

## APPENDIX 1

### Consultation Comments Revised Interim Planning Policy on the Release of Housing Land

142 responses were received to the Revised Interim Planning Policy for the Release of Housing Land

**Do you agree with the Introduction to the Revised Interim Planning Policy for the Release of Housing Land? (Pages 2 and 3)**

Yes: 23

No: 24

Comment: 22

No tick box completed: 73

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP2	Yes	
RIPP3	Yes	
RIPP4	Yes	
RIPP5	No	"Interim Measure" - Cheshire East has been set up fully for three years, but despite this it is well behind on the creation of its new Land Plan. Interim measures should not be needed. The Local Plan dates of late 2013 and site allocations in 2014! Most local authorities are in the process of completing their Land Plans now.
RIPP6	Comment	The complete document appears to cover every GENERAL aspect in very great detail. In fact it is so detailed that I am sure that nobody could accuse the council of negligence in these initial proposals.
RIPP7	Comment	Any development must be carried out in a sustainable manner. This means preparing for a low carbon community, wherever possible. Construction using sustainable methods and materials. Good alternative transport opportunities, e.g., walking, public transport, cycle routes. Planting many trees to offset carbon dioxide. Plan for as low emissions as possible of carbon dioxide from new developments.
RIPP14	No	Too many houses without local needs being considered
RIPP8	No	I do not agree with the building of any developments on green field sites - regardless of sustainability issues.
RIPP9	Yes	
RIPP10	Comment	I agree with the statements made in the introduction, but I am highly sceptical about the weight that will be afforded to any interim planning policy by Cheshire East Council planning officers. If this policy is to be worth anything then Cheshire East Council planning officers must adhere to it. 1.8 The Sustainability Appraisal is not an easy document to read and follow. A summary in plain English is required.
RIPP11	Yes	

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP12</b>	Comment	Agree in principal but, emphasis should be on 1.1 - "new housing development takes place in locations where the Council and the local community considers appropriate"; the weight of emphasis being on the local community. Local communities are the source of the widest range of information and opinions. 1.4 Whilst the local authority may be required to maintain a 5 year supply of housing land this must not be achieved by passing planning applications that do not meet all the criteria contained within the Interim Planning Policy on the Release of Housing Land. 1.9 This does not go far enough - there are a number of issues that are not currently covered by the Habitat Directive 92/43/EEC, for example, increasing concern over the lasting impact made by the destruction of hedgerows by developers and real threat to indigenous species, namely hedgehogs, caused by the destruction of green belt/agricultural land.
<b>RIPP13</b>	Yes	
<b>RIPP15</b>	Yes	
<b>RIPP16</b>	Yes	
<b>RIPP17</b>	Comment	Providing it uses brown field land only and DOES NOT use ANY green belt or urban green spaces and is used to show/prove that there is NO NEED for new houses in Wilmslow.
<b>RIPP18</b>	No	
<b>RIPP19</b>	Comment	I am disappointed that there isn't emphasis on affordable housing. This should be clear and upfront.
<b>RIPP20</b>	Comment	No specific mention of encouraging any agencies to take up the provision of housing land. No concrete proposals to encourage local councils to provide any housing.
<b>RIPP21</b>	Yes	
<b>RIPP22</b>	Comment	I do not agree with the release of green belt or green field land for housing, it should remain protected as a natural habitat for wildlife and for future generations.
<b>RIPP23</b>	No	
<b>RIPP24</b>	Yes	
<b>RIPP25</b>	Yes	
<b>RIPP26</b>	Comment	Probably yes but the government/.eurospeak language makes it difficult to be sure
<b>RIPP27</b>	Yes	
<b>RIPP28</b>	Yes	
<b>RIPP29</b>	Yes	

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP30</b>	No	The Policy is flawed because it assumes a local housing demand for which there is no robust basis. The new NPPF makes clear (in paragraph 111) that "local planning authorities should plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community" and that they should "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand." Where is this analysis? Why is it not referred to in the draft policy? It is simply not good enough to say that this analysis will not be done until the Local Plan is adopted somewhere towards the end of 2013 (para 1.3). Why can't this analysis be done now? The Regional Spatial Strategy figures (referred to in para 2.9) are outdated and not based on any local demand analysis. Para 2.10 states that the Council has agreed to use these figures. Agreed with whom? Certainly not the local community.
<b>RIPP31</b>	No	Try using some existing sites before carving up yet more green belt - develop unoccupied houses
<b>RIPP32</b>	No	
<b>RIPP33</b>	No	
<b>RIPP34</b>	Comment	Need obvious. Provisos good. But how can Crewe have identified areas and once again Macclesfield is left behind!
<b>RIPP36</b>	Comment	Green belt land and existing green leisure space should not be used for housing or any other form of development. The development of existing gardens should be viewed as extremely undesirable and only considered when all other options have been exhausted. Brown field land should be identified and redeveloped as a first option.
<b>RIPP35</b>	Comment	Protect all greenbelt land and existing recreational green spaces. Identify brownfield sites.
<b>RIPP37</b>	No	Alsager's long term housing plan can be met by utilising the 2 large brown field sites (Twyfords and MMU). The controversial sites in Alsager are the playing fields and green field sites that will be covered by this document. This strategy will basically allow all the playing fields and greenfield sites to be built on before the 2 large sites can be considered as they will be held up waiting for the full plan. The criteria to be used to decide if permission for the site is granted are irrelevant. The point is that this plan does not take into account the 2 large sites that should be built on first as they are brownfield sites.
<b>RIPP38</b>	Yes	
<b>RIPP39</b>	No	You've made it too easy and thereby put pressure on yourselves to agree no matter what.
<b>RIPP40</b>	No	
<b>RIPP41</b>	Yes	

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP42	No	Clearly it is necessary to provide housing to meet the needs of the population. However, the figures are completely arbitrary, with no indication of an objective process to identify real demand in an area. The concept of 'sustainability' is not defined, and does not account for the cumulative effects of many individual smaller developments which might in their own right be defined as 'sustainable'. How many 1ha developments does it take to become unsustainable?
RIPP43	Comment	(i) It would have been very heartening if the 'Introduction' to the whole document had said something about the need for the policy and the housing figures to be sustainable and to take cognisance of environmental limits. There is no such over-arching statement or commitment. This is a major flaw/ omission. (ii) There is an inaccurate date in the Introduction. Para. 1.2 says that the National Planning Policy Framework was published in April 2012. It was not, it was published on March 27th, 2012 and became immediately operative. (iii) There is a typographical error in para. 1.7. It should refer to 'your comments' not 'you comments'.
RIPP45	Comment	If the supply of housing land for the next 5 years is below government guidelines, then I accept that short term provision needs to be made, as the possibility of developers gaining planning permission on appeal on unsuitable greenfield sites must be resisted at all costs.
RIPP46	Comment	Macclesfield Transition Town Movement (Macc2020) would like to see Cheshire East Council committing, in all its policy and strategy documents, to achieving sustainable outcomes and reducing carbon emissions. In the light of the Climate Change Act and in view of the Council's own Sustainable Community Strategy, which recognises that the per capita carbon emissions of Cheshire East are higher than elsewhere in the North West, it needs to reinforce its commitment to acting on sustainability and carbon issues. It is important that these key messages are re-iterated.

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP64</b>	Comment	<p>The proposed policy is a non statutory document prepared outside the normal framework for Local Development Frameworks as set out in practice guidance. As such it may have lesser weight in decision making than the existing development plan. The normal way to introduce such policy would be through the Local Plan. Urgent progress on pursuing the Local Plan, as promoted in National Planning Policy Guidance would be better than introducing a stop gap policy which, for many reasons, will not provide a satisfactory means of dealing with applications nor achieving an equitable distribution of housing in the short term. Resources should be applied to accelerating the Local Plan which, when it becomes the main part of the Development Plan for Cheshire East, will form a sound and co-ordinated set of policies through which to manage development and achieve a 5 year housing land supply. In the meantime development proposals should be dealt with in accordance with the development plan unless material considerations indicate otherwise. Any applications for housing development could be judged on the principles of the National Planning Policy framework and, for the time being, the Regional Spatial Strategy together with relevant existing policies in the respective Local Plan for the area in which the application proposals are located. There is then a need to take into account other considerations which, for the time being would include the lack of a five year housing land supply.</p>
<b>RIPP47</b>	Comment	<p>paras. 1.1-9, pages 2-3 I welcome this revised interim policy - in summarising the updated context of the NPPF with its requirements &amp; definitions together with other changes in context, including the updated land supply - in giving detailed criteria for development to be judged against - in excluding large new housing developments adjacent to Key Service Centres - in reducing the risk of inappropriate planning approvals &amp; appeals for housing land release - if the final version ensures that new housing development takes place in locations where the local community considers it appropriate. However, it could be clearer to read if it were not confusingly repetitive.</p>
<b>RIPP48</b>	No	
<b>RIPP49</b>	Yes	<p>Agree fully with ALL CHANGE FOR CREWE, Crewe needs more housing, and town centre development, better roads and cycle ways. Full speed ahead!</p>

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP57</b>	No	The status of the adopted Interim Planning Policy for the Release of Housing Land (IPP) has been a matter that has been debated at planning appeals where Inspectors have concluded that only limited weight can be attached to IPP policy. In March 2012 the Government published the NPPF which contains no support at all for Councils to seek to rely upon non-development plan documents in decision making. Reference in Paragraph 1.4 of the IPP to Paragraph 47 of the NPPF is entirely acceptable BUT any housing implementation strategy has to be consistent with the advice in the NPPF. The IPP is not a Development Plan Document and therefore the policies in the NPPF are the most relevant policies that should be used to determine housing applications until a new Development Plan is adopted. The IPP cannot supersede the policies in the NPPF and where there is conflict with the NPPF the IPP can be afforded no weight.
<b>RIPP50</b>	No	
<b>RIPP52</b>	No	
<b>RIPP53</b>	No	Provision for protection of wildlife habitat is completely inadequate. The document only considers 'special' sites worthy of mention, but we should not be building on ANY wildlife habitat. So many of our native species have seen massive declines in numbers over the last couple of decades - all due to human 'development'. And most of this is not for the benefit of the majority, but for the profit of a few. And to suggest mitigation is very feeble - we should not be building on pristine green land at all!!!
<b>RIPP54</b>	No	The document doesn't properly address demand for new house which is always overestimated and driven by developers
<b>RIPP55</b>	No	
<b>RIPP56</b>	No	Whilst I agree with the need to provide an adequate supply of housing land and note that 5 years is the stipulated period, I do not accept that it is necessary to provide a further 5% buffer as there will automatically be choice and competition within the schemes provided in accordance with the Strategy
<b>RIPP58</b>	Comment	I do not agree with the land that has been proposed nor do I trust the integrity or those involved in proposing the land and those who will develop that land further down the line. I do not believe that the best interests of the townspeople of Wilmslow have been adhered.
<b>RIPP59</b>	Yes	Paragraph 1.4 Agree with the principles of the introduction of the interim policy document, however, reference to the policy applying until such time that the Council can demonstrate a 5-year supply of housing land should be amended to include reference to the addition of a 20% buffer, so complying with the guidance set out in the new NPPF in respect of Council's who have persistently under delivered on their housing requirements.
<b>RIPP60</b>	No	The release of Green Belt or Green Gap land should not be permitted as it will change the nature of the borough.

ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP61	Yes	Desperately require a housing policy to guard against speculative house builders who are seeking to use greenfield land surrounding our towns as a cheap, easy way of house building with no regard to what mess they leave after they have built too many homes in unsustainable locations.
RIPP62	No	Inadequate protection for our countryside and wildlife habitat. Greenfield sites should not be earmarked for development under any circumstances.
RIPP63	Comment	Generally agree, however it is disappointing to see that the dates for the Core Strategy and Site Allocations are still so far in the future. These documents need to be in place as soon as possible to avoid speculative and inappropriate green field applications being granted on appeal. It is disgraceful that residents are going to be exposed to such risks for more than 2 additional years.
RIPP119		The status of the IPP needs to be clearly defined in the introduction to the document. The IPP is not part of the statutory development plan and therefore its weight is limited. Recent appeal decisions, and in particular the Fox Land High Court Judgement at Sandbach, have concluded that the current IPP should be given limited weight. Further, we consider that the IPP is contrary to the NPPF. The consultation document states that it is the council's intention to apply the IPP at such times as it is unable to demonstrate a 5-year supply of housing land. However, this has been overtaken by events as the NPPF is clear (paragraph 49) that in such circumstances relevant policies for the supply of housing should not be considered up-to-date and the presumption in favour of sustainable development as set out in paragraph 14 of the NPPF is engaged. This means that housing development should be granted, unless the adverse impacts of doing so would significantly outweigh the benefits when assessed against the policies of the NPPF or where specific policies in the NPPF indicate development should be restricted. In short, the NPPF becomes the interim policy for Cheshire East. Consequently, even if the IPP was part of the statutory development plan, which it is not, when the council is unable to demonstrate a 5-year supply of housing land, it would be considered out of date and the presumption in favour of sustainable development would be engaged across the borough and not just to the areas described in the IPP. This, along with its proven limited status, begs the question as to whether the IPP should exist at all.
RIPP117		It is stated that the purpose of the Draft Revised Interim Policy (dRIP ) is to maintain a 5-year supply of housing land. Para. 47 of NPPF states that an additional buffer of 5% should also be provided to ensure choice and competition in the market for land and an additional 20% in areas where there has been a persistent record of under delivery. This is acknowledged by para. 2.5 of the dRIP and should be added in at para. 1.4.
RIPP65	Yes	Broadly yes, although it cannot be used until it has undergone consultation and the outcome of the consultation has been properly considered and the policy amended and formally approved.



ID	Do you agree with the Introduction? (Pages 2 and 3)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP70</b>	Comment	See below
<b>RIPP66</b>	Yes	Need something in place to stop the destruction of our towns from property developers who only serve themselves and do not care at all about the devastation that they bring
<b>RIPP129</b>		<p>Taylor Wimpey supports the decision by Cheshire East Borough Council [CEBC] to revise the Interim Planning Policy on the Release of Housing Land [IPPRHL]. The proposed revision to the IPPRHL demonstrates CEBCs recognition that greenfield sites on the edge of Key Service Centres, should be released for housing development. The current IPPRHL provides the mechanism for the early release of greenfield sites on the edge of Crewe, subject to a range of criteria. Whilst this adopted interim policy has sought to increase the supply of available housing land in the Borough to meet the needs of Crewe (the focus for development in the emerging Local Plan), the operation of the policy has been limited because it did not provide any scope to allow for sustainable greenfield release on the edge of towns other than Crewe. Despite the introduction of the Interim Policy in 2011, the Council has still failed to meet its shortfall in housing land supply. It is also considered that the Council has stalled the sustainable growth of the Key Service Centres, where much needed housing development is necessary to maintain their vitality and viability. A good supply of housing is not only beneficial to economic prosperity but also to ensuring a healthy housing market and that an appropriate choice of housing is available for future generations. If the Council does not provide sufficient housing over a long and sustained period, housing prices will increase, economic growth will be stifled and the choice and balance in the housing stock will be eroded. CEBCs lack of a 5 year housing supply also puts the Council at risk to speculative housing proposals on appeal. In a recent appeal case in Cheshire West &amp; Chester (ref. APP/A0665/A/11/2159006) the Inspector allowed the development of 150 dwellings on the edge of Cuddington. In allowing the appeal, the Inspector heavily criticised the Council for not having taken sufficient steps to manage the supply of housing land and improve the deficit against the 5 year supply. Taylor Wimpey is pleased that the Council is taking pro-active steps to resolve its shortfall in ensuring it has a deliverable 5 year housing land supply prior to the adoption of the Cheshire East Local Plan. The new National Planning Policy Framework [The Framework] seeks to significantly boost the supply of housing and requires LPAs to ensure that Local Plans meet full, objectively assessed needs for market and affordable housing. In addition, LPAs are required to identify a rolling 5 year supply of deliverable sites, with an additional buffer of 5% (or 20% where there has been a record of persistent under delivery) to ensure choice and competition in the market for land. In the context of this new national policy and continued slow growth of the economy, the need for CEBC to ensure that it has a deliverable 5 year housing supply and to put the right mechanisms in place to allow new housing developments to come forward, is more important than ever.</p>



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<b>RIPP71</b>	No	green belt is sacrosanct and should not be built on if it is the damage cannot be undone the rectory fields are a glorious natural space in the centre of the village an should stay as such
<b>RIPP68</b>	Yes	
<b>RIPP69</b>	Yes	
<b>RIPP67</b>	Comment	1.2 presumably only the 5% buffer should apply
<b>RIPP127</b>		Para 1.4 - states that NPPF requires local planning authorities to set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing to meet their housing target. I set out below why I object to the policy and what the amendments should be. Section 3 of the Draft Interim Policy should be amended as follows:- 1. Where land is within the existing (historic) green belt designation but the site does perform the function of green belt and in all other respects conforms to the interim draft policy (save for point 2 below) then such land should be considered for housing development. The reason is that some sites are in built up areas and have development up to existing boundaries i.e. they are infill plots. The development of such plots does not have a green belt role and should be considered for development and the green belt status removed. 2. Clarity is required in relation to what constitutes the sub-division of a larger site. Redevelopment of a site in total should be permitted.
<b>RIPP94</b>	Comment	There is a need for Local Planning Authorities (LPAs) to plan positively and seek opportunities to meet the development needs of their area. It is in this context that the IPP should be prepared.
<b>RIPP145</b>		KCHG welcomes the principle of the policy document and that Cheshire East Council has identified the need to deal effectively and in a planned way with the provision of future housing land. The proposed Planning Stakeholder Panel for Knutsford and preparation of a Town Strategy Document, in informing the Cheshire East draft Local Plan, will no doubt present opportunities for consideration of future housing land and future employment land in Knutsford - forecast need, potential scale and potential location, including of affordable housing. KCHG notes CEC's focus on Crewe for future housing development in the Borough, it being "a town of sub-regional importance" and "a principal town". 1. KCHG suggests the title of the draft policy is flawed. KCHG recommends the policy is described as the Provision of Housing Land, or Release of Land for Housing, not the Release of Housing Land. The land which it is proposed should be considered for future housing does not necessarily now have a housing land allocation, nor does the draft policy convey formal planning approval of residential development at the proposed permitted residential development locations. In neither respect does the draft policy change those facts. Instead, such future housing land may currently be allocated for employment or other use, and may comprise greenfield sites. And applications for planning permission will still be required to be submitted. The draft title "Release of Housing Land" is therefore a misnomer and incorrect. It is suggested that the draft policy relates instead to the provision of housing land,

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		<p>or to the release of land for housing, which may lead to it being 'released' (ie from its current use and state) and developed for housing if criteria are met as specified in the policy and if planning permission is granted for residential development. 2. The policy should refer to co-operation with other authorities. The NPPF (paragraph 178 et seq) requires such co-operation and refers also (paragraph 47) to "the housing market area". In a Knutsford context, the future proposed provision of housing and employment particularly in neighbouring authority areas of Cheshire West and Chester, and Trafford, are relevant potentially (for example, in nearby Northwich). Local authority boundaries should not of themselves determine local or sub-regional need or provision. At section 1.2, amending "(April 2012)" to "(March 2012)"</p>

# **Do you agree with the Background to the Revised Interim Planning Policy for the Release of Housing Land? (Pages 4 to 8)**

Yes: 25

No: 30

Comment: 13

No tick box completed: 74

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP2	Yes	
RIPP3	No	<p>2.9 Basing housing requirement for the next years based on the last 10 years is not very scientific and takes no account of the market or of demographics.</p> <p>2.14 The people of Crewe are under the impression that 'All Change for Crewe' is about improving the town centre and improving employment and business opportunities. Increasing housing supply in Crewe is neither wanted nor needed, as can be seen by the very low house prices, compared to other areas of the borough, and the number of empty properties. Increasing the population of Crewe is not sustainable at all due to the very poor road system, which is always going to be restricted by the number of railway lines, and henceforth railway bridges, in the town, which cause points of congestion. Travelling around Crewe by car is already a very very slow process and further increase in population is unsustainable.</p> <p>2.16 I would argue that rather than the development of Crewe being fundamental to the borough, this policy reflects the fact that the conservative-led council would rather see green land developed around the edge of labour-dominated Crewe, rather than around the conservative strongholds elsewhere.</p>
RIPP4	Yes	

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP5</b>	No	<p>2.3 - "unless adverse impacts significantly outweigh the benefits". Examples needed here of the types of "adverse impacts" which could be taken into account to deny planning permission.</p> <p>2.4 "Taking into account the different roles and character of different areas". The Interim Plan does not do this, - basically it takes a model to develop Crewe and then extrapolates this to the rest of Cheshire East, despite the fact that many of the other towns are rural or semi rural.</p> <p>2.9 and 2.10 - "The Localism Act 2011 provides for the revocation of the Regional Spatial Strategy,.....that part of the act has not come into force." When will it come into force? The purpose of the Localism Act was to remove the quotas and dictats imposed by the RSS and put housing number in the hands of local people. It seems to me that this Interim Policy is an attempt to dictate numbers despite the fact that Government Legislation will not require it.</p> <p>2.12 - again the "adverse impacts" of planning are not exemplified.</p> <p>2.13 "In the case of refusal of planning permission, appeals may be upheld on the grounds that the proposed developments are in sustainable locations and there is not a 5 year housing supply". This statement does not match 2.12 because the appeals would not be upheld if the council could demonstrate adverse impact of development or specific policies in the NPPF indicate that it should not planning permission.</p> <p>2.23 "The release of sustainable small sites" - Definition of small sites needed - size and possible number of developments.</p> <p>2.24 "Modest housing developments" - what are modest housing developments? - size and number of houses needs to be defined. Again "small scale " - definition needed.</p> <p>2.25 - consultation with "stakeholders" These stakeholders should be defined in advance.</p>
<b>RIPP6</b>	Comment	I am a little concerned about the original source of this information.
<b>RIPP7</b>	Comment	Where does the figure of 1150 homes come from? I agree with more affordable homes being made available in any scheme as part of the mix.
<b>RIPP14</b>	No	
<b>RIPP8</b>	Yes	Provided the process is rigorous and involves total transparency, community consultation and has a proper appeals process.
<b>RIPP9</b>	Yes	
<b>RIPP10</b>	Comment	<p>The definition of a sustainable site is critical. The definition proposed is far too lax. A sustainable development should be one that does not depend on car journeys. People should be encouraged to walk or cycle to school, to the playground, to the doctor and to other facilities. Para 2.24 correctly says Developments should not prejudice key strategic decisions about the growth of a town. I fear that this policy will prejudice key strategic decisions.</p>
<b>RIPP11</b>	Yes	

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP12	Yes	<p>Real concerns with 2.3. Could imply that speedy planning approval, (where the development plan is out of date, etc.), takes precedence over the NPPF 12 core principles.</p> <p>2.4 Where the 'countryside' is concerned, it is essential that there is a real understanding of "conserving the natural environment" - this has to include protection and an understanding of the impact that one ill thought proposal can have another area, for example, water table, light pollution, etc. Having questioned local authority officers, it would appear that there is little knowledge/concern/awareness of the how the current infrastructure copes with existing demands, particularly in the Sandbach area - (at peak times, very badly). There has to be a realistic assessment and indication of changes that need to be in place to cope with increased demand as a result of any proposed new housing development.</p>
RIPP13	Yes	
RIPP15	Yes	Far too much detail.
RIPP16	Yes	To an extent the strong focus on Crewe as the major development vehicle is both understandable and logical yet also contradictory to the overall strategy of localising employment. I do, however, support the policy and hope that a strong justification for such a policy is developed.
RIPP17	No	There is no need for new housing in Wilmslow.
RIPP18	No	
RIPP19	No	<p>Whilst there may be a minimum requirement for 30/35% affordable housing I would like to see a much more ambitious aspiration set. Why not set the aspiration much higher, twice as high would be great 70-80%? What does 30/35% mean - 3 in 10 houses or, as I would prefer, 30% of market value. In other words for every £1m home we see a minimum of 3-4 £100K homes. This should be very clear.</p>
RIPP20	Comment	No mention of the many areas of blight, brown land, derelict and "cleared" sites (such as the old TA building on Chester Road, Macclesfield) that exist within and around many towns, particularly Macclesfield.
RIPP21	Yes	
RIPP22	Comment	I do not agree with the release of green belt or green field land for housing, it should remain protected as a natural habitat for wildlife and for future generations.
RIPP23	No	
RIPP24	Yes	
RIPP25	Yes	
RIPP26	No	<p>1) What does sustainable mean in terms of housing</p> <p>2)The total for the Cheshire East constituent authorities is 1,150 net additional dwellings per annum. This figure reflects the level of house building in the Borough that was delivered in the ten years up to April 2010. The last 10 years have been the poorest for house building across the UK so this does not seem enough</p>
RIPP27	Yes	
RIPP28	Yes	there are critical issues that need to be considered carefully e.g.

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<b>RIPP29</b>	Yes	
<b>RIPP30</b>	No	I object to paragraph 2.10 which assumes a local need for which there is no supporting analysis.
<b>RIPP31</b>	No	
<b>RIPP32</b>	No	
<b>RIPP33</b>	Yes	Protecting the Green Belt must be paramount, particularly in the face of attacks such as the "Wilmslow Vision"
<b>RIPP34</b>	Comment	What has happened to the whole local development framework? Surely all bodies have had to have long, short, and interim plans - for many many years. So why does this seem a panic, last minute, knee jerk reaction?
<b>RIPP36</b>	No	
<b>RIPP35</b>	No	
<b>RIPP37</b>	No	Alsager's long term housing plan can be met by utilising the 2 large brown field sites (Twyfords and MMU). The controversial sites in Alsager are the playing fields and green field sites that will be covered by this document. This strategy will basically allow all the playing fields and greenfield sites to be built on before the 2 large sites can be considered as they will be held up waiting for the full plan. The criteria to be used to decide if permission for the site is granted are irrelevant. The point is that this plan does not take into account the 2 large sites that should be built on first as they are brownfield sites.
<b>RIPP38</b>	Yes	
<b>RIPP39</b>	No	It's too open ended. Its says small developments-but what's small , to me its under 10 houses, you need to specify Also it should say not in green belt
<b>RIPP40</b>	No	Para 2.7 - I do not agree with the basis of this document, namely the required number of new dwellings in Cheshire East (1150). This based on the last ten years. There are different requirements and constraints for the forthcoming decade. We cannot and should not keep taking green belt land for development. We should adopt a sustainable approach whereby previously developed land should be re-used. Such sites include derelict land, sites of old industrial buildings and old housing stock. The population of England has remained broadly static over the last twenty years and the north west of England in particular has in fact seen a decline in numbers over this period. A new approach is required over the next decade to provide more housing units at reasonable cost such as, for example apartments for single parent families, young couples and old folk. It is totally incorrect to base the next decade's housing requirements on the last ten years. Building on Green Belt land is the easy option for both Councils and developers. It must not be allowed to continue in the future.
<b>RIPP41</b>	Yes	



ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP42	No	<p>Where does the figure of 1150 net additional houses per annum come from? How is the 'Green Gap' defined? A good supply of housing only benefits economic prosperity if it is accompanied by employment opportunities in Congleton. There is no evidence of joined up thinking in this area. Most construction companies will bring in workers from outside of the towns in question, thereby bringing little or no benefit for the local economy.</p>
RIPP43	Comment	<p>(i) Para. 2.1 opens with the statement The National Planning Policy Framework (NPPF) was published in March 2012. This is correct but at odds with para. 1.2.</p> <p>(ii) Para. 2.2 It is noticeable that the most condensed quote used from para. 7 of the NPPF is the one which relates to the environmental dimension of sustainable development. The full original paragraph calls for improvements to biodiversity, the need to use natural resources prudently, the minimisation of waste and pollution and the need to mitigate and adapt to climate change including moving to a low carbon economy. The lack of balance in the approach to this should be remedied.</p> <p>(iii) Also, in view of the fact that para. 2.2 is succeeded by one which flags up the NPPF 'presumption in favour of sustainable development', it would be apposite for this paragraph (or a newly inserted one) to set out the five guiding principles of sustainable development from the UK Sustainable Development Strategy that are recognised in the NPPF on page 2, ie. living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance and using sound science responsibly.</p> <p>(iv) Paras. 2.5 to 2.8 inclusive explain the buffer requirement for housing numbers that has come forward as a result of the NPPF and they focus on the implications of not meeting the buffer requirements placed on local authorities. However, the Background fails to explain that there is some leeway as to the overall housing numbers that are sought. If the overall figures are contained, then the buffer requirement is also less.</p> <p>(v) It is welcome that the revised Interim Planning Policy continues to reflect, in para. 2.9, the Regional Spatial Strategy figures. ChALC would strongly urge that these are not exceeded once the RSS is finally rescinded. All the current evidence is that CEC are working towards much higher growth aspirations than this. If they do pursue this higher growth agenda, this will have severe implications on Green Belt and other open countryside. Despite what Strategic Housing Marketing Assessments may say, principal authorities have a degree of leeway in their response to such documents. ChALC's members consistently ask us to speak up against incursions into the Green Belt and the wider countryside. We therefore ask for a moderate and sustainable housing figures and a sequential approach to land use.</p> <p>(vi) There is no reference to extant Supplementary Planning Documents having played a useful role in the past. There should be.</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
		<p>(vii) Para. 2.18 makes the definitive statement that: a good supply of housing is beneficial to economic prosperity (page 7). Yet there is no proven connection between the two. Whilst it is obvious that refreshing a run-down urban area with new housing stock can breathe much needed life into a failing community, there is no proven direct crossover between housing numbers and economic prosperity. In fact many new-build housing units and offices have remained empty for many years in any number of locations around the country. The need is clearly for the right kind of dwellings and employment units in the right kind of locations at the right market price not any, anywhere at any price.</p> <p>(viii) ChALC welcomes the proposal in para. 2.20 for housing to take place on parts of allocated employment areas in the Crewe area. We would remind CEC that the panel report on the last RSS instructed both Cheshire and Warrington to release employment land for housing and mixed use purposes as they were holding too much. This ruling covered the entire period of the new Local Plan. Consequently, we would urge CEC to do the same in other areas where appropriate also. We note that this has not happened in the case of the most Town Strategies that have been produced in draft form to date. Just one site within the draft Middlewich Town Strategy was on land allocated for employment. The majority of new sites were greenfield and, in the case of the Wilmslow strategy, all sites were Green Belt with one exception (ref. para. 2.22 of this draft strategy). Again we urge CEC to opt for lower overall housing figures which will require less greenfield land.</p>
<b>RIPP45</b>	Yes	
<b>RIPP46</b>	Comment	<p>Para. 2.2 does not do justice to the environmental aspect of sustainable development as described in the National Planning Policy Framework (NPPF). Paras. 2.5 to 2.8 fail to explain that local authorities have a degree of flexibility in the housing figures they aspire to. If these are lower, the 'buffer' requirement reflects this. Macc2020 note that, for the purpose of this interim policy, CEC are proposing to stay with the Regional Spatial Strategy (RSS) figures. These were substantial. We therefore urge CEC not to strive for unsustainable levels of housing beyond the RSS figures once RSSs are finally withdrawn. Para. 2.20 proposes that housing development should occur on parts of allocated employment areas in Crewe area. We urge CEC to also re-allocate employment land elsewhere (including in Macclesfield) where it is appropriate to do so - in line with the RSS recommendations. (N.B. Cheshire East and Cheshire West local authorities are currently holding too much land for employment uses).</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP64</b>	No	<p>In general terms the content is a review of the position relating to the NPPF, and how consideration may have to be given to permitting sustainably located housing development outside settlement boundaries in certain circumstances where a 5 year housing land supply is lacking. The concerns over piecemeal planning applications being made for sites outside settlement boundaries is noted but this becomes inevitable in the absence of up to date Local Plans and where existing allocations have been developed or are under construction. This underscores the need to have an up to date Local Plan and site allocations to provide for the identified needs of all parts of the Borough. The current Interim Policy has resulted in housing being approved on several sites but few of those approved have yet been completed and there can be no guarantee that all of those will come forward in the 5 year required period. The developers can only respond to the housing market requirements over time. As set out below the aspirations set out in paragraphs 2.23 to 2.24 are unlikely to produce the intended effect.</p>
<b>RIPP47</b>	Comment	<p>The Annual Housing Requirements (paras. 2.9-10, page 5) Managing the 5 year Supply (paras. 2.11-26, pages 5-8) [these are dealt with together] The annual land supply seems to need 2 elements to be met: a] for the time being, the Regional Strategy 2010 level of 1,150 net additional dwellings per annum is retained [para. 2.9 &amp; 10] b] the NPPF requirement to have a rolling 5 years land supply through policy proposals or planning permissions [para.2.12] which Cheshire East fails to meet [para.2.11] The NPPF calculation appears to need housing needs to be met with an additional buffer of 5% to ensure choice and competition or a buffer of 20% where there has been a persistent under delivery of housing [para. 2.5]. The draft document does not set out the calculation for Cheshire East: is a buffer 5% or 20% included? Whilst the area delivered 1150 dwellings annually for the last 10 years [para.2.9], this seems to have been less than the area needed to ensure 5 years constant supply so amounting to persistent under-delivery. Maybe the Regional Strategy annual figure by chance incorporates the higher buffer. The detailed calculation should be given &amp; explained in the final document to ensure transparency. Para 2.13 The draft refers to land owners/developers submitting applications that would be difficult to refuse it is unlikely that a land owner could demonstrate that the land would certainly be developed in the 5 year period so the high risk of approval by appeal wouldn't apply. Maybe, to avoid encouraging unnecessary applications from solely owners, this paragraph should only refer to 'developers' who will be in a better position to guarantee delivery. I support the revised interim policy preventing permissions on appeal for greenfield land outside settlements as they would prejudice &amp; distort the plan-led process. Para. 2.16 I agree that no sites between Crewe &amp; Nantwich should be released under this revised interim policy. Para.2.17 I agree to the revised interim policy encouraging development of sites within settlements, including Nantwich, but</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
		<p>preferably before any greenfield sites in the locality are released. Para.2.22 I support the avoidance of greenfield development before the local plan has been prepared in towns other than Crewe. Towns in green belt alone should not be protected by this policy at the expense of towns, like Nantwich, in the south as implicated in Policy paragraph Location 3.3 criteria 1]. These too should not be permitted to expand until the local plan has been prepared. Paras.2.23 &amp; 24 This proposes the release of sustainable 'small' sites as not being prejudicial to the local plan preparation. However they could have adverse impacts on the local town, like its character, traffic, precluding other land uses on the site etc.&amp; the utmost care will be needed even with the criteria listed in the policy. It should be made clear that these criteria are not exhaustive. Para 2.26 There is a danger of inappropriate development being approved if the interim policy is implemented 'with immediate effect' and in advance of the town strategies becoming material consideration after their consultation process has been undertaken. A way needs to be found to ensure that this is avoided.</p>
<b>RIPP48</b>	No	
<b>RIPP49</b>	Yes	
<b>RIPP57</b>	No	<p>Paragraph 2.5 : If the Council is going to refer to the NPPF in support of the IPP it needs to apply the policies clearly and effectively. It would be helpful and help clarify the Council's position if the IPP established which buffer referred to in Paragraph 47 of the NPPF applied to Cheshire East. As it stands paragraph 2.5 is rather meaningless. Paragraph 2.6 : Although this correctly sets out the implications of Paragraph 49 of the NPPF, it needs to be made clear that the IPP cannot change the requirements of Paragraphs 49 and 14 as it affects existing Development Plan policies for housing applications, until the Council can demonstrate that it has a 5 year supply of deliverable sites. As written it infers that the IPP will in some way mean that Paragraph 49 will not apply to Cheshire East which is patently wrong and hence should be clarified. Paragraph 2.11 : As the Council's justification for producing the IPP is to address the significant shortfall in the deliverable 5 year housing land supply, it is essential that the IPP identifies the scale of the shortfall so that the effectiveness of the policy approach can be assessed. Setting aside whether the Council's calculation of its deliverable 5 year supply of housing land is sound as evidenced by the 2011 SHLAA, it is incorrect for the IPP to report the supply as being 3.94 years as the NPPF has been published and the implications are known. Therefore the precise post NPPF figure needs to be set out in paragraph 2.11. Paragraph 2.12: This refers to Paragraph 14 of the NPPF which states that where relevant policies of the development plan are out of date (which applies to housing policies where a 5 year housing land supply cannot be proven) then permission for housing proposals should be granted unless any adverse effects of doing so significantly and demonstrably outweigh the benefits . . . In Paragraph 2.12 the word "demonstrably" has been excluded and as it is an important</p>

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		<p>consideration in Paragraph 14 of the NPPF, the word should be included to give a full and proper reading of the requirement. 2.15 : Although the Council has used the adopted IPP to encourage developers to submit housing schemes on the edge of Crewe, to-date not one single approval has been granted and the delivery of housing on these IPP favoured sites will not contribute to the number of completions within the 5 year period which the Council had intended and which is relied upon in the 2011 SHLAA. The failure of the adopted IPP to deliver completions to address the serious housing land supply position in Cheshire East has led to the Council accepting that the IPP policy has failed and that it now needs to be revised. This demonstrates how important it is for the Council to ensure that it manages the release of housing land properly to address the chronic housing land situation and to ensure that through proper development management procedures the required number of completions can be delivered. The adopted IPP has failed to deliver and the delay in bringing forward the new Local Plan has meant that the Council's approach to housing policies in Cheshire East is seriously failing to address the scale of the problem. The NPPF provides the appropriate policy framework within which housing policy in Cheshire East now needs to be applied and the failure of the adopted IPP should caution against adopting changes to the existing failed policy unless this will demonstrably address the scale of the problem. Paragraph 2.22 : The Council's approach to housing release is muddled and flawed by seeking to contend that the release of major non Green Belt housing sites on the edge of towns "other than Crewe" would pre-empt decisions on the future development strategy for the Borough. This is nonsensical since the Council sees no harm to the future development strategy of releasing major housing sites around Crewe, even though the Local Plan has firstly yet to define a housing requirement for the District or to establish a spatial distribution which may be different to that in the RSS and then to determine the infrastructure requirements to deliver this growth and where the most sustainable locations would be to accommodate it. As such the Council's approach through the adopted IPP has already compromised the future strategy for Crewe, albeit in the context that the Local Plan has not been advanced from the Issues and options stage and that the District has a chronic housing land supply shortage. This requires a strategy to deliver significant housing numbers in sustainable locations albeit outside of the emergence of a new spatial strategy for Cheshire East but that in itself does not negate the need to bring forward deliverable housing land in sustainable locations applying the policies in the NPPF. It does not need an IPP that will not deliver the required growth, as the IPP has been developed outside of the emergence of a new spatial strategy and therefore it contributes nothing to addressing this issue. Unfortunately the revised IPP seeks to apply a spatial strategy to the District which doesn't exist by differentiating between Crewe and the rest of Cheshire East by applying a strategy based</p>



ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
		<p>upon the unplanned incremental growth of the other towns in the District. There is no justification for adopting a different strategy to the release of housing land in Crewe from that of the other main towns, especially as this strategy will not address the scale of the problem and that the small-scale release of sites cannot represent the most sustainable form of housing strategy. In effect, the Council's failure to advance its Local Plan cannot be used as justification to implement an Interim Policy that will neither address the scale of the problem or will produce a pattern of land release that is planned or sustainable. Paragraph 2.23 : In addition to the afore-mentioned concerns, the scale of the housing land supply problem in Cheshire East would necessitate the delivery of over a 100 small sites on the edge of settlements. Setting aside that this strategy is neither deliverable or sustainable, small sites will not deliver the necessary level of affordable housing, community benefits or contribute towards major infrastructure constraints that larger housing sites would deliver. This will prejudice the proper delivery of infrastructure and affordable housing within Cheshire East. Paragraph 2.24 : The 5 criteria pertaining to sites proposed for release, not only excludes Crewe for reasons that are not justified, but it will also preclude sites coming forward on settlements that are constrained by Green Belt and/or Green Gap. This will further severely limit the effectiveness of the policy approach.</p>
<b>RIPP50</b>	No	
<b>RIPP52</b>	No	
<b>RIPP53</b>	No	<p>The NPPF is a document drawn up largely by builders for the benefit of builders. This information is in the public domain. Anyone who has waded through the draft document in order to comment on it at the public consultation stage will know that it is strongly biased in favour of maximum development. But it is also very woolly, and therefore Cheshire East should not be caving in so easily; you should be employing legal experts to advise how you can avoid all this pointless and unwanted development. There is no proof in your document of any 'need' for any of this housing; it seems you are just doing it because you have been told to. And don't forget, once there are houses we will need the infrastructure to go with it too!!! What exactly is the 'Green Gap'? This doesn't seem to be explained anywhere. We should not build on any green land whatsoever. If 'affordable' housing is required (and I would question this) then build affordable housing ONLY. To aim for 30-35% of a development to be affordable is pathetic, and we all know that the developers will reduce this to more like 10% anyway. Cheshire East should NOT allow ANY houses to be built that are not 'affordable'. YOU should be calling the tune! I think that you are proposing to give far too much away far too easily; once land is earmarked for development there is no way you will be able to prevent it happening even if there is a massive drop in the population! The developers are way too powerful. So PLEASE show some resistance now!!!</p>
<b>RIPP54</b>	No	
<b>RIPP55</b>	No	



ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP56	No	I note that it was calculated that there was 3.94 years of supply at 1.4.11 and therefore believe that the current suggested additional sites for housing are totally unnecessary
RIPP58	No	
RIPP59	Yes	Paragraphs 2.1 - 28 Support the approach of the Council with regard to the new guidance under the NPPF. Paragraphs 2.9 - 2.11 Suggest review of housing figures and on-going supply in light of considerable reduction in provision over the past 5-year period and questions that have been raised in respect of the deliverability of a number of sites in the SHLAA.
RIPP60	Yes	
RIPP61	Comment	Partly would be a more considered response. Allowing developers to build on small sites could be seen as the thin end of the wedge unless strictly enforced. Use of the word "should" in para.2.24 "developments should be small scale" is utterly meaningless - if the council want only small scale housing must state "developments must be small scale""Locations must be sustainable should be defined including reference to where people will work - no good building where there are no suitable jobs - not sustainable (more road infrastructure required / use of car etc. Consideration must be made first of brownfield land or allocated land which isn't being used.
RIPP62	No	As above. There is nothing in this document to suggest that any development is needed in Cheshire East at all. Please do not plan to destroy our countryside with unnecessary and unwanted housing. Challenge Government housing targets rather than force them on us. Arguments about 'affordable' housing are not convincing when you do not insist on 100% affordable for new developments.
RIPP63	Comment	Why is the figure for the 'current' housing supply assessment so out of date? By my reckoning, Cheshire East have granted permission for approximately 3,000 dwellings since 1 April 2011 (~1150 full permission, ~1850 outline). As such the current figure would be much closer to the necessary 5 years and may well even exceed it. It is essential that Cheshire East maintains an up to date housing supply figure rather than making policy and application decisions based on data over 12 months old. I agree with the other aspects, especially the need to promote new housing in Crewe and to avoid major developments in other towns impacting the viability of achieving this essential aim.

