute with ‘will be required to meet’ in the opening sentence	No	The word ‘should’ is considered sufficiently robust in relation to the future application of this policy.
Reference to outdoor space – proposals will be subject to the environment noise and air pollution policies.	No	The Local Plan, including the SADPD, is intended to be read as a whole. Development proposals will be considered against the relevant local plan policies as they apply. Each planning application is determined in accordance with the development plan unless material considerations indicate otherwise.

Policy REC 5 ‘Community facilities’

Summary of the main issues raised	Revised SADPD amended?	Council response
The policy should include reference to the support for continued growth and development of educational facilities within the Green Belt.	No	LPS Policy PG 3 ‘Green Belt’ is relevant to proposals for development in the Green Belt.
All community facilities should be retained, whether they make a positive contribution or not.	No	Community facilities overwhelmingly make a positive contribution to the social or cultural life of a community, but in the rare instance where this is not the case, it would not be desirable to require proposals to retain facilities that have a negative effect on the social or cultural life of a community.
The policy is not in accordance with NPPF (2019) (¶92), which requires policies to “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day to day needs”. An assessment is needed to determine whether the facility is valued; whether its loss would reduce the	No	The policy seeks to retain community facilities that make a positive contribution to the social or cultural life of a community. Where a facility makes such a contribution, it is reasonable to consider it as ‘valued’. The NPPF (2019) (¶92) seeks to retain facilities, particularly (but not only) where their loss would reduce the community’s ability to meet its day-to-day needs. The NPPF

community's ability to meet its day-to-day needs; and whether its loss is necessary. The policy is a blanket restriction; instead it should identify specific sites of value and provide for sites to be redeveloped based on an assessment of the value or viability of a community use.		(2019) (¶92) also requires planning policies to "ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community". Under the policy, facilities do not need to be retained where suitable alternative provision is made. Any list of valued community facilities would almost certainly be incomplete and would inevitably become out of date quickly.
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Chapter 12: Site allocations (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Where sites require a buffer to a watercourse, this should be a minimum 8m zone measured from bank top. The buffer zone should preferably be free of development and function as a beneficial green infrastructure asset. Where built development within an 8m buffer zone is proposed, consideration will need to be given to whether this is appropriate and/or acceptable on a case-by-case basis.	Yes	These requirements have been incorporated into the site policies where appropriate.
Where ground investigations are stated as a requirement, the policy should reference that the appropriate level of ground investigation must be undertaken and, where required, that a remediation strategy is devised and implemented.	Yes	These requirements have been incorporated into the site policies where appropriate.
Site policies should include a requirement for development to be in accordance with the Heritage Impact Assessment	Yes	This requirement has been incorporated into the site policies where appropriate. However, in many cases, the form and layout of development is not specified by the policy and a Heritage Impact Assessment of the final proposals would be required as part of any future planning application.
Maximising housing supply requires a wide range of sites by size and market location; a range of sites is needed to provide enough sales outlets to maintain delivery. Further	No	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution

allocations are needed so that the 36,000 dwelling housing requirement will be met; to demonstrate and maintain a deliverable five-year supply of housing land; to be consistent with the LPS; to meet the need for affordable housing; to comply with the NPPF (2019) requirements for 10% of allocations to be on small sites; and to provide flexibility if HS2 comes to Crewe. The plan should over-allocate sites to provide flexibility and contingency where sites do not come forward as envisaged.		report [ED 05]. Housing land supply issues, flexibility, and the requirement for small sites are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix. Planning for HS2 is considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
Additional smaller sites should be allocated in the PTs and KSCs to enable different scales and types of housebuilders to deliver housing. The supply is overly reliant on large sites, which poses delivery risks in the short term. Smaller sites were not considered through the LPS and therefore further allocations of smaller sites should be made.	No	The need for site allocations at each tier of the settlement hierarchy is considered in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05].
Development on brownfield sites should reduce surface water flow to the combined sewer network by discharging surface water to more sustainable options. Each site allocation policy should require that proposals include surface level sustainable drainage for the management of surface water, which has multifunctional benefits. The expectation will be that only foul flows communicate with the public sewerage system.	No	Policy ENV 16 'Surface water management and flood risk' requires new development to manage and discharge surface water through SuDS. Where this cannot be achieved, the policy requires consideration of attenuated discharge to a watercourse before attenuated discharges to the public sewer would be allowed.
Additional site allocations should be made to support the delivery of self-build and custom-build housing.	No	This issue is considered in the Policy HOU 3 'Self and custom build dwellings' section of this consultation statement appendix.
Site allocations for C2 older persons accommodation are required.	No	This issue is considered in the Policy HOU 2 'Specialist housing provision' section of this consultation statement appendix.
The LPS committed the SADPD to making site allocations in the OSRA but no allocations are proposed. Allocations in the OSRA are needed to deliver affordable housing.	No	This issue is considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
The council must be more ambitious about brownfield land regeneration to prevent unnecessary greenfield development.	No	As set out in the Site Selection Methodology [ED 07], brownfield sites are considered ahead of greenfield sites.

New site allocations are not of a significant scale at an individual level and their location throughout the borough is unlikely to generate noticeable increase in traffic impacts on the Strategic Road Network. However, there is a need for growth proposals set out within the LPS and SADPD to be understood at a cumulative level to establish associated highway impacts on the Strategic Road Network.	No	In accordance with the Site Selection Methodology [ED 07], Highways England has been consulted on each of the sites proposed for allocation in the SADPD through the infrastructure providers/statutory consultees consultation at stage 6. This is set out in each of the relevant settlement reports.
The issue of minerals sterilisation in Minerals Safeguarding Areas has not been given due consideration and should have been considered properly before proposing sites for allocation.	No	The presence of minerals is one of the planning considerations in the traffic light criteria used to assess sites as part of the Site Selection Methodology [ED 07]. In addition, the Sustainability Appraisal [ED 03] considers each site through the water and soil theme. The Minerals Safeguarding Areas and detailed minerals and waste policies were originally part of the part two plan as outlined in LPS Policy SE 10 'Sustainable provision of minerals'. These issues now form part of the part three plan; the MWDPD. Evidence to inform policy development will primarily be informed by British Geological Survey Mineral Resource Mapping and the Cheshire Replacement Minerals Local Plan 1999 as utilised in the Revised Publication Draft SADPD and is considered likely to lead to a similar site assessment and outcome when considered with other policy objectives.
A number of issues were raised in relation to sites already allocated in the LPS.	No	It is beyond the scope of the SADPD to revisit strategic issues examined through the LPS.

Crewe (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>The following sites have been put forward for consideration:</p> <ul style="list-style-type: none"> Land at Newcastle Road, Willaston (CFS200) 	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Crewe Settlement Report [ED 28] have considered all the sites put

<ul style="list-style-type: none"> • Land E of Nantwich Bypass, Cheerbrook Road, Willaston (CFS210) • Land at Sydney Road (CFS 314) • Land south of Bradeley Hall Farm (FDR2722) • Land to the rear of Hunters Lodge Hotel, Sydney Road (CFS360) • Land west of Middlewich Road (West Crewe Sustainable Urban Extension) (CFS 593) • Land to the south of Park Road, Willaston (CFS 599) • Land off Sydney Road (PBD 992) • Land at Goddard Street (PBD 613) • Land at Gresty Road (CFS594) • Land at Gresty Lane (CFS111) • Land at Flowers Lane/Moss Lane, Bradfield Green (CFS 591) • Land at Crewe Road, Shavington (CFS67) • Land at Gresty Lane, Crewe (RPD866 new site) • Land off Warmingham Road, Crewe (RPD297 new site) 		forward in Crewe and the need for further allocations, concluding that no further site allocations in the SADPD for Crewe are required. Whilst two employment sites are proposed for allocation in Crewe, these will specifically support the expansion of two large local employers in the town.
Housing supply in Crewe is reliant on commitments (windfalls) and strategic allocations. These may not come forward as expected. Further sites should be allocated to provide additional flexibility and to ensure that the LPS housing requirement is met in full.	No	The issue of flexibility is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The housing trajectory set out Appendix E of the LPS should be updated.	No	Issues about the trajectory are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Additional housing land should be allocated in Crewe to reflect its position in the settlement hierarchy and to support growth initiatives for the town (e.g. 'All Change for Crewe', 'High Growth City', HS2, CHAAP, Crewe Local Housing Study 2019).	No	Issues about the housing requirement and growth initiatives are considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.

Housing requirements are a minimum.	No	Issues about the housing requirement are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Additional housing land should be allocated in Crewe to support the delivery of the employment sites CRE 1 and CRE 2.	No	Issues about the housing requirement and growth initiatives are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The SADPD should include an assessment of the need for roadside services.	No	The issue of roadside services is considered in the Chapter 10: Transport (general issues) section of this consultation statement appendix.
The proposed settlement boundary does not utilise existing physical features to form logical rounding.	No	The Crewe Settlement Report [ED 28] details the implementation of the settlement boundary review methodology for Crewe.
Sites promoted for housing should be removed from the SGG/ included in the settlement boundary/ the SGG should be reviewed.	No	The issue of the SGG boundary is considered in the PG 13: SGG Boundaries section of this consultation statement appendix.
The council cannot demonstrate a deliverable five-year housing land supply and the allocation of more sites are needed.	No	Issues about five-year housing land supply are considered in the Chapter 8: Housing (general issues) section of this consultation statement.
Small and medium sized sites should be allocated in the SADPD.	No	Issues about the allocation of small and medium sized sites are considered in the Chapter 8: Housing (general issues) section of this consultation statement.
The council does not have a robust employment land supply	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Crewe Settlement Report [ED 28] provide details of employment land supply in Crewe.

Site CRE 1 'Land at Bentley Motors'

Summary of the main issues raised	Revised SADPD amended?	Council response
Historic England states that the policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site. This will ensure that the plan meets the requirements of the NPPF (2019) and the 1990 Act.	No	This issue is considered in the Chapter 12: Site allocations (general issues) section of this consultation statement appendix. In addition, the Crewe Settlement Report [ED28] identifies that the majority of this site has planning permission (17/4011N) and that heritage impacts were considered as part of that application.

Site CRE 2 'Land off Gresty Road'

Summary of the main issues raised	Revised SADPD amended?	Council response
The Environment Agency notes that the Gresty Brook corridor is an important ecological network known to support protected species. Any new development should be supported by an ecological assessment and ensures key ecological receptor and current Water Framework Directive failing waterbody (Wistaston Brook) is positively integrated into any future riparian development.	No	Policy provision for ecological assessments can be found in LPS Policy SE 3 Biodiversity and SADPD Policies ENV 1, 2 and 4. The supporting text to CRE 2 also refers to the need to consider the environs of the Brook for ecological reasons.
Historic England states that the policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	No	This issue is considered in the Chapter 12: Site allocations (general issues) section of this consultation statement appendix.
The site promoter has made representations requesting that the policy is amended to provide sufficient flexibility to enable the site to be developed:	No	There is sufficient flexibility in the policy as worded for these issues to be considered at the detailed planning application stage when up-to-date

<ul style="list-style-type: none"> • Criterion 3 should be reworded to allow for the installation of foul drainage through the wooded area as this is the only possible route. Without sufficient flexibility, the site may not be developable; • Evidence should be provided by the council to demonstrate why the woodland makes a significant contribution to the area. This has not been provided; • Technical studies were undertaken and submitted in 2017. These reports concluded that there were no ecological or arboricultural constraints preventing the site being developed; • Previous planning applications for residential development proposed the removal of woodland at the site. The loss of the orchard and woodland was considered acceptable at that time when weighed against the benefits of providing housing. The benefits of any loss would also be outweighed by the economic benefits; • An Arboricultural Impact Assessment will be submitted at the planning application stage to identify the quality of the trees. This will enable a drainage strategy to be implemented in areas with lower quality trees where possible; • Additional planting will be provided as a buffer to residential properties and there will be a net gain in trees at the site. • Criterion 6 should be reworded to allow for SuDS in the 8m buffer; • Criterion 8 should be reworded because there are very limited opportunities for improvements to be made to walking and cycling routes. 		<p>technical reports and any compensatory mitigation (if needed) can be fully considered.</p>
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Macclesfield (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
The following sites are being promoted and have been submitted for consideration:	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The Provision of

<ul style="list-style-type: none"> land at the Tytherington Club (CFS 605); Land at Lark Hall (CFS 50); Land at Macclesfield Rugby Club, Priory Lane (CFS 276); and Land at Blakelow Road (PBD 295). 		Housing and Employment Land and the Approach to Spatial Distribution' [ED 05] report. As set out in the 'Macclesfield Settlement Report' [ED 35], the indicative housing figure for Macclesfield has already been met. Further information about the process is contained in the 'Site Selection Methodology Report' [ED 07].
Churchill Way car park in Macclesfield town centre should be allocated for mixed use development (if not the site will remain as previously developed land within Macclesfield town centre but outside the Primary Shopping Area and without any formal allocation).	No	The approach to the town centre is discussed in the 'Macclesfield Settlement Report' [ED 35]. Policy RET 11 in the Revised Publication Draft SADPD covers Macclesfield town centre and environs.
Land north of Black Lane, Macclesfield that is no longer part of the employment area should be designated as a local centre along with the adjacent Tesco site – due to the forthcoming retail plans for the Black Lane site (LPS ref 19/3439M).	No	The remaining land that acts as a small retail park is not a local centre or neighbourhood parade as such. The Black Lane site lies outside the town centre and once developed would be regarded as an out-of-centre retail park. The approach to designating neighbourhood parades of shops is set out in the 'Macclesfield Settlement Report' [ED 35].
Removal of new Kings School Site at Fallibroome Farm and Derby Fields Facilities from the Green Belt or inclusion of a specific site policy.	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The Provision of Housing and Employment Land and the Approach to Spatial Distribution' report [ED 05].
The area of Protected Open Space between LPS 17 and the Macclesfield Canal should be covered by the Green Belt notation, and the Green Belt boundary be realigned to the boundary built up section of LPS 17, the Gaw End Lane Strategic Housing Site. (Logged under PG 11)	No	The 'Settlement and infill boundaries review' note [ED 06] sets out the methodology to reviewing settlement boundaries in each of the PTs, KSCs and LSCs. The approach to the settlement boundary for Macclesfield is set out in the 'Macclesfield Settlement report' [ED 35]. The Green Belt boundary in this area follows the defensible and recognisable boundary of the Macclesfield Canal.
The following sites are within Safeguarded Land site LPS 19 and the request is that they be brought forward for development: <ul style="list-style-type: none"> Land East of Pexhill Road (CFS 106); 	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The Provision of Housing and Employment Land and the Approach to Spatial Distribution' report [ED 05]. As set out in the 'Macclesfield

<ul style="list-style-type: none"> Land at Gawsworth Road (CFS 385); Land north and west of Penningtons Lane (new site); and Part of the Henbury Estates land (off Chelford Road) (new site). 		Settlement Report' [ED 35], the indicative housing figure for Macclesfield has already been met. Further information about the process is contained in the 'Site Selection Methodology Report' [ED 07].
Concerns raised around Mineral Safeguarding (Sites EMP 2.4, 2.8 and 2.9 Macclesfield).		This issue is addressed in the Chapter 12: Site Allocations (General issues) section of this consultation statement appendix.

Alsager (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> Heath End Farm (CFS 380) Linley Lane (CFS 218) Land off Linley Lane (CFS 295) Land at Close Lane (PBD1144) Land to the east of The Plough (CFS 408) Land at Manor Farm, off Dunnocksfold Rd (FDR1338) Land off Fanny's Croft (CFS 406) Land to the north of Fanny's Croft (FDR2800) Land at Radway Green (PBD1109) Land forming part of Excalibur Industrial Estate (RPD893) (new site) Land at Manor Farm (RPD803) (new site) 	No	All Alsager sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
The housing supply, alongside proposed allocations, does not meet Objectively Assessed Needs. The supply is too reliant on large scale housing sites, which poses deliverability risks particularly in the short term;	No	Issues around housing land supply (including flexibility) are considered under Chapter 8: Housing (general issues) section of this consultation statement appendix.

there is insufficient flexibility. There is a heavy reliance on existing planning permissions for housing.		
The balance of 0 dwellings gives little leeway to make sure that housing needs are met in the short term; some of the commitments or allocations may not come forward as expected. Alsager's LPS allocations are all large brownfield sites and it is unclear when they will be delivered.	No	The issue of flexibility in the housing land supply is considered under Chapter 8: Housing (general issues) section of this consultation statement appendix.
The plan does not accord with NPPF (2019) ¶68, which stipulates that small and medium sized sites make an important contribution to meeting the housing requirements of an area.	No	This issue is considered under Chapter 8: Housing (general issues) section of this consultation statement appendix.
The Alsager Settlement Report does not explain why it has not brought forward the only site being proposed for employment allocation; counter to ¶5 of the SSM Report [ED 07].	No	The site has been considered for its suitability for allocation in the 'Alsager Settlement Report' [ED 22] in line with the methodology set out in the 'Site Selection Methodology Report' [ED 07].
Alsager's employment land requirements set out in LPS Policy PG 7 have not been met, which is unreasonable and unsustainable.	No	As highlighted in the 'Alsager Settlement Report' [ED 22] the residual of 2.26ha should be considered in the context of the overall requirement for Alsager of 40ha; this is 6%. LPS Policy PG 7 'Spatial Distribution of Development' expects Alsager to accommodate 'in the order of 40 ha'; it is reasonable to conclude that the provision of 37.74ha of employment land would fall under this expectation, being 94% of the total. Consideration has also been given to the fact that the overall employment requirement includes 20% flexibility, which is built into the employment land requirement for Alsager.
The evidence base does not reflect the most up-to-date position of available site options.	No	The evidence base included information on sites submitted through the Call for Sites exercise (2017), the First Draft SADPD consultation (2018) and the initial Publication Draft SADPD consultation (2019) and was up to date when the Revised Publication Draft SADPD was published. New sites that were submitted during the Revised Publication Draft SADPD representations period could not have been included in the evidence base.

The significant growth from HS2 should be planned for in the SADPD.	No	The issue of HS2 is considered under Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.
Alsager's residual amount of employment land can't be accommodated in the town itself and there are no other sites that can deliver the growth 'at source'. This is unsustainable as needs are not addressed locally due to exporting the remainder back to Cheshire East as a whole, to be absorbed elsewhere. A sustainable location, lack of other employment proposals, minimal impact on Green Belt function, opportunity to provide flexibility and resilience locally demonstrates exceptional circumstances for Green Belt release for housing/employment use.	No	The NPPF (2019) (¶136) requires that Green Belt boundaries are only altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries and where strategic policies have established such a need, detailed amendments to boundaries can be made through non-strategic policies. The exceptional circumstances to justify the need for changes to the Green Belt boundaries were identified through the strategic policies of the LPS and allow for alterations where required to meet identified development requirements in the north of the borough plus a site-specific reason for alterations at the Radway Green employment area. The LPS did not identify any additional exceptional circumstances that would justify the non-strategic policies of the SADPD making further Green Belt boundary alterations in Alsager.
The site selection process is not sound as it unjustifiably omits a site in Alsager that should have been assessed in more detail.	No	All Alsager sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and the initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].

Congleton (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Sites promoted at: <ul style="list-style-type: none"> Eaton Bank Farm (RPD 1457); Waggs Road (CFS 430); 	No	The Congleton Settlement Report [ED 27] identifies that housing commitments, completions and allocations at the 31 March 2020 exceed the LPS indicative expected level of housing development for Congleton,

<ul style="list-style-type: none"> • Macclesfield Road, Congleton (PBD 2247); • Sandbach Road, Congleton (FDR 1588); • Land North of Banky Fields, Congleton (RPD 910); • Land west of Chelford Road, Somerford (CFS 607); • Belbro Farm (CFS 374); • Forge Lane, Congleton (RPD 760). 		including an additional level of flexibility. As such, there is no requirement to identify additional sites for housing over the remaining plan period in Congleton. The Provision of Housing and Employment Land and the Approach to Spatial Distribution [ED 05] document has considered the approach to housing land flexibility in the SADPD.
Concerns over the delivery of Congleton Link Road.	No	The Congleton Link Road is currently under construction and is anticipated to be open for traffic in the spring of 2021.
Sites promoted at Land at Viking Road/Barn Road (CFS 447/448/449) including Land at Viking Road/Barn Road (CFS 447/448/449) including Household Waste Recycling Centre, Barn Road, Congleton – live application at household waste recycling centre submitted to provide a drive thru coffee shop. This should be reflected in the SADPD.	No	The need for further site allocations and the assessment of sites (where necessary) has been considered through the Congleton Settlement Report [ED 27]. The report concludes that no further site allocations for housing land are required in the SADPD but the need to allocate additional land for employment development is considered further through the report. The site submission(s) at land at Viking Way/Barn Road were considered in the Congleton Settlement Report [ED 27] for employment uses. An allocation for employment use is included in the SADPD – Site CNG 1 'Land off Alexandria Way'. The submission of a planning application at the Household Waste Recycling Centre is noted. That is a separate process to the SADPD. Each application is considered on their own merits against the requirements of the development plan, unless there are material considerations that indicate otherwise.
Concerned about the lack of future provision for any other employment land for Congleton over the Plan period.	No	The LPS established the overall amount of employment land to be provided for in the borough and indicated that in the order of 24 hectares is to be provided at Congleton over the Plan period. An allocation for employment uses is included in the SADPD – Site CNG 1 'Land off Alexandria Way'. Evidence on the employment land position in Congleton is included in the Congleton Settlement Report [ED 27].