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP130		<p>One of the core principles that is set out in the NPPF which would underpin plan making and decision taking is as follows; - to actively manage patterns of growth to make fullest use of public transport, walking and cycling , and focus significant development in locations which are or can be made sustainable; and It is noted that this is not repeated in full in your published policy draft, which has in general paraphrased the underlying NPPF core principles which have been identified. This should not be allowed to detract from the objective, which the Highways Agency has very much in mind, to promote development to genuinely accessible locations so as to further discourage dependency on the car and to maximise potential for attractive alternatives via a choice of public transport, cycling or walking. It is suggested that this would best be applied to all new housing development, with the possible exception of occasional small windfall or infill sites and which would help to support the rural economy, for example. Reducing the need to travel/ car dependency is indeed a laudable aim but to be successful people need attractive alternatives, such as an improved bus service or Park and Ride schemes. In the event that there is only one mode, such as cycling as an alternative, this may not necessarily be attractive or feasible to most. It is accepted that public transport alternatives still produce carbon emissions but potentially such emissions would be lessened. There are linkages to areas which lie adjacent to your local authority area, and which perhaps may be usefully included here, to provide wider context. Most notably, there is important interaction between Cheshire East and the areas of both Greater Manchester and Stoke &amp; the Potteries. This dimension would also reflect the importance of finding a way forward on promoting longer distance commutes by more sustainable modes, where possible. In the context of both the changes which flow from the recent Localism Act 2011, as well as the streamlining of national policy through the NPPF, the Highways Agency therefore wishes to emphasise the mutual benefits of pro-active engagement at an early stage of the Plan-making process. A final point is thrown up also in relation to how the interim policy on the release of housing land may be integrated into the neighbourhood planning initiatives being taken by your Council and which is not mentioned.</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP119		<p>We note that paragraph 2.15 of the consultation document states that the IPP has been operating successfully since its adoption and has led to an increase in the supply of housing as developers have submitted planning applications on a number of sites adjacent to the settlement boundary of Crewe, resulting in the approval of about 1,150 additional homes. Whilst this may be the case, it is important to note that given the council's failure to demonstrate a 5-year housing land supply; these sites would be acceptable within the provisions of paragraphs 69 and 71 of PPS3 and subsequently paragraph 49 of NPPF, regardless of the IPP. Moreover, it is incorrect to state that the IPP has been operating successfully. Firstly, the purpose of the IPP is to maintain a 5-year housing supply. The IPP has failed to achieve this. In fact, the housing supply has decreased from 4.58 years at 1st April 2010 to just 3.94 years at 1st April 2011. Secondly, the IPP has not prevented permission being granted on greenfield land outside of the areas identified within it. The recent appeal at Elworth Hall in Sandbach (LPA ref: 10/2006C, PINS ref: APP/R0660/A/11/2145229) demonstrates this.</p> <p>Additional buffer</p> <p>We note that paragraphs 1.2 and 2.5 of the consultation document make reference to paragraph 47 of the NPPF and the requirement for local planning authorities to identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their requirement plus an additional buffer of 5% or 20% depending on their record of delivery against requirements. As the council has persistently under delivered against its requirement every year since and including 2008/09, the IPP needs to state that it must demonstrate a 5-year supply plus an additional buffer of 20%.</p> <p>Annual housing requirement</p> <p>We note that paragraphs 2.9 and 2.10 of the consultation document set out the council's housing requirement of 1,150 dwellings per annum in line with policy L4 of the RSS. However, the IPP also needs to state that owing to the shortfall in delivery between April 2003 and March 2011 the residual annual requirement to 2021 is 1,215 dwellings per annum.</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP138</b>		<p>In my view, there should be an additional, short statement that sets out to prohibit, or at least makes it very difficult, for developers/land owners to act as 'predators' and submit speculative large scale housing, planning applications whilst the Core Strategy is in progress, as per the LDS, and also in the absence of a 5 year supply of housing. In my view, applicants for large scale housing planning applications, as registered/validated with CEC, and/or in the pipeline, are unable to demonstrate any meaning benefits to the local community and also the Borough of Cheshire East Council. This new approach could possibly be successfully included at Paras 12.12/13 which seek to broaden the current interim policy to modest developments, and would therefore become a new, important safeguard to potential large scale developments in the open countryside.</p>
<b>RIPP135</b>		<p>Page 7, Section 2.21 and Page 11 Section 3.7 requires developers to take into account the layout, design and balance of uses with site specific considerations and that the design of new developments must ensure that they are appropriate to the character of the area. We believe this needs to be more explicit and include examples. Specifically, it needs to be very explicit that if a proposed exceptional green gap site being considered for development has more than 50% of detached housing within 100m of it, then it would be not be permissible to build semi detached housing.</p>
<b>RIPP134</b>		<p>2.4" In any new development, the opportunity should be taken to design highways and other infrastructure to reduce dependence on motor transport and encourage cycling and walking. In any residential development a speed limit of 20mph should be the norm"</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP84</b>		<p>Section 2: Background. We acknowledge the need to release housing sites in towns other than Crewe. We believe that it is appropriate to release sites where there are acceptable in terms of impact upon the local area and that such sites should be released in sustainable settlements. However, we believe there is no useful purpose in imposing upper limits on the numbers of units because this may artificially constrain logical sites which are otherwise appropriate in terms of location, lack of environmental or technical significant impacts and which are capable of delivering sustainable development. We also consider that it is inappropriate for the draft RIPP to be used as a consideration with immediate effect and that it should not be used until such time as any representations in respect of the document have been considered and resolved. It should be noted that the guidance is informal and does not have the weight of a Development Plan policy. Furthermore it is not supported by any Development Plan policy. We do believe that in certain situations a site of significant scale could be released for development so that an initial phase can be brought forward to help to contribute to five year housing land supply with the remainder of the site being held back to provide housing later on in the plan period. We note that the draft RIPP does contemplate such a scenario and we refer to paragraph 3.4 which states that sites which require a longer period for development may be restricted to the grant of planning permission for the first phase of development. We believe this approach has merit, but that this approach should not apply to Crewe.</p>
<b>RIPP117</b>		<p>Cheshire East Council has not achieved a 5-year supply of housing land in recent years and there is an argument that the additional 20% could apply to Cheshire East and certainly an additional buffer of 5%. We propose that the second sentence of para. 2.5 should read as follows:-"In Cheshire East an additional buffer of at least 5% will also be provided to ensure choice and competition in the market for land."</p>
<b>RIPP143</b>		<p>1. In section 2.16 you refer to the Green Gap without explaining what this is. 2. In section 2.30 mention is made to Firstly without subsequently moving on to Secondly etc 6. I have also noticed a couple of typos: in section 2.15 there is a comma at the beginning of the last line but it should be at the end of the previous line, and within the shaded box on page 9 there are spurious spaces within paragraph 2.</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP128</b>		<p>I do not necessarily accept the need for 1150 units /year and that we therefore have 3.94 years of supply. Paragraph 2.9 (P.5 background) says "This figure reflects the level of house building in the Borough that was delivered in the ten years up to April 2010." On the basis of that, the Council has agreed 1150 net additional houses per annum based on that past demand figure. I contend 1150 is wrong and out of date. I would like to know what the average build calculation would be based on the 10 years ending April 2011 or indeed in the 10 years ending April 2012. I am either would produce a lower figure and wonder why this more up to date figure shouldn't form the base figure to determine the true supply level.</p>
<b>RIPP65</b>	No	<p>The 1,150 net additional houses per year figure stated represents current RSS. The Council's own Options proposals consider this figure to be at the low end of the scale in terms of future need and its aspirations for "supercharged growth". In addition, the 20% buffer introduced by the NPPF is clearly relevant to Cheshire East. If the Council intends to utilise an interim policy to deliver development, then these factors need to be fully addressed and taken into account in devising the Revised Interim Policy. Whilst I welcome the LPA's acknowledgement that it does not have a 5 year housing supply, in common with many other parties I have severe reservations about how the LPA has calculated its latest housing land supply figures. I cannot therefore accept that the 3.94 year figure as at 1/4/11 is correct. I believe this figure to be very much on the high side with the actual supply being 2.5 - 3 years. If the LPA is not prepared to listen to feedback on the supply side then the whole basis of this Revised Interim Policy is clearly flawed. The actions proposed will not adequately address the shortfall in supply and the interim policy will be of little use in defending appeals against premature large scale proposals that undermine the local plan preparation process. The Interim Policy has not been operating successfully as it has led to greater confusion and indeed was largely dismissed as irrelevant by the appeal inspector in respect of the Richborough and Fox Land schemes at Sandbach. It is apparent that Members do not understand or accept the implications of the policy as exemplified by the recent refusal of the Bloor Homes application at Gresty and the confusion surrounding the Coppenhall East and Parkers Road approvals. Even where consents have been agreed, applications are still awaiting completion of S106 Agreements and therefore delivery of housing development has been delayed.</p>



ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP102</b>		<p>I believe the 5 year supply requirement, based on 1150 per annum is a policy left over from regional strategy, which was itself subject to development pressures. A move toward greater sustainability dictates this figure now needs to be revised down to a more realistic figure 950 Para 2.13 is misleading in that it implies that a lack of 5year supply is the single or major factor in delivering sustainable decisions on speculative housing applications whereas the question of sustainability should be equally if not the senior determining factor in deciding speculative applications. Para 2.22 I recognise that if the plan is to achieve its aims it must clearly must manage housing releases. I reiterate my fundamental disagreement with the excessive housing number provision required to catering for a significant proportion of net inward migration. The land releases for housing must be based on clear priorities and this means accepting the need for restraining development in some areas. I suggest the first priority to be the re-use of land (Brownfield Sites) second priority, mixed development, where housing brings forward land for employment purposes.</p>
<b>RIPP75</b>		<p>The IPP was initially published in February 2011 and has been revised to take into account changes in circumstances, particularly the adoption of the National Planning Policy Framework (NPPF), since February 2011 to ensure that new housing development takes place in appropriate and suitable locations. The main thrust of the NPPF is the presumption in favour of sustainable development and paragraph 14 states: At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For plan-making this means that: - Local Planning Authorities should positively seek opportunities to meet the development need of their area; -Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted. For decision taking this means: - approving development proposals that accord with the development plan without delay; and - where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted. Based on the above presumption in favour of sustainable development there is a need for Local Planning Authorities (LPAs) to plan positively and seek opportunities to meet the development needs of their area. It is in this context that the IPP should be prepared.</p>
<b>RIPP70</b>	Comment	See below
<b>RIPP66</b>	Yes	

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP96		<p>Paragraph 2.4 As a principle we strongly support the recognition that small sites on the edge of settlements can often be brought forward quickly and this can assist the Council in meeting their identified housing land supply shortfall. Moreover, we support the recognition that settlements other than Crewe, such as Congleton have an important contribution to make in bringing such sites forward and they are not likely to prejudice the development plan process in doing so.</p>
RIPP97		<p>Paragraph 2.4 We agree with most of this paragraph but we are concerned that the Policy as drafted does not demonstrate how the identified outcomes would be delivered. As stated at the first bullet, the NPPF is clear in its requirements for people to be involved in the plan making process and there is no reason why this principle should not be part of the decision making process, as in this case, before a plan is adopted. We consider this to be a serious oversight that needs to be addressed if the document is to conform to the NPPF. To meet the requirements of the first two bullets we would want to see a requirement on all developers under this Policy to consult with the public before submitting their planning application, preferably at an early stage, so that the public's views and ideas can be incorporated in the development. Not only would this bring the Policy into conformity with the NPPF it would begin to overcome the current adversarial approach to planning whereby local people view the developers and the council with high levels of distrust. Surely it would be better if the developers and the council were seen to be working collaboratively with local people to benefit the local community. In addition, the outcome of such an exercise could result in resolving many objections which could result in savings of developers, council officers and council members' time and money and significantly reduce the likelihood of appeals. While welcoming the third bullet it is vague on what constitutes a sustainable development. More detail comments on this are given later in our response. Paragraphs 2.6 and 2.7 Again these paragraphs quote from the NPPF that there is a presumption in favour of sustainable development and that to achieve this developers need to demonstrate that they meet all the requirements of the NPPF. If it is your intention that all developments under this Policy are required to meet all the requirements of the NPPF this must be clearly stated at the start of the Policy itself at Section 3; alternatively, you can set out specific sustainability requirements along the lines we suggest later in our response. Paragraph 2.12 Again it is not clear what you require in respect of sustainable development; if it is as stated above, that all developments must fully comply with the NPPF then this must be stated. But what happens if the development fails to meet just one of the NPPF requirements, would this be grounds for you to refuse planning permission even if you are not meeting your housing targets? Perhaps it might be better to set out specific sustainability criteria that developers are required to meet. Paragraph 2.13 We are very disappointed at the negative approach to appeals. A decision on whether to grant permission or not must</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
		<p>be taken on a full knowledge of the site including, in particular, the sustainability of the location and design of the development. It is for your officers to obtain this information from the applicant or other departments within Cheshire East as appropriate. To enable you to achieve this, the application must include a sustainability assessment produced by the applicant and the need and requirements for such a sustainability assessment must be clearly set out as part of this Policy. To follow such a course should result in a sound defensible decision with perhaps only the grounds of less than a five year housing supply being the possible cause of an appeal if the decision is to refuse permission. However, following this course of action would ensure that the Council has robust and defensible reasons for refusal. Paragraph 2.14 We are concerned that if most, if not all, new employment is to be at Crewe then housing development in surrounding towns, such as Congleton, without the delivery of a proportionate number new jobs to these towns could result in these towns simply becoming dormitory towns to Crewe with workers commuting to Crewe to find employment. This is completely unsustainable and in contravention of the NPPF and must, consequently be strongly resisted. The Policy must be re-worded to provide for employment elsewhere in the Borough in addition to Crewe, particularly within the towns identified at Part 3 of the Policy. Paragraph 2.22 We too are very concerned that the release of major non Green Belt housing sites on the edge of towns other than Crewe would pre-empt decisions on the future development of these towns and of the Borough as a whole. This paragraph and the Policy itself need to be re-drafted to ensure that this does not become a possibility. Paragraph 2.23 We disagree that small greenfield sites are unlikely to cause harm to the countryside. Any greenfield site will cause some level of harm, to address this, paragraph 2.23 should be amended to require any developer of a greenfield site to include mitigation measures to overcome the harm. As the enhancement of biodiversity is a key requirement to sustainable development in the NPPF, where the mitigation measures proposed by the developer are inadequate or cannot be made adequate then the site should be deemed unsustainable and permission should be refused. Section 2 general comments At no point in Section 2 is there anything on brownfield sites. The NPPF is quite clear on the importance of brownfield sites in the delivery of sustainable development (paragraphs 51 and 111 in particular). It is very important that best use is made of all previously developed land within the existing urban area to avoid the blight of derelict and under-used land. In addition, being closer to facilities, brownfield sites are generally much more sustainable than greenfield sites. While the Policy itself includes for brownfield development we consider this needs to be significantly strengthened to give the flexibility to maximise the contribution brownfield sites can and should make to meeting housing targets under this Policy. We have suggested amendments to this part of the Policy and strongly urge you, for the reasons set out above, to</p>

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
		amend the Policy as suggested or in other wording to achieve the same outcome. In addition, we would want to see paragraphs in Section 2 on the development of brownfield sites to support this amended Policy.
<b>RIPP129</b>		The Cheshire East SHLAA (updated March 2012) states that the Borough currently has a 3.94 year housing supply. Taylor Wimpey agrees that this is a significant shortfall and an urgent need to provide a policy response is required to rectify this position. Whilst the RIPPRL acknowledges the absence of a five year supply, the interim policy makes no attempt to define the supply. We consider that CEBC have persistently under delivered in each of the last 3 years, which is considered to represent persistent under delivery in terms of national policy <sup>1</sup> . If the additional buffer was applied to the 5-year requirement the shortfall would be 2,506 dwellings, which represents a 3.28 years supply. To comply with the requirements of the Framework [47] and the need to provide an additional buffer of 20% (due to the record of persistent under delivery of housing in Cheshire East) the LPA should clearly set out details of the current housing supply in the RIPPRL. The RIPPRL [2.7] recognises that where there is not a demonstrable five year supply in the Borough, the LPA states that favourable consideration should be given to planning applications for housing development on sites outside of settlement boundaries. The presumption in favour of sustainable development, as supported by the Framework, means that where an application can demonstrate that the proposal will perform a positive economic, social, and environmental role and comprises sustainable development, such applications should be granted planning permission. This is an approach that is fully supported by Taylor Wimpey as it will help to ensure that the housing requirements of the community are met.
<b>RIPP71</b>	No	green belt is sacrosanct and should not be built on if it is the damage cannot be undone the rectory fields are a glorious natural space in the centre of the village an should stay as such
<b>RIPP68</b>	Yes	
<b>RIPP69</b>	Yes	
<b>RIPP67</b>	Comment	2.3 any development must be sustainable and in particular safely accessible by walking particularly where there is affordable housing

ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
RIPP110		<p>The Strategic Housing Market Assessment (SHMA) which was published in September 2010 is the most up to date evidence base of housing needs in Cheshire East. Accordingly this should be a material consideration in the determination of planning applications for residential development. The SHMA concludes that in the 'Former Macclesfield' area there is an annual demand for 5500 market houses and 857 affordable houses. Furthermore table 5.1 of the SHMA shows (see figure 1) that there is an annual shortfall of 1417 market houses and 455 affordable housing in the former constituent of Macclesfield, with a shortfall of 2,753 across the entire Council. Furthermore the Office of National Statistics household projections (2006-based) forecast that the number of households in Cheshire East is set to increase from 154,000 in 2006 to 191,000 in 2031, representing an increase of 24% over the plan period. This equates to an average annual increase of 1,480 households, 330 households higher than the RSS build rate of 1,150 each year. This therefore provides compelling evidence that the housing requirement within Cheshire East should be substantially higher than the 1,150 units per year to address the need for housing across the District. One of the Government objectives is to ensure that the planning system delivers a flexible and responsive supply of housing land. Accordingly Local Planning Authorities are required to assess and demonstrate the extent to which they can maintain a rolling five year supply of deliverable land for housing. This has been reinforced by the NPPF in paragraph 47. Accordingly based on the soon to be abolished Regional Spatial Strategy (RSS) figures the five year housing requirement for Cheshire East is set at an additional 5750 dwellings (1150 per annum). Cheshire East Councils Annual Monitoring Report provisionally calculated Cheshire East Councils five year supply of housing land at 1st April 2009 at 4.06 years worth of supply. However since then a full review of potential sites has been carried out in conjunction with the preparation of the Strategic Housing Land Availability Assessment accordingly this assessment has indicated a supply of only 3.95 years as of 1st April 2011. However, a recent assessment undertaken to complement planning application no. 10/3471C has challenged the Council's 5 year housing land supply. The assessment demonstrated that across the Borough there is only actually a 2.66 year supply, with Macclesfield only having a 1.44 year supply of deliverable housing. This shows that the numbers of homes to be delivered over the 5 year period from 2010 - 2015 is 3,054, representing a supply of 2.66 years when compared against the 5 year requirement of 5,750 homes. However perhaps more disconcerting is the significant shortfall of housing supply in Macclesfield of 1,714 units. This is a substantial shortfall in supply and consequently the provisions of the NPPF determine that applications and allocations should be considered favourably outside of existing settlement boundaries. Furthermore, an assessment undertaken to support planning application no. 10/2608C reaffirms the findings of the above</p>



ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
		<p>planning application. Indeed this assessment demonstrated that across the Borough there is actually only a 2.95 year supply. This calculation shows that the number of homes needed over the preceding 5 year period is 5,737, whilst the actual amount forecasted to be delivered is 3,384, representing a net undersupply of 2,353 dwellings. Furthermore a significant under supply is seen across both Macclesfield and Congleton, with a plethora of housing delivered in Crewe &amp; Nantwich far greater than that of demand. Accordingly growth should be geared towards Macclesfield, Congleton and its surrounding rural areas with applications for residential development favourably considered where they are shown to be sustainable and inline with the Core Planning principles of the NPPF. This representation has challenged and provided evidence that the Councils own assessment of their 5 year housing supply is overly optimistic. Accordingly to allow for the sufficient release of housing land to meet housing needs across the whole of the district the Councils need to consider favourably planning applications which are before them that will make a meaningful contribution to the shortage in housing supply, as advocated in the NPPF. There should be a particular focus in meeting the acute and critical shortfall of housing in the Macclesfield and Congleton districts to ensure a sustainable mix of housing across the Borough, as presently the surplus of housing supply in Crewe implies that people only want to live in Crewe. These imbalances need to be addressed in the adopted interim Revised Planning Policy on the Release of Housing Land.</p>
RIPP112		<p>It is however paragraph 2.20 that raises most concern, as although the provisions of this paragraph allows some scope for the release of allocated employment land for housing, this only appears to encourage housing development where this can be brought forward alongside employment development where it is demonstrably necessary to achieve a viable development and contribute to necessary infrastructure costs. The provisions set out in this paragraph therefore continue to be restrictive and are contrary to policy set out within the National Planning Policy Framework which clearly sets out at paragraph 22 that: "Planning policies should avoid long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities "And continues at paragraph 173 to emphasise that; "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened..."</p>



ID	Do you agree with the Background? (Pages 4 to 8)	Please provide any comment (please indicate the paragraph number that any specific comments relate to).
<b>RIPP114</b>		<p>It is refreshing to see formal recognition (by the council's own definition) that the council's housing land supply is insufficient to provide up to 5 years worth of housing capacity against its own housing requirements, for example, as at April 2011, housing land provision has capacity for 3.9 years. This under provision of housing land is indicative of the low supply of net housing units coming forward against the council's own housing targets (set at 1,150 units per annum), a widening cleavage that has been increasingly marked over the last 4 years: - 2008-2009 741 net units (under provision of 409 units, delivering 64% of the annual housing target) - 2009-2010 634 net units (under provision of 516 units, delivering 55% of the annual housing target) - 2010-2011 466 net units (under provision of 684 units, delivering 40% of the annual housing target) Taking account of the persistent under provision of housing supply, paragraph 47 of the National Planning Policy Framework (NPPF, 2012) states Local Planning Authorities should also set aside a buffer of 5% (to the 5 year land supply) to ensure there is choice and competition in the market place for housing land, and, in cases where there is a persistent delivery of under provision an additional 20% buffer is advised, which is likely to be the case for Cheshire East.</p>
<b>RIPP124</b>		<p>Ref: 2.24 - I feel that the sustainability factor should be further emphasised by including direct reference to SUDS.</p>
<b>RIPP144</b>		<p>Cheshire East Council in the Draft Revised Interim Planning Policy: Release of Housing Land states at section 2.19 that the main thrust of the Interim Planning Policy should remain the same but that 'additional provisions are included in relation to allocated employment areas and in respect of housing development in other towns in the Borough.' It is not clear however what 'additional provisions' CEC are referring to, unless this relates to section 2.24.</p>
<b>RIPP145</b>		<p>Textual glitches at section 2.7 and pp 9 - 10 (where is 1 in the text of the draft policy?)</p>

**Do you agree with the Interim Planning Policy on the Review of Housing Land  
(as set out on pages 9 and 10 of the draft document)?**

Yes: 17

No: 34

Comment: 18

No tick box completed: 73

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
RIPP2	Yes	
RIPP3	No	In section 3 part 1 regarding Crewe, there is no reference to the statement 'Is accessible by walking to a wide range of local services', whereas this does apply to the developments in other towns. This should apply to Crewe too, as traffic is a major issue in Crewe. I don't agree with differentiating between development around Crewe and development around other towns. It is simply a way of this council dumping all the new homes into Crewe because that way they won't lose their seats. It is ill-conceived, unsustainable (both environmentally and economically) and seems to me to be just a lazy way of the council being seen to have developed a plan without actually having put much work into it. It seems to me that a housing plan should look at demand for housing, and need for housing. Demand is clearly higher in other areas of the borough, to the North particularly. This is demonstrated by the higher house prices and the lower level of empty or incomplete properties in the North. Crewe has a plentiful supply of affordable housing, a plentiful supply of empty houses, and a plentiful supply of incomplete developments, so it makes no sense to dump all the planned houses there.
RIPP4	Yes	
RIPP5	No	Page 9 2. This statement gives a carte blanche to give planning permission to whoever the council pleases, for example, the Council could grant planning permission to a large supermarket which wants to set up in a town centre and could argue it supported the provision of employment, town centre and community uses. page 9 3. "No more than 30 net additional dwellings" - this is not a modest or small development. page 10 - "A minimum of 35% affordable housing in accordance with the Interim Planning Statement on Affordable Housing". Crewe's affordable housing quota was 30%, Macclesfield and Congleton - 25%. Now by this all sites will have to have as a minimum 35%. This does not take into account the different character and roles of towns and villages across Cheshire East - some sites are more suitable than others. Again the Localism Act is designed to get rid of this type of blanket housing requirement being imposed from "above". Justification bottom page 10 - is simply a repetition of earlier information.
RIPP6	Yes	
RIPP7	Comment	Any development should be as close as possible to facilities. We should assume that we may not have as ready access to as many

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
		cars running on fossil fuels in the future.
RIPP14	No	
RIPP8	Yes	
RIPP9	Yes	
RIPP10	Comment	<p>What constitutes a sustainable development is defined in a footnote on page 10. Under this definition being within 500m of a cashpoint, post box, bus stop, public open space (i.e. waste ground) and within 1,000m of a pub constitutes a sustainable site. There are very few places in Sandbach that fail to meet these criteria are and if churches and church halls count as local meeting places, then most of the outskirts of Sandbach is covered for this as well. The definition as it stands is an open door to developments on every greenfield on the outskirts of Sandbach This definition should be amended to say at least 4 out of Primary School (1,000m), child care facility (nursery or creche) (1,000m), playground (500m), medical centre (1,000m), leisure facilities (1,000m) plus at least 5 of the following : a shop selling food or fresh groceries (500m); Post box (500m); Post Office (1,000m); bank or cashpoint facility (1,000m); Pharmacy (1,000m); Local meeting place/community centre (1,000m); Public House (1,000m); Public Park or village green (1,000m); Public open space (500m); Bus stop (500m); Railway Station (2,000m) Employment sites on the outskirts of towns should be maintained if the towns are not to become dormitories for commuters working elsewhere.</p> <p>A new bullet point under 3 on page 9 should be is not within an allocated employment area; this is already included in the Crewe section.</p>
RIPP11	Comment	<p>I have great concerns with regard to any development on the fields adjunct with the Bollin Valley at Areas Ba Bb and Bc. Corridors such as these form crucial links between wildlife sites, they facilitate wildlife moving from open land to more densely populated areas. It is necessary to safeguard them from development and to enhance their value by creating additional corridors rather than build upon the existing ones. I would want to see evidence of how the council can even consider these fields in respect of the Habitats Directive and the three tests. There are satisfactory alternative sites for building purposes. There is no imperative overriding public interest served in building upon these fields so close to a SSSI designated area. There is a very real danger of flooding. There is a very real chance that disturbance of Bat breeding and resting sites will occur. The use of good practice by a developer will no longer form a defence, when disturbance of this nature affecting the survival chances of breeding success or the reproductive ability of a protected species leads to a reduction in the area surrounding the Bollin Valley i.e. areas BaBbBc. I have no doubt that the council will take my comments into accounts when making their final decisions and will follow the codes of practice and guidance in respect of the destruction of breeding sites and general deterioration of sites.</p>

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
RIPP12	Yes	3.3 It is essential that applicants for housing developments meet ALL the criteria, most particularly, - "Is not within the Green Belt of the Green Gap" - the countryside/green spaces have to be protected. There are sufficient brown field sites available to achieve the 5 year supply of housing land, accessible to transport systems and amenities.
RIPP13	Yes	
RIPP15	Yes	
RIPP16	No	Whilst the logic behind small scale new developments is understandable against the threats posed by national requirements, it is open to abuse by developers and could lead to a piecemeal and non- cohesive approach to development. A more comprehensive approach to land allocation for development purposes which meets national requirements including a buffer would be preferable. Central government policy, which is essentially a top down approach, creates an unenviable position for both officials and elected members in terms of their accountability to local communities.
RIPP17	No	There is no need for new housing in Wilmslow.
RIPP18	No	
RIPP19	No	I think the criterion "Is accessible by walking to a wide range of local services" is not discriminatory (and certainly not clear to members of the public). A very large number of locations, including many rural locations, will at least FIVE of the following close by Post box + playground/amenity area + Leisure facilities + Local meeting place/community centre + Public House + Public Park or village green + Public open space + Primary School + child care facility Is the distance walking or as the crow flies? - please be clear. Does it have to be on 'pavements' or along roads and tracks across fields? - please be clear. What is the difference between an "amenity area", a "public park/green", a "leisure facility", and an "open space"? Does a playing field with a swing and a pitch count three times? Does a community centre with a nursery and a play area count three times? This criterion is very important and it is open to extremely broad interpretation.
RIPP20	Comment	No mention of the essential contribution to housing within the derelict town centre of Macclesfield. No mention of the essential need to replace all existing housing within a sustainable lifetime. At the present rate of building it will take hundreds of years to replace the whole housing stock, which is unsustainable as existing houses are not built to last that long and are totally inadequate from the point of view of energy conservation and use. Generally, there is no mention of the need to replace housing to increase the standard of design, layout, amenities, safety, appearance and community worth.
RIPP21	Yes	
RIPP22	Comment	I do not agree with the release of green belt or green field land for housing, it should remain protected as a natural habitat for wildlife and for future generations.

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
RIPP23	No	<p>We desperately NEED a Brownfield v's Greenfield Sequential Test to ensure that our brownfield sites (and stalled developments) are developed prior to the destruction of greenfield land. The present system is not working, with real life Cheshire East examples of where greenfield has been built upon where brownfield sites have been trying to gain development for years! This is particularly important given this documents importance of sites that are developable within 5 years - developers WILL try and argue that brownfield sites are undevelopable within 5 years due to contamination etc...which is simply untrue!! Definitions are needed for: "very closely related", "sustainable". For example ALL greenfield development is unsustainable - as to continue with this course of development into future years would result in no greenfield space being left. However, once all brownfield and redeveloped sites have been developed greenfield development may be the only option - whilst not sustainable this is the only option hence may be permitted if the benefits outweigh the costs. The statement "capable of being fully developed within 5 years" is pointless - all sites, particularly of the size outlined, are developable within 5 years. The statement "That it will not pre-empt or prejudice the future scale and direction of development within the individual town." is also pointless - as often this is inevitable.</p>
RIPP24	Comment	<p>The overall policy approach appears sound bearing in mind it is an interim policy pending finalisation of the LDF. Agree approach for Crewe and for sites in town centres. For other settlements the criteria of acceptability are fairly strict and I suspect they would be challenged as such on appeal though i would support a strict approach, after all panic measures are not be encouraged ! More guidance needed for the consideration of applications within the settlement boundaries but on land allocated for other purposes, such as employment. This would be consistent with the thrust of the NPPF. Some of the criteria in part 3 of the policy are particularly applicable for example not sub-dividing larger sites and relationship to existing/emerging patterns of land uses. The aim should be very much to prevent pre-emption of the LDF process of option evaluation and public participation.</p>
RIPP25	Yes	
RIPP26	Comment	<p>Without some scale example it is had to understand what 30 dwellings a hectare means Is less than 1 hectare in size or has the capacity for no more than 30 net additional dwellings; That the density of the site is appropriate to its location and is no less than 20 dwellings per hectare; Does not represent the subdivision of a larger site; and That it will not pre-empt or prejudice the future scale and direction of development</p>
RIPP27	Yes	
RIPP28	Yes	
RIPP29	Yes	
RIPP30	No	<p>I object on the basis that this policy is not based on any rigorous analysis of local need.</p>
RIPP31	No	

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
RIPP32	No	I am not satisfied that this document has been drawn up WITHOUT a thorough and consolidated report on a) better qualified researched evidence on the need for housing in the town...1500 ?? 1200?? 900? there is no real fact basis for the numbers in the report b) I would like to see a well researched and detailed report on ALL the brownfield sites in the area and the potential number of housing units which that could be built there c) I would like some form of respect given in this report to the current residents of Wilmslow We chose to live here because of its semi rural environment , this has to be maintained at all cost and therefore the number houses built should be determined by brownfield availability and not a socialistic number plucked from the sky
RIPP33	No	
RIPP34	Comment	2:24 All ideas good - high ideals - "on foot" wow - wouldn't it be good if current housing was this far away from facilities on foot!!!! P 10: 3 - these distances are- would be - like a dream come true - note the word "DREAM"
RIPP36	No	
RIPP35	No	
RIPP37	No	Alsager's long term housing plan can be met by utilising the 2 large brown field sites (Twyfords and MMU). The controversial sites in Alsager are the playing fields and green field sites that will be covered by this document. This strategy will basically allow all the playing fields and greenfield sites to be built on before the 2 large sites can be considered as they will be held up waiting for the full plan. The criteria to be used to decide if permission for the site is granted are irrelevant. The point is that this plan does not take into account the 2 large sites that should be built on first as they are brownfield sites.
RIPP38	Comment	As part of it's Strategic Housing Market assessment has the council made any assessment of the need for self build housing. In particular on larger development sites setting an allocation of self build plots (as with the 35% affordable requirement) whose infrastructure will be provided as part of the wider development. This would give local people the opportunity to build their own properties to suit their specific needs and should help people buy into the idea of development in their local area rather than opposing it. The Housing minister has very recently said that he wants self build to take off and make a significant contribution to the supply of new housing. If this is to happen then self build needs to move from simple one off replacement dwelling which by and large it has done to a strategy where self build forms part of a planned development with new plots served by new infrastructure. I accept that Self Build is more likely to form part of the longer term strategy and the Local Plan but surely there should be some mention about it as part of the Interim Strategy?



ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
<b>RIPP39</b>	No	<p>Under point 3 page 9, you say not within green belt yet local Sandbach plan shows development on green belt site reference A Land adjacent to Junction 17 of the M6, north west of Congleton Road on page8 of that plan. On Page 10 I'm very concerned with the criteria used at the bottom namely at least 5 of the following Post Box (500m) etc. This criteria would include all of Sandbach, it will end up as a total open door to developers to build wherever they like. Change it to this at least 4 out of Primary School (1,000m), child care facility (nursery or creche) (1,000m), playground (500m), medical centre (1,000m), leisure facilities (1,000m) plus at least 5 of the following : a shop selling food or fresh groceries (500m); Post box (500m); Post Office (1,000m); bank or cashpoint facility (1,000m); Pharmacy (1,000m); Local meeting place/community centre (1,000m); Public House (1,000m); Public Park or village green (1,000m); Public open space (500m); Bus stop (500m); Railway Station (2,000m)</p>
<b>RIPP40</b>	No	
<b>RIPP41</b>	Yes	
<b>RIPP42</b>	No	<p>No definition of 'Green Gap' This is simply a charter for greedy land owners and national developers to apply for permission to develop green field sites around towns such as Congleton and Macclesfield as the definition relating to local amenities is so broad that virtually every green field site adjacent to the built up area will comply. Indeed, much of the land has already been purchased by Developers! Additionally, the presence of a primary school within 1000m does not necessarily mean it has capacity!! Defining a defensible boundary as a substantial hedgerow will only serve to reduce available and attractiveness of habitat for nesting birds. No account is taken of flood risk, highway capacity etc. For example, Congleton town centre is already extremely congested, and encouraging further traffic into and through the town centre will negatively impact the health and wellbeing of residents and users of the town centre. This contradicts one of the core principles of the NPPF to support local strategies for improving health, social and cultural wellbeing. No evidence of any strategy to incentivise the development of brownfield sites as a priority. For example The Silk Mill in Congleton has been earmarked for development for at least 10 years and is still an eyesore for anybody entering the town. The policy should include some evidence of how the developments on brownfield sites will be incentivised.</p>

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
RIPP43	Comment	<p>(i) We believe that bullet three of the first part of the policy should be phrased the opposite way around to how it is phrased in the draft. It should say: 'is within an allocated employment area if that area is deemed suitable for housing'</p> <p>(ii) We object strongly to the proposed generalised statement in the third part of the policy where it is proposing to sanction housebuilding adjacent to the settlement boundary of Macclesfield and the nine Key Service Centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow). Although the policy goes on to flag up exceptions, including building on Green Belt, it says nothing about impacts of building on land immediately adjacent to Green Belt, nothing about building on brownfield land first, nothing about Sites of Biological Importance (SMIs), nothing about the Jodrell Bank exclusion zone and nothing about flood plains or playing fields. There must be a requirement for sequential tests to be applied to land use. The policy as it stands is wide open to abuse.</p>
RIPP44	No	<p>Although our client does appreciate the need for the Council to rectify the significant five year housing land supply position in Cheshire East Council, and which is regarded as being so severe that the Council is subject to the 20% addition identified in National Planning Policy Framework, we believe that the RIPP does not go far enough in enabling the authority and landowners to bring forward appropriate parcels of land which can provide a lasting solution to the problem. In this context we believe that the RIPP should be amended to allow for the release of larger sites in the main towns where to do so would help to assist in the delivery of sustainable development on sites which are capable of providing other benefits, such as the provision of infrastructure and which would be of benefit to the overall delivery of economic and social objectives for the individual settlements. In this case this may mean that some of the larger sites need to be released which will also help to bring forward much needed infrastructure in the larger towns. Although some of these sites may not be capable of being delivered in full within a five year period, their release will nonetheless make a contribution in the five year period and with the provision of other benefits will help to release other economic opportunities of benefit to the objectives identified in the emerging Development Plan.</p>
RIPP45	Comment	<p>The definition of "Is accessible by walking to a wide range of local services" is too loose. The requirements should be split into 2 or 3 categories and then a minimum requirement set for each category. I approve of the restriction on size of development, but the requirement that it "does not represent a subdivision of a larger site" will be difficult to enforce.</p>
RIPP46	No	<p>The policy should be re-phrased to indicate that it is in order to allocate employment land for housing (i.e. according to the RSS). Macc2020 do not support the text which (as a general rule) supports housebuilding "adjacent to the settlement boundary of Macclesfield and the Key Service Centres" even though it mentions</p>

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
		Green Belt as an exception. The text should be stressing the need to prioritise urban regeneration, building on brownfield land first and making better use of existing buildings, e.g. setting targets for bringing empty homes back into use and converting more existing premises to housing, including mill buildings and accommodation over shops.
RIPP64	No	<p>The policy under Part (1) is very similar to that of February 2012 save that some relaxation to allow enabling development in employment allocations around Crewe is proposed. It is assumed that some new proposals will come forward on appropriate sustainable sites in Crewe though with the potential housing numbers it is difficult to see how existing and proposed sites will be built out within the 5 years stipulated and that the housing market can absorb the numbers proposed to be produced in that time.</p> <p>The policy under Part (2) is the same as before and is logical though the contribution from this source may be quite small, for example in Macclesfield the town centre regeneration scheme is unlikely to produce any real net increase in residential properties.</p> <p>The policy under Part (3) is the new content and cannot be supported for a variety of reasons. Ten towns are identified where the policy will apply and a set of criteria will be used to assess the acceptability of any such proposals. The first criterion (not Green Belt or Green Gap) in other circumstances may seem to be a proper concern until the facts are examined. Historically, in the former Macclesfield Borough, the green belt boundary was drawn tightly around the existing settlement boundaries. That has been the case for some 25 years and in the meantime allocated sites from Local Plans have been developed and much infill and redevelopment has taken place within the settlement boundaries. Virtually every site that could have been brought forward in accordance with policy have been in that time. Effectively, from the list at the top of this part of the proposed policy the settlements of Macclesfield, Handforth, Knutsford, Poynton and Wilmslow can all be discounted as being suitable for the application of the Interim Policy for this reason. The policy simply does not apply to half of the mentioned settlements based on this criterion. Those settlements contain 34% of the population of Cheshire East. Additionally housing supply for many years in those settlements have not met local need or demand having failed to provide completion rates to meet the former targets for Macclesfield Borough and having had a restrictive housing policy for some 4 years from around 2003 to 2008. In addition to this there are considerable parts of the settlement boundaries of Congleton and Alsager that would be unable to be considered in view of this Green Belt constraint. This would focus development towards Crewe, Nantwich and Sandbach where at Crewe and Sandbach considerable housing development has been approved recently or may be in the pipeline awaiting a final planning decision. The second criterion, addressing the relationship to the built area of a settlement, is a fair guideline to take in assessing sites. The third</p>

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		<p>criterion, requiring defensible boundaries, on the face of it seems logical but would preclude part of a larger area of land even where all other criteria are met. The fourth criterion, accessibility to a range of services, relating to walking distances is generally acceptable as contributing to a sustainability test. The fifth criterion is that relating to full development taking place within 5 years. That should be more capable of being met given other restrictive criteria regarding site size currently proposed. The sixth criterion, about providing a mix of housing to improve choice, quality and supply in the town, is accepted as a way of addressing the Strategic Housing Market Assessment. The seventh criterion, limiting site size to a hectare, will create difficulties and much reduce the opportunities to bring forward sustainable sites around the settlement boundaries of some towns that are not set in the green belt. Whilst 1 hectare or 30 dwellings is an easily identifiable marker, development sites do not come in neatly packaged sizes. This, taken with criterion 9, means that some more sustainable sites will not be developed whilst less sustainable sites further from facilities could be. The eighth criterion relates to density and can broadly be supported though there may be instances relative to the character of an area where a lower density would be more appropriate. The ninth criterion, preventing sub division of a larger site, would rule out a large proportion of sustainable sites around settlement boundaries. Most land around those boundaries are fields or are in some other low key use and will exceed 1 hectare. This requirement not to sub divide a site will preclude many such sites adjacent to settlement boundaries that may otherwise meet the criteria and contribute to addressing any shortfall. The tenth and final criterion, on pre-emption of future decisions on growth is somewhat vague and has to be considered against the other criteria. At the scale proposed in the policy (1 hectare) this is unlikely to happen. There is no criterion relating to sieving out locally protected sites of environmental, ecological, historic or other importance. The additional requirements above the normal policy levels relating to 35% affordable housing and designing to Code for Sustainable Homes Level 4 and Building for Life Silver Standard are not appropriate and should properly be addressed at a national level when trying to address a pressing problem and will deter sites from coming forward.</p>
RIPP47	Comment	<p>The policy should reiterate the priority for brownfield sites being developed before greenfields with the exception of needy area of Crewe. Certainly sites adjacent to key service centres should not be assumed to be released if such sites remain available. All attempts should be made to stimulate the development of sites within towns, often nearest to the areas of local housing need.</p> <p>Location 1 Crewe I support the continuation of Crewe being the focus of growth. The list of criteria should include the requirement for a minimum of 35% affordable housing as per para. 2.16.</p> <p>Location 2 Mixed Development within Settlements In seeking certain uses, this seems to omit the phrase 'of the site'</p>

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	<p>or 'within the site' compared with para 2.14 &amp; in the town centre delivery requirement so needs amending for accuracy &amp; consistency.</p> <p>Location 3 Adjacent to the boundary of Key Service Centres These are presumably the 'sustainable small sites' of paras.2.23 &amp; 2.24 judging by criteria 7; but this needs to be made clear. The 10 Criteria [the bullet points are numbered] I agree with listing criteria but wish to ensure they are clear, sound &amp; robust as these interim ones are likely to lead to their being used in the final local plan. I support the principle of all criteria being met before development is permitted.</p> <p>Criteria 1 the implication of protecting green belt sites, almost exclusively in the north of Cheshire East, is that the brunt of development will be adjacent to towns in the south. This will prejudice the local plan preparation which should review green belt where there is a need for housing to meet needs either local or from neighbouring areas such as Greater Manchester &amp; also assess the intrinsic character of all non-green belt &amp; green belt towns in an even handed way.</p> <p>Criteria 2 the meaning of 'closely related' should be specified as it is such a loose a term that most sites 'adjacent' to towns could be argued to fit here.</p> <p>Criteria 3 I support the criteria of development being self-contained but not the list of defensible boundaries as they would allow further encroachments into open land to the next similar boundary feature. For example, hedgerows are too frequent to be barriers to further development which would reach the next hedgerow &amp; many sites in the SHLAA exercise are already beyond waterways &amp; roads so, by this criterion, should not be permitted. Existing boundary features are very important in reflecting the 'contained character' of some towns, like Nantwich, &amp; it is precisely these features that lead local people to oppose inappropriate town extensions. It would be better to omit the list in favour of individual assessments of each proposed extension.</p> <p>Criteria 4 I very much agree in principle that developments should be 'accessible by walking' but regarding the distances specified: it should be stated that this means direct routes that are safe &amp; pleasant &amp; not along busy roads - Distances should be specified in miles as well as metres, which are not readily visualised by everyone 5 local facilities seems an arbitrary minimum requirement. Some seem more important than others &amp; could be specifically required such as children's facilities, bus stop, post office [especially for the elderly]. If these do not exist, surely the development is unsustainable &amp; should not be permitted? The distances to some of the facilities seem too long e.g. especially those for young children &amp; frequently visited ones where walking is encouraged for improved health</p> <p>Additional walking criteria - in addition, it is important that settlements with a small compact town character are allowed to remain so. Distances to other residential areas on the other side of</p>



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	<p>town should be kept within walking capability so friends &amp; family can visit on foot [or cycle] passing through other neighbourhoods so that residents retain a close knowledge with all parts of the town. Once a town grows beyond this size, [as is the risk for Nantwich] the emotional character changes completely &amp; identification with its whole is lost with consequences for anti-social behaviour, isolation etc. I also hope that this criterion will be adopted in the local plan process.</p> <p>Criteria 6 I agree that the type of housing should meet local needs but feel that more precision is required virtually all schemes will fit this wording to someone or other! Perhaps insert as assessed by the local community or recent housing needs assessment surveys including any special needs.</p> <p>Criteria 7 I agree that developments should be small but, to avoid incremental growth, it would be more forceful to list criteria 9 [not a subdivision] &amp; 10 [not pre-empting] immediately after this one. All these criteria together will enable local communities to prevent large scale growth of towns with a small compact character.</p> <p>Criteria 8 I support density appropriate to setting.</p> <p>Criteria 9 I strongly support this criteria against incremental creep.</p> <p>Criteria 10 I strongly support avoiding prejudicing the local plan process whereby local people may prevent extension to their town.</p> <p>Additional criteria suggested: a] where a town has taken significant growth in the last 10-15 years [like in Nantwich], no further schemes will be permitted in advance of the local plan in order to leave a period of rest so that the community can assimilate that change before considering if further development can be absorbed without adversely affecting the town's character. b] development should be designed to be appropriate to the character of its surroundings. The</p> <p>4 Delivery Criteria I agree with the need to provide 1 a minimum of 35% affordable housing on green field sites, including in Crewe. 2 open space &amp; community facilities 3 improving highways/ public transport &amp;, especially safe footpaths &amp; cycleways &amp; 4 sustainable building standards. On urban mixed use developments, the lower affordable housing delivery criteria of 30% may be understandable in many cases. However it is unlikely that any developer, other than a social landlord, will agree to provide the full 35% without being pressed to do so. Yet the locations of these sites are probably exactly where affordable housing is most needed. The test for viability of the scheme needs to be specified &amp; must be revealing &amp; robust enough &amp; preferably undertaken independently.</p> <p>Justification Para 3.4 I support the need for developers to demonstrate an acceptable start date &amp; that the development will be completed within 5 years so that there is not an oversupply of ad hoc housing sites. However I feel that a condition to that effect should [not 'may'] be imposed on all approvals during the life of the interim policy. I feel this should be part of the policy rather than being merely in the justification. The reference to the possibility of phased permissions is ambiguous in relation to the criteria for small greenfield developments [Location 3.3 criteria excludes phased</p>



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		development], therefore it should be made clear that this possibility will apply only to developments in settlements like Crewe [Location 3.1] & mixed developments [Location 3.2]. Para. 3.6 I support the justification for regeneration of sites. Para. 3.7 The requirement for schemes to be of high design standard appropriate to the character of the area should apply to all new development not just to heritage areas. This should be contained in the policy wording.
<b>RIPP48</b>	No	
<b>RIPP49</b>		
<b>RIPP57</b>	No	<p>The concerns that have been set out in commenting upon the background sections of the IPP, demonstrate that the review will :</p> <ul style="list-style-type: none"> <li>- Repeat the failings of the adopted policy by being ineffective in addressing the scale of the District's chronic housing land supply position.</li> <li>- Provide an unjustified and muddled approach to housing supply within Cheshire East by adopting completely different strategies for Crewe and for the rest of the District.</li> <li>- Represent a continuation of an unplanned strategy for Crewe that will neither deliver the number of dwellings to address the District's chronic housing land shortage and nor will it deliver housing within a strategy that seeks to address the significant infrastructure issues affecting the town.</li> <li>- Constitute a flawed approach to housing delivery in the 10 largest settlements outside Crewe. It will preclude the release of land under the terms of the IPP in settlements such as Macclesfield, Handforth, Knutsford, Poynton and Wilmslow where tight Green Belt boundaries mean that the policy cannot deliver housing numbers. Taking account of the limitations of Green Belt and Green Gap that further constrain many of the remaining towns, the policy approach will provide insufficient opportunities to bring forward sufficient sites required to help address the serious housing land shortfall. The flawed and muddled approach under the 3rd element of the policy where it relates to the 10 named towns other than Crewe, is further evident in the last two bullet points where sites considered acceptable under the terms of the policy preclude sites that would represent the subdivision of a larger site and where the release would prejudice the future scale and direction of the settlement. Firstly this strategy differs to that adopted for Crewe without any justification. Secondly, as championed under Paragraph 52 of the NPPF, the supply of new homes can sometimes be best achieved through planning for larger scale development such as extensions to existing settlements. This reflects the sustainability objectives enshrined in the NPPF. As planning decisions for housing proposals have to be made in accordance with the principles embodied in the NPPF and that development needs to be sustainable, a policy relying upon the small-scale uncoordinated release of housing sites on the edge of a few towns within the District, is unlikely to accord to the NPPF as it represents an unsustainable approach to land release. The threat to sustainability objectives far outweighs any perceived concern that decisions</li> </ul>

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		<p>could prejudice the future scale and direction of individual settlements. The fact that the Council has not been able to bring forward its Local plan timescale to provide a context to housing land release, cannot be used to justify an approach that is flawed as it will not deliver what it is required to deliver and that will fail to ensure that a sustainable approach to housing delivery can be pursued. The Council has an evidence base of sites in the SHLAA which provides a pool of potential sites that have been considered to be satisfactory and available. It would be far more effective and sustainable to encourage the bringing forward of SHLAA sites around the larger towns and villages in Cheshire East where the policies in the NPPF can be applied to ensure they are sustainable and deliverable, than implement policies in the IPP that will neither address the scale of the problem nor which represents a considered and sustainable approach to housing land release.</p>
<b>RIPP50</b>	No	
<b>RIPP52</b>	No	
<b>RIPP53</b>	No	<p>This section include circumstances under which you would allow development on greenfield sites. THIS IS COMPLETELY UNACCEPTABLE!!! We all know that our persuasive local developers always prefer this option! See previous comments above on wildlife protection, 'affordable' housing and Green Gap.</p>
<b>RIPP54</b>	No	just opens the door to developers
<b>RIPP55</b>	No	
<b>RIPP56</b>	No	<p>I do not accept the reference to "key service centres" as towns such as Congleton are not, in my view, suitable for significant expansion and do not have the infrastructure in place to support it</p>
<b>RIPP58</b>	No	
<b>RIPP59</b>	Yes	<p>Page 9 Support in principle, however, comments as per first question apply in respect of references to a 5-year supply of housing land.</p>
<b>RIPP60</b>	Comment	<p>The proviso that new developments should not be built on green belt or green gap land should be widened to include safeguarded land.</p>

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<b>RIPP61</b>	Comment	<p>Partly. Not sure that the policy is strong enough to stop speculative developers from targeting the small towns such as Sandbach from more building. Size definition is crucial together with subdivision clause as otherwise sites will be seen as easy prey eg - locations surrounding Sandbach. Developers are willing to build many of the local services in return for building 750 houses - this would destroy a small town such as Sandbach and therefore size limitation must be paramount to the policy. Definition of sustainability needs to be fully explained - for example it's not really very sustainable building large housing estates on greenfield land away from places of employment and without consideration on the local road network which is often grid locked at peak times. Why no inclusion of consideration of brownfield sites first rather than assumption that building will be on green fields around periphery of settlements - this is making it far too easy for developers and will not rectify brownfield sites within towns. This is a very large oversight.</p>
<b>RIPP62</b>	No	<p>Protection for our wildlife and countryside is completely inadequate. This land should never be built on. See all comments in previous 2 sections.</p>
<b>RIPP63</b>	Yes	
<b>RIPP103</b>		<p>Our main objection to the Policy is that it should only be applied to those sites on the edge of Crewe and the 10 Key Service Centres in the District, and therefore excludes potential housing sites in and adjacent to some of the smaller but equally sustainable villages in the district. We have previously submitted representations to the Core Strategy Issues and Options making the case that Wybunbury should be classed a Local Service Centre due to it having between 2 and 4 of the essential services identified by the Council to be considered a Local Service Centre. We note that the revised Interim Policy at the fourth bullet point of Section 3 also identifies a number of services and facilities that should be accessible by walking when considering the suitability of proposals. In respect of our client's sites at Wybunbury, these are all within walking distance of a shop selling food or fresh groceries, a post office, a primary school, village hall, public house and bus stops and therefore fulfil the requirement of being within walking distance of at least 5 of these. Wybunbury clearly has a good level of existing service provision within the village for residents not to have to rely on Nantwich and Crewe for their basic day to day needs. Notwithstanding this, the addition of modest new housing development will help create sustainable communities where residents' needs are catered for in the settlement they live as opposed to them having to travel to larger towns with a greater range of service provision. Guidance in paragraph 55 of the NPPF endorses this approach stating that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Whilst not all out commuting would be addressed by directing growth to some of the smaller settlements, the impacts of development such as additional traffic would be spread over a wider area thus dissipating the impact as opposed to concentrating</p>

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		<p>it in one particular area. Guidance in paragraph 54 of the NPPF states that local planning authorities should consider allowing some market housing in rural areas in order to facilitate the provision of significant additional affordable housing to meet local needs. The release of land around Wybunbury for such purposes could help to increase the supply of housing but also deliver much need affordable housing in rural areas. We contend that some of the smaller settlements in the District, such as Wybunbury, are sustainable in their own right and could accommodate modest levels of new housing development. Development here would not undermine the overall spatial development objectives of the District, whilst at the same time helping to increase the supply of new housing in sustainable settlements. We therefore believe that the scope of the Policy should be widened so that applications for housing development on sites in other parts of the district, particularly in rural areas and the smaller settlements such as Wybunbury, should also be considered potentially suitable, subject to the same considerations outlined in Section 3 of the Policy as currently drafted.</p>
RIPP126		<p>We do not accept your premise that the overwhelming proportion of future development should be in Crewe and the surrounding villages. - You know that this is the strongly held view of those who have attended your meetings and workshops. - Indeed, whilst we would all support realistic proposals to create employment opportunities, the stated intention to create 12000 additional jobs was conceded to be merely an aspiration - and is underpinned by no coherent plan - There is no evidence of success - Much of the industry for which the area was noted has been lost - In so far as the private sector has created employment, this is largely part time and/or is staffed predominately by agency workers and therefore is not by any rational definition sustainable employment requiring significant residential development. Having said that, we do accept that a Development Plan is necessary if only to exert a measure of control over what might otherwise be uncontrolled development and we note that:</p> <ul style="list-style-type: none"> <li>- Reusing brown field sites should be encouraged in fact, we would urge that it should be mandated;</li> <li>- Sites released should not be within the Green Gap;</li> <li>- That the planning should be plan led, giving people the power to shape their surroundings.....</li> <li>- We are concerned that ease of development outside of Crewe on green field sites could lead to a loss in the centre of the town. We do not believe that the views of the people urging the permanent retention of the Green Gap could have been more consistently and forcible expressed and we urge the Council to respect those views.</li> </ul>

ID	Do you agree with the Policy (pages 9 and 10)?	Policy Comment - Please provide any comment
RIPP135		<p>There is much in the Policy that we support, specifically that potential developments/sites:- Should be small scale, (no more than 5 dwellings should be stipulated) Should not be within the green belt or green gap Should not represent the sub-division of a larger site Should minimise any impact on the countryside Should be sustainable There are, however, omissions and areas that are not sufficiently clear, that will, if left unaddressed, encourage opportunistic and inappropriate interim development by planners. We make the following specific points that we would like included:- The most obvious omission from the policy is the need to take into account the identified needs of local communities. We are great supporters of the Localism Bill and the desire to give local residents and Parish Councils more say in the matters that affect them, such as planning. It is essential that this Interim Policy makes explicit reference that the case for any proposed development on a rural exception site should be based on the explicit housing need solely for that Parish. You should also stipulate that an up-to-date survey of all residents of a Parish must be undertaken to support any application and explicitly, that it cannot include residents from adjoining Parishes, unless the settlement boundary is unequivocally connected by residential development. Page 7, Section 2.21 and Page 11 Section 3.7 requires developers to take into account the layout, design and balance of uses with site specific considerations and that the design of new developments must ensure that they are appropriate to the character of the area. We believe this needs to be more explicit and include examples. Specifically, it needs to be very explicit that if a proposed exceptional green gap site being considered for development has more than 50% of detached housing within 100m of it, then it would be not be permissible to build semi detached housing. On Page 10, Section 3, open space and community facilities are included in your definition of sustainable development and the Policy lists criteria that should be applied, whereby 5 of the facilities listed need to be relevant for a site to be considered to be sustainable in terms of community facilities. We are concerned that some of these facilities are, in reality, duplicates. For example, the inclusion of a Village Green and Public Open Space as two separate criteria are in practice one and the same things, as they both provide residents access to green space. Only one of these should be included. With regard to the reference to the provision of a Bus Stop, this is far too narrow a descriptor. We believe that you should add that the Bus Stop is serviced by a route that as a minimum allows residents to reasonably fulfil an employment contract and/or to attend local schools, with a regular weekday service which starts on or before 7am and finishes on or after 7pm. With regard to reference to a Shop, it needs to be clear that it only qualifies if it sells a sufficient range of produce to meet the needs of a normal household's weekly shop. For example, a local garage selling hot savouries and a few regular provisions would not meet that requirement. Page 11 Section 3.4 maintains that "For sites that will require a longer period</p>

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		<p>than the five years for development, permission will only be granted for the first phase". This contradicts the earlier point made in the document that sites cannot be sub-divided. In effect, this would allow for subdivision of plots and part development and consistently expanding development. If a site cannot be developed within five years, then it should not be approved. Furthermore, the policy ought to stipulate the need for applicants to illustrate that the developer has sufficient funds to carry out the development within the 5 years and that a proportion of the sale of the land proceeds, we recommend 50%, should be held in escrow (or monetary bond) to ensure that there are sufficient proceeds both to start and to complete the development within this timeframe or at least to contribute towards its completion, should a developer run out of funds. Page 11 Section 3.5 The policy refers to the fact that a contribution should be made towards transport networks if they are insufficient. This contradicts one of the hurdles that needs to be overcome that there is sufficient infrastructure to support the sustainability requirement The alternative would be to stipulate that the development of any site would require the developer to provide public transport that would allow residents to reasonably fulfil an employment contract or to attend local schools, with a regular weekday service which starts on or before 7am and finishes on or after 7pm. The developer must be required to provide this for a minimum period of say 10 years.</p>
<b>RIPP122</b>		<p>Although this Council understands that under the new National Planning Policy Framework Cheshire East as the local planning authorities is required to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements, Rope Parish Council reiterates its prior views on the use of existing Green Gap which it strongly feels should be preserved.</p>
<b>RIPP116</b>		<p>The Parish Council of Sutton wish to register their support primarily for the protection of the Green Belt/Gap areas against residential development adjacent to the settlement boundary of Macclesfield as outlined in the consultation document.</p>



ID	Do you agree with the Policy (pages 9 and 10)?  Policy Comment - Please provide any comment
<b>RIPP136</b>	<p>We do not accept your premise that the overwhelming proportion of future development should be in Crewe and the surrounding villages and you will know that this is the strongly held view of those who have attended your meetings and workshops. Indeed, whilst we would all support realistic proposals to create employment opportunities, the stated intention to create 12000 additional jobs was conceded to be merely an aspiration and is underpinned by no coherent plan. Much of the industry for which the area was noted has been lost and, in so far as the private sector has created employment, this is largely part time and/or is staffed predominately by agency workers and therefore is not - by any rational definition - sustainable employment requiring significant residential development. Having said that, we do accept that a Development Plan is necessary if only to exert a measure of control over what might otherwise be uncontrolled development and we note that: . - Reusing brownfield sites should be encouraged - in fact, we would urge that it should be mandated; - Sites released should not be within the Green Gap; - That the planning should be "plan led, giving people the power to shape their surroundings..." We do not believe that the views of the people urging the permanent retention of the Green Gap could have been more consistently and forcibly expressed and we urge the Council to respect those views.</p>
<b>RIPP134</b>	<p>3.6 "Where developers are required to contribute to the development of the local transport network: consideration should be given to modifying existing highways to facilitate safe cycling"</p>
<b>RIPP106</b>	<p>Whilst we broadly support the Draft Interim Planning Policy changes, we do have 2 concerns as set follows: Policy Statement 3: Adjacent to the settlement boundary of .... We are concerned about the lack of clarity in the definition of "adjacent", and to what extent this encroaches on neighbouring parishes. Despite the additional criteria stated, we feel this lack of definition may provide a free for all approach to raid any pocket of land within neighbouring rural parishes resulting in unwanted growth by stealth. Policy Statement 3, bullet 4, note 2: We believe that since walking distances is stated for each criteria, the limit of meeting just 5 of the criteria is insufficient. All criteria is relevant for any prioritised sustainable housing development within a rural environment. Applicants should demonstrate that ALL criteria can be met, or they should be required to provide the means to achieve them.</p>

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RIPP137	<p>Anwyl welcomes the Council's initiative in bringing forward this Interim policy to address its serious housing land shortage. However, it does consider that the policy makes a serious attempt to address a substantial shortfall. Only allowing more than modest developments of more than 30 dwellings on the edge of Crewe or part of redevelopment/regeneration will not solve the very acute housing land shortage. Under 3 if a development meets all the criteria except the last bullet point ( ie there is a 5 year shortfall and the site is less than 30 dwellings) on what basis is it reasonable to refuse an application that it would not pre-empt or prejudice the future scale and direction of development within an individual town. In any event it is necessary to set out the criteria to assess any pre-emption or prejudgement. Has there been an approved/agreed Development Appraisal that supports 35% affordable Housing on all but mixed use schemes- especially as the Council also requires (i) unknown and unspecified improvements to strategic and other highway, public transport and pedestrian/cycles routes and (ii) Code for Sustainable Homes level 4 or higher etc . Have the costs of these requirements been factored in especially as national planning guidance now specifies that viability and deliverable are important material planning considerations.</p>
RIPP147	<p>I have read the draft document and am pleased to fully endorse its contents for the reasons following. I am writing as a concerned Sandbach resident living close to the Hind Heath Road and Abbeyfields planning appeal sites now under determination by the Secretary of State. I attended most days and spoke at both appeal inquiries. My support for the R.I.P.P is largely in the context of preventing the development of these sites but I assume there maybe others throughout Cheshire East, wherever opportunistic developers and landowners see the possibility to force planning consent under the 5 year deliverable housing land shortfall argument, without regard to a rational Local Plan for the entire Cheshire East council area. The criteria (section 3) for consent to small developments adjacent to existing settlement boundaries in the nine Key Service Centre Towns ad-interim are sensible and would certainly exclude the two huge developments above i.e.r- - They are within the green gap between villages (and they are not brownfield sites). - Sandbach town centre (or the railway station) is not accessible by walking except for the most athletic residents so there would be almost 100% travel by car. Also, the substantial proportion of 'affordable homes' are occupied by those least able to afford higher travel costs. - They are many times in excess of 1 hectare size and 30 net additional dwellings - They would severely pre-empt, prejudice and prejudice proper consideration of the future scale and direction of development within the individual town. It is vital that the Secretary of State gives maximum weight and full support to Cheshire East as it nears adoption of the Local Plan. It is vital that inappropriate developments in scale, location and timing are dismissed so as not to prejudice proper consideration of the development strategy within the (Crewe/Macclesfield plus Key</p>

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	<p>Service Towns) core strategy. Finally, although I'm sure it is a politically incorrect sentiment, we all know that the 5 year housing demand calculation is deeply flawed in the current environment. The economy IS derelict, the banking system is broken with mortgage lending at record low; there are hundreds of unsold houses on local estate agent's books; 300,000 mortgagees are in-arrears with their mortgages and almost everyone fears for their jobs. Developers are always pushing to achieve planning consents (which have substantial intrinsic value) but they will only build at a snail space while there, is not a 5 year deliverable supply of financially credible buyers. The supposed demand IS merely aspirational', not practical and deliverable.</p>
RIPP100	<p>* Strongly support the protection for the existing Green Gap around Crewe, this also needs to include the Green Belt land to the SE of Crewe. Would also take this opportunity to support the extension of the Green Gap around Crewe to include additional land on the southern edge of Haslington through to the Crewe Hall estate as referenced in previous submissions relating to the Local Plan process.</p> <p>* Support the protection of land for Leighton Hospital</p> <p>* Support the concept of only granting permission where the development will be achieved within 5 years i.e. addressing the current shortfall in sites - without jeopardising a coordinated Cheshire East wide approach for the medium term to be provided by the impending Local Plan.</p> <p>* Support the allocation of sites relating to Macclesfield and the other 9 Key Service Centres to spread both the burden and benefits within the whole community of Cheshire East.</p> <p>* Concern at the use of "a railway line" as a defensible boundary - this is acceptable for retail, commercial, education or other employment sites but NOT for residential where the adverse impact of noise and vibration results in a substandard environment for living. [The latest high speed electric and diesel trains are increasingly noisy and poor neighbours (the fact they are quiet for passengers is not relevant)]</p> <p>* Concern at the use of Post Offices and medical centres as part of the measure for suitable sustainable development. Post Offices are closing at a rapid rate and are increasingly not used in the provision of benefits and essential services to the community, Medical provision is increasingly being centred in large centralised centres requiring road transport for existing patients let alone potential new residents.</p>

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RIPP84	<p>We have the following comments to make on the actual policy contained in Section 3 of the Consultation Document:</p> <p>Subsection 1, Bullet point 2. We believe that reference to green gap should be deleted and that all such designations should be capable of being re-examined on their merits.</p> <p>Subsection 1, Bullet point 5. We do not believe that all sites need to be capable of being fully developed within five years. The local authority has already resolved to grant permission for sites which will take more than five years to develop. It may be appropriate to consider granting phases of development but there should be no upper limit on the size of site release at Crewe.</p> <p>Subsection 1, Bullet point 3. We do not endorse the release of employment land at Crewe.</p> <p>Subsection 3, Bullet point 1. We believe the reference to green gap should be removed.</p> <p>Subsection 3, Bullet point 5. Again we believe that the entirety of the site may not have to be developed within a five year period.</p> <p>Subsection 3, Bullet point 7. We object to the reference to a restriction on the size or capacity of individual sites. There would seem to be no reason why this should be imposed and sites should be released in terms of their relationship to the settlement and the physical factors identified in the policy.</p> <p>Subsection 3, Bullet point 9. We see no reason why elements of a larger site should not be released. This is simply a phasing matter. Sites should be assessed on the basis of their sustainability, environmental and physical credentials. We consider that sites of up to 170 dwellings could be released to satisfy the housing shortfall without prejudicing the emerging Core Strategies or Development Plan process.</p> <p>Reference to minimum 35% affordable housing. At this stage we have not seen a justification for this and believe that until a formal Cil has been produced then this should be deleted and reliance made on the Council's adopted policy of 30%.</p> <p>Code for Sustainable Homes level 4. We consider this to be a building regulation issue and should not be included in the statement. Other methods should be considered as an alternative.</p> <p>With regard to the reference to the accessibility to local services, we suggest that the policy is amended to allow for the possibility of these being provided as part of a development.</p>	

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RIPP107	<p>Sport England would like to take this opportunity to point out that the National Planning Policy Framework (NPPF) also provides key planning policy guidance for both the protection of sports facilities and the need to understand and plan for the sport and recreation needs of local communities. The NPPF provides protection against the loss of existing sport and recreation land and buildings. Paragraph 74 states that open space, sports and recreation facilities (including playing fields) should not be built on, unless an assessment has clearly shown the facility or space to be surplus to requirements; or an equivalent or better replacement is provided; or that the proposal is for an alternative sporting use the need for which outweighs the loss. This protection is afforded not only to playing fields, but also to all land and buildings that are used for sport and recreation, or as open space. In light of the above, Sport England would recommend that the criteria for the interim release of housing land are amended to reflect the protection offered by the NPPF, ie that sites used for sport and recreation should not be considered for housing unless an assessment has clearly shown the facility or space to be surplus to requirements, or an equivalent or better replacement is provided.</p>
RIPP117	<p>We firmly support the development of Crewe as fundamental to the development strategy for the Borough . We believe however that Shavington village should be considered as part of Crewe urban area and that one or two sustainable housing sites on the edge of the village , excluding those in Green Gap, can make a significant contribution to meeting Crewe's housing requirement. Shavington is in close proximity to the existing and expanded employment areas on the south side of Crewe (Basford East and Basford West strategic employment sites) , Manchester Metropolitan University, Crewe Town Centre and Crewe Railway Station. Shavington has an extremely broad range of services and facilities associated with an urban rather than a village environment. Its social infrastructure is shared with Crewe urban area, including Shavington Sports and Leisure Centre and the High School, and its pattern of day to day movement is an integral part of that of Crewe. We propose therefore that the phrase "on the edge of Crewe" be rephrased as "on the edge of Crewe or Shavington" outside the Green Gap etc. Releasing parts of allocated employment areas for housing, purposes in order to achieve a viable development and to contribute to necessary infrastructure cost could be problematic. In some instances housing and employment located together on allocated employment areas will mean that each is relying on the other to make development viable thus not achieving the benefits envisaged by the Council. We consider it better to approve high quality developments such as that at East Shavington which are more able to contribute to infrastructure costs generally through CIL which can generally help to bring along employment sites more positively. Para.1 We strongly support Cheshire East Council 's identification of Crewe as the focus for new development where there is less than a 5-year supply of housing land. We believe</p>

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		<p>however that Shavington village should be considered as part of Crewe urban area and that one or two sustainable housing sites on the edge of the village, excluding those in Green Gap, can make a significant contribution to meeting Crewe's housing requirement. Shavington is in close proximity to the existing and expanded employment areas on the south side of Crewe (Basford East and Basford West strategic employment sites), Manchester Metropolitan University Cheshire, Crewe town centre and Crewe railway station. Shavington has an extremely broad range of services and facilities associated with an urban rather than a village environment. Its social infrastructure is shared with Crewe urban area , including Shavington Sports and leisure Centre and the High School and its pattern of day to day movement is an integral part of that of Crewe. We propose that the sentence "Adjacent to the settlement boundary of Crewe ... " be replaced by "Either adjacent to the settlement boundaries of Crewe or Shavington ... ". After the 5th bullet point a 6th bullet point should be added as follows:- "For sites that will require a longer period for development, permission will only be granted for the first phase of the site. "This reflects the last sentence of para. 3.4 of dRIP. Para. 3.2 We strongly support Crewe as the principal focus for future housing development in the Borough as envisaged in the Crewe Vision. We consider however that the village of Shavington should not be excluded as a settlement since it can deliver new housing to meet the overall amount and direction of growth for the Crewe urban area. Although a village. Shavington clearly functions as part of the urban area of Crewe for the reasons set out in our response to para. 1 of the Policy and where we suggest a wording change. Para. 3.5 There is no reason why the development of a greenfield site adjacent to a settlement boundary should be considered as "exceptional development". NPPF does not state that greenfield sites are exceptional. Greenfield land ranks alongside previously developed land as a source of supply for new housing. This is recognised in Cheshire East's SHLAA.</p>