Site CNG 1 'Land off Alexandria Way'

Summary of the main issues raised	Revised SADPD amended?	Council response
This policy addresses the land allocated for employment off Alexandria Way and reduces the land allocated for employment development from 1.4 to 0.95 ha. Concerned about the lack of employment land.	Yes	As noted in the Congleton Settlement Report in ¶¶ 4.59-4.60 [ED 27]. A larger allocation (1.4 hectares) was considered in the initial Publication Draft SADPD. However, planning permission has since been granted (planning ref 18/3261C) for a 3 storey B1 office building on part of the site (0.45ha); the building has now been constructed and is occupied. Given the background to the site as set out above, it is considered prudent to consider the remaining area of the site (0.95ha) for employment use as part of the SADPD site selection work.
Site promoter request for reference to a mineral resource assessment to be deleted	No	The reasoning for the request for a mineral resource assessment is included in ¶4.68 of the Congleton Settlement Report [ED 27] as the site is in a known mineral resource area for salt, sand & gravel, and silica sand.
The Revised Publication Draft SADPD is unsound as minerals have not been given due consideration.	No	Issues around minerals are considered under the Chapter 12: Site allocations (general issues) section of this consultation statement appendix.

Handforth (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Three sites were submitted: <ul style="list-style-type: none"> Knowle House (CFS349); Dean Dale Farm (CFS395); and Land at Clay Lane (CFS566). 	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered all the sites put forward in Handforth and the need for further allocations, concluding that no further site allocations in the SADPD for Handforth are required.

There is a remaining requirement for additional dwellings in Handforth, which is calculated based on the needs of that settlement and should be met despite over-delivery in other areas. The North Cheshire Growth Village will not deliver quickly, and housing delivery may be less than 1,500 units as the proposed densities are high. Handforth should not be reliant on neighbouring settlements to deliver its housing needs. Whilst commitments and completions in the northern part of the borough exceed the LPS indicative figures, the actual number of completions in the first half of the plan period is very low.	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] and the Handforth Settlement Report [ED 31] have considered the need for further allocations, concluding that no further site allocations in the SADPD for Handforth are required. Issues around housing land supply are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
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Knutsford (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Site Selection Methodology Report concerns remain from the previous consultations. The council should re-consider the allocation of sites in and around Knutsford to ensure that development requirements are met. We strongly disagree with the decision point taken at stage 3 to not proceed sites in Knutsford to stage 4 (detailed site assessment). This needs to be re-looked at as a matter of urgency, as sites in Knutsford need to be assessed at stage 4 within the site selection report to ensure development requirements are met.	No	The approach to Knutsford has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Knutsford Settlement Report [ED 34].
There is a need to make retail site allocations in Knutsford	No	As set out in the Knutsford Settlement Report [ED 34] ¶. 5.15. The lack of proposed retail allocations in the SADPD is based on the WYG Retail Study Partial Update (2020) [ED 17].
The residual need for employment land has not been met	No	The consideration of further employment sites in Knutsford is set out in the Knutsford Settlement Report ED 34. ¶4.8. LPS Policy PG 7 refers to Knutsford being expected to

		accommodate 'in the order of' 15 hectares of employment land. Given the 20% flexibility allowance in the LPS, the provision of 14.86 hectares is deemed sufficient.
<p>Sites submitted for consideration</p> <ul style="list-style-type: none"> • FDR 2343 Land West of Toft Road • FDR 2693 Moorside Car Park • FDR 1756 Land to the south of Lilybrook Drive • FDR 2004 Land at Booth Hall 	No	All sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered in the 'Knutsford Settlement Report' [ED 34] using the methodology set out in the Site Selection Methodology Report' [ED 07].

Middlewich (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Several sites submitted for consideration:</p> <ul style="list-style-type: none"> • Cledford Lagoon (CFS 164) • British Salt site, Booth Lane/Faulkner Drive (CFS 165, CFS 166) • Land at Tetton Lane (CFS 387) • Land to the east and west of Croxton Lane (CFS 600) • Centurion Way (CFS 635, CFS 635A) • Land adjacent to Watersmeet, Nantwich Road, (housing) (FDR 860) 	No	All sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered in the 'Middlewich Settlement Report' [ED 36] using the methodology set out in the Site Selection Methodology Report' [ED 07].
<p>There is a shortfall of housing sites and this will impact on the five-year deliverable housing land supply in Middlewich.</p>	No	The approach to allocating sites for housing sites in Middlewich is set out in the 'Middlewich Settlement Report' [ED 36] and in 'The Provision of Housing and Employment Land and the Approach to Spatial Distribution' [ED05]. The housing supply of 1,922 dwellings in Middlewich is considered to be 'in the order of' the LPS indicative levels of development for the town (1,950 dwellings). There is no requirement to demonstrate a five-year housing land supply at the settlement level. Issues about five-year housing land supply are

		considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Housing supply in Middlewich is reliant on commitments (windfall) and strategic sites. These sites may not come forward as expected. Further allocations are needed to provide choice and increase flexibility to ensure that minimum requirements are met.	No	Issues about housing delivery/ trajectory and supply are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
Additional sites are proposed within the open countryside, above and beyond sites allocated in the LPS.	No	The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing. The council's approach to assessing the suitability of sites for allocation is set out in the Middlewich Settlement Report' [ED 36]. All sites are assessed consistently using the Site Selection Methodology [ED 07]. While some sites are located in the open countryside, there are no sites assessed as being suitable, available and achievable that perform better (other than those already proposed for allocation).
Concerns raised over the site assessment for 'Land adjacent to Watersmeet, Nantwich Road' (FDR860).	No	All sites submitted have been assessed for their suitability for allocation in accordance with the published Site Selection Methodology [ED 07]. The site selection assessment findings for this site can be found in the Middlewich Settlement Report' [ED 36].
Land at 'Watersmeet, Nantwich Road' could be delivered as self-build plots to assist Cheshire East Council in addressing their recognised issues with housing delivery in Middlewich in the short term.	No	All sites submitted have been assessed for their suitability for allocation in accordance with the published Site Selection Methodology [ED 07]. The site selection assessment findings for this site can be found in the Middlewich Settlement Report' [ED 36].
Further housing allocations are needed in Middlewich to support the growth anticipated from HS2.	No	Issues about the housing requirement and growth initiatives are considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.

Housing requirements for Middlewich are a minimum and more sites should be allocated to provide flexibility.	No	The issue of flexibility is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
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Deleted Site MID 1 ‘Land off St. Ann’s Road’

Summary of the main issues raised	Revised SADPD amended?	Council response
Site MID 1 ‘Land off St Ann’s Road’ is in a sustainable central location, but the development would result in the loss of some older properties. The mature trees on site are of character and environmental value and should be protected. Planning permission had been obtained for this site.	Yes	The allocation was deleted in the Revised Publication Draft SADPD because the site has planning permission and is under construction.
Historic England state that the policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	No	

Site MID 2 ‘East and west of Croxton Lane’

Summary of the main issues raised	Revised SADPD amended?	Council response
Loss of Best and Most Versatile Agricultural Land.	No	The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing. The council’s approach to assessing the suitability of sites for allocation is set out in the Middlewich Settlement Report’ [ED 36]. The agricultural quality of the

		<p>site is grade 3 but it is not known whether this is classed as best and most versatile agricultural land (grade 3a).</p> <p>While the site will result in the loss of greenfield land, there are no sites assessed as being suitable, available and achievable that perform better (other than those already proposed for allocation).</p>
The Canal and River Trust states that the policy should be reworded to include reference to SADPD Policy INF 10: 'Canals and mooring facilities'. The site is on the towpath side of the Canal and should be considered as part of the public realm of the development. Pedestrian access should be provided to the towpath.	No	This is not considered necessary, as any planning application submitted for the site would be considered against the policies in the development plan as a whole.
The Canal and River Trust states that the supporting text should be expanded to refer to opportunities for surface water drainage to the canal.	No	This is not considered necessary, as any planning application submitted for the site would be considered against the policies in the development plan as a whole. In addition to SADPD Policy INF 10: 'Canals and mooring facilities', there are a number of policies in the LPS and SADPD that address contamination and drainage issues, for example LPS Policies SE 12: 'Pollution, land contamination and land instability' & and SE 13: 'Flood risk and water management' together with SADPD Policies ENV 7: 'Climate change' & and ENV 16: 'Surface water management and flood risk'.
The Canal and River Trust states that the supporting text should be expanded to refer to the canal as a receptor for contamination.	No	This is not considered necessary as any planning application submitted for the site would be considered against the policies in the development plan as a whole. In addition to SADPD Policy INF 10: 'Canals and mooring facilities', there are a number of policies in the LPS and SADPD that address contamination and drainage issues, for example LPS Policies SE 12: 'Pollution, land contamination and land instability' & and SE 13: 'Flood risk and water management' together with SADPD Policies ENV 7: 'Climate change' & and ENV 16: 'Surface water management and flood risk'.
Historic England states that the policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact	No	This issue is considered in the Chapter 12: Site allocations (general issues) section of this consultation statement appendix.

Assessment document including the specific mitigation/enhancement measures for the site.		
The site promoter makes representations about the wording of the policy. Criterion 4 should be reworded as there is no direct access from either of the site parcels to the canal. There is no evidence of any issues with the surface of the current towpath or the section of towpath to which the policy refers. It is highlighted that Policy INF 10: 'Canals and mooring facilities' has been reworded to recognised that waterside developments should contribute towards improvements to towpaths where this is necessary or viable and such improvements could comprise a variety of measures. The same approach should be adopted in Policy MID 2 'East and west of Croxton Lane'.	No	The policy requirements to provide for improvements to the surface of the canal towpath to promote its use for walking and cycling are in accordance with the objectives of national and local planning policies. ¶¶102 and 108 of the NPPF (2019) states that opportunities to promote sustainable transport including walking and cycling should be identified and pursued. LPS Policy CO 1: 'Sustainable travel and transport' also seeks the improvement of pedestrian facilities as part of development proposals so that walking is attractive for shorter journeys. This includes supporting work to improve canal towpaths and rights of way where they can provide key linkages from developments to local facilities. The adopted CIL Charging Schedule and the Regulation 123 list (Column 2) does not cover 'towpath works that are necessary to mitigate the direct impact of new development in proximity to canals.
The site promoter comments that reference to towpath improvements is made in the council's Infrastructure Delivery Plan. Footpath improvements on the Trent and Mersey Canal are required from Middlewich to Sandbach. The requirements cannot reasonably relate to a site at the northern edge of the settlement. Appendix B of the council's adopted CIL Charging Schedule (2019) includes a list of projects that the council may fund through CIL receipts. Page 14 refers to canal towpath improvements. Improvements to the towpath are not required to mitigate the impact of the development, where S106 might legitimately be used.	No	The Infrastructure Delivery Plan (July 2016) was prepared to support the preparation of the LPS and identifies infrastructure requirements of strategic significance. This is defined as infrastructure that is over and above the normal provision that is part and parcel of developing a site. Site MID 2 lies in close proximity to the canal and towpath. The policy, in accordance with the objectives of national and local planning policies. ¶¶102 & 108 of the NPPF (2019), states that opportunities to promote sustainable transport including walking and cycling should be identified and pursued. The site is located in close proximity to the canal and towpath. LPS Policy CO 1: Sustainable travel and transport also seeks the improvement of pedestrian facilities as part of development proposals so that walking is attractive for shorter journeys. This includes supporting work to improve canal towpaths and rights of way where they can provide key linkages from developments to local facilities. The adopted CIL Charging Schedule and the Regulation 123 list (Column 2) excludes 'towpath works that are necessary to mitigate the direct impact of new development in proximity to canals.

Site MID 3 'Centurion Way'

Summary of the main issues raised	Revised SADPD amended?	Council response
The Minerals Products Association states that the council has given limited consideration to minerals sterilisation issues. The council relies on the submission of Minerals Resource Assessments during the planning application process. If that assessment indicates that the site is not suitable development due to the presence of minerals/sterilisation issues, it is not clear what the outcome would be.	No	This issue is considered in the Chapter 12: Site allocations (general issues) section of this consultation statement appendix.
The policy should be reworded to refer to the longer-term potential of a larger housing site on adjacent land within Cheshire West and Chester.	No	The Middlewich Settlement Report [ED 36] identifies the reasons why a larger site is not considered to be suitable for allocation.
Any requirement for landscaping should not preclude the development of a larger site.	No	The Middlewich Settlement Report [ED 36] identifies the reasons why a larger site is not considered to be suitable for allocation. Comprehensive landscaping will be required for this site to ensure that landscape impacts are minimised.
The development will encroach into the open countryside.	No	The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing. The council's approach to assessing the suitability of sites for allocation is set out in the Middlewich Settlement Report' [ED 36]. While the site will result in the loss of greenfield land, there are no sites assessed as being suitable, available and achievable that perform better (other than those already proposed for allocation). Policy MID

		3 requires a comprehensive landscaping scheme in order to mitigate any impact upon the wider landscape and once established will provide a boundary to the development site.
The development has an arbitrary boundary that would be vulnerable to further speculative development.	No	Policy MID 3 requires a comprehensive landscaping scheme in order to mitigate any impact upon the wider landscape and once established will provide a boundary to the development site.
Pedestrian access would be along a busy road.	No	No issues have been identified through the implementation of the SSM in the Middlewich Settlement Report [ED 36] in terms of highway safety or impact.
No need for the allocation.	No	The Middlewich Settlement Report [ED 36] identifies housing and employment requirements for Middlewich. Taking into account existing completions/take up and commitments, a remaining requirement for the provision of 153 dwellings and 0ha of employment land over the remaining Plan period was identified. Middlewich has therefore met its requirement for employment land but there is a need to assess sites put forward for housing. The council's approach to assessing the suitability of sites for allocation is set out in the Middlewich Settlement Report' [ED 36]. While the site will result in the loss of greenfield land, there are no sites assessed as being suitable, available and achievable that perform better (other than those already proposed for allocation).
Historic England states that the policy should be amended to require that development proposals are in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	No	This issue is considered in the Chapter 12: Site allocations (general issues) section of this consultation statement appendix. As set out in the Middlewich Settlement Report [ED 36], there will be no heritage impacts arising from the development of this site. A Heritage Impact Assessment was carried out in terms of the much larger site: CFS 635 but this larger site was discounted for several reasons as set out in the Settlement Report.

Nantwich (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>As the Local Plan Part Two does not allocate any small sites for development they cannot contribute to meeting and exceeding housing delivery within Nantwich. This policy is therefore not consistent with NPPF or positively prepared to boost housing. Broad Lane, Nantwich can greatly assist with the delivery of housing numbers within the first 5 years of the adopted Plan. The only allocated site within the settlement is a large strategic site which raises deliverability issues which could significantly impede housing delivery over the short to medium term. Therefore, the overall scale of housing growth particularly on smaller sites, should be increased so an adequate degree of flexibility can be applied to ensure the SADPD plans positively for growth.</p>	No	<p>The approach to Nantwich has been considered through the provision of housing and employment land and the approach to spatial distribution [ED 05] report, the site selection methodology report [ED 07] and the Nantwich Settlement Report [ED 38]. The issue of housing land supply (including flexibility) is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.</p>
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • CFS204 Land to the Rear of 144 Audlem Road • CFS207 Land east of Batherton Lane • FDR 2739 Land at Broad Lane • PBD 1146 Land to the south of Nantwich 	No	<p>All sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Nantwich Settlement Report' [ED 38] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].</p>

Poynton (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land at Lower Park (CFS 639) • Land east of Waterloo Road (CFS 418) 	No	<p>All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Poynton</p>

<ul style="list-style-type: none"> • Land at Towers Road (CFS 51) • Woodleigh, 77 Chester Road (CFS 560) • Lostock Hall Farmyard (CFS 563) • Lostock Hall Farm (CFS 562) • Lostock Hall Farm, Area B (CFS 565) • Lostock Hall Farm (CFS 568) • Glastonbury Triangle (CFS 329) • Moggie Lane Farm, Adlington (CFS 12) • Safeguarded Land LPS 52 'Woodford Aerodrome, Poynton', (RPD389) (new site) 		Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
The LPS sites in Poynton are not delivering the scale of housing they were allocated for.	No	The issue of flexibility in the housing land supply is considered under Chapter 8: Housing (general issues) section of this consultation statement appendix.
There is reference to, and reliance on the delivery of significant number of dwellings in Poynton on windfall sites; this approach has not been sufficiently justified.	No	Issues around housing land supply (including flexibility) are considered under Chapter 8: Housing (general issues) section of this consultation statement appendix.
The SADPD sites are unlikely to deliver the scale of housing suggested.	No	The precise number of dwellings would be considered through the planning application process. The site policies have been worded with the use of the word 'around' to allow for some flexibility.
The need for an additional 200 dwellings has not been proven.	No	It is not the role of the SADPD to revisit strategic policy. The overall development figures that Poynton is expected to accommodate is set out in Policy PG 7 'Spatial Distribution of Development' of the LPS. This has been considered at length through the LPS examination process and was found to be sound. Figure Poynton 1 of the 'Poynton Settlement Report' [ED 39] shows the amount of development land required over the plan period for Poynton, including the balance needed.
All development sites identified in Poynton need to be held back and re-assessed against the Section 19 Flood Investigation Report.	No	All the allocations proposed in Poynton and across the whole of the SADPD have been reviewed with the Lead Local Flood Authority. Flood risk issues for each site are documented in the Poynton Settlement Report [ED 39] in line with the Site Selection Methodology [ED 07].

Site PYT 1 'Poynton Sports Club'

Summary of the main issues raised	Revised SADPD amended?	Council response
Sport England considers that delivery of the site for housing and a replacement site in the Green Belt carries risk as there is no guarantee that the replacement site would be able to provide the type and scale of facilities needed.	No	Criterion 3 of the policy for PYT 1 requires the sports facilities at the relocation site to be enhanced facilities in line with the recommendations made in the Cheshire East Indoor Built Facilities Strategy [ED 20] and the Cheshire East Playing Pitch Strategy and Action Plan [ED 19]. The NPPF (2019) ¶145 states: 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:... b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.' This is taken account of in ¶12.59 of the supporting information to Site PYT 2. Prior to publication of the Revised Publication Draft SADPD, the council understood that an agreed position had been reached with Sport England and that it was satisfied with the approach taken in the plan. Further representations have been received to the Revised Publication Draft SADPD indicating otherwise. The council is continuing to carry out discussions with Sport England and is seeking to address those outstanding concerns ahead of the examination.
Recreational and amenity space would be lost and the need to relocate Poynton Sports Club has not been demonstrated. The relocation site at PYT 2 should be identified.	No	Poynton Sports Club is a private facility, and a suitable site for its relocation has been identified at Site PYT 2 'Land north of Glastonbury Drive' (Revised Publication Draft SADPD ¶12.53). The Delivery Statement submitted by the site promoter as part of their representation to the initial Publication Draft SADPD (PBD1322) demonstrates why the Club would like to relocate.
There is insufficient justification that replacement playing fields or recreational facilities will be delivered.	No	The policy requires (criterion 3.) 'that the relocated facility is fully brought into use in advance of the loss of any existing facilities to ensure continuity of provision'.

There is insufficient supporting evidence to demonstrate that the proposed allocation will be delivered. The number of dwellings on the site should be restricted to a minimum.	No	The Delivery Statement submitted by the site promoter as part of their representation to the initial Publication Draft SADPD (Comment ID: PBD1322) includes an indicative plan showing a proposed layout for the site, with 92 dwellings. However, the housing figures in the delivery statement range between 80 and 90. The precise number of dwellings would be considered through the planning application process.
The 10m buffer does not take into account site specifics and does not make best use of the land.	No	The requirement for the buffer is for nature conservation purposes. Priority Habitats such as the woodlands on the northern and eastern boundary of the sports club are a material consideration for planning. The intention of the buffer is to retain and encourage the development of woodland edge habitats and avoid and indirect impacts on the woodland from the proposed housing (issues with gardens backing onto woodland are a frequent issue). The buffer can be used as part of the open space design for the scheme, and it is considered that it would not prevent the best use being made of the allocation.
The site should be extended to include the woodland belt on the north and eastern boundary to enable management and maintenance.	No	The woodland is protected open space (SADPD Policy REC 1) and an ecological corridor (SADPD Policy ENV 1). It is not necessary to include it in the allocation as it is not proposed to be developed.
Add policy criterion relating to the submission of an Arboricultural Implications Report.	No	The requirement for an arboricultural impact assessment is considered through SADPD Policy ENV 6 'Trees, hedgerows and woodland implementation'.
Concern regarding pollution, traffic and its cumulative impact. Add a condition to ensure that development does not give rise to increased delays and added congestion at the centre of Poynton. A traffic impact assessment needs to be added.	No	Cheshire East Highways and Environment Protection have been involved throughout the site selection process. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 'Travel Plans and Transport Assessments', SE 12 'Pollution, Land Contamination and Land Instability' and SADPD Policy INF 3 'Highway safety and access'. These issues are considered and documented in the Poynton Settlement Report [ED 39] in line with the Site Selection Methodology [ED 07].
The site is a heritage asset and a restrictive covenant is in place.	No	As stated in the traffic light assessment for the site ('Poynton Settlement Report' [ED 39], p49) there are no known heritage assets on or adjacent

		to the site. The council does not understand there to be any covenants issues.
Any decision about this site should be curtailed until the results of the Flood Investigation Report have been published and any remedial action carried out.	No	Noted. The Lead Local Flood Authority has been involved throughout the site selection process and discussions continue to be held with them. The site was assessed as amber in relation to flooding and drainage as there are some issues, but mitigation is possible ('Poynton Settlement Report' [ED 39] p50).
Criterion 5 is unclear and requires clarification with regards to meaning and implication.	No	Criterion 5 was developed in consultation with the council's Environmental Protection team and it is considered to be clear as written.
Mention/provision in the policy for residents living nearby regarding noise and other effects of ongoing construction.	No	Impacts on residents would be considered through the planning application process.
The development proposal should require that existing woodland and hedges are to be retained.	No	This would be considered through the planning application process.
The development proposal should require replacement greenspace/open space to be made available for the benefit of Poynton residents to replace that lost to the development.	No	Poynton Sports Club is a private facility. Site PYT 1 'Poynton Sports Club' requires development proposals to demonstrate how the sports facilities will be replaced locally.
Reasonable alternatives to the policy have not been adequately considered.	No	All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Specifically, ¶4.75 of [ED 39] considers other sites put forward through the call for sites for sports and leisure uses. As stated in [ED 07] it is for the council to determine what is considered to be a reasonable alternative, whereby the shortlisted sites produced as a result of Stage 2 of the SSM, and carried through to Stage 4 of the SSM, were seen as reasonable alternatives that needed to be subjected to SA and HRA ([ED 07] ¶2.25).

Add text requiring measure to protect homes from flooding and prevent flooding elsewhere from displaced water.	No	LPS Policy SE 13 'Flood Risk and Water Management' requires planning applications for development at risk of flooding to be supported by an appropriate flood risk assessment.
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Site PYT 2 'Land north of Glastonbury Drive'

Summary of the main issues raised	Revised SADPD amended?	Council response
The 8m wide buffer should be measured from bank top and be increased to 15m to protect the wildlife corridor	Yes	Criterion 1 was amended in the Revised Publication Draft SADPD to acknowledge this point.
Sport England considers that a replacement site in the Green Belt carries risk as there is no guarantee that the replacement site would be able to provide the type and scale of facilities needed.	No	Criterion 3 of the policy for PYT 1 requires the sports facilities at the relocation site to be enhanced facilities in line with the recommendations made in the Cheshire East Indoor Built Facilities Strategy [ED 20] and the Cheshire East Playing Pitch Strategy and Action Plan [ED19]. The NPPF (2019) ¶145 states: 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:... b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.' This is taken account of in ¶12.59 of the supporting information to Site PYT 2. Prior to publication of the Revised Publication Draft SADPD, the council understood that an agreed position had been reached with Sport England and that it was satisfied with the approach taken in the plan. Further representations have been received to the Revised Publication Draft SADPD indicating otherwise. The council is continuing to carry out discussions with Sport England and is seeking to address those outstanding concerns ahead of the examination.

There is insufficient supporting evidence to demonstrate that the proposed allocation will be delivered.	No	The Delivery Statement submitted by the site promoter as part of their representation to the initial Publication Draft SADPD (Comment ID: PBD1325) seeks to demonstrate that the proposed allocation will be delivered.
Exceptional circumstances to release Green Belt land for sport and recreation have not been demonstrated.	No	As stated in ¶12.57 of the Revised Publication Draft SADPD, the land will remain in the Green Belt.
CEC have not demonstrated or evidenced that it has examined fully all other options for the provision of outdoor sport and recreation. It has not evidenced its methodology for selection.	No	All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Specifically, ¶4.75 of [ED 39] considers other sites put forward through the call for sites for sports and leisure uses.
Reference to a Grampian condition should be added to the policy wording covering the relocation and redevelopment of the sports facilities.	No	It is not necessary to include a Grampian condition in the policy as the mechanism of how to achieve policy is down to the decision maker. Planning application approval could include a Grampian condition.
Any new riparian development adjoining Poynton Brook needs to ensure main ecological network and ecological receptor of site is actively protected and where feasible enhanced. Impacts to the riparian zone and any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric in order to achieve biodiversity Net Gain.	No	The policy highlights the requirement for protected species, Poynton Brook, its wet ditches and woodland to be retained and protected through buffering. In addition, other policies such as LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'Ecological implementation' will help to mitigate any negative effects arising from the proposed development.
There has been flooding off Glastonbury Drive where the Poynton Sports Club is proposing to move to. The need for a flood assessment must be added to the proposal.	No	Noted. The Lead Local Flood Authority has been involved throughout the site selection process and discussions continue to be held with them. LPS Policy SE 13 'Flood Risk and Water Management' requires planning applications for development at risk of flooding to be supported by an appropriate flood risk assessment. The site was assessed as amber in relation to flooding and drainage as there are some issues, but mitigation is possible ('Poynton Settlement Report' [ED 39] p53).

Several policies and conditions would need to be met to allow sport and recreation on this site and this must be made clear.	No	The Development Plan is intended to be read as a whole.
It should be explained why the site will remain in the Green Belt.	No	As stated in the NPPF (2019) ¶133, 'the Government attaches great importance to Green Belts' and one of their essential characteristics is their permanence. ¶136 notes that Green Belt boundaries should only be altered in exceptional circumstances. ¶12.59 of the supporting information to Site PYT 2 considers the Green Belt designation.
It needs to be clarified whether PYT 2 will be made available for sport and recreation development anyway and independent of being linked to site PYT 1.	No	As stated in ¶12.58 'the two allocations are ... linked and a planning obligation will be required to govern the mutual development of each site...'
The building cannot be treated in isolation in the open countryside and cannot fulfil LPS Policy PG 3, criterion 3(ii).	No	The policy allocates the site for sports and leisure development and acknowledges that there may be a requirement for a building. Both the LPS and the SADPD (once adopted) form part of the Development Plan.
Any structure should be limited to a single storey with turf roofs and any entrance is as close to London Road North as possible.	No	The detailed design and layout of any proposed development would be considered through the planning application process.
The statement that the area is vulnerable to erosion of its open character is not justified and must be removed.	No	¶12.66 highlights that the 'area has already been affected by the building of the A6 – Manchester Airport Relief Road', hence it is vulnerable to further erosion of its open character.
Reasonable alternatives to the policy have not been adequately considered.	No	All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Specifically, ¶4.75 of [ED 39] considers other sites put forward through the call for sites for sports and leisure uses. As stated in [ED 07] it is for the council to determine what is considered to be a reasonable alternative, whereby the shortlisted sites produced as a result of Stage 2 of the SSM, and carried through to Stage 4 of the SSM, were seen as reasonable

		alternatives that needed to be subjected to SA and HRA ([ED 07] ¶2.25).
The policy is not justified, as alternative means of securing funding for improved changing facilities at Poynton Sports Club may be available to improve club house facilities and it is highly unlikely that 80 homes would be needed to bridge a funding gap to improve changing rooms.	No	The 2019 Playing Pitch Strategy and Action Plan [ED 19] highlights the current status of pitches and recommended actions for Poynton Sports Club. The relocation of Poynton Sports Club offers the opportunity to grow football (helping address shortfalls) and support the club through the football pyramid, grow cricket, reduce overplay and maintain a multi sports hub, grow lacrosse and help the club address the high levels of latent and future demand. The relocation would also enable the provision of improved changing facilities for Poynton Sports Club, which have been identified in the PPS as being of poor quality (p104), with a recommendation that they are improved. A further recommendation of the 2019 Playing Pitch Strategy and Action Plan is that the ambition of Poynton Sports Club to relocate should be supported (p104).
Doubts that the site is deliverable against NPPF ¶35 as the site has not been removed from the Green Belt, and it is unclear that the associated facilities will 'preserve the openness of the Green Belt' (NPPF 2019, ¶145).	No	The policy seeks to give support in principle to the facilitation of development of a non-Green Belt site for housing and the provision of enhanced sports facilities for Poynton. The council considers that there is sufficient merit in the overall position that very special circumstances could be achieved when it is satisfied that everything has been done to minimise harm on the openness of the Green Belt.
The SADPD is unsound as minerals have not been given due consideration.	No	PYT 2 is a large site with proposed allocation for sports and leisure uses detailed in the 'Poynton Settlement Report' [ED 39]. British Geological Survey Mineral Resource Mapping indicates the potential for sand & gravel resources along the extent of the Poynton Brook and associated ditches, forming the boundaries of the site. Most of the site is not indicating the presence of mineral reserves according to British Geological Survey Mineral Resource mapping. However, a cautious approach has been taken to consider minerals in this case owing to the wider resource in the area by requesting a Mineral Resource Assessment, which forms part of the policy requirement in draft Policy PYT 2. Issues around minerals are also considered under

		Chapter 12: Site allocations (general issues) section of this consultation statement appendix.
The increase in the size of the buffer to Poynton Brook, woodland and wet areas is not justified and will impact on the current scheme.	No	The wording as drafted is considered sound and is justified on ecological grounds and in order to comply with ecology policies.

Site PYT 3 'Land at Poynton High School'

Summary of the main issues raised	Revised SADPD amended?	Council response
Sport England considers that there would be a loss of a strip of functional playing field and an impact on several pitches, with no justification that the pitches are surplus to requirements. The delivery of a housing site that involves a strip of land from the playing field carries risk; whilst a 3G pitch is identified it may not deliver the needs for a range of sports, solely football.	Yes	The initial Publication Draft SADPD was amended to reflect the proposal for and proposed location of a new 3G pitch at Poynton High School. The council is continuing to discuss this matter with Sport England, with the objective of reaching an agreed position ahead of the examination and it is now considered that a preferable solution can be found
It has not been demonstrated 25 units can be achieved with on-site open space/affordable housing policy requirements on the land. 25 dwellings would only be achievable in a high-density development which may be seen to be out of character with the local area.	Yes	The precise number of dwellings would be considered through the planning application process. The policy has been worded using the word 'around' to allow for some flexibility. The design and layout of the proposed development would also be considered through the planning application process. The number of dwellings was amended in Revised Publication Draft SADPD to 20 dwellings to take account of the culvert. However, this was not in direct response to this issue.
There is insufficient justification that replacement playing fields or recreational facilities will be delivered.	No	The council is continuing to discuss this matter with Sport England, with the objective of reaching an agreed position ahead of the examination.

The water main easement and gravity sewer will affect the deliverability of the site, and it is unclear if development of this scale would be viable.	No	It is considered that the water main easement and gravity sewer could be incorporated into the site layout and these issues would be considered further as part of any planning application
It has not been demonstrated that the sale would fund the 3G pitch or that it is viable.	No	Provision of a 3G pitch at Poynton High School is dependent on several factors, which include planning permission, section 77 approval and availability of sufficient funding. Housing land is identified at Poynton High School (Site PYT 3), which will generate a capital receipt and facilitate the provision of a 3G pitch.
Further evidence is required to demonstrate that a suitable access can be achieved and that it will not negatively impact on existing users of the field. Vehicular access to and from the site and impact on Dickens Lane traffic flows has not been considered; a traffic impact assessment needs to be added. Concern with regards to the increased risk of road traffic collisions along Dickens Lane.	No	Cheshire East Highways has been involved throughout the site selection process. As stated in the traffic light assessment for the site ('Poynton Settlement Report' [ED 39], p61) there is frontage access onto Dickens Lane to serve the units and there is a limited highways impact. Policies in the LPS and SADPD seek to mitigate any potential impacts including LPS Policy CO 4 'Travel Plans and Transport Assessments' and SADPD Policy INF 3 'Highway safety and access'.
The site needs to be assessed for possible flooding as part of the wider Flood Risk Investigation.	No	Noted. The Lead Local Flood Authority has been involved throughout the site selection process and discussions continue to be held with them. The site was assessed as green in relation to flooding and drainage as there were no apparent issues ('Poynton Settlement Report' [ED 39] p61).
The allocation is not consistent with a strategy to address the shortfall of sports facilities.	No	The policy (criterion 1) requires replacement of the lost playing field, with ¶12.68 of the Revised Publication Draft SADPD setting out how the loss would be mitigated. ¶4.59 of the 'Poynton Settlement Report' [ED 39] sets out how the loss of part of the playing field would be addressed.
If the school expands, it might not be able to meet the future sports needs of its pupils.	No	Cheshire East Education has been involved during the site selection process for both the LPS and the SADPD.
Funding to education from new housing developments in the area is intended to provide school places arising from the	No	The sporting benefits being proposed at Poynton High School would be provided by way of the reinvestment of any capital receipt realised from a disposal. Any S106 contributions received

new pupils living in the houses, not to meet existing sports deficiencies.		for education purposes would be utilised for the purpose of providing additional school places.
Sport England considers that the policy and approach as suggested will not provide the appropriate mitigation for the site and therefore details will be required to clearly set out where this lost playing field could be replaced.	No	The council is continuing to discuss this matter with Sport England, with the objective of reaching an agreed position ahead of the examination.
Reasonable alternatives have been ignored i.e. small-scale Green Belt sites.	No	All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. As stated in [ED 07] it is for the council to determine what is considered to be a reasonable alternative, whereby the shortlisted sites produced as a result of Stage 2 of the SSM, and carried through to Stage 4 of the SSM, were seen as reasonable alternatives that needed to be subjected to SA and HRA ([ED 07] ¶2.25). There were sufficient suitable non-Green Belt sites to meet the indicative development requirement for Poynton (Stage 5 of the SSM).

Site PYT 4 'Former Vernon Infants School'

Summary of the main issues raised	Revised SADPD amended?	Council response
Sport England considers that developing the site could have a prejudicial impact on the playing field; replacing such a strip of playing field elsewhere may not be sufficient on its own. There is no certainty of any likely lack of direct or prejudicial impact on the playing field; developing this site is likely to carry a potential objection from Sport England.	No	The council is continuing to discuss this matter with Sport England, with the objective of reaching an agreed position ahead of the examination.

Concerns over the delivery of the site regarding replacement provision and no details are provided as to whether an alternative location has been found or if Sport England have agreed to the proposals. The loss of playing field from the site has not been justified; the impact of this loss has not been quantified.	No	
The impact of the culvert on the development of the site requires investigation, particularly as to whether the target of 50 units on the site would be achievable.	No	The precise number of dwellings would be considered through the planning application process. The policy has been worded using the word 'around' to allow for some flexibility. The design and layout of the proposed development would also be considered through the planning application process. Further investigation has found that the culvert appears to be outside of the development site and of the 8m buffer required by the Cheshire East Land Drainage Byelaws. As a result, criteria 5 and 6 of the policy and ¶12.76 have been deleted in the Revised Publication Draft SADPD.
Redevelopment of this site would result in a very high-density scheme, which is not in keeping with the surrounding area.	No	The design and layout of the proposed development would be considered through the planning application process. There is a typographical error regarding the hectarage, which should read 0.76ha.
The policy should reference the delivery of retirement homes, if this is the intention.	No	The policy is considered to be sound as written. ¶12.72 highlights that the site is particularly suitable for retirement homes, but this does not preclude other types of housing.
The site needs to be assessed for possible flooding as part of the wider Flood Risk Investigation that is taking place.	No	The Lead Local Flood Authority has been involved throughout the site selection process and discussions continue to be held with them. The site was assessed as amber in relation to flooding and drainage as there are some issues, but mitigation is possible ('Poynton Settlement Report' [ED 39] p63).

Sport England considers that the policy fails to provide mitigation for the loss of playing field land and is not consistent with the NPPF (2019) and Sport England's Playing Field Policy. The 1st point in the policy and ¶12.73 in the supporting information as now deleted, should be retained.	No	The text was removed with the agreement of Sport England, and the policy is therefore considered to be sound. However, Sport England has made a further representation requesting that the text is reinstated. The council is continuing to discuss this matter with Sport England, with the objective of reaching an agreed position ahead of the examination.
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Sandbach (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
There does not appear to be any trail to suggest that these responses have been considered or amendments made in relation to the settlement boundary/open countryside around the Zan Industrial Park in Wheelock (FDR2935).	No	The 'Settlement and Infill Boundaries Review' [ED 06] sets out the methodology to reviewing settlement boundaries in each of the PTs, KSCs and LSCs. This area of land is not considered to form part of the settlement boundary. The approach to the settlement boundary for Sandbach is set out in the 'Sandbach Settlement report' [ED 41].
The housing supply, alongside proposed allocations, is not considered to meet Objectively Assessed Needs. The supply is too reliant on the delivery of large-scale housing sites, which poses deliverability risks, particularly in the short term. LPS 53 is unable to deliver the full 450 dwellings to meet Sandbach requirements. Therefore, the overall scale of housing growth particularly on small sites should be increased so an adequate degree of flexibility can be applied. Land north of Wright Lane, Sandbach forms part of LPS 53 and can deliver housing in two phases, with phase 1 delivering circa 25 units with the remainder of the site delivering additional units as part of the second phase. Alternatively, the site could be included as an individual housing allocation given that it can be delivered independently of the wider LPS 53 site.	No	An element of flexibility (flexibility factor) has been built into the housing requirement; this was considered thoroughly in the LPS examination and the LPS was found to be sound. The 'Sandbach Settlement Report' [ED 41] has considered all the sites put forward in Sandbach and the need for further allocations, concluding that no further site allocations in the SADPD for Sandbach are required. It is not the role of the SADPD to review sites allocated in the LPS.

Additional sites are needed to meet the overall housing requirement; ensure the council can demonstrate and maintain a deliverable five year supply of housing land; to ensure the SADPD is consistent with the LPS; and to provide flexibility in the event that HS2 is committed to come to Crewe by 2030.	No	As set out in the 'Sandbach Settlement Report' [ED 41], no further allocations are necessary in Sandbach. The LPS is the strategic plan for the borough. The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. Policies addressing HS2 cannot be included in the SADPD. They would be strategic policies that departed from the LPS and fall outside the scope of the SADPD. The council is preparing a separate CHAAP, which is setting a policy framework to promote and manage land use change in the area immediately around the proposed new HS2-related Crewe Hub Station. This is subject to its own plan process including public consultation. The full implications of HS2 on the wider area are a strategic matter to be addressed through a review of the LPS.
<p>Several sites put forward for consideration in Sandbach:</p> <ul style="list-style-type: none"> • Land to the rear of Twemlow Avenue and Marlborough Drive (PBD 1352); • Land south of Old Mill Road (FDR2262); • Land at the Hill (PBD 1079a, PBD 1079b, PBD 1079c, PBD 1079d); • Land to the rear of Park Lane and Crewe Road, (FDR 2835); • Land at Hind Road (new site); and • Land off Belmont Avenue (new site). 	No	As set out in the 'Sandbach Settlement Report' [ED 41], it is not considered necessary to allocate these sites.
The Albion works should be included within the settlement boundary for Sandbach (CFS419).	No	The 'Settlement and infill boundaries review' note [ED 06] sets out the methodology to reviewing settlement boundaries in each of the PTs, KSCs and LSCs. The approach to the settlement boundary for Sandbach is set out in the 'Sandbach Settlement report' [ED 41]. The settlement report concludes that the former Albion Chemical Works site is considered to be physically separate from the main built up

		area of Sandbach and is not to be included within its settlement boundary.
Given the diverse nature of settlements in Cheshire East, each with different needs and constraints, it is appropriate to set indicative levels of development by settlement. There is no reason to regard the requirement figure for Sandbach as a ceiling especially as the overall housing requirement is not being met elsewhere. Furthermore, the council cannot demonstrate a deliverable five-year housing land supply. Therefore, additional deliverable sites are required to meet these requirements, and should be allocated through the SADPD.	No	Issues around housing land supply are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix.

Wilmslow (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Eight sites were submitted:</p> <ul style="list-style-type: none"> • Land west of Rotherwood Road (CFS194); • Land east of Rotherwood Road (CFS87); • Land at Mobberley Road and Sandy Lane (CFS49); • Sunnybank Farm and 36 Sunnybank Drive (CFS114); • Land at Yew Tree Farm, Moor Lane (part of CFS268/281); • Meadowside, Moor Lane (new site); • Land south of Holly Road North (new site); and • Land at Ferring, Adlington Road (new site). 	No	The Wilmslow Settlement Report [ED 43] has considered all the sites put forward in Wilmslow prior to the Revised Publication Draft SADPD stage. It has also considered the need for further allocations, concluding that no further site allocations in the SADPD for Wilmslow are required.
The forecasted and completed allocations may not fulfil the required need in Wilmslow and further sites should be allocated.	No	The need for site allocations at each tier of the settlement hierarchy is considered in the Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. Housing land supply issues and flexibility are

		considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The Wilmslow settlement boundary and Green Belt boundary should be reviewed to comply with NPPF (2019) ¶139, which requires that when defining Green Belt boundaries, plans should not include land which it is unnecessary to keep permanently open; and define boundaries clearly using physical features that are readily recognisable and likely to be permanent.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.

Alderley Edge (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
There are no exceptional circumstances for the release of Green Belt land.	Yes	The Revised Publication Draft SADPD has removed the site allocations in Alderley Edge, but there is a need to alter Green Belt boundaries to identify safeguarded land. This issue is considered in the PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
<p>Eight sites were submitted:</p> <ul style="list-style-type: none"> • Land to the west of Heyes Lane (CFS366); • Land to the east of Heyes Lane (CFS370); • Whitehall Meadow (CFS405); • Land to the west of Congleton Road (CFS359/400); • Land at Mayfield (FDR2831); • Land at Ryleys Farm, north of Chelford Road (CFS404 Plot 1); • Land adjacent to Jenny Heyes (CFS301); and • Land north of Beech Road (CFS130b). 	No	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].

Further site allocations are required in Alderley Edge to make sure its development requirement will be delivered, to account for the shortfall in dwellings and for flexibility.	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for additional allocations in the Revised Publication Draft SADPD. It concludes that there is no need for allocations at Alderley Edge. However, there is a requirement for safeguarded land. Issues around housing land supply are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The Whitehall Meadow site is more suitable than the proposed allocations for Alderley Edge and should be allocated for up to 50 dwellings and a local car park.	No	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
It is no longer necessary to keep Land at Mayfield permanently open. The site should be removed from the Green Belt and included within the settlement boundary.	No	The review of settlement and Green Belt boundaries is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.
The Green Belt Site Assessment overstates the contribution that the land to the west of Congleton Road makes to the purposes of Green Belt; and development of the site would only have a negligible impact on the adjacent conservation area. The site should be allocated for residential development.	No	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
The Green Belt Site Assessment overstates the contribution that the land to the west of Heyes Lane makes to the purposes of Green Belt. It should be allocated for housing.	No	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
The Green Belt Site Assessment overstates the contribution that the land to the east of Heyes Lane makes to the purposes of Green Belt. The traffic light assessment should reflect that an access point could be created; landscape impacts could be mitigated. The site should be allocated for housing.	No	All sites submitted have been considered in accordance with the Site Selection Methodology [ED 07] through the Alderley Edge Settlement Report [ED 21].
Sites in Alderley Edge should be considered for safeguarded land instead of sites in Disley.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.