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RIPP120		<p>The broadening out of the interim policy to include potential locations for new housing development outside existing settlement boundaries but in sustainable locations other than Crewe is welcomed. However, it is considered that the limitation of size of sites to under 1 hectare or a maximum of 30 dwellings is unduly restrictive and there appears to be no logical justification for this, especially since the Council has already breached its own draft guidelines by approving a development of 39 dwellings on a greenfield site of 1.29 hectares in Hassall Road, Sandbach outside the settlement zone line. Such undue restriction is likely to result in insufficient numbers of dwellings being brought forward to contribute to the 5 year housing land supply. This is particularly so if potential strategic sites are excluded as the Draft Interim Guidance implies. There are a number of sustainable sites in separate land ownerships on the edge of Congleton which are part of larger sites deemed deliverable in the SHLAA and which are under consideration for strategic allocation. Parts of these sites could be developed at an early stage without the need for any major infrastructure development and without prejudice to the overall Cheshire East Local Plan. It is suggested that there should be no prescribed site area for the release of greenfield sites adjacent to the towns specified in the Draft Interim Guidance and that decisions on the suitability of sites should be made on a case by case basis, in a similar way to the site at Hassall Road Sandbach, where it was clear that the benefits of the proposed development were sufficient to override the draft guidance.</p>

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<b>RIPP121</b>		<p>The broadening out of the interim policy to include potential locations for new housing development outside existing settlement boundaries but in sustainable locations other than Crewe is welcomed. However, it is considered that the limitation of size of sites to under 1 hectare or a maximum of 30 dwellings is unduly restrictive and there appears to be no logical justification for this, especially since the Council has already breached its own draft guidelines by approving a development of 39 dwellings on a greenfield site of 1.29 hectares in Hassall Road, Sandbach outside the settlement zone line. Such undue restriction is likely to result in insufficient numbers of dwellings being brought forward to contribute to the 5 year housing land supply. This is particularly so if potential strategic sites are excluded as the Draft Interim Guidance implies. There are a number of sustainable sites in separate land ownerships on the edge of Congleton which are part of larger sites deemed deliverable in the SHLAA and which are under consideration for strategic allocation. Parts of these sites could be developed at an early stage without the need for any major infrastructure development and without prejudice to the overall Cheshire East Local Plan. It is suggested that there should be no prescribed site area for the release of greenfield sites adjacent to the towns specified in the Draft Interim Guidance and that decisions on the suitability of sites should be made on a case by case basis, in a similar way to the site at Hassall Road Sandbach, where it was clear that the benefits of the proposed development were sufficient to override the draft guidance.</p>
<b>RIPP82</b>		<p>We strongly support the focus within Draft Revised Interim Planning Policy of allowing new housing proposals within and on the edge of Crewe and also towards using housing to make employment sites more viable and hence deliverable. In addition to the spatial benefits of focusing housing upon Crewe as the largest town within Cheshire East and the regeneration benefits of improving the housing stock and facilitating the delivery of employment sites through using housing as a higher value cross enabler of infrastructure, we also consider that the Draft Revised Interim Planning Policy supports more sustainable forms of development through supporting the co-location of jobs and homes within Crewe to address existing imbalances. Crewe has evolved over time based upon the rail industry. Due to its historic evolution, housing within Crewe has been focussed to the north and west of the settlement whilst employment provision has generally been located to the south and east of the centre. This historic segregation of uses does not contribute towards a walkable or well-balanced and sustainable settlement. The Draft Revised Interim Planning Policy and ultimately the Local Plan provides the opportunity to rebalance Crewe spatially in order to allow a better co-existence of jobs and homes. This would result in co-locating employment and housing uses alongside each other to form sustainable urban extensions. Paragraph 9 of the NPPF supports this approach. We therefore strongly support the Draft Revised Interim Planning Policy of</p>

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	<p>allowing housing on parts of employment sites to achieve viable development as it reflects advice in the NPPF but also will help to achieve the requirements of 'All Change for Crewe' and the 'Ambition for All' Sustainable Community Strategy 2012. The Draft Revised Interim Planning Policy, as set out on pages 9 and 10 and paragraph 3.2 of the consultation document, sets out that where a five year supply of housing land cannot be demonstrated certain development (controlled by criteria) adjacent to the settlement boundary of Crewe should be allowed. We strongly support that the focus for future housing should remain within Crewe as detailed in paragraph 3.2 of the consultation document. In relation to the proposed criteria, we generally support these controls (subject to the comments below) but would emphasise that the priority for development should remain within the Local Plan settlement boundary of Crewe, where possible, and only if sites within the settlement boundary are not available then sites adjacent the settlement boundary should then be considered. Goodman consider that the Basford West site can support a comprehensive strategic, mixed use, sustainable urban extension to Crewe. The site is available, achievable and deliverable and capable of being brought forward within the next 5 years as required by the Draft Revised Interim Planning Policy paragraph 3.4 developers will be required to demonstrate as part of their planning application that the development is deliverable within 5 years. In the short to medium term the comprehensive development of this area of Crewe will bring a range of economic benefits including a range of construction jobs. In the long term once the developments have been completed there are likely to be increased benefits for the future and existing communities within Crewe. The development of the Crewe Green Link, Basford West site and Basford East site will allow for greater connectivity within the area, create employment opportunities, bring about community benefits and provide housing to meet identified need within the area. Employees of the newly created employment units and future residents of the sites will benefit from the connections offered by the Crewe Green Link. Access to existing local services, access into the mixed use sites to access housing, community and retail facilities as well as the opportunity to commute to work and undertake business more conveniently will be some of the direct benefits on offer. The comprehensive development of the area will also allow jobs and homes to co-exist within acceptable walking and cycling distances. This would generate significant benefits for the area as a whole. Paragraphs 2.16 and 3.5 of the Draft Interim Planning Policy on the release of housing land refer to the development of greenfield sites adjacent to settlement boundaries and identify that where sites are considered to be acceptable for development they will also be expected to: - be of a high design standard; - deliver 35% of the development as affordable housing; - incorporate open space and community facilities; - contribute toward improvements to the strategic and local transport networks and public transport. Whilst</p>

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	<p>we support the principle of greenfield sites delivering the above, the nature of the Interim Policy recognises the viability constraints of delivering employment sites in the current market and hence the need for housing as a higher value use to shoulder some of the burden of the infrastructure costs. The prescriptive nature of the affordable housing element of the Draft Interim Policy could put that viability in doubt. Given the complexity of bringing some employment sites forward, it is necessary to consider that contributions to affordable housing should be balanced against other costs such as infrastructure and so be assessed in relation to the viability of the overall scheme. It is considered that the delivery of such contributions should not hinder the ability to bring a scheme forward which would deliver significant regeneration benefits. Where this is a concern then schemes should be subject to an economic viability assessment as outlined within paragraph 2.14. As such, we consider that the Policy should be amended in this respect to include reference to viability and hence read seek to achieve 35% of the development as affordable housing unless an economic viability assessment indicates otherwise. The Draft Interim Policy also includes a criterion in relation to delivery: is capable of being fully developed within five years of the granting of full or outline planning permission. The largest employment sites such as the Basford sites in Crewe are unlikely to be able to confirm Full development within five years. This requirement would not reflect the market realities of housing and employment take up rates. We do however understand and accept the need to review the viability of large schemes on a periodic basis and hence accept that review mechanisms could be built into legal agreements for these large sites. We therefore propose the following amendment:- is capable of being fully developed within five years of the granting of full or outline planning permission or is subject to a review mechanism as part of the legal agreement. Basford West Site Basford West along with Basford East have been identified as sub regional employment priorities for which Development Briefs were adopted by Crewe and Nantwich Borough Council in April 2004. The majority of the urban settlement of Crewe is situated to the north of the site, to the south is open countryside, the A500 and beyond are the small settlements of Shavington, Basford and Weston. To the east is the Crewe / Stock railway, which links to the West Coast main railway line and to the west is residential development, which fronts Crewe Road. The Basford West site was formerly open agricultural land however this now has the benefit of an outline planning permission for warehousing and distribution (B8), manufacturing (B2) and light industrial/office (B1) development, construction of access roads, footpaths and rail infrastructure, import of soil materials, heavy goods vehicle and car parking and landscaping/habitat mitigation which was granted on 13 May 2008. In connection with this planning application, Cheshire County Council commissioned a Highway Delivery Study prepared by Atkins Transport Planning when assessing the sites for</p>

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	<p>employment uses. This concluded that a phased strategy based on traffic thresholds was required to enable partial development of the Basford sites and assist with the delivery of the Crewe Green Link Road. As a result of this work, outline planning permission (ref P03/1071) was approved by the Council on 7 February 2008 in respect of the Basford West site, which included a requirement to contribute to the Crewe Green Link Road secured through a Section 106 Agreement which amounted to £3.2 million which was index linked to 2008. The total site is 52 hectares in extent. The development plan allocation for employment includes the Mercer land which is located to the east of the site. This land is now within the ownership of Goodman and the extant outline planning permission for Basford West recognized that the Mercer Land would come forward for development. A planning application has now been submitted for the Mercer site for employment use which is due to be determined in July 2012. A reserved matters planning application for the enabling works of the wider Basford West site was approved by Cheshire East Council on 28 July 2011 which set out proposals for the enabling works required to deliver the scheme. These include the construction of the new access/spine road and infrastructure, drainage works, re-modeling of ground levels, formation of ponds and landscape planting. Similarly, the reserved matters application for the first built Employment Unit comprising of 38,122 sq m of warehouse/distribution space, 1951 sq m office space along with 525 sq m operations office (total floor area of 40,598 sq m) was approved on 2 August 2011. Work has now been progressed with the discharge of planning conditions and Section 106 obligations in addition to the demolition of Springbank Farm, the erection of the substation, bat barn and the implementation of significant ecological mitigation measures on site. Goodman are therefore fully committed to bringing forward the development of this Employment site when it is viable. However, since the grant of outline permission in May 2008, there has been a significant impact upon the market for employment sites due to the global recession. As a result, speculative development is not currently viable, nor fundable, particularly when a scheme requires upfront substantial capital outlay on infrastructure for the delivery of serviced plots as is the case with Basford West. Without pre-lets or pre-sales in place, the expenditure required for the Phase 1 infrastructure is not fundable and thus the development is not deliverable. Goodman's objective is therefore to ensure that the site is in a position where serviced plots, ready for development, are available to meet the current and medium term market demand. As such, in order to be in this position, Goodman have considered both Public Sector funding support and the development of part of the site for higher value uses, (to include residential development), which would cross enable the funding of the delivery of employment development at Basford West. Goodman have submitted a Growing Places Fund application but this does not provide gap funding, it only improves cashflow by lending money to support development</p>



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	<p>which ultimately has to be paid back. Therefore Goodman need the funding support from the higher value uses to bring the wider Basford West site forward and to confirm their contribution towards the Crewe Green Link Road. The sale of land for higher value uses would be used to offset the significant future infrastructure costs associated with the delivery of this site. Without this higher value use support, Goodman cannot justify any further investment in bringing the site forward unless there is a significant upturn in the market, or a significant pre let is secured. Whilst Goodman are committed to the employment led development, they consider that there are opportunities to consolidate the existing residential areas with further residential infill and that the area around Gresty Road could form a logical, comprehensive urban extension to Crewe which can deliver residential development as well as the committed employment, infrastructure and sustainable community benefits. A mixed use scheme that included residential elements would promote sustainable development by locating new homes in close proximity to both new and existing employment opportunities to start to re-dress the imbalance in the location of current houses in relation to the existing employment areas of Crewe. In addition the higher value housing development would assist in funding the infrastructure improvements necessary to realise the full economic benefits of the employment development. The adoption of the Draft Revised Interim Planning Policy on the release of housing land, May 2012 as identified on pages 9 and 10 would allow sites such as the Basford West site to come forward for development and deliver much needed employment development and seek to address some of the short fall in housing within the area. The scheme would continue to be delivered as an employment led development with the provision of housing enabling the delivery of employment and related infrastructure which is required. This approach is supported in 'All Change For Crewe' and draft Local Development Framework Core Strategy documents which state that Crewe is a key focus for both employment and housing growth within the Authority Area. We strongly support this approach and have made representations to the emerging Core Strategy as we consider that the Basford West site can support a comprehensive strategic, mixed use, sustainable urban extension to Crewe. Basford West will remain an employment led development however Goodman are seeking ancillary higher value uses that can help bring the site forward. The delivery of the Crewe Green Link road is noted as a fundamental objective in achieving 'All Change Crewe' which is a key component of this growth aspiration. Our previous representations to the SHLAA have sought to more closely spatially align the need for more housing with the delivery of the regionally significant Basford sites and also the Crewe Green Link Road. We believe that there is a need for significant urban extensions within Crewe to meet the housing needs and that such urban extensions should be utilised to facilitate a sustainable co-location of jobs and homes but also to enable the delivery of key infrastructure through</p>



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	<p>using the higher value uses to enable the delivery of infrastructure that cannot otherwise be viably delivered through employment uses on their own. The site will assist in the delivery of a high quality business and logistics park in addition to a potential new residential element of the site coming forward. This could comprise up to 300 dwellings which could be delivered on site as part of a mixed use development.</p>
RIPP80	<p>Incorporate open space and community facilities; contribute toward improvements to the strategic and local transport networks and public transport. Whilst we support the principle of greenfield sites delivering the above, the nature of the Interim Policy recognises the viability constraints of delivering employment sites in the current market and hence the need for housing as a higher value use to shoulder some of the burden of the infrastructure costs. The prescriptive nature of the affordable housing element of the Draft Interim Policy could put that viability in doubt. Given the complexity of bringing some employment sites forward, it is necessary to consider that contributions to affordable housing should be balanced against other costs such as infrastructure and so be assessed in relation to the viability of the overall scheme. It is considered that the delivery of such contributions should not hinder the ability to bring a scheme forward which would deliver significant regeneration benefits. Where this is a concern then schemes should be subject to an economic viability assessment as outlined within paragraph 2.14. As such, we consider that the Policy should be amended in this respect to include reference to viability and hence read seek to achieve 35% of the development as affordable housing unless an economic viability assessment indicates otherwise. The Draft Interim Policy also includes a criterion in relation to delivery: is capable of being fully developed within five years of the granting of full or outline planning permission. The largest employment sites such as the Basford sites in Crewe are unlikely to be able to confirm Full development within five years. This requirement would not reflect the market realities of housing and employment take up rates. We do however understand and accept the need to review the viability of large schemes on a periodic basis and hence accept that review mechanisms could be built into legal agreements for these large sites. We therefore propose the following amendment:- is capable of being fully developed within five years of the granting of full or outline planning permission or is subject to a review mechanism as part of the legal agreement. Basford West Site Basford West along with Basford East have been identified as sub regional employment priorities for which Development Briefs were adopted by Crewe and Nantwich Borough Council in April 2004. The NPPF but also will help to achieve the requirements of 'All Change for Crewe' and the 'Ambition for All' Sustainable Community Strategy 2012. The Draft Revised Interim Planning Policy, as set out on pages 9 and 10 and paragraph 3.2 of the consultation document, sets out that where a five year supply of housing land cannot be demonstrated certain</p>

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	<p>development (controlled by criteria) adjacent to the settlement boundary of Crewe should be allowed. We strongly support that the focus for future housing should remain within Crewe as detailed in paragraph 3.2 of the consultation document. In relation to the proposed criteria, we generally support these controls (subject to the comments below) but would emphasise that the priority for development should remain within the Local Plan settlement boundary of Crewe, where possible, and only if sites within the settlement boundary are not available then sites adjacent the settlement boundary should then be considered. Goodman consider that the Basford West site can support a comprehensive strategic, mixed use, sustainable urban extension to Crewe. The site is available, achievable and deliverable and capable of being brought forward within the next 5 years as required by the Draft Revised Interim Planning Policy paragraph 3.4 developers will be required to demonstrate as part of their planning application that the development is deliverable within 5 years. In the short to medium term the comprehensive development of this area of Crewe will bring a range of economic benefits including a range of construction jobs. In the long term once the developments have been completed there are likely to be increased benefits for the future and existing communities within Crewe. The development of the Crewe Green Link, Basford West site and Basford East site will allow for greater connectivity within the area, create employment opportunities, bring about community benefits and provide housing to meet identified need within the area. Employees of the newly created employment units and future residents of the sites will benefit from the connections offered by the Crewe Green Link. Access to existing local services, access into the mixed use sites to access housing, community and retail facilities as well as the opportunity to commute to work and undertake business more conveniently will be some of the direct benefits on offer. The comprehensive development of the area will also allow jobs and homes to co-exist within acceptable walking and cycling distances. This would generate significant benefits for the area as a whole. Paragraphs 2.16 and 3.5 of the Draft Interim Planning Policy on the release of housing land refer to the development of greenfield sites adjacent to settlement boundaries and identify that where sites are considered to be acceptable for development they will also be expected to: - be of a high design standard; - deliver 35% of the development as affordable housing; - incorporate open space and community facilities; - contribute toward improvements to the strategic and local transport networks and public transport. Whilst we support the principle of greenfield sites delivering the above, the nature of the Interim Policy recognises the viability constraints of delivering employment sites in the current market and hence the need for housing as a higher value use to shoulder some of the burden of the infrastructure costs. The prescriptive nature of the affordable housing element of the Draft Interim Policy could put that viability in doubt. Given the complexity of bringing some</p>

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	<p>employment sites forward, it is necessary to consider that contributions to affordable housing should be balanced against other costs such as infrastructure and so be assessed in relation to the viability of the overall scheme. It is considered that the delivery of such contributions should not hinder the ability to bring a scheme forward which would deliver significant regeneration benefits. Where this is a concern then schemes should be subject to an economic viability assessment as outlined within paragraph 2.14. As such, we consider that the Policy should be amended in this respect to include reference to viability and hence read seek to achieve 35% of the development as affordable housing unless an economic viability assessment indicates otherwise. The Draft Interim Policy also includes a criterion in relation to delivery: is capable of being fully developed within five years of the granting of full or outline planning permission. The largest employment sites such as the Basford sites in Crewe are unlikely to be able to confirm Full development within five years. This requirement would not reflect the market realities of housing and employment take up rates. We do however understand and accept the need to review the viability of large schemes on a periodic basis and hence accept that review mechanisms could be built into legal agreements for these large sites. We therefore propose the following amendment:- is capable of being fully developed within five years of the granting of full or outline planning permission or is subject to a review mechanism as part of the legal agreement. Basford West Site Basford West along with Basford East have been identified as sub regional employment priorities for which Development Briefs were adopted by Crewe and Nantwich Borough Council in April 2004. The majority of the urban settlement of Crewe is situated to the north of the site, to the south is open countryside, the A500 and beyond are the small settlements of Shavington, Basford and Weston. To the east is the Crewe / Stock railway, which links to the West Coast main railway line and to the west is residential development, which fronts Crewe Road. The Basford West site was formerly open agricultural land however this now has the benefit of an outline planning permission for warehousing and distribution (B8), manufacturing (B2) and light industrial/office (B1) development, construction of access roads, footpaths and rail infrastructure, import of soil materials, heavy goods vehicle and car parking and landscaping/habitat mitigation which was granted on 13 May 2008. In connection with this planning application, Cheshire County Council commissioned a Highway Delivery Study prepared by Atkins Transport Planning when assessing the sites for employment uses. This concluded that a phased strategy based on traffic thresholds was required to enable partial development of the Basford sites and assist with the delivery of the Crewe Green Link Road. As a result of this work, outline planning permission (ref P03/1071) was approved by the Council on 7 February 2008 in respect of the Basford West site, which included a requirement to contribute to the Crewe Green Link Road secured through a</p>

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		<p>Section 106 Agreement which amounted to £3.2 million which was index linked to 2008. The total site is 52 hectares in extent. The development plan allocation for employment includes the Mercer land which is located to the east of the site. This land is now within the ownership of Goodman and the extant outline planning permission for Basford West recognized that the Mercer Land would come forward for development. A planning application has now been submitted for the Mercer site for employment use which is due to be determined in July 2012. A reserved matters planning application for the enabling works of the wider Basford West site was approved by Cheshire East Council on 28 July 2011 which set out proposals for the enabling works required to deliver the scheme. These include the construction of the new access/spine road and infrastructure, drainage works, re-modeling of ground levels, formation of ponds and landscape planting. Similarly, the reserved matters application for the first built Employment Unit comprising of 38,122 sq m of warehouse/distribution space, 1951 sq m office space along with 525 sq m operations office (total floor area of 40,598 sq m) was approved on 2 August 2011. Work has now been progressed with the discharge of planning conditions and Section 106 obligations in addition to the demolition of Springbank Farm, the erection of the substation, bat barn and the implementation of significant ecological mitigation measures on site. Goodman are therefore fully committed to bringing forward the development of this Employment site when it is viable. However, since the grant of outline permission in May 2008, there has been a significant impact upon the market for employment sites due to the global recession. As a result, speculative development is not currently viable, nor fundable, particularly when a scheme requires upfront substantial capital outlay on infrastructure for the delivery of serviced plots as is the case with Basford West. Without pre-lets or pre-sales in place, the expenditure required for the Phase 1 infrastructure is not fundable and thus the development is not deliverable. Goodman's objective is therefore to ensure that the site is in a position where serviced plots, ready for development, are available to meet the current and medium term market demand. As such, in order to be in this position, Goodman have considered both Public Sector funding support and the development of part of the site for higher value uses, (to include residential development), which would cross enable the funding of the delivery of employment development at Basford West. Goodman have submitted a Growing Places Fund application but this does not provide gap funding, it only improves cashflow by lending money to support development which ultimately has to be paid back. Therefore Goodman need the funding support from the higher value uses to bring the wider Basford West site forward and to confirm their contribution towards the Crewe Green Link Road. The sale of land for higher value uses would be used to offset the significant future infrastructure costs associated with the delivery of this site. Without this higher value use support, Goodman cannot justify any further investment in</p>

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	<p>bringing the site forward unless there is a significant upturn in the market, or a significant pre let is secured. Whilst Goodman are committed to the employment led development, they consider that there are opportunities to consolidate the existing residential areas with further residential infill and that the area around Gresty Road could form a logical, comprehensive urban extension to Crewe which can deliver residential development as well as the committed employment, infrastructure and sustainable community benefits. A mixed use scheme that included residential elements would promote sustainable development by locating new homes in close proximity to both new and existing employment opportunities to start to re-dress the imbalance in the location of current houses in relation to the existing employment areas of Crewe. In addition the higher value housing development would assist in funding the infrastructure improvements necessary to realise the full economic benefits of the employment development. The adoption of the Draft Revised Interim Planning Policy on the release of housing land, May 2012 as identified on pages 9 and 10 would allow sites such as the Basford West site to come forward for development and deliver much needed employment development and seek to address some of the short fall in housing within the area. The scheme would continue to be delivered as an employment led development with the provision of housing enabling the delivery of employment and related infrastructure which is required. This approach is supported in 'All Change For Crewe' and draft Local Development Framework Core Strategy documents which state that Crewe is a key focus for both employment and housing growth within the Authority Area. We strongly support this approach and have made representations to the emerging Core Strategy as we consider that the Basford West site can support a comprehensive strategic, mixed use, sustainable urban extension to Crewe. Basford West will remain an employment led development however Goodman are seeking ancillary higher value uses that can help bring the site forward. The delivery of the Crewe Green Link road is noted as a fundamental objective in achieving 'All Change Crewe' which is a key component of this growth aspiration. Our previous representations to the SHLAA have sought to more closely spatially align the need for more housing with the delivery of the regionally significant Basford sites and also the Crewe Green Link Road. We believe that there is a need for significant urban extensions within Crewe to meet the housing needs and that such urban extensions should be utilised to facilitate a sustainable co-location of jobs and homes but also to enable the delivery of key infrastructure through using the higher value uses to enable the delivery of infrastructure that cannot otherwise be viably delivered through employment uses on their own. The site will assist in the delivery of a high quality business and logistics park in addition to a potential new residential element of the site coming forward. This could comprise up to 300 dwellings which could be delivered on site as part of a mixed use development.</p>



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RIPP85		<p>RPS objects to the restriction in the first paragraph of the policy to sites 'adjacent to the settlement boundary of Crewe'. Other locations including sites adjacent to the settlement boundary of Nantwich should also be included where development is able to secure the delivery of important local infrastructure for which there is evidence of significant local support. This approach is considered to be entirely consistent with the Coalition Government's 'localism' and presumption in favour of sustainable development agenda. The scale of development on the edge of Nantwich should not be restricted to sites of not more than 1 hectare or 30 dwellings. 15. The fifth bullet should also be amended to refer to sites being capable of substantial development within five years of the grant of planning permission. There is a risk that piece-meal development will result from the policy as currently written which can be avoided if an element of flexibility is introduced whereby sites can be permitted where they can make a significant contribution towards extending the housing land supply in the District. Paragraph 3.4 requires to be amended to reflect this suggested change to the policy. It is noted that at Coppenhall East the policy recommended by RPS was applied in practice as that site is not capable of full development within 5 years. 16. The protection of Green Gaps is strongly supported as there are opportunities to extend housing supply at Greater Crewe and Nantwich which do not require any erosion of the identified and protected Green Gaps. 17. The affordable housing policy target should be reduced to a minimum of 25% to reflect realistic viability considerations and the lower proportional level of need in the former Crewe &amp; Nantwich Borough Housing Market Area as advised in the Council's SHMA. In addition, the policy should recognise that other viability considerations may apply especially where contributions are being sought in respect of strategic transport infrastructure. Paragraph 3.5 should be amended to include reference to any variation from the proposed level of affordable housing provision being subject to evidence of viability. 18. The criterion referring to contributions towards transport infrastructure is supported. Land at North West Nantwich is particularly suited to contributing effectively towards local road improvement schemes as identified above. 19. NPPF paragraph 52 clearly states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.</p>



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RIPP88	<p>14. RPS objects to the restriction in the first paragraph of the policy to sites 'adjacent to the settlement boundary of Crewe'. This, as stated in paragraph 3.2 of the consultation document, expressly seeks to exclude sites adjacent to the settlement boundary of Shavington. However, no explanation is given as to why sites adjacent to Shavington should be excluded. The policy should be extended to include Shavington within a policy relating to Greater Crewe. 15. The fifth bullet should also be amended to refer to sites being capable of substantial development within five years of the grant of planning permission. There is a risk that piece-meal development will result from the policy as currently written which can be avoided if an element of flexibility is introduced whereby sites can be permitted where they can make a significant contribution towards extending the housing land supply in the District. Paragraph 3.4 requires to be amended to reflect this suggested change to the policy. It is noted that at Coppenhall East the policy recommended by RPS was applied in practice as that site is not capable of full development within 5 years. 16. The protection of Green Gaps in part 1 bullet 2 is strongly supported as there are opportunities to extend housing supply at Crewe and Shavington which do not require any erosion of the identified and protected Green Gaps around the Crewe urban area, including land south of Newcastle Road in Shavington and Wybunbury. 17. The affordable housing policy target should be reduced to a minimum of 30% to reflect realistic general viability considerations as advised in the Council's SHMA. In addition, the policy should recognise that other viability considerations may apply especially where contributions are being sought in respect of strategic transport infrastructure. Paragraph 3.5 should be amended to include reference to any variation from the proposed level of affordable housing provision being subject to evidence of viability. 18. The criterion referring to contributions towards transport infrastructure is supported. Land at Shavington is capable of contributing effectively towards improvement of the A500 corridor between Crewe and M6 Motorway. That road scheme will provide significant benefits for the future growth of Crewe through the implementation of the Core Strategy. 19. The extension of the previous policy to include sites of up to 1 hectare or 30 net additional dwellings on the edges of other settlements is noted. It is not considered that this will make a suitable contribution towards sustainable development in Cheshire east or be an effective means of adding to the supply of available and deliverable housing to address the identified shortfall. 20. A more appropriate approach is to widen the search to include sites in the Greater Crewe area, consistent with the Council's preferred development strategy. 21. NPPF paragraph 52 clearly states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.</p>	

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RIPP125		<p>The policy now also provides a number of criteria that a housing proposal located adjacent to the additional settlements must adhere to, before the Council considers the development acceptable. These criteria are far more specific than those set out for proposals adjacent to Crewe and include: - Very closely related to the existing built framework of the settlement - Self contained - Capable of being fully development within the 5 years of the granting of full or outline permission - Is less than 1 hectare in size or has the capacity for no more that 30 net additional dwellings - Does not represent the subdivision of a larger site These criteria and the phrasing of the policy may create uncertainty amongst developers and investors and hinder the delivery of suitable and deliverable sites which satisfy the general development criteria for determining applications for housing which are set out in the NPPF but do not meet the specific criteria set out in the policy document. This could undermine the objective set out at paragraph 2.11 of the Interim Policy Document of addressing the forecast shortfall in deliverable sites. Paragraph 47 of the NPPF states that in order significantly boost the supply of housing, local planning authorities should meet the full needs for market and affordable housing and update the supply of deliverable sites, sufficient to provide five years worth of housing. The sub-text to paragraph 47 at the bottom of page 12 also provides specific criteria, within which sites are assessed as being deliverable and developable. Paragraph 49 then goes on to state that housing applications should be considered in the context of the presumption in favour of sustainable development. By restricting the areas within the Borough where housing will be looked at more favourably than others, the policy document is contrary to the positive thrust of national policy, which clearly states that local authorities should be planning and responding positively to market signals and boosting the housing supply and should be considering applications in the context of the presumption in favour of sustainable development. Should the Council wish to bring forwards such policy guidance, it should be done through the formal Development Plan Document (DPD) route rather than informal guidance such as this, as supported by the NPPF. Our understanding is that it is not intended to form part of the Local Development Framework either as a DPD or Supplementary Planning Document. Therefore, it must be made clear that the guidance within this document is not intended to preclude residential development on suitable sites outside of Crewe and that all development will be assessed in accordance with paragraph 150 of the NPPF which states that planning decisions must be taken in accordance with the development plan, unless material considerations indicate otherwise. We therefore recommend that the policy wording is revised to promote a more even-handed approach to planning positively for housing development and should not be used to prevent housing development coming forward on suitable windfall sites in areas other than adjacent to Crewe, even if the specific criteria set out in the Interim Document</p>

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		are not all met. We consider that it is important that the Council maintains ambitious targets for house building in order to help to provide certainty for the development industry and encourages economic growth, which goes hand in hand with housing growth.
RIPP133		I feel that a number of points should be made, the principle one being that statistic predictions seldom fall in line with actual events and such predictions merely give an indication within a snapshot of time. There are indications that some elements of the government's new housing build plans that may have been over estimated, however it is important that a general plan supported by local town plans are lodged as soon as possible to prevent financial speculation and inappropriate development. To provide sustainability within East Cheshire it is therefore essential that the social well-being of residents and that the protection of the environment is maintained as well as planning for controlled economic growth within the locality. There have been many examples up and down country where unsustainable development has taken place only for those areas to fall into decline two decades later. Rural and semi rural development must take into account. the well-being of people who live in to area and protection of the environment as well as economic expansion. Therefore land released for housing development should be aimed at meeting needs of that area and not as a commuting location. for nearby towns. In short, develop employment and prosperity then provide the appropriate housing expansion based on inner town development and regeneration of brown field locations. This form of expansion encourages local employment, increased prosperity on our high streets and stronger communities and discourages sprawling commuter belt development that contributes little to the local economy.

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<b>RIPP143</b>	<p>I am pleased you are acting so swiftly to pre-empt any speculative proposals for developments outside settlement boundaries. Overall it seems to me to be appropriate and well thought out, however there are a few instances where it is less than clear: 3. In the shaded box within section 3, there is surely no need for any proposal to demonstrate that it does not impact on any Offshore Marine Site? I am aware that technically this may be so, and I would agree that these marine sites should properly be mentioned for completeness in section 1.9, but would posit that inclusion here smacks of bureaucratic obscurity. 4. Also within the shaded box, I assume that the distances in brackets refer to the distances for the 5 local services. However I think this should be made clearer, especially to say that for each of the proposed dwellings the distance to the service must not be exceeded. 5. In section 3.4, when built out is mentioned, does this in fact mean completed? If so why not use the more common word, if not what is meant? Furthermore, could I suggest that penalties be specified and implemented if such completion is promised but not achieved? 6. I have also noticed a couple of typos: in section 2.15 there is a comma at the beginning of the last line but it should be at the end of the previous line, and within the shaded box on page 9 there are spurious spaces within paragraph 2.</p>
<b>RIPP141</b>	<p>Whilst I broadly support your Interim Planning Policy and its desire to prevent opportunistic interim development by planners, it does seem to me that the document has one glaring omission: there is no mention of taking the wishes of local communities into consideration. This has been a point reiterated frequently by government ministers, and David Cameron himself has, on several occasions, vigorously expressed the view that local communities should ultimately decide what is, and is not built. The views of local Parishes are therefore of great significance in this matter.</p>
<b>RIPP139</b>	<p>I do not see any need to amend your proposals in regard to the draft Revised Interim Planning Policy for the Release of Housing Land.</p>
<b>RIPP128</b>	<p>I am very much in support of the suggested revisions to the interim policy to accommodate house building within allocated employment areas where that will facilitate the development of those sites predominately for employment purposes. I also support the proposal to allow for modest development on sustainable sites on the edges of towns other than Crewe. I very much want to see green gaps protected as they are the primary tool in ensuring that our towns and villages retain a sense of identity.</p>

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RIPP65	No	<p>There are two key aspects that I cannot agree to in this amended Interim Policy: 1. Para 1, Bullet point 3 - A very clear message must be established that the Regional Employment Allocations at Basford are not to be developed for housing, either in part or as a whole. These are longstanding allocations of Regional Importance. Such sites can take time to achieve their development. To allow housing development on the grounds of viability of the delivery of the employment development is a very dangerous approach to follow. It undermines established strategic employment commitments on land that would not otherwise have been allocated for development on the scale proposed. It will therefore undermine the Local Plan preparation process if any part of these strategic Employment allocations is released for housing development. 2. Para 3, Bullet point 7 - I believe that larger, sustainably located sites adjacent to the boundaries of the key service centres could be allowed to be brought forward to address the shortfall in housing supply. The limit of 30 dwellings proposed will not address the housing shortfall on a sustained basis. The lead-in and set up timescales associated with a large number of small scale developments represents an inefficient approach to addressing the shortfall. A more appropriate scale for development would be circa 150 houses. Developments of this scale would not undermine emerging Local Plan strategy, could be reasonably implemented within the 5 year time horizon and provide short to medium term continuity in housing delivery. In addition to the above specific points, I would welcome the review of the Green Gap to proceed as a priority. From my own local knowledge, there is clearly capacity within the Green Gap to accommodate significant levels of development without undermining the integrity of the designation.</p>

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RIPP95		<p>The draft Revised Interim Planning Policy does not make provision for any housing development within or on the edge of any of the smaller settlements in the Borough. In our opinion this not only places unnecessary restrictions on the number of suitable sites that could come forward to help meet the housing land supply but does not meet sustainability objectives. Allowing small development sites within or on the edge of other smaller settlements would help to meet the housing land supply and ensure that there is a good choice of housing available spread throughout the Borough. As with the sites adjacent to the Key Service Centres they would have to meet certain criteria and sustainability targets. The Council has already stated in the draft Revised Interim Planning Policy that a key benefit of smaller sites is that they can be developed quickly and without major infrastructure requirements - and provide a good opportunity to improve the housing land supply for the Borough. It is therefore important that development in and on the edge of smaller settlements is not overlooked. The draft Revised Interim Planning Policy briefly covers sustainability issues in particular that development in Crewe will support sustainability objectives as it has a good range of jobs , shops and services and a high standard of accessibility by means of travel other than car. A number of planning applications have already been received for sites adjacent to the settlement boundary of Crewe some of which have been approved resulting in about 1,150 additional homes. By only allowing larger sites in Crewe and small sites in Key Service Centres housing would be unfairly allocated and too much emphasis is being placed on development adjacent to Crewe. Many smaller settlements could also provide sustainable housing sites which would help to maintain and enhance the shops and services within those settlements. It is not felt that Crewe requires any further housing to maintain the level of services already available but some of the smaller settlements would greatly benefit from an appropriate level of housing provision. The draft Revised Interim Planning policy refers to the National Planning Policy Framework (NPPF) which requires Local Planning Authorities to identify and update annually housing supply sufficient to provide five years worth of supply against their housing requirements with an additional buffer. Cheshire East LPA is aware that they currently cannot demonstrate a 5 year supply. The NPPF also sets out that there is a need to deliver a wide choice of high quality homes, widen opportunities for home ownership and to create sustainable and mixed communities. Housing allocation should reflect local demand. It is not considered that the draft Revised Interim Planning Policy will fully meet these objectives set out in the NPPF as it limits people's choice of where they can live and will not help to sustain communities in the smaller settlements. Furthermore there are only limited suitable sites on the edge of Crewe and the Key Service Centres and by including appropriate development in smaller settlements it will help to ensure an adequate level of housing supply. The NPPF also refers more specifically to promoting</p>



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	<p>sustainable development in rural areas in that housing should be located where it will enhance or maintain the vitality of rural communities. It also recognises that development in one village may support services in a village nearby. The Crewe and Nantwich Replacement Local Plan 2011 sets an objective of having a wide range of good quality housing sites and that a limited amount of development appropriate to the size and character of existing settlements is acceptable in rural areas. It also acknowledged that development of unallocated or windfall sites can make an important contribution to housing provision. The draft Revised Interim Planning Policy is contrary to this objective and precludes any housing development away from Crewe and the Key Service Centres. It is our conclusion that the draft Revised Interim Planning Policy is too reliant on development adjacent to the settlement boundary of Crewe with some limited development adjacent to the settlement boundaries of the Key Service Centres. There are a limited number of suitable sites that will fulfill the criteria set out in the Policy and the Council runs the risk of not being able to meet housing requirements. By including for limited development within and on the edge of smaller settlements it would ensure that there are not suitable sites elsewhere that have been overlooked which could make important contributions to the housing land supply. These smaller sites could also prove to be valuable in terms of delivering quickly and with few infrastructure requirements. It would also ensure that a wide range of housing type can be provided spread across the Borough and not just in limited locations. Many smaller settlements require limited development to help maintain existing services and to support a prosperous rural economy. In relation to our client, one such settlement is the village of Hankelow, which could easily sustain some further organic growth. To conclude it is considered that the draft Revised Interim Planning Policy should include provision for limited housing development within and adjacent to development boundaries of smaller settlements in addition to Crewe and the Key Service Centres.</p>