Green Belt site allocations are needed as Alderley Edge is one of the largest and most sustainable LSCs.	No	This issue is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix.
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Deleted Site ALD 1 'Land adjacent to Jenny Heyes'

Summary of the main issues raised	Revised SADPD amended?	Council response
The site is remote from existing transport and social infrastructure	Yes	The accessibility assessment of the site in the Sustainability Appraisal [ED 03] shows that the site is in an accessible location, but this site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site has potential flood risk constraints, meaning there may be viability issues and a reduced quantum of development. Insufficient evidence on flooding issues is presented.	Yes	Flood risk issues are considered in the Alderley Edge Settlement Report [ED 21] but this site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
There is no certainty that a suitable access with appropriate visibility could be provided. It is doubtful that suitable pedestrian access or a safe crossing point could be provided.	Yes	The Alderley Edge Settlement Report [ED 21] acknowledges that very careful consideration would need to be given to visibility. Pedestrian access has also been considered, but this site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
There is little or no opportunity to deliver affordable housing; mature tree planting would need to be removed and opportunities for replacement planting are limited; the site size limits the opportunity to provide complementary open space. It is an illogical extension to the settlement boundary as it only adjoins the existing settlement on one side; it is outside of Alderley Edge parish and the Alderley Edge Neighbourhood Plan area. The site should provide minimum 8m undeveloped	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.

semi-natural buffer to Whitehall Brook, but preferably larger where feasible. Development should positively integrate with the watercourse.		
The site makes a 'major contribution' to Green Belt purposes in the Green Belt Assessment Update but the council has now re-classified it as only making a 'contribution'.	No	The Alderley Edge Settlement Report [ED 21] includes a Green Belt Site Assessment, which demonstrates that the site makes a 'contribution' to Green Belt purposes.
The site promoter has confirmed that initial highways and flood risk work demonstrates that there are no technical constraints to development and the site could accommodate around 10 dwellings as envisaged.	No	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site should be considered for safeguarded land instead of sites in Disley.	No	As demonstrated in the Disley Settlement Report [ED 29], there are suitable sites for safeguarded land in Disley to meet the figure set out in the LSCs Safeguarded Land Distribution Report [ED 53].
The site should be re-instated as a housing allocation to provide a realistic prospect of meeting the overall housing requirement; to demonstrate and maintain a deliverable 5 year housing supply; to be consistent with the LPS; to meet the need for housing in Alderley Edge; to meet the requirement to identify 10% of the housing requirement on small sites; and to provide flexibility if HS2 comes to Crewe.	No	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD. Issues around housing land supply issues (including flexibility) and affordable housing are considered in the Chapter 8: Housing (general issues) section.
The housing need in Cheshire East and in Alderley Edge specifically provide the exceptional circumstances to justify alteration of the Green Belt boundary.	No	The issue of exceptional circumstances to justify further Green Belt boundary alterations is considered in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
The Alderley Edge Housing Needs Assessment completed for the Alderley Edge neighbourhood plan shows that there is a need for affordable housing and the population and demographic data shows there is a need to build more homes of all types and sizes, particularly small family homes and	No	The issue of provision of affordable housing in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix. Policy HOU 1 'Housing mix' seeks to make sure developments deliver a range and mix of house types, sizes and tenures.

housing for the elderly. The Cheshire Homechoice data shows there are 295 households on the waiting list for houses.		
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Deleted Site ALD 2 ‘Ryleys Farm, north of Chelford Road’

Summary of the main issues raised	Revised SADPD amended?	Council response
The site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside; boundaries are not well-contained leading to further potential encroachment into the open countryside.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site should be required to accommodate a sports pitch and a car park; the site should provide a cycle access to the bypass and screening/landscaping from existing dwellings and infrastructure; development should be required to achieve a reduction in energy use compared to standard new build construction.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site policy should require proposals to include additional compensatory measures to offset the impacts of removing land from the Green Belt.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
Development should provide for a minimum of 30% affordable dwellings.	Yes	Affordable housing would be required in accordance with LPS Policy SC 5 ‘Affordable homes’. However, this site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site promoter considers that additional land should be released from the Green Belt because the current proposed boundaries are not robust, and a larger site would allow delivery of 75 dwellings alongside other benefits. Alternatively, even more	No	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.

land could be allocated to enable delivery of up to 100 dwellings to help meet any identified shortfall within Alderley Edge.		
The site should be considered for safeguarded land instead of sites in Disley.	No	As demonstrated in the Disley Settlement Report [ED 29], there are suitable sites for safeguarded land in Disley to meet the figure set out in the LSCs Safeguarded Land Distribution Report [ED 53].
The site should be allocated for development as exceptional circumstances still exist; there is a need to allocate sites to comply with the LPS; reliance on windfall sites will not deliver the remaining development needs. The area of the allocated site should be increased.	No	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD. Issues around housing land supply issues (including flexibility) are considered in the Chapter 8: Housing (general issues) section and the issue of exceptional circumstances to justify further Green Belt boundary alterations is considered in the deleted Policy PG 11 'Green Belt boundaries' section.

Safeguarded land ALD 3 'Ryleys Farm (safeguarded)'

Summary of the main issues raised	Revised SADPD amended?	Council response
The site has a poor relationship with the urban area and represents a clear expansion of the settlement into open countryside.	No	The site's relationship with the urban area is considered in the Alderley Edge Settlement Report [ED 21].
The boundaries are not well-contained leading to further potential encroachment into the open countryside.	No	The boundaries are considered in the Alderley Edge Settlement Report [ED 21].
There are no proposals to provide any public car parking within the site.	No	The site is proposed as safeguarded land and is not allocated for development.
The site promoter considers that the boundaries of the safeguarded land should be amended to allow the	No	The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05] has considered the need for

provision of a larger allocation on the adjacent site ALD 2 and to ensure that a strong permanent defensible boundary defines the northern boundary of the site.		additional allocations in the Revised Publication Draft SADPD. It concludes that there is no need for allocations at Alderley Edge but there is a requirement for safeguarded land.
The site should be required to deliver cycle access to the bypass and protective green screening and landscaping between it and existing housing and infrastructure when it is developed.	No	The site is proposed as safeguarded land and is not allocated for development. However, Revised Publication Draft SADPD Policy PG 12 'Green Belt and safeguarded land boundaries' highlights the need for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land if allocated for development in the future.

Deleted Site ALD 4 'Land north of Beech Road'

Summary of the main issues raised	Revised SADPD amended?	Council response
The site is remote from existing transport and social infrastructure.	Yes	The accessibility assessment in the Sustainability Appraisal [ED 03] shows that the site is in an accessible location, but it has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site has a poor relationship with the urban area and is a clear expansion into open countryside; the boundaries are not well-contained leading to further potential encroachment. The policy requirement to create a physical feature is not adequate. It is not clear how design and landscaping could mitigate the impact on settlement character and urban form when the site only adjoins the settlement on one side.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site is close to Wilmslow, with a separation distance of only 380m. The Green Belt gap has already been reduced following removal of the Royal London site to the south of Wilmslow and removal of this site would narrow the gap further. There are no proposals to provide any public car parking within the site.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.

No evidence is provided to show how flood risk mitigation and compensation could be provided; no Environment Agency response is provided to indicate that residential development would be acceptable. The site is 2.9ha and could accommodate 35 dwellings, giving a density of only 12 dwellings per ha, which does not make efficient use of land released from the Green Belt.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The site policy should require proposals to include compensatory measures to offset the impacts of removing land from the Green Belt.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
Development should be required to achieve a reduction in energy use compared to standard new build construction; pedestrian route improvements would be required along Davey Lane; the access roads are unfit for purpose.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
Development should provide for a minimum of 30% affordable dwellings.	Yes	Affordable housing would be required in accordance with LPS Policy SC 5 'Affordable homes'. However, this site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The Green Belt Assessment Update considers the area to make a 'major contribution' to the purposes of Green Belt but this has now been downgraded to 'significant contribution'.	No	The Alderley Edge Settlement Report [ED 21] includes a Green Belt Site Assessment, which demonstrates that the site makes a 'significant contribution' to Green Belt purposes.
The site should be considered for safeguarded land instead of sites in Disley.	No	As demonstrated in the Disley Settlement Report [ED 29], there are suitable sites for safeguarded land in Disley to meet the figure set out in the LSCs Safeguarded Land Distribution Report [ED 53].
The site should be allocated for residential development as there is limited brownfield land available; it would contribute to the five year deliverable housing land supply; it would deliver affordable housing; it would provide public open space; it would provide sustainable travel links between Alderley Edge and Wilmslow.	No	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD. Issues around

		housing land supply issues are considered in the Chapter 8: Housing (general issues) section.
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Audlem (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised	N/A	N/A

Deleted Site AUD 1 'Land South of Birds Nest'

Summary of the main issues raised	Revised SADPD amended?	Council response
Criterion 2 requires a 'suitable pedestrian and vehicular access into the site from Audlem Road'. A new pedestrian route has already been provided on the other side of the road, running alongside the Anwyl development. It is suggested that the policy wording be amended to 'a new pedestrian crossing to be provided to the site'.	No	The comment is now superseded as the site is no longer being allocated in the Revised Publication Draft SADPD.
Site south of AUD 1 (East View CFS 570) should also be considered for residential allocation.	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'Provision of Housing and Employment Land and Approach to Spatial Distribution' [ED 05] report. As set out in the 'Audlem Settlement Report' [ED 23], the indicative housing figure for Audlem has already been met.
AUD 1 is a developable, deliverable, and sustainable site. It is an isolated case in respect of this plan, being that it is not Green Belt. The site can be included much like site HCH 1 (London Road, Holmes Chapel), where it remains an isolated allocation. The inclusion of AUD 1 within the plan will ensure that Audlem receives the number of homes needed, benefits from local	No	The need for site allocations at each tier of the settlement hierarchy is considered in 'The Provision of Housing and Employment Land and the Approach to Spatial Distribution' report [ED 05]. As set out in the 'Audlem Settlement Report' [ED 23], the indicative housing figure for Audlem has already been met.

investment, and continues to support the Parish Council's vision for continuing (and improving) the viability, success and attractiveness of the village.		
Any housing land supply figure should not be a ceiling, in line with the government's objective to significantly boost the supply of homes. Furthermore, local authorities must still demonstrate five years' worth of deliverable housing sites. The recent impact of the COVID-19 pandemic provides one example of the unpredictable risks that can be faced by the housebuilding industry and consequently, housing land supply. Other factors impacting on supply are also susceptible to change. It is probable that Cheshire East Council will face new pressures to maintain five years' worth of deliverable housing sites beyond July 2022. By allocating non-Green Belt sites in the SADPD, the council can plan positively to meet anticipated future development needs and ensure robustness in their future supply.	No	Issues around housing land supply are considered under the Chapter 8: Housing (general issues) section of this consultation appendix.
AUD 1 offers a clear opportunity to meet an identified settlement need; suffice a clear shortfall in affordable housing; to accord directly with the vision for LSCs as outlined by CEC; and to ensure that Audlem continues to grow until the end of the plan period.	No	Issues around housing land supply are considered under the Chapter 8: Housing (general issues) section of this consultation statement appendix.

Bollington (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Site BOL 1 Henshall Rd is now proposed as 'safeguarded land'. It should be re-instated as an allocation.	No	See response under 'BOL 1 'Land at Henshall Road'.
Site BOL 1 Henshall Rd should be deleted (various site-specific reasons).	No	See response under 'BOL 1 'Land at Henshall Road'.

Site BOL 2 Oak Lane/Greenfield Road should be deleted (various site-specific reasons).	No	See response under 'BOL 2 'Land at Oak Lane/Greenfield Road'.
<p>Several alternative sites have been put forward:</p> <ul style="list-style-type: none"> • Land east of 41a Shrigley Road, (CFS79/80); • Land off 59 Shrigley Road, Bollington (CFS277); • Land to south of Grimshaw Lane (FDR855a); • Land at Hall Hill (CFS 352); • Dyers Mill Pond (FDR2878). 	No	Sites submitted through the Call for Sites, First Draft SADPD consultation and the initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the Bollington Settlement Report [ED 24], using the methodology set out in the Site Selection Methodology Report [ED 07]. The approach to the identification of safeguarded land is set out in the Local Service Centres Safeguarded Land Distribution report [ED 53].
The settlement boundary should be revised to include the group of houses at Dumbah Lane, Tytherington Lane, Springwood Way and Larkwood Way.	No	The council disagrees; this area correctly falls within the settlement boundary defined for Macclesfield as it forms part of the general built-up area of the town. The Settlement and Infill Boundaries Review [ED 06] sets out the methodology and justification for the approach to settlement boundaries. This methodology has been applied and the outcomes documented in the 'Bollington Settlement Report' [ED 24].
Exceptional circumstances to release Green Belt have not been demonstrated (and do not exist); Cheshire East's approach is unsound and in legal error (view supported by legal opinion). Contrary to NPPF (2019) and ¶¶136/137 – failure to demonstrate that all reasonable alternatives have been examined; not considered alternative options. There is enough housing and allocated safeguarded land (through the LPS) – do not need any more.	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in the 'Provision of Housing and Employment Land and the Approach to Spatial Distribution' [ED 05] report. It concludes that there is no need for housing or employment allocations at Bollington. However, there should be safeguarded land. The approach to identifying safeguarded land is set out in the LSCs safeguarded land distribution report [ED 53]. The Revised Publication Draft SADPD is supported by a detailed site selection methodology including the consideration of Green Belt matters [ED 07]. Exceptional circumstances are also addressed in policy PG 12 'Green Belt and Safeguarded Land Boundaries'.

Safeguarded land BOL 1 ‘Land at Henshall Road’

This safeguarded land was included as development site BOL 1 in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
‘Exceptional circumstances’ to justify removing the site from the Green Belt have not been demonstrated.	No	See response under ‘Policy PG 12 ‘Green Belt and safeguarded land boundaries’.
The SSM is flawed.	No	The SSM is dealt with in the Chapter 12: Site Allocations (General issues) section of this consultation statement appendix.
Concern regarding traffic impact, safety, increased risk of accidents and congestion; access off bend on B5090.	No	Traffic, ecology/trees and flooding issues have all been considered as part of the SSM. See the ‘Bollington Settlement Report’ [ED 24].
Concern regarding impact on local wildlife and local wildlife habitats. Conflict with policy ENE.P1 of the Bollington Neighbourhood Plan.	No	
Concern regarding increased risk of flooding on Albert Road and the two schools there in particular; United Utilities expressed a preference to use other sites.	No	
Contamination concerns (storage drums); tipping of waste by Bollington Printworks up to 1980.	No	Contamination, landscape and historic assets are issues that have all been considered as part of the SSM. See the ‘Bollington Settlement Report’ [ED 24].
Concern regarding loss of natural landscape.	No	
Concerns regarding effect on nearby historic assets, including Bollington Cross and Lower House areas.	No	
Add reference to Historic Impact Assessment within the policy – additional bullet point to be added.	No	Heritage Impact Assessments are addressed in the Chapter 12: Site Allocations (General issues) section of this consultation statement appendix.

2013 SHLAA – site assessed as not suitable, not achievable and not currently developable.	No	Sites submitted through the Call for Sites exercise, First Draft SADPD consultation and initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
The site is now proposed as 'safeguarded land'. It should be re-instated as an allocation. (Information from site promoter concerning drainage, Green Belt considerations and housing supply including affordable housing). Critical and substantial need to deliver affordable housing.	No	Allocations are no longer considered necessary at the LSC tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05] and response to main issues for Policy PG 8 'Development at Local Service Centres'. The site is however considered suitable to help meet Bollington's growth by safeguarding land. See 'Bollington Settlement Report' [ED 24]. Affordable Housing is dealt with under the Chapter 8: Housing (General issues) section of this consultation appendix.

Safeguarded land BOL 2 'Land at Oak Lane/Greenfield Road'

This safeguarded land was included as development site BOL 2 in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
'Exceptional circumstances' to justify removing the site from the Green Belt have not been demonstrated.	No	See response under 'Policy PG 12 'Green Belt and safeguarded land boundaries'.
The SSM is flawed.	No	SSM is dealt with in the Chapter 12: Site Allocations (General issues) section of this consultation statement appendix.
Tree loss, effect on local wildlife; great crested newts on site and bats.	No	Ecology, trees, historic assets, Green Belt, landscape and contamination are issues that have all been considered as part of the SSM. See the 'Bollington Settlement Report' [ED 24].
Historic site of the Beehive Mill; potential contamination.	No	
Impact on Kerridge Conservation Area; need reference to historic impact assessments in policy.	No	

Houses on site will introduce a significant urban element to quiet country lane; land acts as strong border to Green Belt; valuable amenity for nearby homes.	No	Heritage Impact Assessments are addressed in the Chapter 12: Site Allocations (General issues) section of this consultation statement appendix.
Insufficient weight given to location of site within Peak Park Fringe.	No	
Concerns regarding access to site; traffic impacts.	No	Access to the site, traffic and access to local facilities plus drainage issues have all been considered as part of the SSM and are considered in the 'Bollington Settlement Report' [ED 24].
Insufficient attention given to gravity sewer crossing site.	No	
History of planning permissions refused for site – nothing has changed.	No	

Deleted Site BOL 3 'Land at Jackson Lane'

Summary of the main issues raised	Revised SADPD amended?	Council response
Owner of site confirmed at initial Publication Stage that site was available for development and supported proposed allocation for housing.	No	Sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Bollington Settlement Report' [ED 24] using the methodology set out in the Site Selection Methodology Report [ED 07]. This site has not been identified as safeguarded land in the Revised Publication Draft SADPD [ED 01] and as such will remain in the Green Belt.
Issues raised concerning the following: Sustainability, landscape/Peak Park Fringe, ecology, trees; impact on Kerridge Conservation Area and surrounding historic assets.	Yes	Sustainability, landscape, ecology, trees, impact on Kerridge Conservation Area and surrounding historic assets are issues that have all been considered as part of the SSM. See the 'Bollington Settlement Report' [ED 24]. The Heritage Impact Assessments [ED 48] are part of the evidence base that has fed into the site selection process.
Issues raised concerning the following: Access and traffic, infrastructure, contamination, effect on the Green Belt.	Yes	Access and traffic, Green Belt, infrastructure and contamination are issues that have all been considered as part of the SSM. See the 'Bollington Settlement Report' [ED 24].

Bunbury (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Several sites were put forward for allocation: <ul style="list-style-type: none"> Land at Wyche House (FDR1340) Land east of Bunbury Lane (FDR2751). 	No.	No allocations are considered necessary at the LSC tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05] and response to main issues for Policy PG 8 'Development at local service centres'.
The proposed settlement boundary should be amended to include development along the Whitchurch Road (A49), Bunbury Heath, particularly land at Heath House.	No	The proposed settlement boundary is set out in the Bunbury Settlement Report [ED 25]. Bunbury Heath largely consists of an area of ribbon development along Whitchurch Road (A49), parallel to Bunbury. Most dwellings are separated from the village by large garden plots/fields. The site at Heath House itself is separated from the village several fields and woodland. The settlement boundary review methodology is set out in the 'Settlement and infill boundaries review' [ED 06]. The land in question does not meet the methodology criteria/tests to justify its inclusion within the settlement boundary.

Chelford (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Exceptional circumstances to release Green Belt have not been demonstrated (and do not exist); Cheshire East's approach is unsound and in legal error (view supported by legal opinion obtained by Chelford Parish Council, amongst others).	No	The approach to identifying safeguarded land is set out in the LSCs Safeguarded Land Distribution Report [ED 53]. Exceptional circumstances are also addressed in the Policy PG 12 'Green Belt and Safeguarded Land Boundaries' section of this consultation statement appendix.
Insufficient justification for the 'hybrid' methodology used in the LSC Safeguarded Land Distribution report	No	A number of options were considered through the LSC Safeguarded Land Distribution Report [ED 53]. This included initial options for the distribution of safeguarded land and then revised options following

[ED 53] to move Mobberley's allocation of safeguarded land to Chelford.		feedback from the site selection reports. The methodology and justification for the approach is clearly evidenced in the report.
The amount of safeguarded land proposed for Chelford does not meet the LPS vision for Chelford, as a LSC for "some modest growth in housing and employment will have taken place to meet locally arising needs and priorities".	No	The LSC Safeguarded Land Distribution Report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the northern part of the borough. There is a residual requirement for safeguarded land to be identified at Chelford. The process of selecting areas of land to safeguard at Chelford has been documented in the Chelford Settlement Report [ED 26].
The SADPD also fails to take any account of the infrastructure investment needed to support the suggested growth in housing.	No	Safeguarded land is not allocated for development at the present time. The site selection process is supported by informal consultation with infrastructure providers/statutory consultees as documented in the Chelford Settlement Report [ED 26].
The SADPD proposals for safeguarded land disregard the Chelford Neighbourhood Plan wishes, which makes it very clear that protection and preservation of the Green Belt is a priority and that any future housing development should be small scale, proportionate and appropriate to the local character of the Parish.	No	The LSC Safeguarded Land Distribution report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the northern part of the borough. There is a residual requirement for safeguarded land to be identified at Chelford. The process of selecting areas of land to safeguard at Chelford has been documented in the Chelford Settlement Report [ED 26].
Large scale development in Chelford on the proposed safeguarded land, will increase out commuting, already a feature in the Parish with the new housing developments.	No	Safeguarded land is not allocated for development at the present time. The LSC Safeguarded Land Distribution report [ED 53] has been produced to clearly set out the approach and rationale for the distribution of safeguarded land across the northern part of the borough. There is a residual requirement for safeguarded land to be identified at Chelford. The process of selecting areas of land to safeguard at Chelford has been documented in the Chelford Settlement Report [ED 26].
The site selection traffic light system (Red/Amber/Green) is unsound and relies on judgements which are flawed, largely subjective and not supported by convincing evidence. The assumption that	No	The Chelford Settlement Report [ED 26] sets out the approach to site selection and has considered relevant availability, achievability and suitability factors in coming to a position on recommended areas of safeguarded land to be included in the SADPD. The role of the

all criteria have an equal importance is clearly implausible and consequently there is no attempt to weight the relative influence of each criterion in the decision-making.		Red/Amber/Green traffic light assessment is set out in the Site Selection Methodology Report [ED 07]. The detailed criteria for the assessment have not been pre-weighted. The traffic light assessment provides a way of presenting information about the characteristics, constraints, capacities and circumstances of sites in a consistent way that enables this, along with other factors, to form part of the overall site selection process, and ultimately the recommendation of whether or not a site should be included in the SADPD.
The site at Roadside House (RPD 1680), south of Knutsford Road, should be removed from the Green Belt.	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. It concludes that there is no need for allocations for housing or employment allocations at Chelford. However, there is a requirement for safeguarded land. The approach to safeguarded land is set out in the LSC Safeguarded Land Distribution report [ED 53]. The Chelford Settlement Report [ED 26] considers a number of site options and identifies land suitable as safeguarded land.

Safeguarded land CFD 1 'Land off Knutsford Road'

This safeguarded land was included as development site CFD 1 in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
Rather than be identified as safeguarded land, this site should be allocated for residential development as a small site to meet the requirements of the NPPF (2019) for 10% being allocated on smaller sites.	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in The Provision of Housing and Employment Land and the Approach to Spatial Distribution report [ED 05]. It concludes that there is no need for allocations for housing or employment allocations at LSCs, including at Chelford. However, there is a requirement for safeguarded land. The evidence for the amount and distribution of safeguarded land is included in the LSC Safeguarded Land Distribution Report [ED 53]. The selection of sites for safeguarded land is included in the Chelford Settlement Report [ED 26].

Safeguarded land CFD 2 'Land east of Chelford Railway Station'

Summary of the main issues raised	Revised SADPD amended?	Council response
Future development on the proposed site will represent a significant reduction in Green Belt and will impact significantly on the settlement character, urban form, the visual amenity, its openness and the character of the village itself. Impact of loss of grade 2 agricultural land.	No	The evidence for the amount and distribution of safeguarded land is included in the LSC Safeguarded Land Distribution Report [ED 53]. The selection of sites for safeguarded land is included in the Chelford Settlement Report [ED 26] as site CFS c(i) ¶¶4.95 - 4.120.

Disley (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Further development will lead to additional traffic on the already congested A6. Traffic has increased significantly following the opening of the A555 road; Disley needs a bypass. Further development will increase air pollution, which already breaches legal limits.	Yes	Highways and air quality issues have been considered through the Disley Settlement Report [ED 29] and any proposals would be subject to Policy ENV 12 'Air quality'. The proposed site allocation DIS 1 has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
There is no capacity in local education, health care and public transport services for additional residents.	Yes	In accordance with the SSM, infrastructure providers and statutory consultees have been consulted on each of the sites proposed for inclusion in the SADPD through the infrastructure providers/statutory consultees consultation at stage 6. The proposed site allocation DIS 1 has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.

The housing requirement for LSCs has nearly been achieved already and the remainder will be met through windfall; there is no requirement for further housing development in Disley.	Yes	The proposed site allocation DIS 1 has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
Two sites were submitted: <ul style="list-style-type: none"> • Cloughside Farm (CFS29); and • Land off Jacksons Edge Road, Disley (FDR1941). 	No	All sites submitted have been considered in accordance with the SSM through the Disley Settlement Report [ED 29].
Green Belt should only be altered in exceptional circumstances.	No	There is a need to alter Green Belt boundaries to identify safeguarded land. This issue is considered in the PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
The total supply in Disley is just one dwelling over its 245-dwelling requirement, which gives no flexibility. A flexibility factor of at least 10% should be applied, meaning that more sites are required.	No	The need for site allocations in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix. Housing land supply issues (including flexibility) are considered in the Chapter 8: Housing (general issues) section.
There have been flood events in the area recently.	No	Flooding issues for each site put forward are considered in the Disley Settlement Report [ED 29].
The council's flood risk assessment for Cloughside Farm is incorrect as there has not been any flooding on the eastern section of the land in 20 years and the flooding that occurred in the western section was as a result of a mains water leak. The site has never been sprayed by insecticides or pesticides and contamination is not considered to be an issue.	No	The flood risk and contaminated land assessments in the Disley Settlement Report [ED 29] have been produced in accordance with the criteria set out in the SSM.

Deleted Site DIS 1 'Greystones Allotments'

Summary of the main issues raised	Revised SADPD amended?	Council response
Policy CF2 in the Disley Neighbourhood Plan states that the allotments are 'greatly valued'. The policy requires that any proposal to develop allotment land should result in clear and significant environmental community benefits.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
Further development will lead to additional traffic on the already congested A6; safe vehicular access could not be provided to the site. Further development will increase air pollution, which already breaches legal limits.		
A development of 20 houses would be overbearing and unsympathetic to surrounding properties, which is not in accordance with SADPD Policy HOU 10.		
The site for the replacement allotments has not been identified but would be in the Green Belt; and allocation of this site would still require Green Belt development. Loss of the Newtown Playing Fields would be contrary to SADPD Policy REC 1.		
The site promoter has stated that there is no guarantee that the site will actually be developed.		
The site is further from the village centre than alternative sites and is therefore less sustainable.		
There are approximately 40 empty dwellings in Disley, which indicates there is no need for more houses considering the falling birth rate and the fact that the council's plans for the number of houses were drawn up in the 1980s.		
The village infrastructure (schools, GP surgery, drains) could not cope with additional residents.		

Safeguarded land DIS 2 'Land off Jacksons Edge Road'

Summary of the main issues raised	Revised SADPD amended?	Council response
There is no information on the compensatory improvements that are required to offset the impact of removing the land from the Green Belt.	Yes	Revised Publication Draft SADPD Policy PG 12 'Green Belt and safeguarded land boundaries' has been amended to include requirements for compensatory improvements should safeguarded land sites come forward for development in the future.
The site should be allocated for residential development to provide a realistic prospect of meeting the overall housing need; to demonstrate and maintain a deliverable five year supply of land for housing; to ensure the SADPD is consistent with the LPS; and to provide flexibility in the event that HS2 is committed to come to Crewe by 2027. The site promoter also considers the assessment of the site in the Green Belt Assessment Update 2015 to be inaccurate and further Green Belt assessment of the site should be carried out, as required by the LPS examining inspector.	No	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD. Issues around housing land supply issues (including flexibility) are considered in the Chapter 8: Housing (general issues) section. A Green Belt Site Assessment of the site has been completed in accordance with the SSM and is presented in the Disley Settlement Report [ED 29].
The site has a history of flooding; surface water run-off from the site means Lymewood Drive is susceptible to flooding; there is a history of flooding on Jacksons Edge Road. Development would increase the risk of flooding.	No	Flooding issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the SSM.
Development will lead to additional traffic on the already congested A6; traffic has increased since the A555 road opened. Jacksons Edge Road is congested and dangerous. Development will increase air pollution, which already breaches legal limits.	No	Highways and air pollution issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the SSM.
The proposals do not include any affordable housing. The housing should be built on brownfield sites instead. The number of houses proposed is too many for the site. The	No	The site is not proposed to be allocated for development. If allocated for housing in the future, consideration would need to be given to an appropriate number of dwellings on the site and

proposed development would be wholly contrary to the area's character and distinctiveness.		affordable housing would be required in line with the development plan policy in place at the time.
Green Belt land should only be used in exceptional circumstances. Use of Green Belt sets a precedent for future developments. The Disley Neighbourhood Plan seeks to protect Green Belt land.	No	Exceptional circumstances to justify altering Green Belt boundaries to identify safeguarded land are considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.
The village infrastructure (schools, GP surgery, dentists, wastewater, public transport, car parking, policing) could not cope with additional residents. The plan is not compliant with the Duty to Co-operate because it has not considered cross-boundary matters. As Disley is on the edge of Cheshire East, neighbouring areas will have to cope with increased demand for services and increased traffic. No consultation has been made with neighbouring authorities, health care providers, transport bodies or other key stakeholders.	No	The site is not proposed to be allocated for development. In accordance with the SSM, infrastructure providers and statutory consultees have been consulted on each of the sites proposed for safeguarded land in the SADPD through the infrastructure providers/statutory consultees consultation at stage 6. Duty to Co-operate discussions are set out in the SADPD Duty to Co-operate Statement of Common Ground [ED 51].
Lyme Park and Disley are tourist attractions and any more homes would detract from the natural beauty. The site is within the wider setting of heritage assets in the Disley Conservation Area. Several trees will need to be felled.	No	The landscape and heritage assets impact has been assessed through the Disley Settlement Report [ED 29] in accordance with the SSM. There are some mature trees at the edges of the site and a limited number within the site. The site is not proposed for development.
The site provides habitats for several different species. The site is currently an ecological stepping stone, therefore development would not be compliant with LPS Policy SE 3 'Biodiversity and geodiversity'.	No	Ecology issues are considered through the assessments in the Disley Settlement Report [ED 29] in accordance with the SSM.
To walk to the village, the pavements are narrow and the road is steep.	No	The accessibility assessment of the site in the Sustainability Appraisal [ED 03] shows that the site is in an accessible location.
The village boundary will become blurred and Disley will be regarded as part of High Lane. Further, gradual incursions into the Green Belt would eventually result in Disley effectively merging with High Lane.	No	As part of the Disley Settlement Report [ED 29], the Green Belt Site Assessment for this site considers this issue, showing that the new Green Belt boundary would be defined using physical features that are readily recognisable and likely to be

		permanent. The site is surrounded by built development on three sides.
The housing requirement for LSCs has nearly been achieved and the remainder will be met through windfall; there is no requirement for further housing development in Disley. There are around 40 empty dwellings in Disley.	No	The site is not proposed to be allocated for development.
The First Draft Disley Settlement Report [FD 29] agrees that this site should not be developed.	No	The First Draft Disley Settlement Report considered a smaller version of the site; concluding that it would be suitable for safeguarded land but was not of a sufficient size to accommodate all of Disley's safeguarded land requirement.
The 2013 Green Belt Assessment considered that the site made a 'major contribution' to Green Belt purposes but the 2015 Green Belt Assessment Update downgrades the contribution to 'significant contribution' even though it concludes that it '...is considered to make a major contribution of the Green Belt purposes...'	No	The Disley Settlement Report [ED 29] includes a Green Belt Site Assessment, which demonstrates that the site makes a 'significant contribution' to Green Belt purposes. This issue is considered further in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
The site makes a 'significant contribution' to the purposes of Green Belt yet there are other sites elsewhere that make a lower contribution but are not proposed for allocation.	No	As set out in the SSM, Green Belt sites that are previously developed and/or well served by public transport are considered before those that are not (as required by the NPPF (2019) ¶138). Within each of these categories, Green Belt sites are considered in order of their contribution to Green Belt purposes, to prioritise those making a lower contribution. Some sites making a lower contribution to Green Belt purposes may be unsuitable for other planning reasons, which are documented in the individual settlement reports.
There is no evidence of the need for safeguarded land. LPS Policy PG 4 'Safeguarded land' is based on weak data as to housing land need post 2030 and those data were wrongly interpreted and applied, meaning that the 200ha of safeguarded land referenced in the LPS is incorrect.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.

LPS policies PG 3 and PG 4 require the SADPD to make an assessment of whether or not it is necessary to release further land from the Green Belt to be designated as safeguarded land; and this policy requirement is not altered by the reference to 200ha in the supporting text. This approach was endorsed by the LPS Inspector and is consistent with the NPPF (2019) (¶139) but the council has not conducted an up to date assessment of the need for release of further land from the Green Belt to be designated as safeguarded land.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
The data used to evidence the need for safeguarded land in the LPS should be revisited, specifically in terms of: the apportionment of development requirements to the northern sub-area; the approach to employment land in the LSCs; and the housing need, which is no longer the same due to 'overperformance' in delivery in the first half of the current plan period or expected overperformance in the remainder of the plan period.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
There is no need for any further safeguarded land as the Cheshire East requirement for 1,800 dwellings per year has become 1,068 dwellings per year because of the government's revised figures published on 16/12/20.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
The approach to distributing safeguarded land is flawed and conflicts with the NPPF (2019) theme of sustainable development and the LPS vision for LSCs. Disley's safeguarded land should be redistributed to Alderley Edge as it is the most sustainable LSC.	No	The approach to distributing safeguarded land in the Revised Publication Draft SADPD is based on consideration of services and facilities; constraints; Green Belt impact; and opportunities. This is explained in the LSC Safeguarded Land Distribution Report [ED 53].
There is no definition of the phrase 'exceptional circumstances'.	No	As confirmed in the LPS Inspector's report (at ¶99), " <i>CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land</i> ".

Goostrey (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Three sites put forward for consideration:</p> <ul style="list-style-type: none"> land adjacent to 51 Main Road (CFS 296) land off New Platt Lane (RPD894) land east of Station Road (CFS 373) 	No	All Goostrey sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and Initial Publication Draft SADPD consultation have been considered in the 'Goostrey Settlement Report' [ED 30] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].

Haslington (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Concern that the cumulative impact of development on the community has not been considered (such as traffic levels).	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The Provision of Housing Land and Employment Land and the Approach to Spatial Distribution' [ED 05] report. It concludes that there is no need for housing or employment allocations at Haslington in the SADPD.
Haslington Parish Council note the major changes to policy PG 8, the proposed new wording moves from certainty to vagueness and uncertainty. The replacement of specific targets for each LSC introduces uncertainty for residents as to where further development will take place. Several of the LSC's mentioned, including Haslington, had already more than met their allocation of homes up to 2030.	No	This matter is considered in responses to PG 8 'Development at local service centres' in this consultation statement appendix.
<p>Site submissions received for land at:</p> <ul style="list-style-type: none"> * Land East of Slaughter Hill (CFS 195) * Land at Shukers Farm (CFS 293) 	No	The council's approach to the need (or otherwise) to make allocations in the SADPD is documented in 'The Provision of Housing Land and Employment Land and the Approach to Spatial Distribution' [ED 05] report. It concludes that there is no need for

		housing or employment land allocations at Haslington in the SADPD. The site submissions are referenced in the Haslington Settlement Report [ED 32].
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Holmes Chapel (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>Several sites put forward for consideration:</p> <ul style="list-style-type: none"> • Land off Manor Lane (PBD2249) • Land south of Middlewich Road (CFS 425) • Land south of Middlewich Road (PBD1355) • Land north and south of Middlewich Road (PBD1334) • Land at Dunkirk Farm (CFS 140/CFS 257) • Land east of Manor Lane (FDR2311) • Land east London Road (RPD1552) (new site) 	No	All Holmes Chapel sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD consultation have been considered in the 'Holmes Chapel Settlement Report' [ED 33] using the methodology set out in the 'Site Selection Methodology Report' [ED 07].
Additional sites should be allocated to provide flexibility and contingency regarding delivery for both housing and employment.	No	The issue of flexibility in the housing land supply is considered under Chapter 8: Housing (general issues) section of this consultation statement appendix. The employment land requirement identified in the LPS already includes a 20% flexibility factor, as set out in the Alignment of Economic, Employment and Housing Strategy (¶¶3.55 to 3.58).
The Neighbourhood Plan has identified development needs that will not be delivered by the committed and more limited forms of development in Holmes Chapel as provided for through the LPS and SADPD.	No	The approach to Holmes Chapel has been considered through 'The provision of housing and employment land and the approach to spatial distribution' report [ED 05] and the 'Holmes Chapel Settlement Report' [ED 33]. The selection of sites has been considered through the 'Holmes Chapel Settlement Report' [ED 33]. Neighbourhood Plans can set development figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.

Site HCH 1 'Land east of London Road'

Summary of the main issues raised	Revised SADPD amended?	Council response
The 8m wide buffer should be measured from bank top and should be increased to 15m to protect the wildlife corridor.	Yes	Criterion 1 has been amended in the Revised Publication Draft SADPD to acknowledge this point.
The allocation is intended solely for the purposes of a particular operator and does not serve as new employment land (available on the open market) to secure new inward investment into the borough.	No	Investment to create employment floorspace creates jobs, whether that's through the expansion of a local business or a new business. The proposed allocation would not fall neatly into the categories of either owner expansion land or generally available employment land; development could be led or significantly influenced by other companies, albeit working collaboratively and commercially with Recipharm. As a Contract Development and Manufacturing Organisation Recipharm's business model is to supply Contract Development and Manufacturing Organisation services to third parties. Their standard model is that the customer invests to establish capability on the site to complete the specific activity for them. For example this could include: establishing 'Development Capability' to produce material for the medical approval process, completing testing of material or devices to support the development phase for a new product, taking a product through its medical approval process and establishing full scale manufacturing capability on the site, or taking an existing product and establishing full scale manufacturing capability on the site.
Workers living in Holmes Chapel, and who are not employed in the pharmaceutical industry, will have to continue to travel greater distances out of Holmes Chapel to access jobs.	No	There is a requirement for 380ha of employment land borough-wide. There is no need to provide a mix for every LSC, or even KSC. The Local Plan (intended to be read as a whole) is considered to provide an extensive range and distribution of employment land. There are other employment schemes in Holmes Chapel including new units being developed at Manor Lane.

The SADPD fails to provide for new employment growth/inward investment across the LSCs.	No	There is a requirement for 380ha of employment land borough-wide. There is no need to provide a mix for every LSC, or even KSC. The Local Plan (intended to be read as a whole) is considered to provide an extensive range and distribution of employment land.
For any new riparian development adjoining River Croco, make sure the main ecological network and ecological receptor of the site is actively protected and where feasible enhanced. Impacts to the riparian zone and any semi-natural habitat on site will require mitigation/offsetting in accordance with the new Defra metric in order to achieve biodiversity Net Gain.	No	Other policies including LPS Policy SE 3 'Biodiversity and geodiversity', SADPD Policy ENV 1 'Ecological networks' and SADPD Policy ENV 2 'ecological implementation' will help to mitigate any negative effects arising from the proposed development.
The SADPD is unsound as minerals have not been given due consideration.	No	HCH 1 is an edge of settlement site with a proposed allocation for employment use detailed in the 'Holmes Chapel Settlement Report' [ED 33]. The site was assessed as red for consideration of mineral resources in the Traffic Light assessment owing to 2.2ha of the proposed employment allocation also being promoted in the 2014 Call for Sites as a proposed Area of Search for mineral extraction. The British Geological Survey Mineral Resource map indicates the extensive silica sand, and sand & gravel resources in the locality. The proposed Area of Search is extensive at approximately 760ha. The proposed draft allocation for employment use is on the edge of the potential Area of Search and effects approximately 2.2ha of land with mineral interest. A Mineral Resource Assessment has been requested as part of draft Policy Site HCH 1 with the need for employment land in Holmes Chapel being weighed up with other policy considerations. Issues around minerals are also considered under Chapter 12: Site allocations (general issues) section of this consultation statement appendix.
The 15m figure in criterion 1 could be deleted to allow this to be defined more accurately by further studies and surveys at the planning application stage.	No	The wording as drafted is considered sound and is justified on ecological grounds and in order to comply with ecology policies.

Mobberley (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
MOB 1 any scheme design should ensure any surface water discharges to watercourse adopt multifunctional SuDS systems approach to protect adjoining watercourse and ecological receptor.	No	'The Provision of Housing Land and Employment Land and the Approach to Spatial Distribution' [ED 05] concluded that there is no need for allocations at Mobberley. Site MOB 1 has been removed from the Revised Publication Draft SADPD.
Several sites put forward for consideration: <ul style="list-style-type: none"> FDR2401A Ryecroft Lane (larger site) FDR2401B Ryecroft Lane (smaller site) FDR 2358 Land to the north of Pavement Lane CFS354 Ilford Way CFS 355 Argonaught Holdings (safeguarding) 	No	All sites submitted have been considered in accordance with the SSM through the Mobberley Settlement Report [ED 37].
The plan is unsound because it doesn't allocate enough land in Mobberley. The requirement for affordable homes in Mobberley has not been met; our client is proposing an allocation for 100% affordable housing development in an area of high unmet demand.	No	'The Provision of Housing Land and Employment Land and the Approach to Spatial Distribution' [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Mobberley.
The proposed housing on the land off Ilford Way should be removed from the SADPD and the Ilford site should be zoned as a mixed-use employment site only. Access arrangements to the safeguarded land north of Carlisle Close should be specified in the SADPD	Yes	'The Provision of Housing Land and Employment Land and the Approach to Spatial Distribution' [ED 05] has considered the need for additional allocations in the revised draft SADPD. It concludes that there is no need for allocations at Mobberley.
This policy is considered unsound due to the omission of any provision for safeguarded land in Mobberley. Include Land at Ilford Way as safeguarded land. This should be in substitution to the over provision of sites at Chelford.	No	The approach to distributing safeguarded land in the Revised Publication Draft SADPD is set out in the LSC Safeguarded Land Distribution Report [ED 53]. The Mobberley Settlement Report [ED 37] demonstrates that there are no suitable safeguarded land sites in Mobberley.