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RIPP102		<p>The take up of employment land should also be used as a regulatory device for the release of further housing land in order to introduce a degree of balance between local population and local employment, The existence of local employment capacity engenders local identity and community spirit, vital ingredients for improved quality of life. Such policies, aid in avoiding the development of dormer towns and in achieving targets for cutting carbon emissions. The local Authority housing numbers and release of land should not be in splendid isolation. Simply increasing housing to allow a significant net inward migration into the Cheshire East area will draw resources away from the conurbations to the north and South of Cheshire. Preserving indeed encouraging increased vitality of these areas both north and south is an essential component in the economy of Cheshire as a whole. Many businesses and local employers depend of trade with these conurbations for their wellbeing. No local community interest Planning Economic or Social is served by competing with these areas. In specific reference to note 1 (Defensible Boundary) I do not accept a 'substantial Hedgerow' has the substance to be a defensible boundary. My experience leaves me with a concern that a hedgerow designated as such a boundary is always liable to constructive erosion? Unless protected by suitable means i.e. hedgerow conservation and or public ownership with a fund and brief for its maintenance it would be very vulnerable.</p>
RIPP75		<p>The policy states that when it is demonstrated through the Annual Monitoring Report that there is not a five year supply of housing land as defined by the National Planning Policy Framework, subject to other saved policies of the relevant Local Plan being satisfied, residential development will be permitted in the following locations (each part of the policy is discussed in turn): 1 " Adjacent to the settlement boundary of Crewe The first location where residential development would be permitted in accordance with the Revised IPP is on sites adjacent to the settlement boundary of Crewe subject to 7 criteria being met. Whilst it is acknowledged that focusing development towards Crewe is consistent with the Council's aspirations outlined in the emerging Core Strategy and is supported, objection is raised that solely focusing on Crewe could preclude other sustainable sites from coming forward across the Borough. It is also evident that Crewe on its own will not deliver the Borough's housing supply requirements and therefore the IPP had to be extended. There is support therefore for the inclusion of other locations across the Borough, which is discussed later. 2 " Part of mixed developments in town centres and regeneration areas to support the provision of employment, town centre and community uses Whilst this part of the policy seeks to direct residential development to town centres and regeneration areas, greater clarity is required in relation to what defines a "regeneration area. The Council should not rely too heavily on mixed use town centre and regeneration schemes in terms of delivering new homes. These types of schemes often involve the delivery of apartments for which</p>

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	<p>there is currently limited market demand. There are also normally a higher number of site constraints associated with such sites including ground contamination and the demolition of existing buildings. The Council should therefore be mindful that whilst this approach may deliver residential development, it is unlikely to do so at the rates required to identify the shortfall in provision. Additional sites such as those within or on the edge of Key Service Centres will also be required to assist in meeting demand for housing. Furthermore, the initial IPP (2011) had this allowance and since its introduction has not generated any significant new residential development so therefore cannot be relied upon to any great extent to improve housing supply in current market conditions. 3 Adjacent to the settlement boundary of Macclesfield and the nine Key Service Centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow) subject to a range of criteria Part 3 is an addition to the Revised IPP. In principle there is support for the inclusion of additional areas that are deemed suitable of delivering residential development. It was highlighted in comments submitted to the initial IPP that the focus for future housing was too restrictive. Unlike part 1 of the policy which refers to Crewe, there is no provision to support residential development on existing employment land. This is a serious omission, and is inconsistent with the NPPF. The NPPF is clear at Paragraph 22 that in instances where there is no reasonable prospect of a site being used for its employment allocation policies should avoid long term protection. It also identifies that applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Given that the IPP engages only when the Council cannot demonstrate a 5 year supply of housing, when there is clearly by this fact an urgent need, the IPP is overly restrictive. The policy should allow for allocated employment sites, where it can be demonstrated that they would best serve alternative uses, to be released in their entirety for housing. Any requirement to maintain an element for employment, or indeed any other additional use, could prejudice much needed residential delivery. The Council is therefore urged to be more positive, in the spirit of the NPPF, to encourage the delivery of housing. This is particularly important in areas like Knutsford that are tightly constrained by the Green Belt. There are very limited opportunities for residential development within the town and the Local Plan will need to address this serious constraint to the sustainable future growth of the this part of the Borough (for housing, employment and other needs) by making appropriate changes to the Green Belt boundary. The Tatton Estate look forward to working positively with the Town Council and the Borough Council to determine the best outcomes for the town for the new plan period. In addition, there are a number of concerns in relation to the criteria that these additional sites which the policy encourages to come forward and which they must meet where we</p>

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	<p>wish to offer a comment on a criterion, this is taken in turn and addressed below. Is very closely related to the existing built framework of the settlement Connections and linkages with facilities within a settlement are important in assessing the sustainability of a site for future residential development alongside a good relationship with existing development. However, there are instances where sites that are not immediately adjacent to a settlement boundary that can still display good sustainability credentials and be suitable locations for residential development. It is therefore recommended that the words very closely are deleted to provide some flexibility in allowing the most suitable sites to come forward. No definition is provided as to what very closely related constitutes and therefore the test should relate to sustainability of a site and good planning. Is self contained within clear defensible boundaries This requirement is more akin with reference to Green Belt sites and it should not be necessary for sites outside of the Green Belt to have to be surrounded by defensible boundaries as they are not allocated to function in the same manner as Green Belt sites. Sites should be allowed to create such boundaries if considered necessary. Whilst physical features such as boundaries are part of the material planning considerations, they are not the only consideration and therefore it is important to view the wider context of a site and not refuse residential development just because a site fails to meet one of the criteria. Is accessible by walking to a wide range of local services The allocation of settlements as Key Service Centres confirms that there are sufficient facilities to meet existing demand from local residents and also to cater for additional future residents in locations such as Knutsford. In November 2010 Local Development Framework Report: Determining the Settlement Hierarchy was published. In this Report Knutsford was identified as a Key Service Centre settlements with a range of services and opportunities for employment, retail and education that serve a catchment area and contain good public transport links. Whilst it is important that sites are sustainable and future residents can easily access a range of services and facilities, it is considered too restrictive to set out strict distances to a prescribed list of facilities. Sites will differ on their level of sustainability and whilst not all are within walking distance of a significant level of services they may be in close proximity to a good public transport network which would allow easy access to facilities. Likewise cycling is also relevant as a non-car mode of transport and should not be ignored. A site needs to be viewed in the wider context and not just assessed solely on the walking distance from a predetermined list of facilities. In addition, urban extensions by their very nature can be further away from certain facilities but form an important part of the evolving urban area which adapts over time. Is capable of being fully developed within 5 years of the granting of full or outline planning permission This is supported, as the aim of the Revised IPP is to act as a short-term measure to address the housing need and the shortfall in housing across Cheshire East until the adoption of the</p>

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	<p>Local Plan Core Strategy. Provides homes that improve the overall choice, quality and supply of housing within the relevant town</p> <p>Delivering high quality housing schemes that provide a good mix and choice of dwellings is important. However, as discussed further below, by limiting the size of sites and development densities that are able to come forward, this will directly relate to limiting the choice and mix of houses that can be delivered, making this criterion hard to achieve. Is less than 1 hectare in size or has the capacity for no more than 30 net additional dwellings The restriction on the size of site adjacent to Macclesfield and the Key Service Centres that are able to come forward under this policy is not supported. Imposing restrictions such as this does not demonstrate efforts to positively seek opportunities to meet the development needs and therefore is contrary to the objectives of the NPPF. These restrictions are also contradictory with the background information outlined in the earlier chapters of the Revised IPP; paragraph 2.18 of which states the lack of a 5 year supply of deliverable housing sites means that the Council should continue to take proactive steps to manage the situation. It is considered that placing onerous restrictions on the size of site and density of development that will be permitted to address the shortfall of the 5-year housing supply are not proactive steps. The success of this approach in actually addressing the shortfall in housing supply across the Borough can be questioned. Small sites with development density restrictions are often not attractive to house builders who from a viability perspective need larger sites to make the development worthwhile. NPPF requires the delivery of a wide choice of high quality homes and the creation of sustainable, inclusive and mixed communities therefore requiring a range of site sizes to come forward. This requirement for a range of site sizes to be developed is also considered to be the best way of attracting both local and national house builders to invest in Cheshire East. There is a high probability that these small sites will therefore remain undeveloped as they are not attractive to developers and will not contribute to addressing the shortage of housing. There is also no evidential justification for this threshold being imposed. The LPA recently supported a planning application at The Green Middlewich (LPA Ref: 11/4545C) for 63 dwellings in February 2012 and this is evidence that sites should be assessed on a site by site basis as this site is over the 1 hectare threshold but was still considered to be able to deliver a valuable contribution to the housing land supply position. The bold statement made in paragraph 2.23 of the Revised IPP can also be questioned, with the assertion that small sites can be developed quickly and without major infrastructure requirements. The infrastructure requirements of a site should not be viewed as a reason for refusing development, as it is possible to mitigate and legally enforce that necessary improvements are made. Paragraph 203 of the NPPF highlights that LPAs should consider whether otherwise unacceptable development could be made acceptable through the</p>

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	<p>use of conditions or planning obligations. There are therefore national and legal mechanisms in place that would remove any problems of larger sites requiring infrastructure improvements and should not be considered as a reason for deterring and prohibiting larger sites coming forward. A frequent complaint and concern by Members raised at Planning Committee is piecemeal development that doesn't have good linkages and does not represent the delivery of a comprehensive scheme and also the limited benefits to the local area. Allowing only small sites to come forward has the potential to increase piecemeal development with small pockets of housing being widely dispersed. In addition, small sites are unlikely and in most cases unable to generate significant benefits to the local community. For example, the amount of affordable housing generated by a scheme of 30 houses is minimal and unlikely to make a notable contribution to the shortage of affordable units. By permitting large schemes to come forward monies could be generated to contribute to providing community facilities and making improvements to public transport. This would not be possible from a scheme for 30 dwellings. In summary, this is considered to be an onerous restriction on the sites that are being encouraged to come forward to address the shortage of housing and does not represent a proactive or positive approach. Limiting site size also limits the wider benefits to be gained from the development and it is questioned whether these sites would even be viable for house builders to bring them forward. It has also been the larger house builders on larger sites that have been most active in Cheshire East delivering consents recently and therefore it is very counter productive to have a policy that effectively favours smaller sites only as it potentially precludes developers from assisting in meeting the LPAs housing targets. That the density of the site is appropriate to its location and is no less than 20 dwellings per hectare Similar arguments to those outlined above are relevant to this criterion and again there is objection to the restrictions being placed on bring development forward. It is important that density is appropriate to its surrounding location; however this should be determined on a site-by-site basis taking into account site and surrounding circumstances. Does not represent the subdivision of a larger site The likely intention behind this criteria is to prevent sites coming forward 1 ha at a time, however as objections have been raised to the size limit of sites able to come forward, consequentially this criterion is not deemed to be required. Requirements of Housing Developments on Greenfield Sites In addition to the above criteria, housing developments on greenfield sites that have been permitted through the Revised IPP will also have to adhere to additional requirements. These remain the same as in the initial IPP, and we have previously raised objections to them on behalf of a number of clients. These are reiterated below. A Minimum of 35% Affordable Housing in Accordance with the Interim Planning Statement on Affordable Housing The requirement for the provision of 35% affordable</p>



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	<p>housing is not supported. There is no mention in the Interim Planning Statement on Affordable Housing of the requirement for greenfield sites to deliver 35% affordable housing. There is no justification provided as to why the Council are seeking to demand a higher level of affordable housing on sites which are required to be released in order to make up the current shortfall in housing. In these difficult economic times development should be encouraged and not deterred or hindered by onerous requirements such as high levels of affordable housing. The viability of delivering a scheme should be crucial in determining the additional requirements that will be sought as part of a development. This assessment should be undertaken on a site by site basis and take into account factors such as individual site characteristics, constraints and local needs. Improvements to the Strategic and Local Highway Network, Public Transport, Pedestrian and Cycle Routes It is acknowledged that new development must address the affects of the development on the local highway network, and encourage the use of public transport and where valid contribute to this provision as identified by the Transport Assessment accompanying an application for development. Objection is raised however to the requirement to provide improvements to the strategic highway network as the Borough have not yet adopted the Community Infrastructure Levy (CIL); there is no evidence base and no policy mechanisms for requiring such contributions. Therefore this policy would pre-empt the conclusions of the evidence gathering. Consideration must also be given to viability and the implications such requirements would have on the realistic delivery of housing at a site. A high quality designed development to Code for Sustainable Homes Level 4 or higher and Building for Life Silver Standard or higher The Code indicates the direction for future amendments to Building Regulation requirements, with step changes in maximum permissible CO2 emissions being tied closely to the various Code Levels with Code 4 Levels coming into force from 2013 onwards. As Code 4 Levels will not be introduced until 2013 it is considered unreasonable to request Code Level 4 on developments prior to 2013. It is also important to highlight that the Code is voluntary and not mandatory and is being implemented through Building Regulations and therefore development (by according with Part L which is also in line with the Government's programme of implementation of the Code requirements). The Council's Economic Viability of Affordable Housing Requirements Report (2010) acknowledges that land values are already likely to be constrained by increasing building costs, with the introduction of Code Level 32. Research undertaken on behalf of the Homes and Communities Agency suggests that the introduction of Code Level 4 is likely to add a premium to construction costs of around 12.7% above current building regulation compliance. Code 3 represents a 5.1% increase above current building regulation compliance. From Code 3 to Code 4 therefore corresponds a 7.6% increase in build costs and market research suggests this is unlikely to result in an increase in £ for</p>

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		<p>sale values and is an additional cost developers will have to account for on their balance sheets.<sup>3</sup> The Report goes on to state that the impact of Code 4 could significantly affect the viability of development<sup>4</sup>. Imposing requirements such as Level 4 of the Code for Sustainable Homes will impact upon the viability of developments and thus the provision of other Section 106 offers such as affordable housing provision. This IPP is about delivering development in order to maintain at least a 5 year supply of housing land and it is considered that imposing a requirement to achieve Level 4 of the Code could impede this. The Development Industry fully supports the Governments approach to Building Regulations, and taking the above into consideration, the Council are requested to amend the Revised IPP to reflect that the identification of the Code for use in housing developments is a matter for Building Regulations and the staged introduction or requirements to provide the Code will be dealt with through this regime. Furthermore, there is no statutory Development Plan Policy in place requiring compliance with Code Level 4; therefore the weight to be attached to this requirement is negligible. As already highlighted if the restrictions on site size and development density that are suggested in the earlier part of this policy are adopted then it is highly unlikely that these small greenfield sites will be able to deliver the additional requirements and benefits outlined above. Requirements of Mixed Use Redevelopment Sites The final part of the IPP sets out 3 requirements which housing development on mixed use redevelopment sites will be expected to deliver. These requirements are expressed to be subject to economic viability considerations, which are supported. A minimum of 30% affordable housing in accordance with the interim planning statement on affordable housing The requirement for 30% affordable housing is in line with the Interim Planning Statement on Affordable Housing (2011), however it is important that viability is taken into account in all cases and assessments are made on a site-by-site basis taking into account individual site constraints and the merits of the scheme. Code for Sustainable Homes Level 3 or above. Please see the comments above about imposing targets/requirements for new development to achieve certain levels of the Code.</p>
RIPP140		<p>I have studied the documents enclosed. They appear to be a reasonable plan for the needs of the area. It would be reasonable, I feel, to continue to respect the village and town boundaries so that these areas are not swallowed up into one vast conurbation, People choose to live in certain areas because they meet a familial or work related town or village. The prospect of one vast urban area of Nantwich-Crewe-Shavington-Wyburnbury-Haslington-Sandbach etc would be a nightmare. These areas need an area of separateness and identity. Affordable Housing is a necessity; build more homes for these members of the population, and stop the building of these 'gated' or similar homes that are unaffordable to most.</p>
RIPP70	Comment	See below

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RIPP66	Yes	<p>Need more robust defence of the boundaries of the towns within Cheshire East. Brownfield sites must be considered as part of the solution. Re-use of allocated vacant industrial areas should be used for housing rather than green field sites. Definition of small development must be tightened so no developer can appeal on refusal with expectation that they will have their appeal overturned. Finally - listen to the residents of Cheshire East and not the developers/landowners whose only interest is money for themselves.</p>
RIPP96		<p>Whilst the interim policy has laudable aims to bring forward sites for development, it relates principally to the release of green field sites and whilst we support the use of green field sites there should nevertheless be recognition within the policy that where brown field sites exist on the edge of settlements the Council will in accordance with the core principles of the National Planning Policy Framework 'encourage the effective use of land by reusing land that has been previously developed' . At present the policy fails to do so. We have other concerns regarding the overly prescriptive criteria that the Council is seeking to apply to the release of housing sites. Taking them in order; - Firstly, the policy requires 'all ' of the criteria to be met in order for development to be supported, this in itself will act to constrain the very sites the Council is seeking to allow to come forward and this in turn will defeat the objective of the interim policy. There may be very good planning reasons to support the delivery of a site, where it contributes towards housing land supply and is in a sustainable location and reuses brownfield land for example; but under the criteria of the interim policy it would not be allowed to come forward if it were marginally in excess of 1 hectare or delivers a slightly higher number of units. Whilst on the one hand the Council wishes to endorse the development of small sites on the edge of the settlements the policy is not likely to deliver. There needs to be a more flexible approach to the policy wording as a result in order to not unreasonably constrain sites from coming forward. We therefore object to both the threshold imposed on the size of site and number of units as the policy is not sufficiently flexible to respond to changing circumstances. The ability of a site and a settlement to accommodate development may also vary depending on site specific circumstances and its location and to rigidly prescribe the size and number of units may constrain sites from coming forward which would otherwise contribute towards the Council's objectives of promoting sustainable development and increasing the supply of housing immediately. There needs to be greater flexibility and a reasonable planning balance in assessing the suitability of a site for development. The NPPF promotes a presumption in favour of sustainable development and this should be the only test required rather than the rigid application of size thresholds this policy is seeking to introduce. Land at Forge Mill Congleton is a good example of a site that has been previously developed that should be given priority in looking for the early release of housing sites. It comprises a developable area of some</p>

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		<p>1.5 hectares of former industrial land. Its reuse for housing would provide approximately 45 units. There is also an additional parcel of land on the west side of Forge Lane which is also within our Client's ownership which could deliver up to 24 units which is a Greenfield site. Both are available immediately for residential development. It is rather perverse that under the terms of the interim policy the main site which is previously developed would not classify as an early release site as It is slightly larger than the required threshold, yet the Greenfield site would. It is contrary to NPPF advice to encourage the reuse of brownfield land and it is clearly sensible that best use is made of the existing site and a positive new use for this site found as a priority alongside the Greenfield parcel as appropriate. This explains why the policy should be amended.</p> <p>Affordable housing We object to the application of the affordable housing policy which seeks to apply different thresholds where small sites are expected to deliver 35% but on mixed use development sites this has been reduced to 30%. The council has not justified the application of different standards in different developments. Equally small sites may be affected by site viability issues and there needs to be the ability for such matters to be taken into account when considering development proposals.</p> <p>Sustainability criteria Whilst we understand the aspirations of the policy, the Council cannot seek to impose Code for Sustainable Homes level 4 when this exceeds current building regulations standards. This can only be an aim when current regulations require building to Code 3. This has cost implications for housing developers and may affect site viability, particularly on the smaller sites. Finally, the Council has failed to justify or explain the distances they are seeking to apply in considering accessibility to facilities and why some are required to be 500 metres away and others 1000m. For example the same distance to a post box of 500m is applied to a food shop 500m. When we would suggest food shopping is the more relevant accessibility criteria. It does not suggest any rigorous assessment has been undertaken to determine whether this is realistic or achievable. Again this may vary across the individual settlements according to circumstances.</p>
RIPP97		<p>Part 1 Crewe</p> <p>In line with our comments above we would want all developments to be subject to a sustainability assessment, details of which we give as part of our comments to Part 3 of the Policy.</p> <p>Part 2</p> <p>Brownfield development</p> <p>We believe this is particularly weak and lacking to such an extent that it fails to conform to the requirements of the NPPF. Our general comments on the importance brownfield sites should and must play in the delivery of sustainable development under this Policy are given above. Further, we are very disappointed that the current draft only covers brownfield sites in town centres and (presumably) identified and designated regeneration areas. We believe it should</p>

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	<p>cover all brownfield sites within the full built area, including, if appropriate, edge of town. We are, however, concerned that the possible development of brownfield sites for housing should not impinge on the provision of employment, retail and community uses, particularly town centre and edge of centre sites. To address this significant concern we suggest the following revised wording of Part 2 of the Policy: 2. Previously developed land within any part of the existing urban areas including edge of town sites. Change of use would be acceptable provided a robust case can be made to demonstrate that the proposed site is no longer viable in its current use. Mixed developments in town centre and regeneration areas to support the provision of employment, town centre and community uses is encouraged. In addition, as with all sites coming forward under this Policy, we want all developments to be subject to a sustainability assessment, details of which we give as part of our comments to Part 3 of the Policy.</p> <p>Part 3</p> <p>Greenfield development In addition to Congleton, a number of the towns identified in the first paragraph of this part of the Policy either have or are working towards Transition Town status. This means we are all committed to working constructively to lower the carbon footprint of the towns. This Policy must be fully cognisant of this fact and must accommodate the expressed desire of the residents of these towns to follow this course. To this end, we are concerned over the potential increase of out commuting from these towns to employment sites elsewhere in Cheshire East, principally, as expressed in our comments above on Paragraph 2.14, Crewe. In addition while, in accordance with the NPPF, all development needs to be sustainable, this is all the more important at Congleton and the other Transition Towns. The NPPF is quite clear that ALL development must be sustainable. Therefore, in order to comply with the NPPF, it must be a necessary requirement for ALL sites coming forward under this Policy (Parts 1 to 3) to demonstrate that the development is sustainable. We therefore ask that a sustainability assessment becomes a requirement for ALL developments coming forward under the Policy. One of the key requirements for a sustainable development that not only reduces carbon emissions but reduces traffic generation is to minimise journey lengths to key facilities. This is recognised at subcript 2 of bullet 3. This would provide a good start to a sustainability assessment, however we have a number of fundamental issues with subcript 2 as currently drafted also significant clarification is needed to turn it into a meaningful basis for an assessment. Our comments on this are as follows: As noted above, the NPPF is very clear on the need for sustainable development and we consider that meeting 5 out of 16 criteria is far from acceptable and totally fails to comply with the NPPF. To comply with the NPPF the level of criteria to be met in order for a development to be deemed as sustainable must be substantially increased. We would want the</p>



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	<p>criteria to be raised to 10 out of 16. The method of measuring the distances needs to be clarified. The distances should be along any public right of way (not as the crow flies) also from where in the development are the measurements be taken in order to meet sustainability requirements this should be from the dwelling that is furthest from the facility. The sustainability assessment must identify the distances to each of the facilities, the routes taken, with any steep sections on the route noted, and the level of service provided by each facility. We would want to see a minimum level of service set for each of the facilities. We give an example of this in relation to public transport (bus stops) below. If the minimum level of service is not met, then the criterion is not met. Steep routes can be a barrier to walking and cycling, consequently, where any route is particularly steep the quoted distances should be reduced. We suggest that where there is a rise or fall (it matters not as people walk there and back) of 1 in 10 for a 100m or more the distances should be reduced by 20%, e.g. 500m becomes 400m. We would want the Policy to allow for cycling as well as walking, this is particularly relevant for the facilities at greater distances (1,000m or 2,000m). The bus stop must be on a service that, as a minimum, runs throughout the working day Monday to Friday from 8.00am to 6.00pm (or according to the local work pattern, for example many businesses in Congleton start work at 8.00am, so a 7.00am start would be required here). While most if not all developments coming forward under Parts 2 and 3 will not meet the size criteria for a Transport Assessment/Statement as set out in Appendix B of the Guidance to Transport Assessments (GTA) if there is no bus stop with a level of service set out above, then it would fall within criteria 7 of other considerations and a TA or TS would be required. While the GTA indicates a TA in this case, the less onerous TS may be acceptable given the size of the development provided as a minimum, in order to meet the requirements of the NPPF, this sets out workable and deliverable proposals to minimise the trip generation from the site or alternatively, how the carbon footprint of the development as a whole can be reduced to balance the carbon emissions from car trips. Other criteria from the Thresholds based on other considerations in Appendix B of the GTA could apply to any of the sites coming forward under this Policy particularly, all the criterias set out at 5 and 7 of this Table. In addition to issues relating to sustainable travel and access to facilities identified above the sustainability assessment should cover items identified in the former Congleton Borough Council's (CBC) Supplementary Planning Document 4 Sustainable Development. We note that, currently this document is only relevant to the area covered by CBC. We consider this to be a good document that clearly and comprehensively sets out the principles of, and provides practical advice on, delivering sustainable development. This document would require little updating to bring it into conformity with the NPPF. We therefore strongly urge you to adopt this SPD, updated as necessary, or produce a new similarly comprehensive SPD so</p>



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		that the principles of sustainable development can apply to all development coming forward in Cheshire East including this Interim Planning Policy.
RIPP129		<p>The RIPPRHL recognises this opportunity for some of the housing meeting the five year supply to come forward in sustainable locations adjacent to identified Principal Towns and Key Service Centres, other than Crewe. In particular, Taylor Wimpey supports the development of sustainable greenfield release on the edge of Sandbach, such as land at Congleton Road. The Core Strategy Issues and Options Paper identifies Cheshire East's Principal Towns and Key Service Centres (Crewe and Macclesfield are identified as Principal Towns and Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow are all identified as Key Service Centres). These settlements are all identified as offering a range of employment, retail, education opportunities and services, as well as good public transport and are proposed as the focus for sustainable future growth. Taylor Wimpey therefore considers it appropriate that the RIPPRHL provides the mechanism to allow greenfield releases of housing land in locations other than Crewe. Whilst Taylor Wimpey supports the inclusion of widening the interim policy to allow for sustainable housing land release in towns other than Crewe, the criteria that needs to be met for a greenfield site to be released for housing under this policy is far too restrictive. It will prevent the policy from operating efficiently and assisting the Council in meeting its five year housing land supply and buffer. Site Size Restrictions</p> <p>The RIPPRHL notes that the release of major housing sites on the edge of towns (other than Crewe) could pre-empt the future development strategy that should be dealt with in the Local Plan. CEBC therefore considers that any release of greenfield land for housing should be restricted to small sites (i.e. less than 1ha or 30 dwellings). Taylor Wimpey objects to this restrictive criterion. The annual target for housing in Cheshire East has been set at 1,150 homes per year. Allowing the release of only very small sites for housing would not contribute the level of housing land required to meet the deficiency in the 5 year supply as well as more local regeneration objectives. In addition, the level of housing required in the Borough is significant and even developments of several hundred dwellings would not pre-empt the future development strategy of large towns, such as Macclesfield and Sandbach. For example, the development of land at Congleton Road, Sandbach to deliver up to 195 dwelling is not considered to predetermine the Local Plan process as it only represents around 10% of the proposed housing requirement identified in the Draft Sandbach Town Strategy. Whilst the Council has not fully determined the housing requirement for Sandbach we have used this figure as a mechanism for demonstrating that the impact of the release of Congleton Road will not predetermine the Plan process. The restrictive criterion under Part 3 of the RIPPRHL which states that development sites should not represent the subdivision of a larger</p>

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	<p>site, will also limit the supply of housing and undermine the purpose of the IPPRHL. Larger sites are required to ensure that CEBC can meet its housing requirements. Sites should be assessed on their ability to achieve sustainable development and contribute positively from an economic, social, and environmental perspective, in accordance with the Framework. In this context, Taylor Wimpey considers that it is inappropriate for the CEBC to include additional restrictive criteria to the interim policy, which is not in accordance with the provisions of the Framework. The Framework clearly states that housing applications should be considered in the context of the presumption in favour of sustainable development. The site size restriction proposed in the RIPPRHL will unnecessarily prevent highly sustainable housing developments from coming forward on the edge of the Key Service Centres, just because they exceed the 1ha site size or 30 dwelling limit. Sites of an appropriate scale in the context of the settlement, which meet the requirements of sustainable development, as set out in the Framework, would make a significant contribution towards local housing needs and delivering the Borough's housing requirement. Allowing the release of only very small sites for housing would not contribute the level of housing land required to meet the deficit in the 5 year supply as well as more local regeneration objectives. We acknowledge that there is a need for the LPA to have some level of control over the scale of development that could be permitted under the Interim Planning Policy so that it does not predetermine the plan process. The Council should undertake and define a clear criteria based approach to assessing the impact of greenfield release on the edge of Key Service Centres rather than simply constraining development to 1 ha sites or 30 dwellings which fails to take account of local circumstances or need. For example, the release of a greenfield site should be appropriate in terms of:- 1 Its scale in relation to the status of the settlement; 2 The overall housing requirement proposed for the settlement; 3 The sustainability of the settlement and the level of services available; 4 The realistic delivery of housing commitments in the settlement; and, 5 Its cumulative impact in the context of other permitted developments. This will enable appropriate sized developments to come forward on the edge of the sustainable settlements to meet the acute housing need. Land to the north of Congleton Lane, Sandbach represents a site that is suitable in accordance with the principals of sustainable development and meets with the key criteria of the RIPPRHL. The site is closely related to the existing built framework of Sandbach, it is highly accessible with good transport links and access to local services and facilities. It is self-contained, with clear defensible boundaries. Development of the site would help to meet local housing needs and would not represent an inappropriate level of housing development over the likely scale of development proposed for Sandbach. Such a development should be assessed under the new criteria suggested below, which will allow the delivery of such highly sustainable sites to come forward and make</p>

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	<p>a palpable contribution to the local housing requirement. Requested Amendment Taylor Wimpey requests that in respect of Part 3 of the Interim Planning Policy, the site size and dwelling number restrictions, together with the criterion on subdivision, are removed from the draft RIPPRHL. In their place, applicants should be required to demonstrate the following:- 1 The size of the proposals when assessed cumulatively with other approved housing developments will not pre-determine the plan process and it will not have a detrimental effect on the settlement and its proposed housing requirement; 2 The existing housing commitments are not deliverable; and, 3 The site is sustainable in accordance with the Framework. The application of this criteria based approach in the assessment of new development proposals under the Interim Planning Policy will provide the LPA with a mechanism to resist further development, over and above the likely scale of proposed housing at a settlement. Affordable Housing Provision The RIPPRHL states that housing developments permitted on greenfield sites under this policy will be required to deliver a minimum of 35% affordable housing in accordance with the Interim Planning Statement on Affordable Housing [IPPSAH]. However, the Cheshire East SHMA identifies a requirement for 30% affordable housing and this recommended level of affordable housing is reflected in the IPPSAH which establishes an affordable housing policy of 30%. The source of justification for a higher affordable housing requirement of 35% on greenfield sites is not apparent or justified by evidence. Taylor Wimpey strongly objects to the proposed policy requirement for greenfield sites to deliver a minimum of 35% affordable housing. It is a common misconception that greenfield sites do not have particularly high development costs. However, if contributions are going to be required to enable off-site highways improvements as well as open space and community facilities in accordance with Local Plan policy, a 35% minimum affordable housing requirement may have a significant impact on scheme viability. It is therefore considered that the affordable housing policy requirement for greenfield sites should be 30%, reflecting the IPPSAH and the Council's evidence base contained in the SHMA and Viability Assessment. Requested Amendments on Affordable Housing It is therefore requested in respect of the RIPPRHL that the requirement for 35% affordable housing on greenfield releases is replaced with a 30% requirement. This would ensure that the RIPPRHL is consistent with the IPPSAH, the Council's evidence base contained in the SHMA and prevent inappropriate viability impediments caused by policy. Energy Efficiency Requirements The RIPPRHL states that housing developments on greenfield sites will be required to meet Code for Sustainable Homes Level 4 or higher and Building for Life Silver standard or higher. Taylor Wimpey objects to these requirements as they are overly onerous and should be removed. The Framework states that in pursuing sustainable development, careful attention should be paid to viability and the scale of obligations or policy burdens that a</p>

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	<p>development is subject to, should not threaten the ability of a site to be developed viably. The Framework states further that, to ensure viability, the costs of any requirements likely to be applied to development, should provide competitive returns (when taking account of the normal cost of development and mitigation), to enable the development to be deliverable. The Interim Planning Statement does not set out local circumstances that warrant requirements which go beyond national requirements. Changes to policies relating to local requirements for sustainable buildings should normally be undertaken within this development plan, as opposed to a non-statutory document, so as to ensure examination by an independent Inspector. Taylor Wimpey does not consider that it is appropriate for CEBC to pursue a blanket Borough-wide policy approach outside of formal development plan examination processes. Overall, there is no policy justification for these sustainable building requirements, which go beyond national requirements and could have a significant impact on the viability of some housing developments, which is in conflict with the viability considerations in the Framework. Requested Amendments on Energy Efficiency Requirements It is therefore requested in respect of the RIPPRHL that the onerous requirement for housing developments on greenfield sites to meet Code for Sustainable Homes level 4 or higher and Building for Life Silver standard or higher is removed in accordance with the Framework. Developments should instead be required to comply with national standards (currently Code for Sustainable Homes level 3 or higher). Taylor Wimpey welcomes the opportunity to provide representations on the RIPPRHL, and is pleased that the Housing Market Partnership is also being consulted as part of this process. Taylor Wimpey is keen to assist CEBC in meeting the local housing requirement and affordable needs and respectfully requests that the Council considers and reflects these representations in the progression of the Interim RIPPRHL.</p>

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RIPP131		<p>It fully appreciates and supports the need and urgency of introducing an Interim Policy to retain a five year supply of Housing Land pending the production of the Local Plan for Cheshire East. My Council urges, however, that the following criteria be added to the area adjacent to the settlement boundary of Crewe on page 9 of your report, to help further protect the intrinsic character of the villages and hamlets which make up our Parish. - Bullet point 2 add Green Belt in addition to Green Gap - Is self contained within clear defensible boundaries. - Is very closely related to the existing framework of the settlement. - Is fully in accordance with the Open Countryside Policies contained within the Crewe &amp; Nantwich Replacement Local Plan (2011), in particular policy NE2 - Is fully in accordance with the Conservation Area Policies contained within the Crewe &amp; Nantwich Replacement Local Plan (2011), in particular policy BE7 My Council is very conscious of the views of residents within our parish which were expressed in our recently published Parish Plan in relation to Development and Housing “ 73% response. They recognized that given the development pressures that we’ve been subjected to over the last 15 years or so, our infrastructure is already overloaded, and they didn’t wish to see any additional development on Green Belt, Green Gap or Greenfield sites. Given the fact that draft proposals for Basford East are now just over the horizon, my Council requests that additional robust safeguards are put in place within your Local Plan to protect the character of our area which, albeit on the edge of Crewe, is not physically a part of Crewe. In particular we request that a critical examination is made of the Green Gap allocation and serious consideration is given to extending this allocation.</p>
RIPP93		<p>Overall, BAE Systems support the process which Cheshire East Council is undertaking to develop a strategy to manage the release of additional land for residential development through the consideration of planning applications to maintain a 5 year supply of housing. However, BAE Systems have some comments on the proposed policy in regard to future mixed use development proposals. Whilst paragraph 3.6 of the draft policy document refers to the potential of areas within town centres and older employment areas for regeneration and the opportunity for mixed use schemes to support the redevelopment of these sites. There is no reference to the opportunity for the development of greenfield sites as part of mixed use development. We believe that a reference should be made in the Interim Planning Policy to this effect. Older employment areas often come with the inherited problems of their former uses, such as significant contamination and difficult transport access. The development of adjacent greenfield sites for housing development could contribute towards overcoming the difficulties with older employment areas which would otherwise make redevelopment economically unviable. The promotion of the development of greenfield sites as part of comprehensive mixed use development is consistent with the National Planning Policy Framework (NPPF). In particular, the 'Core Planning Principles' set</p>

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	<p>out in the NPPF (referred to at paragraph 2.4 of the draft policy) which state that planning should 'proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs'. BAE Systems are concerned that the restriction of sites less than 1 hectare could potentially constrain economic growth in areas outside Crewe and other town centres/settlement boundaries. This would certainly be the case if the Interim Planning Policy was in place for a significant amount of time in advance of the adoption of Cheshire East's Local Plan and Site Allocations should the adoption targets not be met. A further fear, if the Interim Planning Policy was in place for a substantial period, is the potential for a number of small-scale greenfield housing sites coming forward and the associated cumulative impacts. Small sites can contribute towards housing supply in a positive way. However, they will not necessarily deliver the strategic benefits that development of greenfield sites as part of a more comprehensive proposal could do. It is for this reason, we feel that the cumulative impact of small scale development could also pre-empt decisions on the future development strategy for the Borough. Cheshire East's intention to continue the Local Plan process is recognised, and BAE Systems will support this process. However, a balance needs to be struck between encouraging sustainable economic growth and delivering housing supply in the absence of a Local Plan. The NPPF makes it clear that planning should operate to encourage and not act as an impediment to support sustainable economic growth. Without appropriate mechanisms and flexibility, the Interim Planning Policy could impede sustainable economic growth. Flexibility could be delivered by amending Part 2 of the Interim Planning Policy proposals to include existing employment areas in or adjacent to Key Service Centres, which allows for the development of greenfield sites as part of a comprehensive mixed use development. The exceptions policy would have to ensure that development is sustainable and satisfy the policies within the NPPF. In addition, specific timescales and definition of how long the Interim Planning Policy will be in place for need to be identified by Cheshire East, including the circumstances which allow for the policy to be reviewed. Many employment areas in Key Service Centres have greenfield sites surrounding them which present an opportunity for sustainable mixed use development. Bringing adjacent greenfield sites forward for development could help in securing the future function of crucial industrial areas that contribute towards the Borough's employment land supply, both in terms of quantity and quality of provision available to existing businesses in the area and future businesses willing to move to the Borough.</p>