Deleted Site MOB 1 'Land off Ilford Way'

Summary of the main issues raised	Revised SADPD amended?	Council response
Objection to the deletion of MOB 1 in the Revised Publication Draft SADPD as whilst MOB 1 was not sound in the form presented in the initial Publication Draft SADPD, it could have been made so with appropriate modifications.	Yes	MOB 1 was removed from the Revised Publication Draft SADPD as 'The Provision of Housing Land and Employment Land and the Approach to Spatial Distribution' [ED 05] establishes that housing allocations were not necessary at the LSC tier of the settlement hierarchy. The Ilford Way site remains a large brownfield site outside the Green Belt, which could come forward through the development management process subject to the application of relevant policies including if appropriate mitigation could be achieved against aircraft noise in relation to noise sensitive uses in line with policy ENV 13 .
United Utilities seek amendments to the policy to safeguard their access to Mobberley Wastewater Treatment Works	Yes	This site is no longer a site allocation in the Revised Publication Draft SADPD.

Deleted Safeguarded land MOB 2 'Land north of Carlisle Close'

Summary of the main issues raised	Revised SADPD amended?	Council response
The site is so small as to be effectively undevelopable making a wholly nominal contribution to potential future development needs. Such a small safeguarding site has been influenced by the aircraft noise policy. This is a flawed approach and the low housing apportionment to Mobberley has in turn determined the distribution of the residual requirement for safeguarded land across the LSC's. It is considered that land adjacent to MOB 1 should be safeguarded to provide for the element of the safeguarded land requirement that cannot be met in Bollington (instead of Chelford, which is a less sustainable option).	Yes	The approach to distributing safeguarded land in the Revised Publication Draft SADPD is set out in the LSC Safeguarded Land Distribution Report [ED 53]. The Mobberley Settlement Report [ED 37] demonstrates that there are no suitable safeguarded land sites in Mobberley.

Prestbury (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Prestbury can achieve its housing requirements without Green Belt Release. The housing requirement for LSCs has nearly been achieved already and the remainder will be met through windfall developments.	Yes	The proposed residential site allocations for Prestbury have been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8, but there is a need to alter Green Belt boundaries to identify safeguarded land. This issue is considered in the PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
Exceptional circumstances have not been identified to justify alteration of Green Belt boundaries. Prestbury has lost over 20ha of Green Belt for a large school development, which will generate significant amounts of traffic. Therefore, there should be no further development in Prestbury.	Yes	The proposed residential site allocations for Prestbury have been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8, but there is a need to alter Green Belt boundaries to identify safeguarded land. This issue is considered in the PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
<p>Eight sites were submitted:</p> <ul style="list-style-type: none"> • Land off Heybridge Lane (southern site) (FDR2871); • Land to the north of Withinlee Road, Mottram St. Andrew (CFS576); • Land at Shirleys Drive (CFS58); • The Bowery (CFS391 plot 4); • Butley Heights (CFS391 plot 5); • Chrystallis Care Centre and Butley Heights Commercial Zone (CFS391 plot 5b); • Land off Heybridge Lane (northern site) (FDR2001); and • Land west of Greenmeadows, Withinlee Road (new site). 	No	All sites submitted prior to the Revised Publication Draft stage have been considered in accordance with the SSM, through the Prestbury Settlement Report [ED 40].
The housing requirement for Prestbury should be expressed as a minimum figure, rather than 'in the order of'.	No	The approach to development in LSCs is considered in the Policy PG 8 'Development at local service centres' section of

		this consultation statement appendix; and the indicative housing figure for LSCs is no longer disaggregated in the Revised Publication Draft SADPD.
More sites should be allocated in Prestbury. There remains a shortfall against its housing requirement. A flexibility factor should be applied to the housing requirements for Prestbury. The council over-estimated housing delivery figures for the strategic sites included in the LPS and this should not be repeated in Prestbury.	No	The need for site allocations in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix. Housing land supply issues (including flexibility) are considered in the Chapter 8: Housing (general issues) section.
Prestbury has not been given any employment land although it is been given a quota.	No	The need for site allocations in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix.
The sites selected should be closer to the village centre to support local services and facilities. The SSM should prioritise the most accessible locations as required by the NPPF (2019).	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40].
Sites should provide accommodation for young families and people over the age of 55. Specific sites should be allocated for retirement living in Prestbury. Specific sites should be allocated for self-build housing.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40]. Issues around residential mix are considered in the Policy HOU 1 'Housing mix' section of this consultation statement appendix. Issues around older persons accommodation are considered in the Policy HOU 2 'Specialist housing provision' section. Policy HOU 3 'Self and custom build dwellings' is supportive of self-build housing.
Each of the sites is within or surrounded by designated low-density housing areas and the amounts of housing proposed would be significantly out of keeping with the area.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40].
The site selection methodology ignores the Strategic Priorities set out in the LPS. The site selection ignores the community benefits from alternative site options.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40], which includes consideration against the strategic priorities of the LPS.

The council has ignored the community response to the First Draft SADPD consultation.	No	All responses have been taken into account in preparing the Revised Publication Draft SADPD.
The assessment of heritage issues overstates the harm that would be caused to the conservation area and development has the potential to enhance the heritage assets. The assessment of landscape impact overstates the harm to landscape character; and development has the potential to enhance the landscape.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40].
Land off Heybridge Lane (southern site) makes a 'contribution' to Green Belt purposes.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40].
The Bowery and Butley Heights make a 'contribution' to Green Belt purposes.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40].
Land to the north of Withinlee Road makes only a limited contribution to the purposes of Green Belt.	No	All sites submitted have been considered in accordance with the SSM through the Prestbury Settlement Report [ED 40].

Deleted Site PRE 1 'Land south of cricket ground'

Summary of the main issues raised	Revised SADPD amended?	Council response
A ball strike risk assessment has not been carried out and is deferred to the planning application stage. There is a lack of supporting evidence and likely prejudicial impact on the cricket pitch. The number of units should be reduced allowing for lower density housing that is less susceptible to ball strikes.	Yes	This site has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8.
The traffic generated will make local roads more dangerous. The land is unable to provide access for 10 properties. The visibility splay at the entrance is hampered by a protected tree. The access point is unsafe. The pedestrian crossing on Castle Hill should not be lost or rendered unsafe. Some of the land is used by Prestbury Cricket Club for parking; some of which should be retained.		
The site is adjacent to an area categorised as making a 'significant contribution' to Green Belt and adjacent to the cricket ground which is within a LLD area. The site is adjacent to the Bollin Valley Flood Zone. Tree cover should not be lost.		

An additional policy requirement should be added to require development to be in accordance with the Heritage Impact Assessment document [ED 48] including the specific mitigation/enhancement measures for the site.		
The site policy should note that Policy ENV 1 requires development at this site to increase the size of core areas and the quality and quantity of existing new or priority habitat; and that in order to achieve biodiversity net gain (required by Policy ENV 2), impacts to semi-natural habitat on site will require mitigation/offsetting in accordance with the DeFRA metric version 2.0.		

Safeguarded land PRE 2 ‘Land south of Prestbury Lane’

This safeguarded land was included as development site PRE 2 in the initial Publication Draft SADPD.

Summary of the main issues raised	Revised SADPD amended?	Council response
There is no need for further site allocations and there are no exceptional circumstances to justify altering the Green Belt boundary.	Yes	The proposed allocation for development in this plan period has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8. However, there is a need to alter Green Belt boundaries to identify safeguarded land. This issue is considered in the PG 12 ‘Green Belt and safeguarded land’ section of this consultation statement appendix.
The site is capable of delivering around 50 dwellings; the flood risk supporting information should be updated in light of the information provided; the reference to the likely need for mitigation measures at either end of Prestbury Lane should be removed; the reference to the requirement for a botanical survey should be removed.	Yes	The proposed allocation for development in this plan period has been removed from the Revised Publication Draft SADPD due to the changed approach to development at LSCs under Policy PG 8. Following consideration of all sites put forward in the Prestbury Settlement Report, it is now proposed to identify this site as safeguarded land.
Prestbury Lane is narrow, congested and an accident blackspot. The junctions at either end are accident blackspots and mitigation measures could not be provided. The site should score ‘red’ for highways impact due to the	Yes	The site is now proposed as safeguarded land due to the changed approach to development at LSCs under Policy PG 8. The Prestbury Settlement Report [ED 40] considers highways issues in accordance with the SSM. If allocated in the future,

accident statistics; there has been no transport assessment; there is no indication of the mitigation measures required; there is no safe pedestrian access.		junction mitigation measures may be required, but it is considered that these could be achieved.
Pedestrian access via Prestbury Lane is not suitable and the proposal for pedestrian access via the footpath to Heybridge Lane is also unsuitable and cannot be delivered as part of the access is owned by a third party. The path would need widening and the pedestrian crossing at Heybridge Lane improved. The public footpath beyond Heybridge Lane is steep and uneven and used by vehicles to access properties. There is no safe pedestrian route to access public transport, therefore this should score 'red' in the traffic light assessment.	Yes	The site is now proposed as safeguarded land due to the changed approach to development at LSCs under Policy PG 8. The Prestbury Settlement Report [ED 40] considers pedestrian access and it is not clear that safe and convenient pedestrian access could be created along Prestbury Lane. The site promoter has shown one option for creating a new pedestrian access linking to the public footpath network. There may also be other options, although these would likely require land acquisition. The public footpath beyond Heybridge Lane is on an incline for part of its length but there is also a pedestrian footpath along Heybridge Lane, Prestbury Lane and New Road that leads to the railway station and village centre. If allocated in the future, pedestrian access would need to be created, but it is considered that this could be achieved.
The site has poor drainage and building would increase surface run-off. The site is subject to flooding. The site is permanently waterlogged and boggy. The field absorbs surface water run-off from London Road, which will increase with the development of the Poynton Relief Road. The traffic light assessment should score flood risk as 'red'.	Yes	The site is now proposed as safeguarded land due to the changed approach to development at LSCs under Policy PG 8. Flooding and drainage issues have been considered in the Prestbury Settlement Report [ED 40]. It is acknowledged that there are some issues in parts of the site, but it is considered that these could be successfully mitigated if allocated in the future.
The proposals are for high density housing in a low-density area and are not appropriate. The traffic light assessment of compatible neighbouring uses should be 'amber' as the housing adjoining the site is at a much lower density.	Yes	The site is now proposed as safeguarded land due to the changed approach to development at LSCs under Policy PG 8. If allocated for residential development in the future, consideration would need to be given to an appropriate number of dwellings on the site.
The site is peripheral and encroaches into open countryside. It forms part of the setting of Prestbury on its approaches, and development would have an adverse impact on the character, appearance and setting of the village. It is immediately adjacent to development, but not to the	No	The site is substantially enclosed by the settlement on three sides. Landscape impact, and impact on the character and urban form are considered in the Prestbury Settlement Report [ED 40] in line with the criteria set out in the Site Selection Methodology Report [ED 07].

settlement of Prestbury and should therefore score 'red' for its impact on settlement character and urban form.		
The land either side of Prestbury Lane should be designated as part of the adjacent LLD Area. The site should score 'red' for landscape impact as it would impact on the appearance of the vista on entering Prestbury from Prestbury Lane and is currently a green space.	No	The site is not within or adjacent to a LLD area and this issue is considered in the Policy ENV 3 'Landscape character' section of this consultation statement appendix. The landscape impact has been assessed in line with the criteria set out in the Site Selection Methodology Report [ED 07]. The site is a green field, but it is well screened by trees for the most part, surrounded by built development on three sides and there are views of the existing housing immediately beyond the site.
There is a high likelihood that protected species are present on site, including great crested newts. The site provides a variety of habitats and an abundance of wildlife. The traffic light assessment should score ecology impact as 'red'.	No	Ecology issues are considered in the Prestbury Settlement Report [ED 40] in line with the criteria in the Site Selection Methodology Report [ED 07]. There is some potential for protected species to be present, but it is considered that appropriate mitigation measures could be provided if the site were to be allocated for development in the future.
The site will not come forward for development in the plan period as the landowner has expressed a clear unwillingness to sell the land for development.	No	The site is controlled by a housebuilder and has been actively promoted through the SADPD process. If allocated for development in the future, it is likely to come forward.
The foul and surface water systems in the area are already over-stretched. Local services are overstretched, including the GP surgery and dental surgery.	No	In accordance with the SSM, infrastructure providers and statutory consultees (including water and wastewater providers, and the NHS clinical commissioning group) have been consulted on each of the sites proposed for inclusion in the SADPD through the infrastructure providers/statutory consultees consultation at stage 6. They did not raise issues in these respects.
The site is not as sustainably located as some other potential sites and is distant from the services and amenities in the village centre. The site should score 'red' in the traffic light assessment for accessibility.	No	The accessibility assessment of the site in the Sustainability Appraisal [ED 03] shows that the site is in an accessible location. It is within walking distance of the village centre.
The 2013 Green Belt Assessment categorised the site as making a 'major contribution' to Green Belt purposes but this has now been downgraded to 'contribution'.	No	The Green Belt Site Assessment included in the Prestbury Settlement Report [ED 40] demonstrates that the site makes a 'contribution' to Green Belt purposes. This issue is considered

		further in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
The site selection is based on a subjective and inaccurate traffic light assessment; it appears to be based on a pre-conceived outcome. The rationale for decisions made is opaque. None of the responses made at the first draft stage have been taken into account or reflected in the revised traffic light assessments.	No	All responses have been considered, but the traffic light assessments of the site have been carried out in accordance with the criteria set out in the Site Selection Methodology Report [ED 07]. The reasons for including the site in the SADPD are set out in the Prestbury Settlement Report [ED 40].
Other brownfield sites in Macclesfield should be used instead.	No	The site is proposed as safeguarded land, which is 'land between the urban area and the Green Belt'.
Reports prepared by the site promoter are said to lack credibility and their information has not been challenged by the council. The reports were only released following a Freedom of Information request. A number of representations challenge statements made in the site promoter's literature.	No	It is usual for a site promoter to submit promotional/technical documents in support of a site. The reports submitted by the site promoter were released in response to a Freedom of Information request; however, no request for this information was received through the normal channels of communication beforehand. The council does not accept all the findings of the site promoter's literature (for example, the suitability of Prestbury Lane to provide a pedestrian access route). The council's assessment of the site is based on its own evidence as set out in the Prestbury Settlement Report [ED 40].
LPS Policies PG 3 and PG 4 require the SADPD to make an assessment of whether or not it is necessary to release further land from the Green Belt to be designated as safeguarded land; and this policy requirement is not altered by the reference to 200ha in the supporting text. This approach was endorsed by the LPS Inspector and is consistent with the NPPF (2019) (¶139) but the council has not conducted an up to date assessment of the need for release of further land from the Green Belt to be designated as safeguarded land.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.

The traffic light assessment methodology is flawed as it treats all criteria of equal importance, with no attempt to weight the more important criteria.	No	The SSM (including the traffic light assessment) is based on the methodology used to select sites for the LPS, which was found sound at examination. As set out in the Site Selection Methodology Report [ED 07], the detailed criteria are not pre-weighted and the traffic light assessment provides a way of presenting information about the characteristics, constraints, capacities and circumstances of sites in a consistent way that enables this, along with other factors, to form part of the overall site selection process.
There is no need for any further safeguarded land as the Cheshire East requirement for 1,800 dwellings per year has become 1,068 dwellings per year as a result of the government's revised figures published on 16/12/20. The LPS was based on an over-optimistic view of economic growth (7% per year) and 30,000 jobs resulting in an increased housing figure to cater for jobs growth. There has been underperformance in jobs growth and limited employment land take-up.	No	These issues are considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.
The NPPF (2019) ¶57 requires a viability assessment. Absence of an independent viability assessment to support to viability of the site means that the traffic light assessment for viability should be 'red'.	No	The NPPF (2019) ¶57 requires a viability assessment in the context of planning applications for schemes that seek not to make the full development contributions expected by policy. The SADPD is supported by the Local Plan Site Allocations and Development Policies Viability Assessment [ED 52]. The assessment of viability under the SSM is appropriate and proportionate to the issue.
The traffic light assessment of the agricultural land quality should be 'red' as it is grade 3 and not known if it is best and most versatile.	No	In line with the criteria set in the Site Selection Methodology Report [ED 07], grade 3 agricultural land is given an 'amber' rating.
The traffic light assessment includes criteria related to the SGG, which is irrelevant in Prestbury. As the criteria are not weighted, this increases the number of green ratings, leading to a flawed assessment.	No	The traffic light assessment criteria are set in the Site Selection Methodology Report [ED 07] and are used across the plan area. The detailed criteria are not pre-weighted and the traffic light assessment provides a way of presenting information about the characteristics, constraints, capacities and circumstances of sites

		in a consistent way that enables this, along with other factors, to form part of the overall site selection process. All Prestbury sites are assessed as 'green' for this criterion and it has not been used to differentiate them.
The traffic light assessment of accessibility is flawed as there is no reference to the specific accessibility guidance under LPS Policy SD 2 'Sustainable development principles' (in Table 9.1 of the LPS). Using the standards set in Policy SD 2 means that the site should score 'red' for accessibility.	No	The SSM traffic light assessment of accessibility reports on the number of criteria in the Sustainability Appraisal [ED 03] accessibility assessment that meet the required accessibility standard. ¶F.1 in the SA confirms that the accessibility assessments are based on the criteria and distances in the accompanying Table 9.1 to LPS Policy SD 2 'Sustainable development principles'. Buffers around each site are used to carry out these assessments so the distances are straight line distances from the site.
The traffic light assessment for highways access should be 'red' as the existing field access is not sufficient for an estate of 50 homes.	No	In line with the SSM criteria, the 'highways access' assessment is a simple assessment of whether there is an existing access point to a highway. If allocated for residential development in the future, consideration would need to be given to an appropriate number of dwellings on the site.
The traffic light assessment of whether the site is in an AQMA should be 'amber' as the junction improvements that would be required and the increase in traffic over the next 10 years could adversely affect the air quality in Prestbury Lane.	No	The site is not in an AQMA and is assessed as 'green' in the traffic light assessment contained in the Prestbury Settlement Report [ED 40], in line with the criteria set out in the Site Selection Methodology Report [ED 07].
The traffic light assessment of public transport frequency should be 'amber' as it is not safe to walk to the railway station, and the nearest bus stop is over 500m away and does not operate after 6pm.	No	The site is within the walking distances of both a commutable rail service and commutable bus service when assessed using the criteria set out in the Site Selection Methodology Report [ED 07].
The traffic light assessment of employment land loss is rated as 'amber'; the traffic light assessment of employment land loss is rated as 'red'.	No	The site is assessed as 'green' for loss of employment land as it is not existing employment land.

Safeguarded land PRE 3 'Land off Heybridge Lane'

Summary of the main issues raised	Revised SADPD amended?	Council response
The site does not meet the accessibility criteria for four of the key facilities identified.	No	The accessibility assessment of the site in the Sustainability Appraisal [ED 03] shows that the site is in an accessible location.
There are access constraints that need to be addressed before the site could be developed. The access requires demolition of one detached home to gain access to the site.	No	Highway and access issues are considered in the Prestbury Settlement Report [ED 40].
The settlement report notes it may be necessary to reduce the development area to mitigate landscape impacts. The presence of the pond and problematic access arrangements may reduce the area further. These need to be factored in and the SADPD should be clear about how many houses can be delivered.	No	As set out in the Prestbury Settlement Report [ED 40], a much smaller area of the site is proposed for safeguarded land to mitigate the landscape impacts. The site is proposed for safeguarded land.
The site was found to make a 'significant contribution' to Green Belt purposes in the 2015 Green Belt Assessment Update but has now been downgraded to make only a 'contribution'. The re-classification was done without a re-evaluation of the Green Belt Assessment Update and is simply an acceptance of the developer's opinion.	No	The Green Belt Site Assessment included in the Prestbury Settlement Report [ED 40] demonstrates that the site makes a 'contribution' to Green Belt purposes. This issue is considered further in the deleted Policy PG 11 'Green Belt boundaries' section of this consultation statement appendix.
There are concerns about the density of housing proposed. 70 dwellings on this site would be out of character with the surroundings.	No	If allocated for residential development in the future, consideration would need to be given to an appropriate number of dwellings on the site.
The land is understood to house a variety of flora and fauna and a full environmental impact assessment must be carried out. The site provides habitats for several species.	No	Ecology issues are considered through the Prestbury Settlement Report [ED 40] and it is considered that any impacts could be mitigated.
The site should be allocated for development rather than safeguarded; and that a further area of adjacent land be safeguarded for future development.	No	The issue of housing provision in LSCs is considered in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix, which shows that

		the indicative LSC housing figure set out in the LPS can be met without making allocations in the SADPD.
This section of Heybridge Lane is not connected to mains drainage/sewage systems.	No	This issue is considered in the Prestbury Settlement Report [ED 40]. The nearest connection point is approximately 300m away and connection is considered to be feasible.
LPS policies PG 3 and PG 4 require the SADPD to make an assessment of whether or not it is necessary to release further land from the Green Belt to be designated as safeguarded land; and this policy requirement is not altered by the reference to 200ha in the supporting text. This approach was endorsed by the LPS Inspector and is consistent with the NPPF (2019) ¶139 but the council has not conducted an up-to-date assessment of the need for release of further land from the Green Belt to be designated as safeguarded land.	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land' section of this consultation statement appendix.
There is no need for any further safeguarded land as the Cheshire East requirement for 1,800 dwellings per year has become 1,068 dwellings per year as a result of the government's revised figures published on 16/12/20. The LPS was based on an over-optimistic view of economic growth (7% per year) and 30,000 jobs resulting in an increased housing figure to cater for jobs growth. There has been underperformance in jobs growth and limited employment land take-up.	No	These issues are considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.

Shavington (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
The council has not planned for enough housing in Shavington.	No.	No allocations are considered necessary at the LSC tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05] and response to main issues for Policy PG 8 'Development at local service centres'.