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RIPP83	No	<p>My client does not support the IPP given the context of the National Planning Policy Framework (NPPF) which clearly states at paragraph 14 that Local Planning Authorities should consider favourably proposals for residential development where the Development Plan is absent, silent or relevant policies are out of date. It is clear that the NPPF provides the necessary planning policy framework for determining planning applications where development plans are out of date and it would appear that the draft IPP as written would only further frustrate the acute shortage of market housing throughout Cheshire East. My client therefore objects to the need for the IPP and also objects to the following elements of the policy:</p> <ol style="list-style-type: none"> <li>1. It is noted the draft IPP refers to the council being able to demonstrate a 3.94 year supply of deliverable housing sites. This figure has been subject to much debate recently both within the Housing Market Partnership (HMP) meetings and during Planning Inquiries. It should be noted that the HMP has not agreed to the figure of 3.94. The Council should make available the full evidence base that underpins this figure given the importance that will be attached to this as housing completions start to come forward.</li> <li>2. Whilst it is noted that the council acknowledges within the draft IPP that there is not a five year housing supply and makes reference to NPPF in terms of potentially including an additional buffer of between 5-20% which would result in a 5.25 – 6 year supply, the draft IPP does not appear to take this into account, however when considering recent rates of completions particularly from 2008 it is clear that the average annual requirement of 1,150 dwellings has not been achieved, in 2010/11 only 466 dwellings were completed. It would therefore seem that to be consistent with NPPF the council should consider a 20% buffer to ensure housing delivery and therefore emerging housing policy must consider the need to demonstrate a 6 year deliverable housing land supply rather than a 5 year supply.</li> <li>3. The draft IPP should not seek to restrict the size of development that will be acceptable either by site size or the number of dwellings proposed. This restriction is not consistent with NPPF where there is not a five year supply of deliverable housing sites and furthermore such an approach will not result in the required level of housing completions necessary to tackle the undersupply.</li> <li>4. The draft IPP seeks to impose considerable burden on development both in terms of affordable housing provision and Level 4 (Code for Sustainable Homes). Whilst it is acknowledged that the types of sites this draft IPP seeks to support are likely to be Greenfield, this does not result in strong viability in all cases. Such policy requirements should be considered on a site by site basis. In relation to affordable housing, such requirements should only be imposed where they reflect a proven local need and where there is adequate financial viability.</li> </ol> <p>In conclusion, it would appear that the draft IPP as written is not consistent with the National Planning Policy Framework given the lack of 5 year supply and an out of date Development Plan. The IPP as written is considered to be too restrictive in terms of both</p>

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		locations where growth will be supported and the overall quantum of development, furthermore other policy requirements such as affordable housing and Code for Sustainable Homes (Level 4). It is suggested that planning applications should be determined in accordance with the NPPF until such a time that a Core Strategy is fully adopted, however, should the council be minded to move forward with an IPP in the interim, my client requests that the content of these representations is taken into account when re-writing the IPP.
<b>RIPP71</b>	No	green belt is sacrosanct and should not be built on if it is the damage cannot be undone the rectory fields are a glorious natural space in the centre of the village an should stay as such
<b>RIPP99</b>		<p>1. SCFOE welcomes the publication of an interim policy as we had become increasingly concerned about the number of speculative consultations being organised by developers in the recent months in Nantwich and a number of developments targeted at Green Gap land in Crewe and Shavington.</p> <p>2. SCFOE is very concerned that there is no protection of agricultural land within the Policy. We believe that as the climate changes and Southern and Eastern areas of the country are no longer able to grow some staple foods such as potatoes and grass for dairy production, counties such as Cheshire will need to produce this food. We have a duty to protect the asset of our agricultural land for the 2020-30 decades. When this land has been built on we will no longer be able to produce food on it.</p> <p>3. SCFOE are pleased that the policy provides protection for the principle of the Green Gap which was a much appreciated and valued principle from the old Crewe and Nantwich Borough Council. The segregation of the communities by Green land gives each community a distinct identity and pride. In most cases the Green gap also promotes the feeling within the community of not being part of an urban sprawl.</p> <p>4. SCFOE understands and welcomes the idea of concentrating housing development in areas where employment will be targeted. We feel that this remove the pressure on more rural developments such as Nantwich which in recent years have been developed as dormitory towns exceeding the capacity of local services, facilities and infrastructure.</p> <p>5. Point 2: We feel that much could be done to revitalise Crewe town centre by accepting that retail is moving on line and that the current space occupied by retail is no longer required. As a result it would make much more sense to allocate the land around ex MFI and Dunelm Mill and Chester Bridge, currently being targeted for yet another supermarket, to housing. This would help to give vibrancy back to Crewe and generate demand from a population in the town centre. Other towns have achieved this growth and Cheshire East should aspire to do so.</p> <p>6. We believe that the above could also be the case for some of the other smaller towns. We know builders hold land within Nantwich town centre. There is sufficient of this to meet the annual needs of</p>

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	<p>housing from Nantwich residents themselves for a few years. By shrinking the CBD of Nantwich, Sandbach and Middlewich and concentrating retail and business within the centres, the towns will look less run down and populated with Charity shops. Released (currently empty) retail could then be used for conversion to housing / infill which would generate business within the town.</p> <p>7. Point 3 Site Criteria. SCFOE is pleased that some attempt has been made to define local services. However we believe that there needs to be rigorous quality criteria added. The criteria shown are so weak that a developer would be able to demonstrate the site met 5 of the list of services in most of the rural areas and hamlets of East Cheshire.</p> <ol style="list-style-type: none"> <li>1. All services should be in safe walking distance, particularly schools and nurseries. We are aware that a few years ago houses were built as infill in Willaston, The only school was full and primary children were allocated a place in Wistaston Berkerley. This school, although an acceptable distance as the crow flies was along a rural lane with no pavements forcing parents to buy a second car or risk a dangerous and long walk. The same is currently happening in Nantwich where parents are being allocated places in primary schools where it is necessary for the children to be taken by car as there is no safe route to school.</li> <li>2. Access to a shop should not involve the crossing of a busy road or walk along a de restricted road. This is particularly important where houses are being targeted at certain populations i.e. affordable for young families or sheltered housing for elderly.</li> <li>3. Access to public transport is essential if a community is not to be isolated by the rising cost of fuel and motoring costs. Or in the case of younger / older populations, the inability to drive. Therefore the transport criteria should be a bus stop and suitable service i.e. 2 buses per hour.</li> <li>4. The criteria for a shop selling food should be shop selling groceries including fresh food, fruit and vegetables along with milk and bread. Again meeting the criteria in points 1 &amp; 2.</li> <li>5. Post box, post office and cashpoint should be combined as criteria. Many post offices offer all 3 and therefore 3 of 5 requirements could be met from an isolated rural post office.</li> <li>6. Leisure facility, meeting place, Public Park and public open space should be combined as criteria. It is possible in Hough or Wistaston to meet 4 of the 5 requirements within this category alone.</li> <li>7. Medical centre and pharmacy should be combined as both can offer medical advice and following the re development of surgeries through out Cheshire the new surgeries usually have a pharmacy within the building.</li> <li>8. There is no requirement for the applicant to prove that the development will not over whelm the existing infrastructure. Traffic</li> </ol>

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		<p>density in Nantwich now means that it is difficult to get to and around the town for 8-10 and 4-6.30 pm. Traffic is so bad on Saturdays that we are aware that people no longer visit the town as they cannot reach the parking and cannot park when they get there. In Willaston and the Marsh lane area of Nantwich, additional infill has generated serious congestion with buses unable to pass in the case of Willaston and cars mounting the pavement in Marsh Lane. This makes those areas particularly dangerous for pedestrians and cyclists thus increasing the number of journeys by car. These issues should be identified and addressed with the applicant taking remedial measures as part of the development before any building is allowed.</p>
RIPP68	Comment	<p>The policy is welcomed and supported in so much as it provides a much needed opportunity for potentially sustainable housing sites to come forward in the key service centres of Cheshire East where there is a shortage of a range of housing choice, especially affordable or lower-cost units. Clear criteria are provided, which is useful for consultation guidance purposes, however we urge the Council, assuming this policy is adopted, to act flexibly in application of the criteria when considering individual applications for sustainable development sites in or on the edge of the key service centres. This flexibility of approach would be consistent with the NPPF and wouldn't preclude sites that are, for example: slightly larger or capable of bringing forward marginally higher numbers of housing units but which are otherwise acceptable. In addition we are concerned that the policy as written could preclude collaboration on a more comprehensive approach that could be beneficial for the local environment in some circumstances. The guidance does not make it clear how the developable area will be assessed. It is always difficult to apply rigid criteria to real world situations. For instance, sites do not, often, come in conveniently sized less than 1ha parcels and it would be unreasonable of the Council to expect this. The application of these criteria as written could impose poor designs on some sites, further emphasising the need for a flexible application of the policy. We suggest that a sensible policy objective is the achievement of appropriate densities - this should be one of the main tests of a site. This, together with a policy that directs the overall form and function of sites in such a way as to prevent major extensions to existing service centres, which is, we presume, the motivation for the size limitation. We contend the 1ha is, as a result, an arbitrary size limit. We further suggest that sites should be allowable in a range up to 1.5ha provided that density in the range 20 to 30 units per hectare is deliverable - this would be a more a useful guide that is likely to produce acceptable designs in most circumstances and would encompass a range of potential sites that could help the borough meet its housing needs.</p>

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<b>RIPP69</b>	Comment	<p>The policy is welcomed and supported in so much as it provides a much needed opportunity for potentially sustainable housing sites to come forward in the key service centres of Cheshire East where there is a shortage of a range of housing choice, especially affordable or lower-cost units. Clear criteria are provided, which is useful for consultation guidance purposes, however we urge the Council, assuming this policy is adopted, to act flexibly in application of the criteria when considering individual applications for sustainable development sites in or on the edge of the key service centres. This flexibility of approach would be consistent with the NPPF and wouldn't preclude sites that are, for example: slightly larger or capable of bringing forward marginally higher numbers of housing units but which are otherwise acceptable. In addition we are concerned that the policy as written could preclude collaboration on a more comprehensive approach that could be beneficial for the local environment in some circumstances. The guidance does not make it clear how the developable area will be assessed. It is always difficult to apply rigid criteria to real world situations. For instance, sites do not, often, come in conveniently sized less than 1ha parcels and it would be unreasonable of the Council to expect this. The application of these criteria as written could impose poor designs on some sites, further emphasising the need for a flexible application of the policy. We suggest that a sensible policy objective is the achievement of appropriate densities - this should be one of the main tests of a site. This, together with a policy that directs the overall form and function of sites in such a way as to prevent major extensions to existing service centres, which is, we presume, the motivation for the size limitation. We contend the 1ha is, as a result, an arbitrary size limit. We further suggest that sites should be allowable in a range up to 1.5ha provided that density in the range 20 to 30 units per hectare is deliverable - this would be a more a useful guide that is likely to produce acceptable designs in most circumstances and would encompass a range of potential sites that could help the borough meet its housing needs.</p>
<b>RIPP67</b>	Comment	<p>3. (page 9) accessible by walking - please see above 3. (page 10) footnote 2: the criteria need to be tighter in as much as these could be "satisfied" by the softer options eg post box without the essentials being available eg medical centre. The distance for a railway station appears to be too far - it should only be 1000m particularly as it is also qualified</p>



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RIPP127		<p>Section 3 of the Draft Interim Policy should be amended as follows:-</p> <p>1. Where land is within the existing (historic) green belt designation but the site does perform the function of green belt and in all other respects conforms to the interim draft policy (save for point 2 below) then such land should be considered for housing development. The reason is that some sites are in built up areas and have development up to existing boundaries i.e. they are infill plots. The development of such plots does not have a green belt role and should be considered for development and the green belt status removed.</p> <p>2. Clarity is required in relation to what constitutes the sub-division of a larger site. Redevelopment of a site in total should be permitted.</p>
RIPP109		<p>A Crewe centric spatial strategy continues to be promoted through the emerging Local Plan and this is reflected in the existing IPP. The revised IPP, however, sensibly takes steps to maintain and enhance housing supply elsewhere in Cheshire East, through the inclusion of locations adjacent to the settlement boundary of Macclesfield and the nine key service centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow). In these locations, housing development will be permitted providing the applicant can meet all ten specified criteria. These criteria place undue and unnecessary restrictions on development opportunities that help deliver housing growth in accordance with NPPF. We have concerns with three of the criteria as follows; Not within the Green Gap; Less than 1ha in size or no more than 30 dwellings; Does not represent the subdivision of a larger site.</p> <p><b>Not within Green Gap</b></p> <p>Following the publication of the NPPF, saved Policy NE4: Green Gaps is inconsistent with the Framework. The transitional arrangements provided in Annex 1 to the NPPF make it clear that in the case of saved development plan policies, weight should be attached to relevant policies according to their degree of consistency with the framework. NPPF continues to safeguard Green Belt land however the Green Gap designation is a local designation and is in the most basic sense, unprotected greenfield land. By virtue of the weight that must be given to the focus on housing growth within NPPF, the continued protection of Green Gap land is inconsistent with the core principles of the framework. Accordingly, in the consideration of housing development proposals it continues to be appropriate to exclude Green Belt sites; however the continued protection of Green Gap is trumped by the provisions of the NPPF relating to housing growth. Any reference to Green Gap within the IPP should therefore be removed.</p> <p><b>Less than 1ha in size or no more than 30 dwellings</b></p> <p>Our previous representation to the existing IPP raised concerns about the size threshold included within it. The criterion is carried over to the revised IPP and we maintain our original concerns. The</p>



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	<p>site size restriction within the IPP could enable less favourable sites (from a perspective of being available, achievable, viable) to be brought forward in advance of sites that have been identified in the SHLAA as being suitable in the short to medium term, purely on the basis that they are below the 1 hectare threshold. Such an approach does not conform with general provisions of promoting sustainable development as a site could be highly sustainable but discounted on the basis that it was too large, notwithstanding the benefits that it could bring to a settlement. Applying an arbitrary site size in this manner is a completely inflexible approach to facilitating short term housing growth. A more reasonable approach would be to consider development proposals on their merits; applying a proportionate approach to the size of the development in relation to the scale of the settlement to be extended. It is more critical to ensure development proposals do not pre-empt the direction of development within an individual town. The criteria should be redrafted to read: is approximately 1 hectare in size or having the capacity for approximately 30 net additional dwellings.</p> <p>Does not represent the subdivision of a larger site This criteria is not clear as worded. There is no further reasoning or justification provided in relation to this criterion. Whether a planning application for a smaller site is submitted in advance of proposals planned for a larger site is immaterial in planning terms. Approving a smaller housing scheme when the Council is of the opinion that it forms part of a larger site does not undermine their ability to resist larger development proposals where they would conflict with the provisions of the emerging development plan. Strategic scale housing proposals will continue to be promoted through the Local Plan process. Those sites that are acceptable will be included within the Local Plan, those that are not will be excluded. In the case of the latter, the Council will continue to be able to resist conflicting proposals that fall outwith the Development Plan, irrespective of whether they have previously approved a small section of the site as a result of its compliance with the IPP. Furthermore, neither can this criterion be related to the need to ensure that larger site comes forward in a well-designed, comprehensive fashion. At the time of determining a planning application for a smaller scheme, the Council will be able to ensure (possibly through the submission of an illustrative masterplan) that the wider site may also come forward in a well ordered manner. In summary on this issue, this criterion is not precise or necessary and should be excluded from the final document.</p>	

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RIPP94		<p>The policy states that when it is demonstrated through the Annual Monitoring Report that there is not a five year supply of housing land as defined by the NPPF, subject to other saved policies of the relevant Local Plan being satisfied, residential development will be permitted in the following locations: 1. Adjacent to the settlement boundary of Crewe (subject to a range of criteria); 2. As part of mixed developments in town centres and regeneration areas to support the provision of employment, town centre and community uses; and 3. Adjacent to the settlement boundary of Macclesfield and the nine Key Service Centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow) (subject to a range of criteria). The inclusion of sites adjacent to the settlement boundaries of Macclesfield and the nine Key Service Centres is an addition to the original IPP, as it was evident that Crewe on its own would not deliver the Borough's housing supply requirements and therefore the IPP had to be expended. In principle there is support for the acknowledgment that sites adjacent to Crewe and within town centres/regeneration areas alone cannot address the shortfall in housing across Cheshire East and that sites elsewhere are required. However, it is considered that sites adjacent to other settlements (in addition to those identified in the Revised IPP) in the Borough can also make a valuable contribution to the housing land supply position and should not be prevented from coming forward for residential development. For example, Goostrey has a number of services located within walking distance of sites adjacent to the settlement boundary, including a parade of shops which provide a Post Office, a hairdressers, butchers and newsagents. It is considered that attracting additional residential development within Goostrey, whilst also contributing to the current shortfall of housing, will attract more people to the area which will increase spending on local services and assist businesses in remaining operational. In terms of accessibility, Goostrey has a Train Station which offers journeys to a range of destinations including Crewe, Sandbach, Alderley Edge, Wilmslow, Stockport and Manchester. The number 319 bus provides a circular journey visiting Sandbach, Holmes Chapel Shopping Precinct, Goostrey Booth Bed Lane and Goostrey Train Station and runs at a frequency of 1 bus per hour during the morning and early afternoon. The tests for assessing the deliverability of a site remain as originally outlined in Planning Policy Statement 3 (PPS3) and are carried forward into the NPPF; sites must be available now, offer a suitable location for development and be achievable. It is these tests which should be used to identify suitable future housing sites. Goostrey should be viewed as a suitable location for future residential development and sites adjacent to the settlement boundary should be assessed on their suitability and sustainability rather than being discounted purely on the basis of the restrictive Revised IPP. It is evident from the publication of the NPPF that the Government are very keen for sustainable development to be encouraged. Based on the</p>

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		<p>information above, and taking into account the significant shortfall in housing land supply across Cheshire East, sites adjacent to settlements such as Goostrey should be considered for future residential development as they would make a valid contribution to the Borough's housing land supply targets. In conclusion, whilst the addition of other locations for future residential development is supported in principle, it is considered that sites adjacent to other smaller settlements not identified in the Revised IPP should still be able to come forward. It is therefore requested that the Revised IPP is amended to reflect this, as sites adjacent to settlements such as Goostrey are well placed and suitable to make a valuable contribution to the shortfall in housing across the Borough and should be able to come forward. A proactive and positive approach to residential development across Cheshire East should be adopted that is based on the NPPF and its presumption in favour of sustainable development rather than being onerous and restrictive. Sites should be assessed on their deliverability and their realistic prospects of delivering residential development to assist in meeting the housing shortfall across the Borough.</p>
<b>RIPP101</b>		<p>The articulation of a revised policy is welcome and in particular point 3 is supported however, the restriction to sites of less than 1 hectare in size and no more than 30 net additional dwellings is not sustainable or deliverable in many cases. If the purpose of the interim policy is to help the LPA effectively manage the release of housing land in advance of the Local Plan then a realistic assessment of larger sites based on the criteria in point 3 would help to address the underlying causes of the lack of a demonstrable 5 year supply. Indeed, as Cheshire East needs to make up the shortfall with the additional 5% and probably 20% buffer in the short to medium term then good sustainable edge of settlement sites are essential to avoid ad hoc applications coming forward. The NPPF is clear that the supply of specific, developable sites should be for 6-10 years and 11-15 years. Without recognising that larger scale sites offering a phased release can address the undersupply there will continue to be challenges. The articulation of a revised policy is welcome and in particular point 3 is supported however, the restriction to sites of less than 1 hectare in size and no more than 30 net additional dwellings is not sustainable or deliverable in many cases. The policy needs to recognise that larger scale sites offering a phased release can address the undersupply in the short, medium and long term.</p>
<b>RIPP108</b>		<p>The aim of the interim policy is to set out locations where residential development will be acceptable should the Council be unable to demonstrate a five year supply of housing. The third category covers adjacent to the settlement boundary of Macclesfield and the nine Key Service Centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow) subject to meeting a number of criteria. It is our view that this category should be expanded or an additional category inserted to include other sustainable villages in the Borough. Saved Policy</p>

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	<p>PS5 of Congleton's Borough Local Plan (First Review 2005) identifies Holmes Chapel as a village in the open countryside. Paragraph 2.63 of the Local Plan states: These settlements provide a basic level of community services which are used by the local population, including those parishes surrounding them, and are expected to absorb the bulk of the housing and employment requirements for the rural areas. Development in these settlements is considered important to maintaining the viability of existing local services and facilities although the scale of development will be limited to that which is necessary to meet local needs. Holmes Chapel is a sustainable village with a good range of service and amenities, including a train station with services to Crewe and Manchester Piccadilly. It would be a good location for additional housing provision. Paragraph 14 of the National Planning Policy Framework (NPPF) states that: Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. The Council acknowledges that it is currently unable to demonstrate a five year supply of housing (latest assessment shows 3.94 years). In addition a 20 % buffer is required where there has been a record of persistent under delivery. In order to ensure that the Policy has the flexibility to respond to rapid changes as required by the NPPF, allowance should be made in the Interim Policy to enable residential development on the edge of Holmes Chapel, subject to compliance with the identified criteria. This is appropriate given the sustainability of the village, and accords with the approach set out in Congleton's Saved Policies. This is particularly important in light of the significant persistent under delivery of housing since 2008, which is identified in the Annual Monitoring Report for 2010-2011.</p>	

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RIPP110		<p>It is unclear why the policy position proposed allows the release of additional greenfield sites on the edge of Crewe. As can be seen in Table 5.1 of the SHMA market demand is least likely to be satisfied in the former Macclesfield area (74.2% of identified demand likely to be satisfied), followed by the former Congleton area (78.9%). Why therefore does the Interim Policy support the further release of greenfield land in Crewe, has over delivered on its five year housing target. The more practical approach for the Council would be to address the chronic shortfall of housing in Macclesfield and Congleton before allowing the further release of greenfield land for housing land in and the surrounding environment of Crewe where demand is currently being met. We make representations on the basis that the 35% affordable housing target does not have adequate regard for its impact on the viability, practicality and setting of housing developments as required by the NPPF, which states in paragraph 50, bullet point 3 that affordable housing policies "should be sufficiently flexible to take into account of changing market conditions over time". The added cost and/ or lower Gross Development Value (GDV) which results from significant proportions of affordable housing can tilt the balance of the viability of a residential development project. The decreased profit and increased risk involved becomes such that the project is not worth embarking on or at the very least affects land prices. Accordingly, expecting investors to accept a lower level of profit to accommodate the full range of policy and planning gain requirement is unrealistic and would serve to stifle housing development, an approach that cannot be seen to be sustainable since the 2008 economic and housing downturn. The mix of affordable and private housing often has a negative effect on the desirability of private homes and consequently their sale price. Whilst the integration of affordable and private homes may encourage a more inclusive society it is likely to have a significant negative affect on the value of upper market residential development schemes. Furthermore it may not always be appropriate for sites to accommodate a substantial element of affordable housing for a variety of reasons including sustainability of the development itself and the socio-economic welfare of the affordable component occupants. For some market schemes it may be unwise and unfair to place the affordable element in the same location if for example they were remote from local services and forced to be reliant upon private transport. Government guidance in the form of the NPPF has actively and rightly advocated the reuse of brownfield sites prior to the use of greenfield sites. This has further implications for the viability of affordable housing requirements. The costs of the redevelopment of brownfield sites are proportionally higher than greenfield sites, to expect the developer to both meet 35% affordable housing requirements and brunt the cost of remediating brownfield land ready for development is unreasonable and will see further development on greenfield sites coming forward. Consequently an open-minded approach is</p>

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	<p>necessary from all parties involved, this includes planners, purchases, developers and perhaps most importantly, Councils who need to understand not only the socio-economic integration but the financial consequence of their stipulations. Indeed a more pragmatic approach would be to only insist upon such affordable housing requirements when it is the best use of the opportunities available. Whilst, it is understandable that affordable housing is an integral aspect of the UK property market especially with today house prices, the stipulation that over a third of all new development should be affordable housing is unrealistic and will stifle development. The Council should look at the requirement of affordable housing on a case by case basis and not look to be overly prescriptive in its stipulations. The planning system is after all meant to facilitate development. The prohibition on the redevelopment of green belt land cited in the Revised Interim Planning Policy Release of Housing Land is contrary to advice contained within the NPPF and will prevent further housing development being directed towards brownfield land. In view of this, paragraph 89 of the NPPF states that:"A local planning authority should regard the construction of buildings as inappropriate in Green Belt. Exceptions to this are: -...limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development". Therefore Cheshire East Council should look to introduce a caveat into green belt policy that still protects the green belt but allows development on previously developed land in 'very special circumstances'. Furthermore the extensive Green Belt that surrounds the Macclesfield area will inhibit the ability of the former Districts to meet its housing demand. As a result it is felt that through the introduction of a caveat into Green Belt Policy, the Green Belt can sustainably contribute to housing demand in Cheshire East with no further impact on their openness and permanence.</p>	



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RIPP112	<p>It is clearly acknowledged within the revised Interim Planning Policy that the Council have a significant shortfall in their 5 year housing supply, calculated at 3.94 years as at 1 April 2011 and through this policy document recognised that further sites outside the settlement boundaries and within employment sites need to be released for housing, which is fully supported. In accordance with the provisions of the NPPF it is important that the IPP allows for greater flexibility for alternative uses on existing employment sites where it is demonstrated that there is no reasonable prospect of the site being used for that purpose, rather than still insisting that employment must come forward alongside any proposed housing on these sites. This approach is onerous and non compliant with the provisions of the NPPF. In deciding whether there is a reasonable prospect for a site to come forward, due consideration should be given to the costs involved in developing sites and their ability to be developed viably.</p>
RIPP113	<p>Similarly, in relation to the Interim Planning Policy on the Release of Housing Land, the Society would highlight the criteria which state that: - Residential development should not be within the Green Belt or Green Gap - Developments should include a minimum of 30% affordable housing. - Developments will not impact on European sites of nature conservation areas.</p>
RIPP114	<p>The Town Planning Company consider there to be limitations to this proposed new policy, if you could register these concerns and consider these comments when adopting any revised policy on the release of housing land we could be grateful. 1. Land Use Swap What if housing proposals are put forward as part of a wider land use swap? There could be benefits in allowing provisions to bring forward brownfield land for housing development if the existing use is relocated elsewhere within the same district but on a more appropriate site. This may be useful for unallocated employment or community sites. This principle forms a core part of the NPPF (2012) and adopted local planning policies, which vies for more flexibility in the planning system. This could allow more appropriate sites to come forward both for community benefits and the economic needs of business. On the other hand, there are many longstanding community use and employment land sites which may be better suited to the provision of housing land. 2. Eradicate the Blanket No Development In Greenbelt Proviso. There are undoubtedly exceptions to the release of green belt land for housing development, not only because of pressure to allow for new growth and limited resources on brownfield land, but, there are green field sites that may be deemed appropriate, or green belt sites that are not strictly green field, therefore the impact of a proposed development may pose an opportunity to improve on what already exists on the site in terms of height, scale and massing. Exceptions to the construction of new buildings in Green Belt are openly listed in paragraph 89 of the NPPF (2012), as loss of green belt may be considered appropriate for: i, limited infilling in villages, and limited affordable housing for local community needs</p>

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	<p>under policies set out in the Local Plan; or i, limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. The 'no building on green belt/green gap' blanket policy comes across as inflexible, as there is a high proportion of brown field land in green belt which, if considered for redevelopment could be seen as an opportunity as opposed to a threat, so long as the proposed can be proven issue less of an impact. This policy restriction should be lifted to allow for a more flexible approach, where assessments are made on the basis of independent circumstance. 3. Sites Identified as Appropriate/Inappropriate via The SHLAA and Pre-planning Partnership Working SHLAA representations should have a bearing on a site's appropriateness for housing development, as this can offer proof of formal pre-application liaison. If a site is not considered appropriate, this should be expressed appropriately as to why and, provisions should be made to discuss how any restrictions may be overcome in a sensible way. Perhaps local group support, especially in the light of the new community lead planning system, could help to convince planners of the benefit of releasing sites they consider to be highly inappropriate (must allow the consideration of what local communities want, even if it is not in line with the academic views of planning policy).</p>
RIPP118	<p>In the first instance the Council's proactive approach through the introduction of this extended IPP measure is commended and supported. In particular the allowance for additional windfall sites to be promoted in other areas outside the settlement of Crewe. However unless the policy is robust and defensible it will not do justice to its purpose, this is the focus of these Representations. - Adjacent to the settlement boundary of Macclesfield and the nine Key Service Centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow), provided the applicant can demonstrate that the site meets all of the following criteria: In principle there is support for the inclusion of additional areas that are deemed suitable of delivering residential development. However objection is raised to only allowing development on the edge of the Key Service Centres this inadvertently advocates that other areas of the Borough are unsustainable and unable to accommodate any growth which is a considerable oversight by the Authority. There are a number of large villages which offer excellent facilities and services that could accommodate moderate growth, one such village is Willaston located within excellent proximity for both Crewe and Nantwich. The villages should not be deprived of investment and should provide an appropriate level of development to encourage young families to remain in the area. To do this however there needs to be an acceptance in policy and in development management that village settlements need to evolve. This in turn is vitally important in</p>

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	<p>safeguarding local services and improving the local economy, it is in reality only large developments that can aid this rather than piecemeal small scale developments. The promotion of sustainable development on the edge of village such as Willaston will support local needs and services allowing for moderate growth of the village and allowing it to continue to thrive and provide for the daily needs of its existing residents.</p> <p>- The Site is not within the Green Belt or the Green Gap Whilst the importance of such sites is acknowledged, in many instances and with particular regard to the Green Gap sites, these can often be in sustainable locations and be just as suitable for development as those sites adjacent to the built-up framework. Rather than adopting a blanket approach that excludes all Green Belt and Green Gap sites from the policy permitting residential development, it is suggested the policy is amended to allow assessment of Green Gap sites, on a site by site basis. This would reveal whether such sites are in fact sustainable and suitable and therefore indeed developable for residential development and would represent a deliverable option to assist in meeting the Boroughs shortfall in housing delivery.</p> <p>- Is very closely related to the existing built framework of the settlement Connections and linkages with facilities within a settlement are important in assessing the sustainability of a site for future residential development alongside a good relationship with existing development- this is supported.</p> <p>- Is self contained within clear defensible boundaries This requirement is more akin with reference to Green Belt sites and it should not be necessary for sites outside of the Green Belt to have to be surrounded by defensible boundaries as they are not allocated to function in the same manner as Green Belt sites. Sites should be allowed to create such boundaries through masterplanning if considered necessary. This should be amended to reflect this.</p> <p>- Is accessible by walking to a wide range of local services The allocation of settlements as Key Service Centres implies that there are sufficient facilities to meet existing demand from local residents and also to cater for additional future residents. Whilst it is important that sites are sustainable and future residents can easily access a range of services and facilities, it is considered too restrictive to set out strict distances to a prescribed list of facilities. Sites will differ on their level of sustainability and whilst not all are within walking distance of a significant amount of services they may be in close proximity to a good public transport network which would allow easy access to facilities. Sites need to be considered in the wider context and not just assessed solely on the walking</p>

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	<p>distance from a predetermined list of facilities. Yet as addressed above other settlements such as large villages such for example Willaston good facilities that can be accessed through modes other than private transport and these villages have well located parcels of land can be accessed by walking. - Is capable of being fully developed within 5 years of the granting of full or outline planning permission This is supported. The intention of the interim policy to support and encourage the release of housing land to meet an identified short term deficiency in land supply and the ability for the land to be developed within 5 years thus should require developments to physically deliver. -Provides homes that improve the overall choice, quality and supply of housing within the relevant town This is supported and is inline with the objectives of NPPF.</p> <p>- Is less than 1 hectare in size or has the capacity for no more than 30 net additional dwellings This is not supported. This conflicts with what the IPP is seeking to achieve i.e. contribute and ultimately meet the Boroughs 5 year housing land supply. Imposing restrictions such as this does not demonstrate efforts to positively seek opportunities to meet the development needs and therefore is contrary to the objectives of the NPPF. These restrictions are also contradictory with the background information outlined in the earlier chapters of the Revised IPP; paragraph 2.18 of the Revised IPP states the lack of a 5 year supply of deliverable housing sites means that the Council should continue to take proactive steps to manage the situation. It is considered that placing onerous restrictions on the size of site and density of development that will be permitted to address the shortfall of the 5 year housing supply are not proactive steps. Small sites with development density restrictions are often not attractive to investors or developers and the interim policy could in turn have a negative effect resulting in few additional sites being promoted. The sweeping statement made in paragraph 2.23 of the Revised IPP can also be questioned, with the assertion that small sites can be developed quickly and without major infrastructure requirements. The infrastructure requirements of a site should not be viewed as a reason for refusing development, as it is possible to mitigate and legally enforce that necessary improvements are made. Paragraph 203 of the NPPF highlights that LPAs should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. There are therefore national and legal mechanisms in place that would remove any problems of larger sites requiring infrastructure improvements and should not be considered as a reason for deterring and prohibiting larger sites coming forward. A frequent complaint and concern by Members raised at Planning Committee is piecemeal development that doesn't have good linkages and does not represent the delivery of a comprehensive scheme and also the limited benefits to the local area. Allowing only small sites to come forward has the potential to increase piecemeal</p>

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	<p>development with small pockets of housing being widely dispersed. In addition, small sites are unlikely and in most cases unable to generate significant benefits to the local community. For example, the amount of affordable housing generated by a scheme of 30 houses is minimal and unlikely to make a notable contribution to the shortage of affordable units. -That the density of the site is appropriate to its location and is no less than 20 dwellings per hectare Density is a matter that should be considered on a site by site basis and this is often dependant upon site constraints and indeed influenced by the market. This should be removed from the interim policy.</p> <p>- Does not represent the subdivision of a larger site No comment.</p> <p>- That it will not pre-empt or prejudice the future scale and direction of development within the individual town No comment.</p>
RIPP123	<p>This representation specifically relates to point 2 of the draft policy which identifies residential development will be permitted in the following locations: As part of mixed developments in town centres and regeneration areas to support the provision of employment, town centre and community uses No clarity is provided to detail what constitutes a regeneration area, however the justification at Paragraph 2.14 (when referring to the original IPP) makes reference to the fact that housing can come forward as part of mixed use redevelopment schemes within settlements to support the development of the site for employment, town centres and or other uses. Paragraph 2.17 confirms that the draft Revised Interim Planning Policy will also continue to allow for mixed use developments in other settlements (outside Crewe) in the Borough. The NPPF is clear at Paragraph 22 that in instances where there is no reasonable prospect of a site being used for its employment allocation policies should avoid long term protection. It also identifies that applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Given that the IPP engages only when the Council cannot demonstrate a 5 year supply of housing, when there is clearly by this fact an urgent need, the IPP is overly restrictive. The policy should allow for allocated employment sites, where it can be demonstrated that they would best serve alternative uses, to be released in their entirety for housing. Any requirement to maintain an element for employment, or indeed any other additional use, could prejudice much needed residential delivery. The Council is therefore urged to be more positive, in the spirit of the NPPF, to encourage the delivery of housing. Point 2 of the draft IPP should therefore be redrafted to reflect this.</p>



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<b>RIPP124</b>	Ref: 3.3 page 9/10 note 2 - Whilst you have appeared to adopt distance parameters of Housing Association standards you will recall that the usual planning requirement for distance of available services is 1.6km. Bearing in mind that items like amenity areas and post box's whilst ideal are in reality few and far between and 500m is not realistic.
<b>RIPP144</b>	<p>In accepting that this level of development may not be sufficient, new housing should be of mixed tenure, affordable and for rent. 'Affordable' should be based on the average income within Cheshire East and reflect real incomes. As a result, in order to meet the estimated needs of population growth and change within Handforth, CEC should before seeking to use 'greenfield' sites consider alternatives in expanding their housing land availability assessment:</p> <ul style="list-style-type: none"> <li>- The possibility of existing property being converted into apartments.</li> <li>- The creation of new property on existing housing footprints by subdivision.</li> <li>- Existing property usage such as surplus office space within Handforth should be considered for refurbishment and conversion to homes before any Green Field/Green Belt land is considered.</li> <li>- Brownfield sites should be used for housing before any Green Field/Green Gap/Belt land is considered.</li> <li>- Land bank held by supermarket for future development should also be considered for compulsory purchase rather than being left fallow for years on end.</li> <li>- Current social housing allocations should seek to assist the long term needs of families.</li> <li>- Abuses of the housing system should be stopped wherever possible.</li> <li>- A high proportion of homes should be for rent or affordable prices.</li> <li>- Aggressively pursuing empty homes for compulsory purchase.</li> <li>- Landlords and potential landlords should be encouraged to let property that is left empty rather than being for sale without buyers.</li> <li>- Local opposition to building developments should be paramount in the decision making process but not at the expense of other areas.</li> </ul>
<b>RIPP145</b>	<p>3. KCHG notes the draft criteria proposed by CEC for the permitting of residential development adjacent to settlement boundaries. KCHG recommends that CEC considers whether residential development adjacent to settlement boundaries should be permitted, in addition to satisfying the criteria listed, only after sequential consideration of town centre sites (and of town centre properties through adaptation) and other sites within existing settlement boundaries. Perhaps more than at sites adjacent to settlement boundaries, potential residential development within town centres and at other sites within settlement boundaries appears to accord in principle with the NPPF's emphasis on sustainable development.</p> <p>4. The alternative use of sites and buildings which are significant in their location might be facilitated by the preparation by CEC of</p>



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	<p>planning briefs for those sites and buildings. This reiterates KCHG's 27 April 2012 comment in response to CEC's SHLAA update. The point is relevant in helping deliver housing, and also in the references in the NPPF and CEC's policy document to Planning being "A creative exercise in finding ways to enhance and improve communities", "Proactively driving and supporting sustainable economic development" and .. "promoting the vitality of our main urban areas". Preparation of planning briefs for sites has a role in the 'creative exercise', 'proactive Planning' and 'promoting urban vitality'.</p> <p>5. It is suggested the CEC reference (section 3.4) to "average market conditions "may be capable of alternative interpretation and therefore may be unenforceable.</p> <p>6. It is suggested the reference (section 3.7) to Conservation Areas and Listed Buildings is amended to read: ... "Listed Buildings. Any residential development scheme or mixed development scheme including residential use should seek to retain and as necessary convert existing buildings in these areas.</p>	

**Other comments - Please provide any other comments on the Revised Interim Planning Policy on the Release of Housing Land. Please indicate the paragraph number that any specific comments relate to.**

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<b>RIPP3</b>	There seems to be no reference to brownfield sites. I would like to have seen a continuation of the policy to encourage re-development of brownfield sites before all this proposed concreting of valuable farming land.
<b>RIPP4</b>	In the event that application is made by a developer [edited by admin] to develop land at Lostock Hall Farm Poynton for houses care, should be taken to prevent access to such land via Lostock Hall Road. The developer's [edited by admin] attempt to lay claim to land fronting 24 Lostock Hall Road to enable him to bring into play an access road of sufficient width was the subject of litigation in the High Court and subsequently the Court of Appeal over a period in excess of 10 years when the Courts made an Order that he had no claim on the land which was to be preserved for the current owner on the terms defined in an Order registered at H M Land Registry.
<b>RIPP5</b>	Page 11. 3.2 is simply repetition. 3.4 "For sites that will require a longer period for development permission will only be granted for the first phase". This contradicts the earlier point that sites cannot be subdivided. In effect, this would allow for subdivision of plots and part development and consistently expanding development. 3.5 - see earlier comments on affordable housing. 3.5 If developments are small and modest then it is hard to see how "open space and community developments" are required. "They will also be required to contribute towards the improvements to the strategic and local transport networks and public transport". Again it is hard to see how "small" and "modest" developments would require this. By saying that they must contribute to these then you have effectively removed one of the "adverse impacts" which might have led to the refusal of the development 3.6 Again this gives a carte blanche for development opportunities within a town centre.
<b>RIPP6</b>	Please see above. Will we also be consulted when you are preparing specific housing action? Are the private sector housing schemes that have faltered or failed going to be included in this policy document? ( I am particularly thinking about the flats near to the Morrison's supermarket.)
<b>RIPP7</b>	It is likely that our communities will come under significant challenge from economic and climate changes in the future. Whatever we do, we should consider making the communities more self reliant and able to cope with the challenges.
<b>RIPP9</b>	If one of the principles of this policy is no building on green belt land, why have Wilmslow Town Council been able to include proposals for green belt building in their town plan which is open to consultation currently?
<b>RIPP10</b>	An interim policy is needed to prevent speculative planning applications. However, the policy will only be effective if planning officers and committees are willing to defend the policy by rejecting applications that do not meet the criteria. The definition of sustainable is far too weak. The NW Sustainability Checklist could be used in its entirety (i.e. ALL criteria had to be met, not just 5). I have suggested a compromise. It should also be made clear in the policy that a marginal failure of a parameter in the Checklist is a failure, not a pass.
<b>RIPP15</b>	I was hoping to see details of proposed sites. I thought the whole document very "wordy", too detailed, time consuming, and difficult to get through.
<b>RIPP16</b>	Central government policy, which is essentially a top down approach, creates an unenviable position for both officials and elected members in terms of their accountability to local communities.