<p>The following sites should be (re)considered for housing allocation:</p> <ul style="list-style-type: none"> • Land at Rope Lane (FDR2307) • Land off Oakleaf Close (CFS364) • Land South of A500 (FDR2675) • Land Adj. 272 Newcastle Road (CFS379) • Land at Grove farm (FDR2791) • Land at 414 Newcastle Road (FDR2743) 	No.	No allocations are considered necessary at the LSC tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05].
Land south of the A500 and at Oakleaf Close should be removed from the SGG.	No.	This issue is considered in the Policy PG 13 'Strategic green gaps boundaries' section of this consultation statement appendix.
The Settlement boundary should be amended to include Land south of the A500 and 414 Newcastle Road.	No.	The settlement boundary review methodology is set out in the 'Settlement and infill boundaries review' [ED 06]. These sites did not meet the methodology criteria/tests to justify their inclusion within the settlement boundary.

Wrenbury (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Land north of Cholmondeley Road (CFS 813) and at New Road (CFS 260) should be allocated for housing.	No.	No allocations are considered necessary at the LSC tier. See the 'Provision of Housing and Employment Land and Approach to Spatial Distribution' report [ED 05] and response to main issues for Policy PG 8 'Development at local service centres'.

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

Summary of the main issues raised	Revised SADPD amended?	Council response
<p>A number of sites were submitted:</p> <ul style="list-style-type: none"> • Land adjacent to 150 Buxton Road, Disley (CFS85); • Brookside Hall, Arclid (CFS209/211); • Land at the former George and Dragon Public House, Higher Hurdsfield (CFS251); • Land off Dodds Green Lane, Burleydam (CFS262); • Crewe Road/Newtons Lane, Winterley (CFS285/286); • Land off Newcastle Road and Holmes Chapel Road, Brereton (CFS297/300); • Land opposite Weaver View, Over Road, Church Minshull (CFS303); • Warmingham Brinefield, Hole House and Spring Moss Farm (CFS330); • Bucklow Garage, Bucklow Hill (CFS338); • Land adjacent to Dale End, Mottram St. Andrew (CFS343) • Land off School Lane, Marton (CFS365/382); • Warford Park, Great Warford (CFS399); • Yarwood Heath and Land North of Yarwood Heath, Rostherne (CFS429); • Land at Agden Park Lane, Broomedge (CFS432); • Land at Wrenbury Road/Whitchurch Road, Aston (CFS446); • Land off Newcastle Road, Hough (CFS495); • Land off Crewe Road Winterley (CFS548); • Land at Newcastle Road, Brereton (FDR599); • Land north of Bolshaw Farm Lane, Heald Green (FDR1411); • Land at Cemetery Road, Weston (FDR1593); • Stone Cottage, 14 Summerhill Road, Prestbury (FDR1918); 	No	<p>All sites submitted prior to the Revised Publication Draft SADPD stage have been considered in accordance with the Site Selection Methodology Report [ED 07] through the Other Settlements and Rural Areas Report [ED 46], but as set out in that report, there is no requirement to make further site allocations within this tier of the settlement hierarchy.</p>

<ul style="list-style-type: none"> • Land at The Boar's Head Public House, Walgherton (FDR1926); • Land at Congleton Road, Marton (FDR2372a); • Land at Marton Lane, Marton (FDR2372b); • Land west of Fowle Brook, Crewe Road, Winterley (PBD1323); • Land off Audlem Road, Hankelow (PBD1415). • Land at Corner Farm, Newcastle Road, Hough (PBD1480); • The Grange Fields, Worleston (new site); and • Land adjacent to Agden Mount Farm, Agden (new site). 		
The flexibility factor should be applied to OSRA.	No	Housing land supply issues (including flexibility) are considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix. The employment land requirement set out in LPS Policy PG 1 already includes 20% flexibility.
The OSRA requirement should be disaggregated. Sites should be allocated for development in the OSRA.	No	These issues are considered in the Chapter 2: Planning for growth (general issues) section of this consultation statement appendix.

Gypsy, Traveller and Travelling Showpersons Sites (general issues)

Summary of the main issues raised	Revised SADPD amended?	Council response
Land at Mill Lane, Smallwood (ref GTTS 14) should be considered as a site for permanent and transit Gypsy and Traveller pitches.	Yes	The site has been considered through the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] and is proposed as Site G&T 6 'The Oakes, Mill Lane, Smallwood' in the SADPD.
United Utilities would like consideration of how sites obtain a water supply and sewer connection (if needed), whilst disposing resulting surface water in the most sustainable way.	Yes	Policy HOU 5c (criterion 7) includes reference to sites providing for an appropriate level of essential services and utilities.

Site G&T 1 'Land east of Railway Cottages, Nantwich (Baddington Park)'

Summary of the main issues raised	Revised SADPD amended?	Council response
Allocation of the site is contrary to the advice in the Peter Brett Associates Report (2014), which considered the site to be unsuitable.	No	The site now has planning permission (ref 19/5261N) for six permanent pitches. As noted in the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14], a number of site(s) have been considered previously through the Peter Brett Associates Gypsy, Traveller and Travelling Showpeople Site Identification Study (Peter Brett Associates Report , 2014). The Peter Brett Associates Report has formed part of the evidence base for producing the Gypsy, Traveller and Travelling Showpeople Site Selection Report , but the site assessments included represent a fresh appraisal of each site option, utilising the SSM outlined in sections 1-3 of the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14].
The council owns numerous sites (see the East Cheshire Gypsy and Traveller Study Report) that are suitable for development, and a council is required to use its own public sites before considering private sites for development.	No	There is no requirement to consider the provision of public sites for Gypsy, Traveller and Travelling Showperson uses before considering private sites for development. ¶4 (e) of National Planning Policy for Traveller Sites notes that one of the aims in respect of Traveller sites is to "promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites". The Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] has utilised a clear and transparent SSM to consider sites appropriate for allocation in the SADPD [Section 3, ED 14]. Stages 1 and 2 of the SSM involves establishing a pool of sites from a number of different sources (including but not limited to council owned sites considered 'available' for consideration in the study), which are then subject a site sift, at stage 2, in line with the stated criteria in the site selection report.
The site is in an unsustainable location. The proposed site can only be reasonably accessed by vehicles, not pedestrians. Approval of this site would fail to meet the council policy of reducing the impact of vehicle journey pollution.	No	The site now has planning permission (ref 19/5261N) for six permanent pitches. The Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] details the sites sustainability noting that the site is assessed as amber with respect of accessibility to services and facilities. However, this has to be balanced against the requirement to identify a supply of specific deliverable sites (5 years' worth of sites against the findings of the 2018 GTAA). Opportunities to maximise sustainable solutions will vary between urban and more rural areas; most journeys to and from this site would be made by the occupants' cars or other motor vehicles and journeys

		to access important facilities and services would not be lengthy for a number of services and facilities, as supported by the sites amber assessment for accessibility. National planning guidance makes it clear that sustainability should not only be considered in terms of transport modes and access to services, other factors such as economic and social considerations are important. These factors are considered in more detail in the site selection report. Following an evaluation of the relevant planning factors, the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] recommends that the site is proposed to be allocated in the SADPD to support the intensification of use on the site by a further 2 permanent pitches.
Concerns over: <ul style="list-style-type: none"> • Open countryside location • Potential surface water run off • Scale of the site 	No	The site now has planning permission (ref 19/5261N) for six permanent pitches. The site allocations proposed in the SADPD are supported by a detailed Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14], which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, whereby further mitigation and assessment will be required at planning application stage.

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

Summary of the main issues raised	Revised SADPD amended?	Council response
The land is owned by Cheshire East Council and was previously considered as a Gypsy and Traveller Site. The recent windfall sites are generally family owned and occupied. The council only have 1 municipally owned site, which is fully occupied. This site would allow Gypsies and Travellers who do not wish, or who are not able to purchase land for development, to rent a pitch with all facilities.	No	Comment noted.
Cheshire East Council is looking at sites in the south of the borough rather than creating an even spread of sites over the whole of the borough.	No	The site selection process has considered sites from several different sources and has considered the suitability of sites for allocation in an appropriate way through the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14].

This site should be carefully assessed for potential contamination from the garage works to ensure that it is safe for development.	No	The site allocations proposed in the SADPD are supported by a Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14], which has considered the suitability of sites for allocation and recommended where additional mitigation is required. This has informed the approach to policy wording, whereby further mitigation and assessment will be required at planning application stage. This includes criterion 4 of the Policy, which refers to the completion of a phase 1 and 2 contaminated land assessment.
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Site G&T 3 'New Start Park, Wettenhall Road, Nantwich'

Summary of the main issues raised	Revised SADPD amended?	Council response
The site is not close to services, facilities or public transport; it will have an impact on the character and appearance of open countryside. The site remains in conflict with local and national planning policy. The allocation is not justified and not consistent in achieving sustainable development. There is inconsistency of the allocation with the council's previous judgements about the site. There are other applications in the immediate area for permanent residential development that have also been dismissed at Appeal on the basis of unsustainability in terms of lack of transport, lighting or footways, a 60-mph speed restriction and distance from accessible services. APP/R0660/W/16/3146021 in 2016 rejected the development of two new dwellings less than half a mile from New Start but in closer proximity to Nantwich	No	Since the consultation on the Revised Publication Draft SADPD and following an appeal decision issued on the 28 January 2021 (ref APP/R0660/W/19/3229076), the site now has permanent planning permission for 8 pitches.

Site G&T 4 'Three Oakes Site, Booth Lane, Middlewich'

Summary of the main issues raised	Revised SADPD amended?	Council response
Historic England request an additional criterion: Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site.	Yes	Reference to the measures identified in the heritage impact assessment has been added to criterion 1.
A previous permission for 24 pitches at Three Oakes, Booth Lane Middlewich lapsed. It is not clear if the owner is committed to delivering additional pitches on this site.	No	The proposed allocation of this site has been considered through the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] as site GTTS 15a. Following this detailed site assessment, the site is recommended for allocation in the SADPD.
If an additional 24 pitches are given planning permission at Three Oakes, it would take provision in Cheshire East to 151 pitches 75 (with the potential of up to 79) of which would be in Moston. It is unreasonable that half of the Gypsy site provision could be located in one parish; there are other areas within Cheshire East where sites could be located and assimilated into the area	No	The proposed allocation of this site has been considered through the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] as site GTTS 15a. Following this detailed site assessment, the site is recommended for allocation in the SADPD.

Site G&T 5 'Cledford Hall, Cledford Lane, Middlewich'

Summary of the main issues raised	Revised SADPD amended?	Council response
Object due to its proximity to industrial sites.	No	The Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] acknowledges that the site is adjacent to employment uses accessed from ERF Way. Some form of mitigation may be required to minimise any amenity impacts. The Policy notes that the site should demonstrate through a noise impact assessment that external and internal noise impacts can be acceptably minimised through appropriate mitigation including a noise management plan.

This proposed site does not meet the requirements as defined in the quoted government criteria.	No	The Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] has considered several relevant factors, aligned with national planning policy.
Middlewich has no real history of illegal encampments and no direct need for a transit site. As such, the site will see very limited use, whilst representing an extremely poor return on investment.	No	The Criminal Justice and Public Order Act 1994 is particularly important with regard to the issue of Gypsy and Traveller transit site provision. Section 62A of the Criminal Justice and Public Order Act allows the Police to direct trespassers (unauthorised encampments) to remove themselves, their vehicles and their property from any land where a suitable pitch on a relevant caravan site is available within the same Local Authority area. A suitable pitch on a relevant caravan site is one that is situated in the same Local Authority area as the land on which the trespass has occurred, and that is managed by a Local Authority, Registered Provider or other person or body as specified by order by the Secretary of State. The suitability of the site for allocation has been considered through the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14].
Part of the site is located within flood zone 2 and a sequential assessment needs to demonstrate that there are no more available or deliverable sites within flood zone 1, prior to looking to allocating the site or developing in areas at greater risk of flooding.	No	All sites proposed for allocation in the SADPD have been assessed for their suitability in the Gypsy, Traveller and Travelling Showperson Site Selection Report [ED 14]. The site is assessed as 'amber' in respect of flooding and drainage matters. The site is in Flood Zone 1. There are areas of Flood Zones 2 and 3 to the west of the site along Sanderson's Brook. There is a small area of surface water flood risk to the north of the site; a suitable drainage system will be required to alleviate this flood flooding. The Policy notes that the site should use permeable materials as hardstanding and provide a drainage strategy to prevent surface water run-off from the site.

Deleted Site G&T 6 'Land at Thimswarra Farm, Moston'

Summary of the main issues raised	Revised SADPD amended?	Council response
Overall, there is clear inconsistency and contradiction in the current methodology and assessment processes to reach a view contrary to all of the council's in-house evidence and previous judgements in fully discounting this site as being wholly unsuitable for permanent residential development.	Yes	The site is now a commitment and no longer proposed to be allocated in the SADPD.

Deleted Site G&T 7 'Land at Meadowview, Moston'

Summary of the main issues raised	Revised SADPD amended?	Council response
Overall, there is clear inconsistency and contradiction in the current methodology and assessment processes to reach a view contrary to all of the council's in-house evidence and previous judgements in fully discounting this site as being wholly unsuitable for permanent residential development.	Yes	The site is now a commitment and no longer proposed to be allocated in the SADPD.

Site G&T 8 'The Oakes, Mill Lane, Smallwood'

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised.	N/A	N/A

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

Summary of the main issues raised	Revised SADPD amended?	Council response
Site TS 1 is unsuitable for occupation by Travelling Show Persons' families. As the SADPD notes, it is adjacent to the waste disposal facility on Mobberley Road. When the site was considered for other purposes, i.e. a health centre, it was rejected because the land is potentially contaminated. It is also adjacent to a petrol filling station and car wash.	No	The Policy refers to the need for a noise impact assessment and the need to provide for a buffer from the recycling centre to achieve an acceptable level of residential amenity for prospective residents including in terms of noise and disturbance. Criterion 4 of the Policy requests that a contaminated land assessment (phase 1 and 2) for the site is completed.
Site specific concerns including impact on amenity, highways, noise, contamination.	No	The reasoning and justification for the proposed allocation of the site is set out in the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14]. The Policy includes appropriate references to securing residential amenity, incorporating and

		retaining existing hedgerows, and preparing appropriate assessments including noise and contaminated land assessments, amongst other things.
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Site TS 2 'Land at Firs Farm, Brereton'

Summary of the main issues raised	Revised SADPD amended?	Council response
Historic England considers that an additional bullet should be included: "Be in accordance with the Cheshire East Heritage Impact Assessment document including the specific mitigation/enhancement measures for the site".	Yes	Noted. Reference to the measures in the Heritage Impact Assessment has been included in criterion 1.
¶12.176 should refer to the correct distance to Arclid landfill site.	No	The council considers that the supporting information to the policy is appropriately worded in referring to the need for permanent structures to be supported by an appropriate level of assessment or mitigation, given the proximity of the site to Arclid landfill site.

Site TS 3 'Land at former brickworks, A50 Newcastle Road'

Summary of the main issues raised	Revised SADPD amended?	Council response
No main issues raised.	N/A	N/A

Chapter 13: Monitoring and implementation

Summary of the main issues raised	Revised SADPD amended?	Council response
Triggers that prompt a full review of the Local Plan should be included.	No	The council does not consider identifying specific triggers is necessary since a Local Plan Monitoring Framework [ED 54] has been developed, the purpose of

		which is to list the monitoring indicators that will appear in the council's yearly AMR. The AMR seeks to establish what has occurred in the borough and how trends may be changing, consider the extent to which Local Plan policies are being achieved and determine whether changes to policies or targets are necessary. A local plan review at least every five years is a legal requirement of Regulation 10A of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017.
The LPMF should not be flexible – any changes made should be consulted on for 4 weeks. ¶13.1 should be amended to reflect this and to clarify that changes made will be to strengthen existing measures or add new ones.	No	As alluded to in ¶13.1, information sources may change or become unavailable, there may be a change in monitoring practices and Local Plan documents are adopted or revised. Therefore, the Local Plan Monitoring Framework needs to be responsive to change. To consult on changes made to the Local Plan Monitoring Framework is not considered to be a proportionate approach to take and there is no legal requirement to do so either.
Indicator SC11 'New assembly and leisure floorspace completions' should have a target, as per the infrastructure plan and CIL collected.	No	The inclusion of a target is not considered necessary in the Local Plan Monitoring Framework as these matters are covered by the monitoring and updating of the council's corporate indoor sports and recreation strategies e.g. through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'initial Publication Draft SADPD', the RPDSADPD and their accompanying documents and have made no comments on the Local Plan Monitoring Framework.
Indicator SC12 'Amount of assembly and leisure floorspace lost' should record any loss of assembly or leisure floorspace. It is for the notes to justify in line with policies SC 1 & 2 or not.	No	Monitoring of the indicator would entail the recording of the amount of assembly and leisure floorspace lost, including those losses that LPS Policies SC 1 and SC 2 allow. Wider monitoring of indoor sports and recreation is carried out through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'initial Publication Draft SADPD', the RPDSADPD and their accompanying documents and have made no comments on the Local Plan Monitoring Framework.
Indicator SC13 'Provision of outdoor sports facilities' the amount gained/lost should be stated and the targets in the	No	The target for indicator SC13 is for no quantitative and qualitative loss and the delivery of recommendations in an adopted sports strategy action plan. This will entail the monitoring and reporting on all losses. Wider monitoring of indoor

sports strategy action plan highlighted, to encourage a sports net gain ambition.		sports and recreation is carried out through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'initial Publication Draft SADPD', the RPDSADPD and their accompanying documents and have made no comments on the Local Plan Monitoring Framework.
Indicator SC14 'Provision of indoor sports facilities' should be stated alongside the sports strategy action plan and any loss should be highlighted, to encourage a sports net gain ambition	No	The target for indicator SC14 is for no net loss of indoor sports facilities, as recorded on the Sport England Active Places database. This will entail the monitoring and reporting on all losses. Wider monitoring of indoor sports and recreation is carried out through the 'Cheshire East Indoor Built Facilities Strategy' [ED 20] and the 'Indoor Built Facilities Strategy Progress Review' [ED 20a]. Sport England has been consulted on the 'initial Publication Draft SADPD', the RPDSADPD and their accompanying documents and have made no comments on the Local Plan Monitoring Framework.

Chapter 14: Glossary

Summary of the main issues raised	Revised SADPD amended?	Council response
There is a need to provide housing for first time buyers and the SADPD should include an entry-level exception site policy, as required by NPPF (2019) ¶71.	No	This issue is considered in the Chapter 8: Housing (general issues) section of this consultation statement appendix.
The definition of affordable housing should include a new point "linked to local income to ensure genuine affordability".	No	The definition of affordable housing matches the definition in the NPPF (2019) Annex 2.
"Locally listed building" should be defined.	No	"Buildings of local architectural or historic interest (local list)" is included within the definition of non-designated heritage assets.

Appendix A: Related documents and links

Summary of the main issues raised	Revised SADPD amended?	Council response
Several issues were raised in respect of the Local Service Centres Spatial Distribution Disaggregation Report [PUB 05].	Yes	The Revised Publication Draft SADPD no longer proposes to disaggregate the indicative LSC figures to individual settlements. This issue is considered further in the Policy PG 8 'Development at local service centres' section of this consultation statement appendix.
Several issues were raised in respect of the Green Belt Boundary Alterations Explanatory Note [PUB 56].	Yes	The Revised Publication Draft SADPD no longer proposes to amend Green Belt boundaries to accommodate development requirements in this plan period, due to the changed approach to development at LSCs under Policy PG 8.
Several issues were raised in respect of Bollington and the Bollington Settlement Report.	No	These issues are considered in the Chapter 12: Bollington (general issues) section of this consultation statement appendix.
The search for housing sites was biased and the council put out a request for sites, which meant only sites were submitted that would not normally obtain planning permission.	No	It is normal practice for a local planning authority to carry out a 'call for sites' exercise to invite the community, landowners, developers and other interested parties to submit sites for consideration.
The duty to co-operate has not been fulfilled as there are very few comments on this section.	No	The approach to the Duty to Co-operate is set out in the draft Duty to Co-operate Statement of Common Ground [ED 51].
The consultation statement does not give representations serious consideration and there is no proper justification as to why particular sites have been chosen for safeguarded land.	No	The consultation statement is the council's summary of the main issues. It refers to the evidence base to justify the proposals in the plan. Each settlement report documents in some detail the reasons why particular sites have been selected for inclusion as safeguarded land.
The government's standard method shows that the housing need in Cheshire East is much lower than that set out in the LPS and there is no requirement for safeguarded	No	This issue is considered in the Policy PG 12 'Green Belt and safeguarded land boundaries' section of this consultation statement appendix.

land. Exceptional circumstances have not been demonstrated.		
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Sustainability Appraisal