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RIPP17	Wilmslow DOES NOT need any more houses there are plenty on the market now (both high end and affordable). There has already been far too much housing development in Wilmslow. Cannot comment on the remainder of Cheshire East.
RIPP18	Section E - land off Welton Rd Wilmslow I believe this to be unacceptable use of green belt land which will spoil the character of the area. The use of green belt will change Wilmslow into Manchester overspill. It will put undue strain on the infrastructure. Roads are already busy and the secondary school cannot take any more pupils. Any further expansion of the school would make it way too big - it already has 2500 pupils. The primary schools are also big enough. Wilmslow is the town it is because of it's size and greenery. It should not be expanded.
RIPP20	I don't think this document will provide any improvement to people's lives or the general well-being of towns and villages in Cheshire East.
RIPP22	Any brown field, derelict or long term empty buildings, old factory or industrial sites should be used for housing land.
RIPP23	We desperately NEED a Brownfield v's Greenfield Sequential Test to ensure that our brownfield sites (and stalled developments) are developed prior to the destruction of greenfield land. The present system is not working, with real life Cheshire East examples of where greenfield has been built upon where brownfield sites have been trying to gain development for years! This is particularly important given this documents importance of sites that are developable within 5 years - developers WILL try and argue that brownfield sites are undevelopable within 5 years due to contamination etc...which is simply untrue!!
RIPP26	I would expect that some areas higher density 3/4 story buildings for affordable renting near town centres or industrial estates would be a requirement so how does this fit with overall housing density?
RIPP27	Don't let the presence of bats and/or crested newts prevent approval of otherwise approvable schemes!
RIPP28	When considering Density, it will be critical to look at other Density variable, not just minimum of 20 houses per hectare. See <a href="http://imagination.lancs.ac.uk/outcomes/Little_Book_Density">http://imagination.lancs.ac.uk/outcomes/Little_Book_Density</a>
RIPP30	How on earth can you expect to secure popular support for a policy that is based on outdated demand figures that have no basis in local need? I would happily support a policy that is based on a rigorous assessment of local need (which is required by para 111 of the NPPF), but this clearly isn't. And it is not necessary to have to wait for the adoption of the Local Plan (apparently some 18 months away!!) for this analysis to be done. It should be done now.
RIPP39	I'm not against development and feel the Council are missing an option. Self Build, why not offer small parcels of land up to 10 houses of distinctive design, you will attract free thinkers to the towns with lots of money and no doubt work too, look at channel 4 grand designs it really would lift the profile of the area.
RIPP42	Cheshire East do not have a history of consistently implemented the core principles of the NPPF, as they have failing to address a number of elements such as giving people the power to shape their surroundings, sustainable infrastructure (roads, school places, post offices etc), recognising the intrinsic beauty of the countryside, conserving the natural environment, encouraging the effective use of land by reusing brownfield land, improving health, social and cultural wellbeing resulting in a lack of trust that the wording of the interim strategy will be interpreted in the right way

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<b>RIPP43</b>	<p>The policy lacks robustness when it comes to protecting vulnerable areas of land which do not have national designations, particularly important open spaces in built up areas and undesignated countryside. Even where land has the national designation of Green Belt, it is apparent that this is not valued as it should be by Cheshire East Council who are seriously considering a Green Belt review. It is also interesting to note that the Sustainability Appraisal for this document does not contain any mention of Green Belt anywhere. The policy is wholly unsatisfactory as drafted and needs to be re-worded to ensure that potential developers are obliged to show that, in the first instance, they have sought and exhausted all possible brownfield sites. Sequential land use should be a basic requirement and it should also be easier for more land currently allocated for employment use to be released for housing and mixed use in line with the ruling by the RSS panel. In addition, there needs to be a requirement that developers take note of adopted Village Design Statements and Supplementary Planning Document where they apply and are still current. The policy requires significant redrafting before we can give it our support. Finally, we would hope that future Cheshire East housing policies would carry across the key housing policy in the current Cheshire East Housing Strategy Document Moving Forward 2011-2016. Policy HOU.1.1 says: Utilise our land assets to maximise new housing delivery by:</p> <ul style="list-style-type: none"> <li>• Looking into the potential to set up delivery vehicles to focus on the regeneration of sites in Cheshire East and develop market and affordable housing;</li> <li>• Utilise or land for the development of affordable housing to achieve maximum provision and return, enabling the Council to recycle any future return in the provision of more affordable housing;</li> <li>• Exploring opportunities to work sub regionally, in conjunction with the HCA, to maximise leverage for use of publicly owned land to achieve new affordable housing across the sub region (Page 19)</li> </ul> <p>The first bullet quoted above should apply to allocated employment land. The third bullet quoted above about operating on a sub-regional basis is very important. Greater Manchester has high growth expectations and commitments. It is normal practice for local authorities to accept some housing for adjoining local authorities. We would like to think that Cheshire East is having detailed discussions most particularly with Greater Manchester, but also with Stoke in respect of housing numbers.</p>
<b>RIPP45</b>	<p>I agree with comments that brownfield land should receive precedence over greenfield land. I agree with comments that the forecast requirement for new homes is too high in some areas where a lot of new homes have already been built in the last 20 years. I agree with the comments that self-build housing needs to be facilitated by the allocation of serviced sites, particularly as a portion of a larger development.</p>
<b>RIPP46</b>	<p>The policy, if it chose to, could build on what appears in the National Planning Policy Framework (NPPF). It could make commitments with regards to protecting important open spaces in built up areas, the wider countryside and the setting of towns. The people of Macclesfield value highly the Green Belt and the undesignated countryside that surrounds it. Macc2020 are alarmed to note that the Sustainability Appraisal for the Revised Interim Planning Policy on the Release of Housing Land does not appear to mention the Green Belt. The policy should be re-drafted to ensure that brownfield sites are used before greenfield sites.</p>

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<b>RIPP48</b>	<p>I believe we should take a longer look at the options available within the existing Settlement Zone Line and not take the easy option of sticking "small sustainable sites on the edge of other towns in the Borough". The redevelopment of small sites and old mills should be regarded as the only option until those sites are exhausted. I know this will not please the developers who would love to get their hands on a juicy piece of greenfield site. It may not please you the planners either but in my opinion it is your duty for the current residents and the generations that follow to preserve our greenfield sites until ALL alternatives are taken up. Often the brownfield sites are not apparent at the beginning of a long term plan but history shows that they become available during the life of that plan - Polarcold, Bossons, Composition Billiard Ball etc. We should budget that the sites arising will not always be visible but will become available.</p>
<b>RIPP57</b>	<p>Paragraph 3.5 : The release of greenfield sites should not be considered as "exceptional development" because the Council's failure to be able to demonstrate a deliverable 5 year housing land supply means that existing Development Plan policies for housing release are out-of-date and therefore applications for housing development should be favourably determined in accordance with Paragraph 14 of the NPPF. This does not give any credence to the assertion made by the Council that the proper consideration of proposals within the context of Paragraph 14 should be treated any differently from housing proposals which may be determined in accordance with existing development plan policies. Policies affecting the delivery of housing land where there is a 5 year housing land supply shortfall are all out-of-date and the IPP cannot override the requirements of the NPPF. The NPPF policies on housing land release including those on viability and affordable housing provide the appropriate framework within which applications should be determined and therefore neither the IPP as a policy document nor the policies contained therein, can be used to override the policies in the NPPF. As such the requirement for greenfield sites to be determined in accordance with the IPP policy to deliver 35% affordable housing in accordance with policies in the IPP on Affordable Housing, is unreasonable as policies in the IPP on Affordable Housing are out-of-date and cannot override the policies in the NPPF.</p>

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<b>RIPP56</b>	<p>Para. 2.10 - How can 1,150 houses per annum be justified ? What is the demand assessment? Approximately 5 years ago, there was a moratorium on all new housing and the Council indicated that there was an over supply of housing land in the North West. I know that parts of Cheshire East were included within this strategy and have first hand experience of discussions with the planning authority ( I was employed at a senior level in the housebuilding industry in this area for 35 years). As we have been in recession since that time, how has the position regarding supply and need changed so radically?. if there was a supply sufficient for 3.94 years in April. 2011, why the need for such dramatic new housing numbers now. Section 3 - Criteria for the release of land. I do not believe that the sites identified for future housing can satisfy the need to be "closely related to an existing framework or settlement". I note the suggested distance to shops, schools etc. and these will not be sustainable. In addition, many of the schools in Congleton are over subscribed already I further note that small sites of less than 1 hectare should be developed to an average density of 20 dwellings per Hectare. This equates to 50 per acre and is I believe totally excessive. I assume that this yardstick will result in many more town houses and apartments the demand for which is questionable. It is family housing, if anything that is needed. Past design standards imposed upon developers have resulted in tenement narrow estate roads are littered with cars in the evenings and week-ends and families with young children cannot, I believe, select 3 storey town houses out of choice.</p>
<b>RIPP61</b>	<p>Must try and plan development not merely be at the whim of developers and landowners who are seeking a quick profit - think of the residents for a change.</p>
<b>RIPP63</b>	<p>All of this is meaningless unless Cheshire East is prepared to actually make decisions based on the policy. We have already seen planning officers recommending permission be granted for developments which did not come close to meeting the current Interim policy. There are many more such applications in the pipeline. Now is the time for Cheshire East to draw a line in the sand and take proactive action to preserve the essential local character of our market towns.</p>
<b>RIPP91</b>	<p>Councillors expressed concern about the lack of communication between those CE officers involved in the current consultation on public transport subsidies, and those involved in your consultation, given the importance of the link between potential housing locations and access to regular and reliable public transport. Poynton is already poorly served by public transport, and this will be further exacerbated if there is a reduction or removal of certain bus services as a result of the public transport consultation.</p>
<b>RIPP103</b>	<p>The current Paper confirms that the Council only have 3.94 years of supply as opposed to the five year requirement that local planning authorities (LPA) are required to plan for as set out in the National Planning Policy Framework at paragraph 47. Guidance in the NPPF requires that LPAs should identify and update annually a supply of specific deliverable sites to provide five years worth of housing against their housing requirements with an additional 5% buffer to ensure choice and competition in the market for land. The Interim Policy is clearly seeking to help boost the supply of housing so that the LPA can demonstrate a deliverable 5 year supply of housing. Whilst we welcome the Council's intention that a more flexible and responsive policy needs to be adopted in advance of the adoption of the Core Strategy so that there may be sites that could come forward for development, we do not believe that the Policy goes far enough.</p>



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<b>RIPP119</b>	Notwithstanding our comments concerning the limited weight of the IPP, particularly within the context of the NPPF, our client's site fully accords with the existing and proposed IPP. The site is located adjacent to the settlement boundary of Crewe, and is not within the Green Gap. Furthermore, this site: - is well related to the built framework of the settlement, in that it is adjacent to the settlement to the north, and bound by residential development to the south and an employment allocation to the east; - is not within an allocated employment area; - is not within an area safeguarded for the operational needs of Leighton Hospital; - is capable of being fully developed within five years of the granting of outline planning permission; - would deliver development that improves the supply, choice and quality of housing in Crewe; and - would support the delivery of the Council's overall vision and objectives for Crewe. In line with the IPP, the proposed development, which has been recently re-submitted would provide: - 35% affordable housing; - 0.76 ha of open space, including a LEAP; - improvement to the strategic and local highway network, public transport, and pedestrian and cycle routes; and - a high quality designed development.
<b>RIPP126</b>	The consultation period has been unjustifiably truncated and it is probable that the responses to this document will be few and far between.
<b>RIPP106</b>	Brereton Parish Council welcomes Cheshire East's actions to increase the release of housing land whilst focusing the priority for this in the stated Key Service Centres within the region. We particularly welcome a proactive policy approach to planning determination and hence limit any presumption in favour of sustainable development that may arise through uncontrolled determinations. As you will be aware through Brereton Parish Council's input to the Local Plan through the Rural Issues feedback, we are very focussed on preserving and maintaining our rural environment and mainstay industry of agriculture. We do not have any local desire to support development outside the existing settlement boundaries of Brereton.
<b>RIPP73</b>	<p>Much could be done to improve previous performance and here are a few suggestions.</p> <p>1) Conservation areas. Congleton has in the past refused to support or implement article 4.2 restrictions to planning development. The authority does not seem to value the importance of original detailing such as windows, glass and doors. Details such as these are vitally important to the visual quality of a period building and have in the majority of cases, been dismissed by planners as unimportant. Article 4.2 directives therefore should be implemented.</p> <p>2) Planning Committee. All members need some basic training in Heritage Conservation, and Urban design. Our officers still seem to be influenced by the movement towards modernism, which did much to destroy the character, and quality of our town centres, such as Stockport and Congleton's own Bridestones Centre. Basic Training for members (and officers) would give them the tools to make their important decisions, which they currently lack.</p> <p>3) Urban design. In recent years the occasional attempt has been made to bring in an Urban design team to help plan the future development of our Towns. Quality urban design is vital if we are to save what is left of our individual character and uniqueness, as they say our own sense of place. Currently the shape and design of our towns is developer lead, to the great detriment of our towns. Developers should not be allowed such reign over how our towns develop. The proposed new Congleton town centre redevelopment, lack any real public input and is in my opinion the next eyesore to be visited on our town, due, as said above, by developers being allowed to dictate the shape of Congleton. We need a town plan that is not Developer lead and is based on our Heritage and sense of place.</p> <p>4) Change of Use. Congleton, like other towns, is fast losing its major industrial mills.</p>

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These form a major part of our history, and yet with the blessing of our planning department are being swept away before our eyes. As with point 3 above, the developers are given apparent free reign in their abuse of these historic buildings. As part of the development process, change of use, has to be applied for. This should not be given so readily. Of course a developer will say that a property is unviable in its usage, but usually this is due to the developer asking an unrealistic price for occupancy. If a developer knew that the council would not grant change of use easily they would think twice about buying a property and this would also keep the price paid down to a more realistic level. Change of use must pass much more stringent tests, and should not be allowed as easily as it is now.

5) Mixed usage. When a site is declared as Mixed usage it usually means that the developer wants to change from an employment use to one based on housing. There may be cases for this, but as can be seen by most schemes, mixed usage is allowed for 95% housing with a derisory and unsustainable one or two units of commercial use. This is not mixed usage, in any recognisable sense. See Old Mill site in Congleton or Congleton Warf development. Mixed Use Should mean what it says and have a much greater percentage of non-residential units included.

6) Mixed usage. When such an order is made it often includes the offer of restoring an existing building as part of a larger scheme. The developer will then build all the new units and either leave the old building till the end, or even worse sell it on and leave it empty. Example here Bossons old Mill. Part of the planning deal should be the insistence that the heritage building is restored first, before the more lucrative new-build is begun. This may involve more costs, but will be reflected in the price initially paid for the site. Restoration of any Heritage units before rest of site is developed.

7) Vacant property. All too often an owner will leave a period building, such as an old mill, open to the elements and often with rubbish, such as cardboard boxes strewn within. This leads to the inevitable vandalism and arson attacks that we have seen on many of our mill buildings in Congleton, which then leads to calls for their demolition on safety grounds. Anyone wishing to develop such a building should be advised to install basic alarm systems and fire and security measures, or failing this any application for redevelopment of the site would likely be refused. Inbuilt protection for large empty properties.

8) Buildings of Local Importance. After years of putting this on the back self, Congleton has such a list, but does anyone take notice of it? Mossley House was put on such a list, after it was demolished! More importance needs to be given to the views of local people on which buildings hold important to their sense of place. Also Congleton Listing list is out of date and badly needs updating. More protection for non-listed buildings of local importance and updating of Listing.

9) Highways. This department does not seem to work with any regard to Heritage importance within Congleton. The many crash barriers strewn throughout the town do nothing to the streetscape and little to help safety. I would say examples are the barriers on Town Bridge, and those around Mountbatten way and Lawton St Traffic Lights. More consultation needs to be included in planning measures by this department. Heritage involvement in Highways streetscape design. Local input into these matters is of great importance to the development of our towns, however it has been my experience that even if local views are asked for they are invariably ignored. The legacy of this can be seen in the poor planning decisions that have been taken in Congleton over the last 30 years in which I have been involved with planning issues. The system itself is very confusing to the non-planning professional, and this is a major reason why so few members of the public feel able to contribute to this debate,

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	in the manner required by the planning authority.
<b>RIPP78</b>	<p>As proposed, it makes sense to permit sustainable small sites on the edges of towns other than Crewe. However, the potential danger with this approach is that developers seeking to develop large sites already in the SHLAA could submit a planning application for a much smaller site initially, after which subsequent planning applications could come forward for extensions, either a single extension or multiple extensions with the resultant effect that the larger site is ultimately developed incrementally over time. For example, Muller Property Group wishes to secure the allocation of 100 acres of greenfield land in Stapeley ('Nantwich South') for housing development. If this policy is not worded appropriately, Muller could submit a planning application in the interim, prior to the adoption of the Cheshire East Local Plan for, say, a 5 acre housing development and then submit extensions for further development in the future, bringing about the ultimate development of the entire 100 acres. I object to any Revised Interim Planning Policy for the Release of Housing Land (Revised IPP) that would make this possible. In conclusion, therefore, there must be appropriate mechanisms within the Revised IPP to ensure that the above scenario (using 'Nantwich South' as an example) would not be possible.</p>
<b>RIPP84</b>	<p>It is the case that the Council has a significant 5 year housing land supply shortfall and the extent of this severity is indicated by the fact that the Council acknowledge (Report to SPB pursuant to planning application 11/3414C) that the 20% buffer identifies in paragraph 47 of NPPF should apply to Cheshire East. In this context, the Council should simply look to support sustainable development proposals for housing and which are able to fulfil the requirements of NPPF given that the Council has a 5 year housing land shortfall, the policies of any operative Development Plan in Cheshire East relating to the provision of housing must be regarded as being out of date in accordance with the advice at paragraph 49 of NPPF. In this context, we consider it inappropriate for the Council to attempt to supplant the out of date policies of any development with an informal document which has not been the subject of independent scrutiny and which does not rely on an objectively assessed evidence base. Accordingly, we strongly object to the attempt to introduce an Interim Policy Statement on the supply of housing. Notwithstanding our in principle position, should the Council decide to adopt the document we have a number of detailed observations to make about the content of the draft RIPP. Before setting out our comments we first examine the relevant National Planning Policy Framework document (NPPF) which was published in March 2012 and which we consider should form the basis of any emerging Development Plan development management control document. The thrust of NPPF is to create a planning framework across the country which seeks to ensure that the planning system delivers sustainable development and economic regeneration. The Ministerial Foreword to the document makes it clear that the Government anticipates the delivery of growth and that when it refers to 'development' it is clearly acknowledging that growth must take place. Furthermore, as again is made clear in the Ministerial Foreword, the planning system should seek to achieve sustainable development without delay. There should be a presumption in favour of sustainable development and this should be the basis for every plan and every planning decision. Thus, the intention of the National Planning Policy Framework is to create a positive approach to planning and to ensure that the planning system delivers sustainable development in a timely fashion. In this context the economic, social (which includes the delivery of housing) and environmental roles of sustainable development are to be progressed in tandem. Although the</p>

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Development Plan should still be the starting point for decision making it is clear that any Development Plan must be formulated in such a way that it reflects the positive principles and objectives set out in NPPF (see for example, paragraph 14 of NPPF). It is not the intention of this representation to explore the basis of the formulation of the emerging Core Strategy, and the subsequent Site Allocations Development Plan documents for Cheshire East but we believe it is important to note that the objectives of these documents should be reflected in any document which the Council intends to use for development management purposes in order to ensure the delivery of an adequate supply of landfall housing. It is clear that local planning authorities must ensure that they 'boost significantly' the supply of housing 'in their areas'. The provision of a supply of housing which meets the needs of present and future generations is one of the three dimensions of sustainable development and also forms one of the core planning principles identified in NPPF. We also note that NPPF requires local authorities to ensure that the evidence base which underpins any Development Plan meets the 'full, objectively assessed needs for market and affordable housing in the housing market area', Councils should also identify and update a supply of specific deliverable sites to provide five years worth of housing with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice of competition. Where there has been a record of persistent under delivery of housing, Councils should take steps to increase the buffer to 20% (again, moved forward from later in the plan period) in order to ensure that there is a realistic prospect of achieving the plan supply and to ensure choice and competition in the market. We believe that the above factors are significant and material considerations to the drafting of any document which seeks to redress the Council's problems in providing an adequate supply of housing land as is the case in Cheshire East. Indeed we note that the local planning authority has already accepted that the 20% buffer requirement identified in NPPF should also apply in Cheshire East. We also note that at this stage the Council has not yet decided upon its appropriate housing requirement and is still in the process of preparing an objective and robust evidence base. We also understand that the Council is considering the overall strategy for development in Cheshire East that has the objective of trying to create a robust economy. This objective will require the provision of an appropriate level of good quality housing throughout the administrative area. We understand that the economically active element of the population is in decline and if the economy is to be stimulated to achieve economic growth for the benefit of all residents of Cheshire East the economically active element of the population will need to be increased. This will require higher housing figures to be produced and we understand that the base figure of 1,150 units identified in the draft RIPP is the lowest level of housing being contemplated in the emerging Core Strategy. This base figure is derived from the RSS. In this context we believe that it is important that the draft RIPP should acknowledge that the housing levels being contemplated in the Development Plan represent a minimum requirement and that the document should not be treated as an interim stage in the Development Plan process. Rather, it should be seen only as a development management tool designed to increase housing land supply. The proper assessment and allocation of land to meet the objectively assessed needs of the district should take place in the Development Plan process. The above point notwithstanding, we do, nonetheless, support the Council's intention to try to rectify the problems being experienced in delivering an adequate supply of housing in Cheshire East, although we do not believe that this needs an interim document, reliance on NPPF policy should be sufficient. We note that the previous attempt has not been successful. It is apparent that this situation has arisen because the previous



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document focused only on Crewe itself and that the rate of release of sites at Crewe has not been sufficient to address the five year housing land supply shortfall'. It is not surprising, therefore, that land owners and developers have sought to release other areas of land outside of Crewe in order to meet the housing needs of the area. We believe that such an approach is in fact consistent with the emerging Core Strategy which, regardless of the options identified, does acknowledge that significant levels of housing beyond Crewe will have to be provided throughout the settlement hierarchy if the overall economic and housing objectives of the plan are to be met. Therefore, we conclude that it is appropriate for the local planning authority to try to bring forward the release of housing sites in order to rectify the five year housing land supply shortfall and that this approach should be undertaken on a Cheshire East wide basis.

For this reason, we also consider that the identification of the settlements in the draft RIPP is too limited and that consideration should also be given to the release of appropriate sites in other settlements which have good sustainability characteristics. We also consider that the document should continue to be used to help bring forward sites until such time as the Development Plan has been adopted. It appears from the introduction to the document that the document will only be used whilst there is a five year housing land supply shortfall. However, we consider that NPPF policy requires local authorities to identify and maintain a five year housing land supply and clearly the concept of maintaining the supply will require the Council to continue to release sites for development in order to prevent the supply from slipping back to a shortfall. Specific Representations In the light of the comments made above we have the following specific comments to make:

- 1) The introduction to the draft RIPP should acknowledge at paragraph 1.4 that having achieved a five year housing land supply, the Council need to maintain the supply and this will necessitate the grant of further planning permissions. It would also be helpful if the document confirms that at the time of adopting the draft RIPP the Council is in a state of a five year housing land supply shortfall and that the 20% buffer identified in NPPF applies.
- 2) Paragraph 2.1. It is correct to state that PPS3 has been superseded but it should be noted that a number of other national policy documents have been replaced by NPPF given that a number of them are relevant to the release of land for housing.
- 3) Paragraph 3.2. We consider that reference should be made to the fact that the NPPF is attempting to ensure that the planning system takes a positive approach to the delivery of sustainable development.
- 4) Paragraph 2.5. It should be acknowledged that Cheshire East Council is in a situation where it has to find a five year supply with an additional 20% buffer. It should be noted that this 20% buffer should be delivered in the first five years of the plan.
- 5) Paragraph 2.10. It is suggested that this paragraph is amended with a reference being made to the fact that the figure of 1,150 net additional houses represents the minimum annual figure which the Council will be seeking to release once the draft Core Strategy is taken further. Therefore, the importance of maintaining a five year housing land supply is extremely high, given that it is likely that the Council will have to find additional housing and to increase the rate of delivery once the plan is adopted.
- 6) Paragraph 2.11 refers to the current five year housing land supply as being 3.94 years as at 1st April 2011. We consider that this is probably an over estimate of the actual supply position. In any event it will be necessary to add a 20% buffer to the requirement in line with NPPF guidance.
- 7) Paragraph 2.12. NPPF is clear in its approach to the status of Development Plans

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where five year housing land supply does not exist. As is correctly identified in paragraph 2.12, NPPF states that where there is a housing land supply shortfall the policies of the plan should not be considered up to date. We consider that this is a material consideration and it means that current restrictive designations in and around settlements should be set aside in order to help to rectify the five year housing land supply situation. For example, the relevance of green gap sites should reviewed and updated given the five year housing land supply position.

8) Paragraph 2.15. Although it is true to say that a number of schemes have been brought through the planning system in and around Crewe a significant number of the plots on these sites are still the subject of negotiations with the local planning authority in terms of 8.106 Agreements. Therefore, the sites are not actually available for development. This increases the importance of releasing other sites elsewhere in Cheshire East.

9) Paragraph 2.16. It is stated that the draft RIPP is only seeking to release sites on the edge of Crewe outside of the green gap. As we have noted, this is a policy from a previous plan and given that the Council does not have a five year housing land supply, the plan must be considered to be out of date. Therefore green gap policies should not be used as a reason to prevent new housing sites on the edge of Crewe from coming forward, except to prevent coalescence.

10) Paragraph 2.16. Affordable Housing Contributions. We note that the draft RIPP refers to a minimum provision of 35% affordable housing on sites to be released. However, we do not consider that the Council has undertaken a balanced assessment of the overall infrastructure costs associated with the release of sites at Crewe and, therefore, the provision of affordable housing as a minimum figure is inappropriate. The Council's adopted policy of 30% should be used. It should be a target figure which will need to be assessed in the light of other infrastructure requirements for the town. This approach applies to other settlements subject to the policy.

11) Paragraph 2.19. We note that it is the intention that the draft RIPP should also refer to allocated employment areas and also other housing proposals in other towns in the Borough. We first consider that it is not appropriate at this stage to release allocated employment areas until these areas have been properly assessed through the Development Plan process. With regard to the other towns which will be required to accommodate housing to meet the five year housing land supply shortfall, we believe that the settlement hierarchy should not be confined to the key service centres or Crewe alone but should be extended to include all sustainable greenfield opportunities to ensure that there is proper and balanced provision throughout the whole of Cheshire East.

12) Paragraph 2.22. We consider that the approach adopted regarding decisions about future development is overly cautious. It is clear from an examination of the three options for the settlement hierarchy identified in the draft Core Strategy that all layers of the hierarchy will have to accommodate new development. There should be, therefore, no reason to try to restrict the release of sites throughout Cheshire East so long as the development takes place in sustainable settlements. We would also urge caution in reliance upon the town strategies which have been prepared and where they are not reliant upon an evidence base. Our examination of these suggests that they have not identified appropriate or sustainable sites and it appears that the views of landowners and the development industry have not been taken on board.



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<b>RIPP107</b>	<p>I would also point out that Sport England is a statutory consultee on all planning applications affecting playing fields, land used for playing fields at any time in the last 5 years which remains undeveloped, or land which is identified for use as a playing field in a development plan. Sport England has produced a policy which outlines our approach towards the protection of playing fields entitled A sporting future for the playing fields of England. In general Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field; or land last used as a playing field; or land identified in an adopted or emerging local development framework as a playing field unless in the judgement of Sport England one of the following 5 specific exceptions applies;</p> <ol style="list-style-type: none"> <li>1. A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.</li> <li>2. The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.</li> <li>3. The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.</li> <li>4. The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.</li> <li>5. The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields. It is important to note that Sport England would object to the loss of an existing playing field or land last used as a playing field unless one of the 5 exceptions referred to above can be met. In addition to the protection of playing fields, Sport England also seeks to protect other indoor and outdoor sports facilities and land uses which are important in terms of sports development from loss or redevelopment. In terms of those other types of facilities/land that Sport England would seek to protect this includes but is not limited to: - Indoor sports facilities e.g. sports halls, gyms, swimming pools, tennis centres, athletics arenas etc Outdoor facilities e.g. tennis courts, multi-use games areas, bowling greens, athletic tracks, golf courses, bodies of water used for watersports, mountain bike trails, equine facilities etc Sport England would oppose a planning application that would result in the loss or redevelopment of existing buildings and/or land used for sport to housing unless it could be demonstrated that they are genuinely surplus to requirements or they would be replaced to an equivalent quantity and quality in a suitable location in line with the requirements of the NPPF.</li> </ol>
<b>RIPP104</b>	<p>This policy is required and acceptable however, Members are greatly concerned that it must bear scrutiny and stand legally.</p>

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<b>RIPP117</b>	<p>Cheshire East Council's Annual Monitoring Report (AMR) for 2010/11 shows that between 2001-2011 the average annual housing completion rate was 1112 dwellings, less than the 1150 set by RSS mentioned in dRIP para . 2.9. Net housing completions in year 2005/2006 peaked at almost 1500, but by 2010/11 this was down to 466. Completions for the last three years, due to recession and a shortage of land, has led to the fall in completion rates and brought the annual average down . For the future however we consider that Cheshire East should be planning an annual housing completion target to reflect the more stable years of 2007/8 which significantly exceed the RSS figure of 1150 and goes some way towards meeting the need calculated by the Strategic Housing Market Assessment (SHMA). An SHMA was commissioned by Cheshire East Council from ARC4 Consultants who, in September 2010, calculated an annual unsatisfied demand for 2753 market homes and 1243 affordable homes, a total of 3,996. Even the RSS housing requirement of 1150 new dwellings per annum falls short of the affordable homes requirement alone. There is however a balance to be struck. A figure of 2500 homes per annum instead of 1150 would appear to be a reasonable figure to work to and which can be delivered by the SHLAA sites.</p>
<b>RIPP81</b>	<p>The Town Councils main areas of interest are contained within part 3 of the Draft Interim Policy, as Middlewich is one of the nine Key Service Centres identified in the report. Having recently undertaken a National Piloting role as part of the Neighbourhood Planning process, and having been encouraged to create opportunities for development, growth and regeneration, members of the Town Councils Planning Committee and Stakeholder Workshop members felt that the smaller scale developments identified under paragraph 3 will not contribute to infrastructure and other requirements, either through CIL or Section 106 Agreements. It is felt that larger scale development will influence scale and direction of improvements to roads, railway, shops, amenities and other services, and that the Town Council wants to play a pivotal role in bringing all parties together to meet our shared Vision for Middlewich. Further to this, Cheshire East's preference for development in the Crewe area should not mean that any CIL funding or S106 monies should be generated by development in Middlewich or any of the other Key Service Centres and directed towards objectives for Crewe. If funds are generated through the Planning process in a town, the funds should directly benefit that town, according to an agreed plan and a common set of objectives.</p>

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RIPP90	<p>At the outset we wish to outline our opposition to this policy. Whilst we acknowledge the rationale behind the production of the Revised IPP to set out the Council's policy approach to maintain a five year supply of deliverable housing land as an interim measure prior to the adoption of the Cheshire East Local Plan, the policy does not carry any weight and does not meet the requirements of the NPPF. Housing Land Supply Provision The NPPF requires local authorities to identify a five year supply of housing with an additional buffer of 5% to ensure there is choice and completion in the market for land. Where there is a record of under delivery, there is an identified requirement for a 20% buffer to be provided by the local authority. The Council have produced the Draft IPP on the basis that it meets the requirements of the NPPF to: 'set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a 5 year housing land to meet their housing target' (NPPF section 6 Para 47) and considers that it 'will only apply when the Council is unable to demonstrate a 5 year supply of housing land and until such a time as the Local Plan Core Strategy is adopted' (Revised IPP- Para 1.4). We do not consider that the Revised IPP fully accords with the housing implementation strategy as required within the NPPF. This is on the basis that the Council have consistently failed to maintain a 5 year supply and there is no evidence that directing growth to Crewe and the nine strategic centres will help to meet the annual requirement of 1,150 units particularly as the current housing land supply is 3.94 years. This results in a deficit of 1,590 units for the 5 year period and whilst it is recognised that sites have come forward since the implementation of the IPP in 2011, they are not at the required levels and additionally we would question the deliverability of these sites coming forward within 5 years. Consideration should therefore be given to applications for housing development on sites out with these settlements if they meet the requirements of the NPPF. The Revised IPP does not seem to address in any coherent manner, the 20% buffer in the application of the IPP policy i.e. It only considers the 5 year supply. Policy Weight Para 2.26 proposes that the 'revised policy should be used in the consideration of planning applications with immediate effect and will be considered as a material consideration, although it is recognised that it will not carry full weight until it is adopted by the Council following consultation: (Revised IPP- Para. 2.26) Whilst the Council considers the policy to be a material consideration and should be awarded full weight when adopted by the Council, neither the adopted IPP nor Revised IPP should be given any weight. This has been demonstrated by the Planning Inspectorate at Inquiry and accepted by the Council in 2010 when Richborough Estates sought outline planning permission for 269 units for land to the east of Marriott Road/Hind Heath Road, Sandbach (Appeal References: APP/R0660/A/10/2140355 and APP/R0660/A/10/2143265). At the Inquiry, the Inspectorate considered that: 'The Interim Planning Policy for the Release Housing Land should be given no weight. It is a document that seeks to manage the release of additional land for housing but it is neither a DPD nor an SPD, and the Council accepts as much: (IR 52) The Revised IPP acknowledges that the main thrust of the Interim Planning Policy remains unchanged' (Revised IPPÂ· Para. 2.19) with the main change being that all growth will be directed to Crewe and the nine strategic centres, rather than just Crewe. Whilst we understand the Council's requirements to promote the growth of Crewe as a town of sub-regional importance which we support, this growth should not be to the detriment of neighbouring settlements which also need to be allowed to grow, particularly where there is an identified need for growth and requirement for affordable housing. However, as the Core Strategy is not due for adoption until late 2013 there is no adopted policy basis for this position and both the adopted IPP and Revised IPP do not carry any weight under s.36(8) of the Planning</p>

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	<p>and Compulsory Act 2004. This has been proven at appeal where it was considered by the Inspector and agreed by the Council that it should be afforded no weight. We consider that wider and more detailed consideration should instead be given to the context of sustainable development particularly as the NPPF seeks to ensure that: 'housing applications should be considered in the context of the presumption in favour of sustainable homes' (NPPF Section 6 Para. 49) Therefore in line with the Inspector's decision at Sandbach and as the policy conflicts with the NPPF which seeks to promote sustainable development, no weight should be given to the IPP as it does not constitute a valid policy consideration. Affordable Housing Provision The adopted IPP seeks to provide 30% affordable housing in accordance with the Affordable Housing IPP which in turn represents the saved policy position of Crewe and Nantwich Local Plan Policy RES7. The Revised IPP seeks to increase the is to 35%. We object to this increase on the basis that the Council is seeking to circumvent the development plan system by introducing a new affordable housing policy through the Revised IPP. We would add that Revised Crewe and Nantwich Policy RES7 which refers to a 35% affordable housing target was not saved by the Secretary of State and this is confirmed within IPS Affordable Housing (2011) para. 1.21. When the guidance to the weight to saved policies in NPPF Annex 1 (para. 214 and 215) is added to the equation it can be further seen that this is actually diminishing the weight to be given to saved policies, and in turn even if this Revised IPP was to be adopted by the Council, it could have little, or what we consider no weight as a material consideration.</p>
RIPP120	<p>Representations have already been made regarding the Draft Congleton Town Strategy on behalf of the Congleton Inclosure Trust and Messrs Whittaker and Biggs who own land at Lower Heath and these have stressed the important role which early development of the land adjacent to the former Cattle Market could have in delivering appropriately located housing which would contribute to the 5 year housing land supply. This land, which is advantageously placed relative to sustainable community facilities forms part of Development Option D in the Draft Congleton Town Strategy, but is quite separate from the land also named as Option D which is further from the town and separated from my clients land by the A34. The land adjoining the former Cattle Market site, (SHLAA Site Ref 2320) whilst in excess of 1 hectare, could be developed at an early stage without prejudice to the overall housing strategy. To preclude such a valuable housing site in terms of its potential contribution to the 5 year housing land supply now, simply because of its size, is illogical. Development of part of the land at Lower Heath Congleton at an early stage could not only deliver a modest number of dwellings in a sustainable location, but could also make a contribution to community facilities, including a future by-pass for the town, as part of S106 monies. My clients would welcome such an approach as they understand the need to support future infrastructure development in this part of Congleton Town.</p>

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<b>RIPP121</b>	<p>Representations have already been made regarding the Draft Congleton Town Strategy on behalf of the Congleton Inclosure Trust and Messrs Whittaker and Biggs who own land at Lower Heath and these have stressed the important role which early development of the land adjacent to the former Cattle Market could have in delivering appropriately located housing which would contribute to the 5 year housing land supply. This land, which is advantageously placed relative to sustainable community facilities forms part of Development Option D in the Draft Congleton Town Strategy, but is quite separate from the land also named as Option D which is further from the town and separated from my clients land by the A34. The land adjoining the former Cattle Market site, (SHLAA Site Ref 2320) whilst in excess of 1 hectare, could be developed at an early stage without prejudice to the overall housing strategy. To preclude such a valuable housing site in terms of its potential contribution to the 5 year housing land supply now, simply because of its size, is illogical. Development of part of the land at Lower Heath Congleton at an early stage could not only deliver a modest number of dwellings in a sustainable location, but could also make a contribution to community facilities, including a future by-pass for the town, as part of S106 monies. My clients would welcome such an approach as they understand the need to support future infrastructure development in this part of Congleton Town.</p>
<b>RIPP74</b>	<p>Representations are made in the context of the following two sites: 1) Peacock Farm, Wilmslow Road, Handforth 2) Land east of Wilmslow Road, Handforth (Junction of A555 &amp; B5358) Both sites are available for development and are under the full control of our client. Overview The Interim Planning Policy is considered to be insufficiently clear, not justified and non-compliant with the NPPF. Introduce planning policy provision should be properly subject to Development Plan Document adoption procedures as set out in paragraphs 150-181. The effective consequence of adherence to this proposed Interim Planning Policy is a situation where developers bring forward sites to address the Councils Housing Land shortfall position that they are constrained by development distribution policy that has not been subject to adequate testing and runs contrary to the approach suggested within the NPPF. The NPPF is clear in stating that when Council cannot demonstrate a five year supply of land (+ additional 5% or 20%) that planning applications should be considered in the context of the presumption of sustainable development (paragraph 49). The proposed approach would seriously undermine the ability of developers to bring forward residential sites and therefore address the 5 year housing land shortfall. The policy is counterproductive in this regard and not "positively prepared" a provision that the NPPF makes clear local planning policies must be in order to be found sound (paragraph 182). Additionally the Council does not appear to have prepared evidence to suggest that adequate deliverable sites are available within the areas stated as being appropriate, again restricting the ability of developers to address the Councils land shortage issues. The policy does not promote the release of housing land to address the five year supply shortage but rather places further barriers to the delivery of sites required to address the shortfall. The proposed approach has no basis in national Policy and is directly contrary to the NPPF. The whole point of the former PPS3 clauses which have been carried through to the NPPF regarding five year land supply is to revert to national policy guidance where the Council has failed to adequately identify land within its preferred distribution strategy. Nowhere does the NPPF recommend that additional layers of restrictive policy be applied locally to avoid compliance with the presumption in favour of sustainable development.</p> <p>Representation 1: Status of Interim Planning Policy Objection is made to the relationship between the intended purpose and the status of the proposed policy document. The status that the document will hold is insufficient to address the</p>



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Councils concern that residential applications may be permitted under PPS3 criteria only. The proposed Interim Policy operates as an Informal Policy Document therefore the only limited weight can be attached to the document in the form of a Material Consideration in determination of planning applications. Whilst it is acknowledged that the document is subject to consultation, this in itself does not lend sufficient weight for the Policy to be regarded as part of the Cheshire East Development Plan. The NPPF is also a material consideration in the determination of planning applications. The status of the proposed policy is insufficient to override NPPF and its provision for housing land release.