Summary of the main issues raised	Revised SADPD amended?	Council response
The SA undervalues the sterilisation of minerals by suggesting this is a minor negative impact; this is an unsustainable approach to minerals planning.	Yes	<p>The purpose and scope of the SADPD are limited to making provision for additional sites, where necessary, to accommodate the level of growth anticipated for specific uses and areas within the settlement hierarchy left over from the LPS. It also follows the strategic lead of the LPS and sets out more detailed, non-strategic policies to guide planning application decision-making.</p> <p>The SADPD and its accompanying SA takes a balanced approach to minerals planning within the context of achieving the overall vision and strategic priorities of the Local Plan as identified in the LPS, which was adopted in July 2017. Ultimately, deciding whether this balance has been achieved is a matter of planning judgment. The fact that the SA identifies the effect on mineral resources as being a negative one acknowledges the planning guidance principle of seeking to protect mineral resources from needless sterilisation. Following comments on the initial Publication Draft SADPD [PUB 01] in relation to minerals, the council has amended the SA to identify that some of the proposed allocations may have a “significant negative” effect on minerals resources. As a result the council has proposed to introduce the need for a Mineral Resource Assessment to be undertaken on those proposed site allocation that are located in areas identified by British Geological Survey as containing a sand resource (sand & gravel and silica sand) or close to such areas, that is, within 250m. This applies to sand resources that are 3ha or greater in size (as any less is not considered likely to be economically viable) or that adjoin a wider sand resource (regardless of the size of the allocated site). The Mineral Resource Assessment will enable the council to understand the potential impact that the proposed development may have on the mineral resources. This should include whether it is feasible to require prior extraction of the mineral before development proceeds and whether the proposed development has the potential to sterilise any future extraction of the wider mineral resource. Therefore, the</p>

		requirement for a Mineral Resource Assessment will enable the council to make an informed planning judgment regarding mineral resource impacts when determining planning proposals on relevant allocated sites.
The Equality Impact Assessment is not fit for purpose as there is no reference to census data or consultation feedback.	No	A revised Equality Impact Assessment has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03], building on work previously carried out on Equality Impact Assessment; the SA is an iterative process. It includes a section on consultation and contains baseline information. Annex D of the Equality Impact Assessment contains a summary of the main issues raised in relation to the Equality Impact Assessment through consultation on the SADPD and how these issues have been considered. Annex B contains a summary of responses of protected characteristics groups made to the SADPD, with comments made in relation to protected characteristics.
There is no reference in the SADPD or in the Equality Impact Assessment that decisions are based on individual protected characteristics, needs or circumstances.	No	A revised Equality Impact Assessment has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03], building on work previously carried out on Equality Impact Assessment; the SA is an iterative process. The Equality Impact Assessment has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all the protected characteristics considered. It is therefore compatible and has had regard to the three main duties of the Equality Act 2010. Annex B of the Equality Impact Assessment contains a summary of responses of protected characteristics groups made to the SADPD, with comments made in relation to protected characteristics issues. Policy and text amendments have also been made to the SADPD that demonstrate the council has paid due regard to one or more of the three public sector equality duties set out in the Equality Act 2010.
The question hasn't been asked regarding relations between different groups or communities and the consultation does not identify protected characteristics for analysis. It has not been demonstrated in the SADPD that the development needs of	No	A revised Equality Impact Assessment has been published in Appendix G of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03] that identifies the protected characteristics. The Equality Impact Assessment has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all the protected characteristics considered. It is therefore

protected characteristics have been met and addressed.		compatible and has had regard to the three main duties of the Equality Act 2010. The SADPD has also been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.
Question 5 of the Equality Impact Assessment has not been answered or the response given justified.	No	All the questions on the form were answered and a revised Equality Impact Assessment has been published in Appendix G of the Revised Publication Draft SADPD SA [ED 03]. The Equality Impact Assessment has highlighted that the SADPD seeks to achieve improvements that will benefit all sections of the community. It promotes accessibility of services, facilities and jobs and development would incorporate a suitable mix of housing types and tenures. The SADPD has either a positive or neutral impact on all the protected characteristics considered. It is therefore compatible and has had regard to the three main duties of the Equality Act 2010. The SADPD has also been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.
With regards to actual or potential impact on specific characteristics, there does not appear to be any qualitative or quantitative data to justify this answer, e.g. age profiles.	No	A revised Equality Impact Assessment has been published in Appendix G of the Revised Publication Draft SADPD SA [ED 03], building on work previously carried out on Equality Impact Assessment; the SA is an iterative process. It includes a section containing baseline information, which incorporates age profile data.
The reference to consultation at the end of the Equality Impact Assessment is unacceptable.	No	A revised Equality Impact Assessment has been published in Appendix G of the Revised Publication Draft SADPD SA [ED 03], building on work previously carried out on Equality Impact Assessment; the SA is an iterative process. The SADPD has been the subject of public consultations, carried out in accordance with the approved Statement of Community Involvement.
Data intelligence should be used to make sure the consultation is accessible to the community	No	The consultation carried out was not just online based. The consultation length (6 weeks), materials available and consultation process was run in line with the council's SCI and the relevant regulations (Town and Country Planning (Local Planning) (England) Regulations 2012). This included notification of the consultation through public notices in local newspapers and press releases carried in local news outlets (details can be provided on request). The council notified its Local Plan database (individuals could write to us (in any form) at any time to ask to be put on our local plan database to receive a direct notification of consultations taking place (via e-mail/letter)). The council also accepted representations (received via online portal, e-mail, and letter) in line with its published Statement of Representations Procedure (again available to

		view in local libraries etc.). The council also prepared a guidance note to assist those making representations. Officers were also available via telephone (number advertised in the Statement of Representations Procedure available online or in local libraries/council offices) to answer any queries and assist with difficulties in responding to the consultation. There is an issue of proportionality here and the council's view is that reasonable steps have been taken to notify members of the public and run the consultation in an appropriate manner in line with its SCI.
¶3.10 (initial Publication Draft SADPD)/¶3.11 (Revised Publication Draft SADPD) is not wholly correct, as PG 7 also focuses upon the KSCs such as Alsager.	No	Although it is acknowledged that LPS Policy PG 7 contains indicative levels of development for the KSCs, these figures, unlike those for the LSCs, have already been disaggregated in the LPS. In this context, the heading of 'Disaggregation Options', is correct.
The focus of the SA is upon the LSCs and OSRA; there are other 'reasonable alternatives' in Alsager that should have been explored.	No	The SADPD is the second part of the Local Plan. Its purpose and scope are limited to making provision for additional sites, where necessary, to accommodate the level of growth anticipated for specific uses and areas within the settlement hierarchy left over from the LPS. It allocates a limited number of additional, generally smaller-scale sites for development and, in the north of the borough, designates parcels of safeguarded land around LSCs. In respect of Alsager, all Alsager sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and the initial Publication Draft SADPD consultation have been considered for their suitability for allocation in the 'Alsager Settlement Report' [ED 22] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Land off Fanny's Croft is in the Green Belt and further Green Belt release was not considered to be a reasonable alternative by the council. The SA has clearly set out its approach and reasoning for the identification of reasonable alternatives by topic area. ¶¶4.6 to 4.9 of the 'Alsager Settlement Report' [ED 22] sets out the decision point – the need for sites in Alsager (Stage 3 of the site selection methodology).
Progressing the SADPD in isolation risks the sterilisation of mineral resources.	No	The council does not consider this is the case for the reasons identified above.
The appraisal methodology used in the SA to identify suitable sites for allocation fails to recognise the	No	The consideration of minerals is one of the 20 criteria used in the SSM. The traffic light criteria for minerals against which all the sites are judged has been enhanced as a result of the representations received. All the considered sites were either classified as

importance of minerals, which are fundamental in the pursuit of sustainable development.		red, amber, or green against the mineral criterion assessment used in the SSM. The traffic light criteria form just one factor balanced against a whole raft of other factors, the outcomes of which are documented in the individual settlement reports. The traffic light criteria were used in the SA to determine significant effects, with the outcomes of the SA process informing the settlement reports. Planning judgment was used to balance the findings of each of the criteria for every site prior to determining which of the sites would be proposed for allocation.
The approach taken to minerals within the SA is contrary to ¶203 of the NPPF (2019) and risks the unnecessary sterilisation of nationally significant mineral resources.	No	The Framework should be read as a whole. The SADPD provides the planning framework for addressing housing needs and other economic, social, and environmental priorities in the borough. The risks of “unnecessary” mineral sterilisation need to be balanced against the need to deliver wider sustainable development priorities identified in the adopted LPS. As identified in the responses above, the council has made further changes to the site selection criteria and relevant proposed site policies to ensure that appropriate account is taken of the impact on mineral resources as part of the policy making and site development process.
The information used to inform the site selection process derives from the Minerals Local Plan adopted in 1999, which is not an ‘up-to-date’ or an appropriate evidence base.	No	The Cheshire Replacement Minerals Local Plan forms part of the statutory development plan. The SADPD has been subject to two rounds of consultation enabling the minerals industry and others to put forward up-to-date minerals related evidence to the council to explain why any of the small number of allocations that are being proposed is significant in terms of the overall remaining mineral resource in the borough and why its safeguarding should be given priority over the need for the council to achieve its wider objectives. While the council has received no such information, it has made further changes to the site selection criteria and relevant proposed site policies to make sure that appropriate account is taken of the effect on mineral resources as part of the policy making and site development process. Work has also started on the development of a MWDPD, which will replace the Cheshire Replacement Minerals Local Plan. The timetable for which is detailed in the LDS.
Information from evidence gathering exercises for the MWDPD (e.g. call for sites) has not been referenced.	No	The council’s 2014 Call for Sites exercise representations have been considered in the SSM. Whilst further evidence has been undertaken through the council’s 2017 Call for Sites, this has not been published ahead of consultation on the draft MWDPD. Nevertheless, the introduction of the need for a Mineral Resource Assessment in relevant allocated SADPD policies will address the issue of prior extraction and mineral sterilisation.

The SA is contrary to NPPF (2019) ¶31 as it is not underpinned by relevant and up-to-date evidence. It therefore can't quantify the long-term impact on minerals or identify whether any of the proposed allocations will result in significant effects.	No	The SADPD has been subject to two rounds of consultation enabling the minerals industry and others to put forward up-to-date minerals related evidence to the council to explain why any of the small number of allocations that are being proposed is significant in terms of the overall remaining mineral resource in the borough and why its safeguarding should be given priority over the need for the council to achieve its wider objectives. While the council has received no such information, it has made further changes to the site selection criteria and relevant proposed site policies to make sure that appropriate account is taken of the effect on mineral resources as part of the policy making and site development process. The council considers its approach is entirely consistent with ¶31 of the NPPF (2019) by using an adequate and proportionate approach to the use of evidence in plan making.
The assessment in the SA does not support Option 8 as the preferred option (Option 7 performs better).	No	The SA report considers the significant effects of implementing the Local Plan and reasonable alternatives, considering the objectives and geographical scope of the Local Plan. It should be noted that whilst the SA findings are considered by the council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, set out in 'The provision of housing and employment land and the approach to spatial distribution' [ED 05] play a key role in the decision-making process.
The SA findings show that Option 8 will not guarantee the delivery of an appropriate quantity of housing in the LSCs to meet the 3,500 dwelling target.	No	
Option 8 fails to meet the needs of the whole population sought by the 'Social Inclusiveness' objective in the SA; the evidence in the SA supports this view.	No	
Option 8 does not support the effective disaggregation of housing to the LSCs to help provide housing in the most appropriate locations.	No	The SA provides a strategic level assessment of spatial options The SA report considers the significant effects of implementing the Local Plan and reasonable alternatives, considering the objectives and geographical scope of the Local Plan. It should be noted that whilst the SA findings are considered by the council in its selection of options and form part of the evidence supporting the Local Plan, the SA findings are not the sole basis for a decision; other factors, set out in 'The provision of housing and employment land and the approach to spatial distribution' [ED 05] play a key role in the decision-making process.

The adverse social impact of not providing affordable housing in the LSCs has not been robustly tested and fails to meet Strategic Priority 2 of the LPS.	No	The SA has been carried out in accordance with extant guidance. The SA uses a framework of sustainability relevant to the borough and analysis is made using professional judgement and against baseline information. Affordable housing is considered through the appraisal against the topic of social inclusiveness. The nine sustainability topics were determined through the baseline review and consultation.
The SA recognises that the sterilisation of mineral resources has the potential for “a long term significant negative effect”. However, this does not appear to be an impact on the mineral resources themselves, but “on the water and soil” through the sterilisation of mineral resources. This requires clarification.	No	The SA methodology approach was approved in the LPS and continues to be applied in the Revised Publication Draft SADPD subject to minor amendments. The ‘water and soils’ theme is the appropriate theme to use. Mineral resources have been considered on a site-by-site basis. Potential mineral sterilisation was considered at Stage 4 of the SSM. The SA uses a framework of objectives for sustainability relevant to the borough and analysis is made using professional judgement and against baseline information. Minerals are considered through the appraisal against the topic of water and soil. The nine sustainability topics were determined through the baseline review and consultation.
It is unclear how many of the sites in the Revised Publication Draft SADPD would not have been included had the sieve analysis and SA properly considered the mineral safeguarding issue early in the process.	No	Mineral safeguarding was not identified as a showstopper in the SSM. However, it is considered through the traffic light assessment of sites and Stage 4 of the SSM. The Minerals and Waste Mineral Safeguarding Areas and detailed policies were originally part of the Part II Plan as outlined in LPS Policy SE 10. It now forms part of the Part III MWDPD. Evidence to inform policy development will primarily be informed by the same British Geological Survey Mineral Resource Mapping and the Cheshire Replacement Minerals Local Plan 1999, as utilised in the Revised Publication Draft SADPD, and is considered likely to lead to a similar site assessment and outcome when considered with other policy objectives.
It is unclear in the SA and supporting documentation ([ED 07] and [ED 05] for example) how sites in the SGG have been dismissed, thereby weakening the reasonable alternatives presented.	No	SGG is considered under criteria 4 of the detailed traffic light criteria (p19 of the ‘Site Selection Methodology Report’ [ED 07] and p257 of the Revised Publication Draft SADPD Sustainability Appraisal [ED 03]) and was not classed as a showstopper under Stage 2 of the SSM. None of the sites that were reasonable alternatives considered through the SA were in the SGG.
The SA has not tested the effects of providing for a significantly higher level of growth than proposed in Crewe, to accommodate for the larger housing	No	The SADPD sets out non-strategic planning policies and is being prepared in line with the strategic policies of the LPS. The LPS does not address the full land use implications of HS2. As such this issue falls outside the scope of the SADPD.

figures set out in the Crewe Local Housing Study, to fulfil the requirements of HS2 investment.		
Lostock Hall Farm, Poynton has not been assessed as an alternative to Site PYT 2.	No	As set out in the 'Poynton Settlement Report' [ED 39] (¶4.73) Site PYT 2 is closely linked with the relocation of Poynton Sports Club, with the promoter of both sites having an option on the land. The 'Poynton Settlement Report' [ED 39] (¶4.75) acknowledges that other sites, all in the Green Belt, were put forward through the call for sites for sports and leisure use, however they were considered to be too small and they were not linked to the relocation of Poynton Sports Club.
No consideration of the alternative in the Playing Pitch Strategy and Action Plan [ED19] update report [ED19a] regarding the transfer of demand to sites with spare capacity if the relocation of Poynton Sports Club does not happen.	No	Reasonable alternatives were considered to be sites that were submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD. All Poynton sites submitted through the Call for Sites exercise, the First Draft SADPD consultation and initial Publication Draft SADPD have been considered for their suitability for allocation in the 'Poynton Settlement Report' [ED 39] using the methodology set out in the 'Site Selection Methodology Report' [ED 07]. Specifically, ¶4.75 of the 'Poynton Settlement Report' [ED 39] considers other sites put forward through the call for sites for sports and leisure uses. As stated in the 'Site Selection Methodology Report' [ED 07] it is for the council to determine what is considered to be a reasonable alternative. The shortlisted sites produced as a result of Stage 2 of the SSM, and carried through to Stage 4 of the SSM, were seen as reasonable alternatives that needed to be subjected to SA and HRA ([ED 07] ¶2.25).
It is not apparent why land associated with Lostock Hall Farm has not been assessed as an alternative to Site PYT 1.	No	The consideration of sites in the 'Poynton Settlement Report' [ED 39] follows the iterative approach set out in the 'Site Selection Methodology Report' [ED 07]. As Poynton's indicative housing figure was met through the allocation of non-Green Belt sites, there was no requirement to consider Green Belt release for housing – Lostock Hall Farm is in the Green Belt. Furthermore, as set out in the 'Poynton Settlement Report' [ED 39] (¶4.73) Site PYT 2 is closely linked with the relocation of Poynton Sports Club (Site PYT 1), with the promoter of both sites having an option on the land. The 'Poynton Settlement Report' [ED 39] (¶4.75) acknowledges that other sites, all in the Green Belt (Site PYT 1 is a non-Green Belt site), were put forward through the call for sites for sports and leisure uses, however they were considered to be too small and they were not linked to the relocation of Poynton Sports Club.

The SA fails to recognise that the opportunities and constraints of the individual settlements, and the areas in and around them, are unique.	No	This is a matter primarily for plan-making. The SA report considers the likely significant effects of implementing the Local Plan and reasonable alternatives, considering the objectives and geographical scope of the plan. The SA has considered the impacts on criteria (taken from the 'Site Selection Methodology Report' [ED 07]), which includes constraints, of all the sites individually and their surrounding areas that reached Stage 4 of the SSM.
The SA does not review alternative calculations of overall housing need; it appraises the alternatives on the basis that the overall indicative level of growth to be delivered at the LSCs is as set out in the LPS and its SA.	No	The purpose and scope of the SADPD are limited to making provision for additional sites, where necessary, to accommodate the level of growth anticipated for specific uses and areas within the settlement hierarchy left over from the LPS. It also follows the strategic lead of the LPS and sets out more detailed, non-strategic policies to guide planning application decision-making. As quoted in the Revised Publication Draft SADPD Sustainability Appraisal [ED 03] (¶ 3.21), the NPPF (2019) (¶20) notes that it is the role of strategic policies to set out the overall strategy for the pattern, scale and quality of development and make sufficient provision for housing amongst other matters. ¶60 of the NPPF (2019) states that strategic policies should be informed by a local housing need assessment, conducted using the standard method. The SADPD is a non-strategic plan looking to deliver the principles set by the LPS, a strategic document. The LPS was adopted in July 2017 and hence a review or update of it has not started. Therefore, alternative calculations of overall local housing need, conducted using the standard method are not considered to be a reasonable alternative for the purposes of the Revised Publication Draft SADPD.

Habitats Regulations Assessment

Summary of the main issues raised	Revised SADPD amended?	Council response
The SADPD HRA document provides a basic narrative but fails to include the National "Nature Improvement Area" (Meres and Mosses) status of significant areas in the South of the borough, particularly Wybunbury Moss.	No	Wybunbury Moss is part of the West Midlands Mosses Special Area of Conservation and the Midland Meres and Mosses Phase 1 Ramsar. The potential impacts derived from proposals in the SADPD have been appropriately considered through the HRA report [ED 04].

Schedule 3: Potential minor amendments to the Revised Publication Draft SADPD

The following potential minor amendments to the Revised Publication Draft SADPD have been identified. It is not considered that these alter the substance of the plan's policies or carry soundness implications but are intended to provide further clarity to the reader and rectify factual, grammatical and/or typographical errors. These have not been published for representations prior to submission.

Policy / section	Page (in ED 01a)	Modification New text <u>underlined</u> ; deleted text strikethrough .	Reason
ENV 12 'Air quality'	43	<i>Amend paragraph 4.70:</i> "Cheshire East Council has declared 49 <u>12</u> AQMAs. All the areas (with one exception) are declared on the basis of being likely to breach the air quality standard for the annual mean concentration of nitrogen dioxide. Further information..."	Due to decreasing concentrations and following consultation with both Defra and relevant stakeholders, seven AQMAs were revoked on 26 January 2021.
ENV 13 'Aircraft noise'	45	<i>Amend the right hand column of the last row of the table under Policy ENV 13 criterion 1(ii)(a):</i> " 30 dB L_{Aeq,16hour} <u>30 dB L_{Aeq,8hour}</u> " <i>Amend paragraph 4.75b:</i> "...This approach is consistent with the statutory target set by the Climate Change Act 2008 <u>(and amended through secondary legislation in June 2019)</u> for at least a 80% <u>100%</u> reduction of UK greenhouse gas emissions by 2050..."	To correct a typographical error. Night-time noise levels are expressed as 8 hour, not 16 hour. To reflect the updated target set in secondary legislation.
EMP 2 'Employment allocations'	85	<i>Amend paragraph 7.5:</i> "As demonstrated through the Employment Allocations Review (2019 <u>2020</u>), each of these sites..."	To correct a typographical error.
HOU 4 'Houses in Multiple Occupation'	94	<i>Amend paragraph 8.25a:</i>	To reflect the latest position with the Article 4 Directions in Crewe and the Draft SPD.

		<p>“... A Draft Supplementary Planning Document is also being has also been prepared to provide additional guidance, including the density calculation and potential exceptions to this.”</p>	
RET 1 ‘Retail Hierarchy’	112	<p><i>Amend paragraph 9.6:</i> “For the avoidance of doubt, local urban centres and neighbourhood parades of shops do not fall within the definition of town centres in the glossary of the NPPF”.</p>	To correct a typographical error
INF 6 ‘Protection of existing and proposed infrastructure’	139	<p><i>Amend paragraph 10.16 (Middlewich Eastern Bypass bullet):</i> “... The anticipated scheme cost is £58 £73.5 million of which £46.8m £48 million will be funded through the Department for Transport’s Large Local Scheme programme. The balance is to be met from the council’s capital budget and developer contributions. Planning permission was granted for the scheme by Cheshire East Council in July 2019 and by Cheshire West and Chester Council in September 2019. Main works are expected to start in 2024 late 2022 with an estimated 30 22 month construction period.”</p> <p><i>Amend paragraph 10.16 (A500 Barthomley Link Road bullet):</i> “... Planning permission was originally granted for the scheme in April 2019 and granted for a revised scheme in August 2020. In May 2020 the council’s Cabinet resolved to take further steps to acquire the land necessary for the scheme including through the making of a compulsory purchase order. Subject to DfT final funding approval, the main works are expected start in 2024 2022, with an estimated construction period of 27 months.”</p> <p><i>Amend paragraph 10.16 (North West Crewe Package bullet):</i> “... Main works are expected to start in early during 2021, with an estimated 24-month construction period.”</p>	To provide updated background information to schemes.
PYT 3 ‘Land at Poynton High School’	164	<p><i>Amend paragraph 12.68:</i> “The intention would be to mitigate the loss of the playing field with the provision of a new 3G pitch including through qualitative improvements to the remaining playing field area at Poynton High</p>	To reflect ongoing discussions with Sport England.

		School, adjacent to the existing leisure centre on land that is not classed as an existing playing field.	
PYT 4 'Former Vernon Infants School'	165	<i>Amend paragraph 12.72:</i> "The former Vernon Infants School site (0.56 <u>0.76</u> ha) presents..."	To correct a typographical error.