**Representation 2: Need for Interim Planning Policy** The 2010 Annual Monitoring Report identifies a housing land supply position of 4.58 years at 1st April 2010. Since then, the Council has been forced to concede this position as a direct consequence of the public inquiry for the proposed development at Land off Hind Heath Road, Sandbach. The position reached at the Inquiry was that a supply of 3.65 years existed. This is significantly below being able to demonstrate a full five year land supply if basing the calculation upon 1,150 dwellings per annum as required by the North West RSS and continued within the Cheshire East Core Strategy/Local Plan. Paragraph 49 of the NPPF establishes that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year housing land supply. Therefore this interim policy would not be considered appropriate in any event as the Council cannot demonstrate a 5 year supply. Objection is therefore made to the introduction of an interim policy as there is no requirement for such a policy when a combination of the NPPF criteria and future performance can address this shortfall.

**Representation 3: Effectiveness of Interim Planning Policy** The Council states that the basis for the adoption of an interim policy is to manage the release of land to meet shortfalls in housing provision. The proposed Policy is considered to be counterproductive and not prepared positively to achieve this aim and objection is therefore made. The proposed Policy introduces a settlement strategy seeking to control the distribution of development. This is a matter that should be considered through the proper adoption of Development Plan Policy. The NPPF requires planning applications in compliance with the tests of paragraphs 47-55 of the NPPF to be considered favourably. The proposed Policy does not further these objectives but seeks to prevent development sites from being brought forward away from locations that are identified in the Interim Policy, even where these sites meet the tests of the presumption in favour of sustainable development. The Policy is considered ineffective and therefore unsound against the provisions of paragraph 182 of the NPPF for the following two reasons: i, It does not promote site release but further restricts it to a very narrow set of locations and circumstances ii, The weight of the Interim Policy is insufficient to override the provisions of NPPF.

**Representation 4: Greenfield Residential Development Sites - Affordable Housing** Objection is made to the inclusion of a 35% affordable housing target within the Interim Planning Policy document in relation to greenfield site release. The NPPF is clear within paragraph 159 that affordable housing targets should be established within Local Development Documents and through appropriate housing needs surveys. Macclesfield Borough Local Plan has an affordable housing target of 25% and this currently forms part of the Development Plan for East Cheshire. The introduction of new targets for affordable housing provision must be made through the adoption of Development Plan Documents and in the correct robust and appropriately examined manner.

**Summary** In summary the attempt to introduce policy provision without proper process is considered to be non-compliant with national policy, ineffective in its stated



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	aims and unnecessary to ensure that housing provision targets are met.
<b>RIPP82</b>	<p>Spawforths have been instructed by our client, to submit representations to the current consultation in respect of the Draft Revised Interim Planning Policy on the release of housing land, on their behalf in respect of the site known as Basford West. The National Planning Policy Framework (NPPF) was published by the Government in March 2012. As such, the current Interim Planning Policy (adopted in Feb 2011) is proposed to be amended to take into account changes since the original policy was adopted to ensure that development takes place in locations which both the Council and the local community consider appropriate. The NPPF sets a new planning policy context which is driven by the need for the delivery of sustainable development supported by economic, social and environmental roles for the planning system. At the heart of this approach is the presumption in favour of sustainable development which, as outlined in para. 13, is driven by a commitment to support growth."The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning must operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system." (para. 19, NPPF, 2012) Furthermore, the NPPF is unequivocal in terms of its approach to sustainable development. The NPPF establishes that the role of the planning system is to assist in achieving sustainable development and this is supported by a presumption in favour of sustainable development."At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. National Planning Policy Framework - March 2012 It is clear that the new national policy is seeking a significant shift to a pro-growth approach to sustainable development which should run through local plan policy and consequently decisions on planning applications.</p>
<b>RIPP80</b>	<p>The National Planning Policy Framework (NPPF) was published by the Government in March 2012. As such, the current Interim Planning Policy (adopted in Feb 2011) is proposed to be amended to take into account changes since the original policy was adopted to ensure that development takes place in locations which both the Council and the local community consider appropriate. The NPPF sets a new planning policy context which is driven by the need for the delivery of sustainable development supported by economic, social and environmental roles for the planning system. At the heart of this approach is the presumption in favour of sustainable development which, as outlined in para. 13, is driven by a commitment to support growth."The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning must operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system."(para. 19, NPPF, 2012) Furthermore, the NPPF is unequivocal in terms of its approach to sustainable development. The NPPF establishes that the role of the planning system is to assist in achieving sustainable development and this is supported by a presumption in favour of sustainable development."At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. National Planning Policy Framework - March 2012 It is clear that the new national policy is seeking a significant shift to a pro-growth approach to sustainable development which should run through local plan policy and consequently decisions on planning</p>

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applications.

**RIPP85**

1. RPS Planning & Development (RPS) is retained by Mosaic Estates to represent the company's interests in land North West of Nantwich. The site has been identified as suitable, available and achievable for residential development through the Cheshire East SHLAAs since 2010. Recent site assessments have confirmed the site has an indicative capacity of some 1,100 dwellings as part of a mixed use development.
2. Two public consultation events have been held at Reaseheath College on 10 December 2011 and in Nantwich Town Centre on 5 March 2012. A summary of the consultation responses has been provided to Cheshire East Council together with the exhibition material. Policy Context
3. RPS fully supports the Council's recognition of the need to adopt an interim policy on housing land release in advance of the adoption of the Cheshire East Core Strategy to guide decisions required to augment the housing land supply in the District in accordance with national planning policy on the need to maintain a minimum supply of 5 years of housing land. Under the National Planning Policy Framework (NPPF) paragraph 47, there is a need to identify additional capacity of 20% to reflect recent under-performance in the district.
4. RPS supports the emphasis on the broad location of Crewe as a principal area where housing land supply should be made available having regard to the broadly consensual approach to focusing growth in the District at the town in accordance with the Crewe Vision 'All Change for Crewe'.
5. However, the draft policy document fails to make proper reference to the Crewe Vision and to the characteristics of the area which require the policy response to relate to a Greater Crewe area which appropriately includes the Basford strategic employment areas and satellite settlements. The search for new housing releases should not be restricted just to the existing Crewe urban area and sites adjacent to its urban edge. Consideration should also be given to other main settlements outside the Green Belt and outside local Green Gaps where development can bring particular

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benefits with local support.

6. North West Nantwich brings particular advantages as a location for early site release given its functional relationship with Nantwich and Reaseheath College and its location which is highly accessible via the A500 to the Basford – a new road link between Waterlode and the A51 Chester Road around the west side of Nantwich, relieving the town centre;

- a diversion of the A51 through relieving the impact of through traffic on The Green Conservation Area;
- a new riverside park to the west of the River Weaver; and
- new affordable homes close to Nantwich town centre and within walking distance of key amenities including Nantwich bus and railway

7. RPS concurs with the Council that development should not be released in the protected Green Gaps in the adopted Crewe and Nantwich Replacement Local Plan (2005).

8. The Revised Interim Policy has taken account of the National Planning Policy Framework referring to the core principles of sustainable development and the need to provide a minimum of specific deliverable sites sufficient to provide five years worth of housing capacity against the strategic housing requirement with an additional buffer of 20 where there has been a persistent record of under delivery (5% additional everywhere else). It is understood that Cheshire East Council has contended that the housing delivery in the District has not been one of persistent under delivery. 9. RPS also notes that the Council's evidence base for the Core Strategy supports a significant increase in the annual housing requirement above the current RSS rate of 1,150 dwellings per year. The high growth option of 1,600 dwellings per year has been identified as the most appropriate level to be consistent with economic growth strategy for the new Local Enterprise Partnership area of Warrington and Cheshire East and Chester West & Chester. The affordable housing need has been identified as 1,243 net additional dwellings annually in the Council's SHMA. The SHMA was quoted in the Core Strategy Issues & Options consultation as identifying general market housing demand as 2,800 dwellings per year in the District (para 6.3 refers). 10. The raw household growth projections for Cheshire East published in November 2010 by DCLG suggest there will be a minimum level of 1,360 additional households requiring new accommodation between 2008 and 2033 (2008 base). This does not allow for concealed households requiring accommodation, any vacancy allowance or allowance for second homes, all of which will increase the requirement. It is understood further evidence of housing need will be adduced later in 2012 to inform the Cheshire east Local Plan.

11. It is noted that under the current RSS housing requirement, the Council has calculated it has a housing land supply of 3.94 years at April 2011. Paragraph 49 of NPPF has been appropriately highlighted which confirms that development plans will not be up to date where a five year supply cannot be demonstrated. This therefore applies in Cheshire East.

12. It is understood from the Housing Market Partnership meetings that many representatives of the development industry contend that the shortfall in supply is significantly greater than this level.

13. The shortfall is likely to continue to grow unless significant new site releases are permitted. If the calculation were undertaken on the basis of an increased rate of employment growth areas. It is able to deliver a significant level of new homes within 5 years of the grant of planning permission as well as securing substantial infrastructure benefits to the area:

- Capital receipts for re-investment by Reaseheath College into its approved

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	<p>Campus redevelopment masterplan;</p> <ul style="list-style-type: none"> <li>• 1,600 dwellings from 2012, then the current supply position would be reduced in years supply significantly.</li> </ul> <p>The introduction of an Interim Planning Policy for the Release of Housing Land is strongly welcomed as an appropriate response to housing land supply constraints in Cheshire East. Focus on the broad location of Crewe for early housing release is broadly appropriate. However, the approach should also recognise the role of Nantwich as a highly sustainable settlement beyond the general extent of the Green Belt where new development, for example to the north west of the town, can secure significant improvements to local infrastructure with strong local support. The widening of the search to Nantwich in part 3 of the policy is welcomed. However, the limit of 1 ha or 30 dwellings is not appropriate and will result in insufficient additional supply and piece-meal development. A restriction to sites being fully developable within 5 years is too narrowly defined. The policy should seek to ensure there is significant development within the next five years. NPPF para 52 positively recognises the sustainability of larger sites in extending housing supply. The expectation that sites will contribute towards required transport infrastructure improvements is supported. These should be related to the development and development at Nantwich should expect to contribute to or secure transport related improvement for the Nantwich area. The policy for affordable housing contributions should not seek unrealistic levels of affordable housing and establish a requirement in the former Crewe &amp; Nantwich Borough Housing Market Area of at least 25% rather than at least 35% in accordance with the conclusions of the Council's SHMA. Separate comments are made in response to the Council's Draft Interim Planning Policy on Affordable Housing. The policy should also recognise that the provision of affordable housing should be subject to viability evidence which may justify a reduced contribution, especially where other planning obligations are being sought to achieve significant improvements to transport infrastructure in the area.</p>
RIPP88	<p>1. RPS Planning &amp; Development (RPS) is retained by Mactaggart &amp; Mickel to represent the company's interests in land south of Newcastle Road, Shavington and Wybunbury in the south of the Cheshire East District. The site has been identified as suitable, available and achievable for residential development through the Cheshire East SHLAAs since 2010. The identified site extended to an area of 18.7ha.</p> <p>2. Recent site assessments in respect of landscape, ecology, archaeology and historic environment, flooding risk, servicing and highway access and accessibility have confirmed the site is not significantly constrained and has the capacity for between 450 and 500 dwellings in conjunction with new local centre uses and open space. An explanatory document setting out the development potential of the Shavington Triangle site has been prepared and has been submitted to Cheshire East Council in November 2010. The document includes a concept masterplan demonstrating the suitability and deliverability of the site. Subsequently in May 2012 an EIA Screening Opinion has been obtained based on a reduced site area of 17.8 ha. The capacity of the reduced site is between 420 to 465 dwellings reflecting a density range of some 32 to 35 dwellings per net hectare. Policy Context</p> <p>3. RPS fully supports the Council's recognition of the need to adopt an interim policy on housing land release in advance of the adoption of the Cheshire East Core Strategy to guide decisions required to augment the housing land supply in the District in accordance with national planning policy on the need to maintain a minimum supply of 5 years of housing land. Under the National Planning Policy Framework (NPPF) paragraph 47, there is a need to identify additional capacity of</p>

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20% to reflect recent under-performance in the district.

4. RPS supports the emphasis on the broad location of Crewe as a principal area where housing land supply should be made available having regard to the broadly consensual approach to focusing growth in the District at the town in accordance with the Crewe Vision 'All Change for Crewe'.

5. However, the revised draft policy document fails to make proper reference to the Crewe Vision and to the characteristics of the area which require the policy response to relate to a Greater Crewe area which appropriately includes the Basford strategic employment areas and the significant satellite settlement of Shavington on the A500 which evidently functions as part of the greater Crewe urban area.

6. Shavington offers particular advantages as a location for early site release given its functional relationship with the town, its location adjoining the Basford employment growth areas, proximity to Crewe station, access to primary and secondary education within the settlement and its ability to make effective contributions towards the required new transport infrastructure to deliver the Crewe Vision (e.g. A500 dualling between Crewe and M6 Junction 16) without placing undue stress on existing links in the interim. Shavington has benefitted from the A500 improvements and is a location which is readily able to accommodate appropriate growth as part of the spatial strategy for the area.

7. RPS concurs with the Council that development should not be released in the protected Green Gaps in the adopted Crewe and Nantwich Replacement Local Plan (2005). There is land within the built up framework of Shavington which, although outside the defined urban limits and therefore currently unallocated, if developed would not extend the urban area out into open countryside and which can readily be integrated with the existing community bringing affordable homes, open space and new local services which will add to the high level of sustainability already in existence at Shavington.

8. The Revised Interim Policy has taken account of the National Planning Policy Framework referring to the core principles of sustainable development and the need to provide a minimum of specific deliverable sites sufficient to provide five years worth of housing capacity against the strategic housing requirement with an additional buffer of 20 where there has been a persistent record of under delivery (5% additional everywhere else). It is understood that Cheshire East Council has contended that the housing delivery in the District has not been one of persistent under delivery.

9. RPS also notes that the Council's evidence base for the Core Strategy supports a significant increase in the annual housing requirement above the current RSS rate of 1,150 dwellings per year. The high growth option of 1,600 dwellings per year has been identified as the most appropriate level to be consistent with economic growth strategy for the new Local Enterprise Partnership area of Warrington and Cheshire East and Chester West & Chester. The affordable housing need has been identified as 1,243 net additional dwellings annually in the Council's SHMA. The SHMA was quoted in the Core Strategy Issues & Options consultation as identifying general market housing demand as 2,800 dwellings per year in the District (para 6.3 refers).

10. The raw household growth projections for Cheshire East published in November 2010 by DCLG suggest there will be a minimum level of 1,360 additional households requiring new accommodation between 2008 and 2033 (2008 base). This does not allow for concealed households requiring accommodation, any vacancy allowance or allowance for second homes, all of which will increase the requirement. It is understood further evidence of housing need will be adduced later in 2012 to inform the Cheshire east Local Plan.

11. It is noted that under the current RSS housing requirement, the Council has



ID	Other comments - Please provide any other comments on the Revised Interim Planning Policy on the Release of Housing Land. Please indicate the paragraph number that any specific comments relate to.
	<p>calculated it has a housing land supply of 3.94 years at April 2011. Paragraph 49 of NPPF has been appropriately highlighted which confirms that development plans will not be up to date where a five year supply cannot be demonstrated. This therefore applies in Cheshire East.</p> <p>12. It is understood from the Housing Market Partnership meetings that many representatives of the development industry contend that the shortfall in supply is significantly greater than this level.</p> <p>13. The shortfall is likely to continue to grow unless significant new site releases are permitted. If the calculation were undertaken on the basis of an increased rate of 1,600 dwellings from 2012, then the current supply position would be reduced in years supply significantly.</p> <p>Conclusion</p> <p>The introduction of an Interim Planning Policy for the Release of Housing Land is strongly welcomed as an appropriate response to housing land supply constraints in Cheshire East.</p> <p>Focus on the broad location of Crewe for early housing release is appropriate. However, the approach should recognise the role of Shavington as part of the Greater Crewe area as identified in the Crewe Vision, given its unique relationship with Crewe and particularly the strategic employment growth areas in the A500 corridor at Basford. The references which seek to exclude Shavington from the policy should be deleted and positive reference should be made to the contribution that sites at Shavington outside the Green Gaps can make towards extending the housing supply sustainably.</p> <p>The expectation that sites will contribute towards required transport infrastructure improvements as part of the Crewe Vision is supported.</p> <p>The policy for affordable housing contributions should not seek unrealistic levels of affordable housing and establish a requirement of at least 30%, rather than at least 35%. The policy should also recognise that the provision of affordable housing should be subject to viability evidence which may justify a reduced contribution, especially where other planning obligations are being sought to achieve significant improvements to transport and other infrastructure in the area.</p>
<b>RIPP92</b>	<p>The IPP was initially published in February 2011 and has been revised to take into account changes in circumstances, particularly the adoption of the National Planning Policy Framework (NPPF), since February 2011 to ensure that new housing development takes place in appropriate and suitable locations. The main thrust of the NPPF is the presumption in favour of sustainable development and paragraph 14 states: At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking. For plan-making this means that: * Local Planning Authorities should positively seek opportunities to meet the development need of their area; * Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted. For decision taking this means: * approving development proposals that accord with the development plan without delay; and * where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless: - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - specific</p>



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policies in this Framework indicate development should be restricted. Based on the above presumption in favour of sustainable development there is a need for Local Planning Authorities (LPAs) to plan positively and seek opportunities to meet the development needs of their area. It is in this context that the IPP should be prepared. Draft Revised Interim Planning Policy on the Release of Housing Land The policy states that when it is demonstrated through the Annual Monitoring Report that there is not a five year supply of housing land as defined by the National Planning Policy Framework, subject to other saved policies of the relevant Local Plan being satisfied, residential development will be permitted in the following locations (each part of the policy is discussed in turn): 1 Adjacent to the settlement boundary of Crewe The first location where residential development would be permitted in accordance with the Revised IPP is on sites adjacent to the settlement boundary of Crewe subject to 7 criteria being met. Whilst it is acknowledged that focusing development towards Crewe is consistent with the Council's aspirations outlined in the emerging Core Strategy and is supported, objection is raised that solely focusing on Crewe would preclude other sustainable sites from coming forward across the Borough. It is also evident that Crewe on its own will not deliver the Boroughs housing supply requirements and therefore the IPP had to be expanded. There is support therefore for the inclusion of other locations across the Borough, which is discussed later. The first criteria that sites adjacent to the settlement boundary of Crewe have to adhere to is being well related to the built framework of the settlement and the second criteria relates to excluding sites within the Green Gap. No comments are raised on these points. The third criteria relates to sites within employment areas. The original IPP excluded sites within allocated employment areas; this has been amended to make an exception where the housing proposals are clearly shown to be necessary to bring forward the employment area. Although this is a positive step, as per Point 2 considered shortly, the policy should allow for land to be released in its entirety to alternative uses such as residential, rather than only for mixed use proposals. The much delayed Cheshire East Employment Land Study should be released as soon as possible and include confirmation of which existing employment sites could be released for residential development. This report should therefore be used to assist in the process of assessing the release of employment sites for alternative uses in line with this criteria. The NPPF is clear at Paragraph 22 that in instances where there is no reasonable prospect of a site being used for its employment allocation policies should avoid long term protection. It also identifies that applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Given that the IPP engages only when the Council cannot demonstrate a 5 year supply of housing, when there is clearly by this fact an urgent need, the IPP is overly restrictive. The policy should allow for allocated employment sites, where it can be demonstrated that they would best serve alternative uses, to be released in their entirety for housing. Any requirement to maintain an element for employment, or indeed any other additional use, could prejudice much needed residential delivery. The Council is therefore urged to be more positive, in the spirit of the NPPF, to encourage the delivery of housing. Criteria 4 seeks to restrict residential development within an area safeguarded for the operational needs of Leighton Hospital. There are no comments on this criteria. Ensuring the development is able to be fully developed within five years of the granting of full or outline planning permission is the fifth criteria. This is not supported and is in fact unlawful. The LPA cannot lawfully impose a requirement for development to be completed within 5 years. In accordance with the NPPF planning conditions should only be imposed where they are necessary,

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relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other aspects

1. It is considered that such a condition is not necessary, enforceable or reasonable therefore in line with guidance in NPPF should not be a requirement of this Revised IPP. The LPA must not therefore assume that all sites approved under the Revised IPP will in fact actually deliver the numbers of housing envisaged within a 5 year period. The final two criteria relate to delivering development that improves the supply, choice and quality of housing in Crewe and also supports the delivery of the Council's overall vision and objectives for Crewe. These criteria are also supported in principle; however there must be recognition that in order for development to be delivered it must be viable, therefore flexibility and consideration of viability will need to be factored into the requirements for high quality schemes.

2 Part of mixed developments in town centres and regeneration areas to support the provision of employment, town centre and community uses Whilst this part of the policy seeks to direct residential development to town centres and regeneration areas, greater clarity is required in relation to what defines a "regeneration area". The Council should not rely too heavily on mixed use town centre and regeneration schemes in terms of delivering new homes. These types of schemes often involve the delivery of apartments for which there is currently limited market demand. There are also normally a higher number of site constraints associated with such sites including ground contamination and the demolition of existing buildings. The Council should therefore be mindful that whilst this approach may deliver residential development, it is unlikely to do so at the rates required to identify the shortfall in provision. Additional sites such as those within or on the edge of Key Service Centres will also be required to assist in meeting demand for housing. Furthermore, the initial IPP (2011) had this allowance and has not generated any significant new residential development so therefore cannot be relied upon to any great extent to improve housing supply in current market conditions.

3 Adjacent to the settlement boundary of Macclesfield and the nine Key Service Centres (Alsager, Congleton, Handforth, Knutsford, Middlewich, Nantwich, Poynton, Sandbach and Wilmslow) subject to a range of criteria

Part 3 is an addition to the Revised IPP. In principle there is support for the inclusion of additional areas that are deemed suitable of delivering residential development. It was highlighted in comments submitted to the initial IPP that the focus for future housing was too restrictive. However, there are a number of concerns in relation to the criteria that these additional sites should also meet. Each criteria is taken in turn and address below.

The Site is not within the Green Belt or the Green Gap

Whilst the importance of such sites is acknowledged, in some instances and in particular the Green Gap sites, these may be in sustainable locations and be just as suitable for development as those sites adjacent to the built-up framework. Rather than adopting a blanket approach that excludes all Green Belt and Green Gap sites from the policy permitting residential development, it is suggested these sites are assessed on a site by site basis. This would reveal whether such sites are in fact sustainable and suitable for residential development and would represent a deliverable option to assist in the Borough reducing the shortfall in housing delivery. This would also be in accordance with the presumption in favour of sustainable development outlined in the NPPF. In addition, Green Belt sites would still however

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be required to demonstrate the special circumstances for permitting development as detailed in NPPF.

Is very closely related to the existing built framework of the settlement  
Connections and linkages with facilities within a settlement are important in assessing the sustainability of a site for future residential development alongside a good relationship with existing development. However, as discussed above with the Green Gap sites, there are instances where sites that are not immediately adjacent to a settlement boundary that can still display good sustainability credentials and be suitable locations for residential development. It is therefore recommended that the words 'very closely' are deleted to provide some flexibility in allowing the most suitable sites to come forward. No definition is provided as to what 'very closely related' constitutes and therefore the test should relate to sustainability of a site and good planning.

Is self contained within clear 'defensible' boundaries  
This requirement is more akin with reference to Green Belt sites and it should not be necessary for sites outside of the Green Belt to have to be surrounded by 'defensible boundaries' as they are not allocated to function in the same manner as Green Belt sites. Sites should be allowed to create such boundaries if considered necessary. Whilst physical features such as boundaries are part of the material planning considerations, they are not the only consideration and therefore it is important to view the wider context of a site and not refuse residential development just because a site fails to meet one of the criteria.

Is accessible by walking to a wide range of local services  
The allocation of settlements as Key Service Centres implies that there are sufficient facilities to meet existing demand from local residents and also to cater for additional future residents in locations such as Middlewich. In November 2010 Local Development Framework Report: Determining the Settlement Hierarchy was published. In this Report Middlewich was identified as a Key Service Centre Settlements with a range of services and opportunities for employment, retail and education, they serve a catchment area and contain good public transport links. Middlewich was also identified in the Congleton Borough Local Plan First Review (2005) as a Town in the Congleton Settlement Hierarchy. More recently in the Draft Middlewich Town Strategy (March 2012) a number of sites adjacent to the settlement boundary were identified as potential residential development options. Therefore Middlewich has always been viewed and promoted as suitable and sustainable location for residential development. Whilst it is important that sites are sustainable and future residents can easily access a range of services and facilities, it is considered too restrictive to set out strict distances to a prescribed list of facilities. Sites will differ on their level of sustainability and whilst not all are within walking distance of a significant amount of services they may be in close proximity to a good public transport network which would allow easy access to facilities. A site needs to be viewed in the wider context and not just assessed solely on the walking distance from a predetermined list of facilities. In addition, urban extensions by their very nature can be further away from certain facilities but form an important part of the evolving urban area which adapts over time.

Is capable of being fully developed within 5 years of the granting of full or outline planning permission

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This is not supported and is in fact unlawful. The LPA cannot lawfully impose a requirement for development to be completed within 5 years. In accordance with the NPPF planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other aspects

It is considered that such a condition is not necessary, enforceable or reasonable therefore in line with guidance in NPPF should not be a requirement of this Revised IPP. The LPA must not therefore assume that all sites approved under the Revised IPP will in fact actually deliver the numbers of housing envisaged within a 5 year period.

Provides homes that improve the overall choice, quality and supply of housing within the relevant town

Delivering high quality housing schemes that provide a good mix and choice of dwellings is important. However, as discussed further below, by limiting the size of sites and development densities that are able to come forward, this will directly relate to limiting the choice and mix of houses that can be delivered, making this criterion hard to achieve.

Is less than 1 hectare in size or has the capacity for no more than 30 net additional dwellings

The restriction on the size of site adjacent to Macclesfield and the Key Service Centres that are able to come forward under this policy is not supported. I must register Bellways strong objection to this restriction. Imposing restrictions such as this does not demonstrate efforts to 'positively seek opportunities to meet the development needs' and therefore is contrary to the objectives of the NPPF. These restrictions are also contradictory with the background information outlined in the earlier chapters of the Revised IPP; paragraph 2.18 of the Revised IPP states 'the lack of a 5 year supply of deliverable housing sites means that the Council should continue to take proactive steps to manage the situation'. It is considered that placing onerous restrictions on the size of site and density of development that will be permitted to address the shortfall of the 5 year housing supply are not 'proactive steps'. The success of this approach in actually assisting to address the shortfall in housing supply across the Borough can be questioned. Small sites with development density restrictions are often not attractive to house builders who from a viability perspective need larger sites to make the development worthwhile. NPPF requires the delivery of a wide choice of high quality homes and the creation of sustainable, inclusive and mixed communities therefore requiring a range of site sizes to come forward. This requirement for a range of site sizes to be developed is also considered to be the best way of attracting both local and national house builders to invest in Cheshire East. There is a large possibility that these small sites will therefore remain undeveloped as they are not attractive to developers and will not contribute to addressing the shortage of housing. There is also no evidential justification for this threshold being imposed. The LPA recently supported a planning application at The Green Middlewich (LPA Ref: 11/4545C) for 63 dwellings in February 2012 and this is evidence that sites should be assessed on a site by site basis as this site is over the 1 hectare threshold but was still considered to be able to deliver a valuable contribution to the housing land supply position. The sweeping statement made in paragraph 2.23 of the Revised IPP can also be questioned, with the assertion that small sites can be developed quickly and without major infrastructure requirements. The infrastructure requirements of a site should not be viewed as a reason for refusing development, as



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it is possible to mitigate and legally enforce that necessary improvements are made. Paragraph 203 of the NPPF highlights that LPAs should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. There are therefore national and legal mechanisms in place that would remove any problems of larger sites requiring infrastructure improvements and should not be considered as a reason for deterring and prohibiting larger sites coming forward.

A frequent complaint and concern by Members raised at Planning Committee is piecemeal development that doesn't have good linkages and does not represent the delivery of a comprehensive scheme and also the limited benefits to the local area. Allowing only small sites to come forward has the potential to increase piecemeal development with small pockets of housing being widely dispersed. In addition, small sites are unlikely and in most cases unable to generate significant benefits to the local community. For example, the amount of affordable housing generated by a scheme of 30 houses is minimal and unlikely to make a notable contribution to the shortage of affordable units. This is considered to be an onerous restriction on the sites that are being encouraged to come forward to address the shortage of housing and does represent a 'proactive' or 'positive' approach. Limiting site size also limits the wider benefits to be gained from the development and it is questioned whether these sites would even be viable for house builders to bring them forward. It has also been the larger house builders on larger sites that have been most active in Cheshire East delivering consents recently and therefore it is very counter productive to have a policy that effectively favours smaller sites only as it potentially precludes developers from assisting in meeting the LPAs housing targets.

That the density of the site is appropriate to its location and is no less than 20 dwellings per hectare

Similar arguments to those outlined above are relevant to this criteria and again there is objection to the restrictions being placed on bring development forward. It is important that density is appropriate to its surrounding location; however this should be determined on a site by site basis taking into account site and surrounding circumstances.

Does not represent the subdivision of a larger site

The likely intention behind this criteria is to prevent sites coming forward 1 ha at a time, however as objections have been raised to the size limit of sites able to come forward, consequentially this criteria is not deemed to be required.

That it will not pre-empt or prejudice the future scale and direction of development within the individual town

The Congleton Local Plan Policy H2 states that in terms of managing future housing supply across Congleton, the Council will seek to ensure that total number of dwellings is distributed as follows 30% to Congleton; 25% to Sandbach; 15% to Alsager; 25% to Middlewich and 15% to rural areas. Middlewich has therefore already been identified as a town capable of accommodating future residential development. The Core Strategy Issues and Options Paper (2010) identified Middlewich as a Key Service Centre. Four different development options were suggested as part of the Issues and Options consultation paper which identified different levels of development to be directed towards Key Service Centres, ranging from 24% to 44%. This therefore demonstrates that Key Service Centres such as Middlewich are considered to be suitable to accommodate additional development and growth. In addition, sites

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adjacent to the settlement boundary of Middlewich have been identified in the Draft Middlewich Town Strategy as being potential residential development options and should be considered as strong contenders to assist in addressing the shortfall in housing across the Borough. As already highlighted, the NPPF promotes the presumption in favour of sustainable development and is a material consideration in the determination of planning applications especially in the absence of an up to date development plan.

**Requirements of Housing Developments on Greenfield Sites**

In addition to the above criteria, housing developments on greenfield sites that have been permitted through the Revised IPP will also have to adhere to additional requirements. These remain the same as in the initial IPP and therefore the original comments raised by Bellway are re-iterated below:

**A Minimum of 35% Affordable Housing in Accordance with the Interim Planning Statement on Affordable Housing**

The requirement for the provision of 35% affordable housing is not supported. There is no mention in the Interim Planning Statement (IPS) on Affordable Housing of the requirement for greenfield sites to deliver 35% affordable housing, the IPS only requires 30% affordable housing. There is no justification provided as to why the Council are seeking to demand a higher level of affordable housing on sites which are required to be release in order to make up the current shortfall in housing. In these difficult economic times development should be encouraged and not deterred or hindered by onerous requirements such as high levels of affordable housing. The viability of delivering a scheme should be crucial in determining the additional requirements that will be sought as part of a development. This assessment should be undertaken on a site by site basis and take into account factors such as individual site characteristics, constraints and local needs.

**Open Space and/or Community Facilities in accordance with the relevant saved Local Plan Policy**

Criteria 2 highlights the requirement to provide open space and/or community facilities in accordance with relevant saved policies. No objections are raised to this.

**Improvements to the Strategic and Local Highway Network, Public Transport, Pedestrian and Cycle Routes**

It is acknowledged that new development must address the affects of the development on the local highway network, and encourage the use of public transport and where valid contribute to this provision as identified by the Transport Assessment accompanying an application for development. Objection is raised however on the requirement to provide improvements to the strategic highway network as the Borough have not yet adopted the Community Infrastructure Levy (CIL); there is no evidence base and no policy mechanisms for requiring such contributions. Therefore this policy would pre-empt the conclusions of the evidence gathering. Consideration must also be given to viability and the implications such requirements would have on the realistic delivery of housing, therefore contributions should be assessed on a site by site basis in accordance with existing policies.

**A high quality designed development to Code for Sustainable Homes Level 4 or higher and Building for Life Silver Standard or higher**

The Code indicates the direction for future amendments to Building Regulation



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requirements, with step changes in maximum permissible CO2 emissions being tied closely to the various Code Levels. It is also important to highlight that the Code is voluntary and not mandatory and is being implemented through Building Regulations and therefore development (by according with Part L which is also in line with the Governments programme of implementation of the Code requirements). It is therefore considered unreasonable to request Code Level 4 on developments in Cheshire East at this stage. The Council's Economic Viability of Affordable Housing Requirements Report (2010) acknowledges that land values are already likely to be constrained by increasing building costs, with the introduction of Code Level 3. Research undertaken on behalf of the Homes and Communities Agency suggests that the introduction of Code Level 4 is likely to add a premium to construction costs of around 12.7% above current building regulation compliance. Code 3 represents a 5.1% increase above current building regulation compliance. From Code 3 to Code 4 there corresponds a 7.6% increase in build costs, market research suggests this is unlikely to result in an increase in for sale values and is an additional cost developers will have to account for on their balance sheets. The Report goes on to state that the impact of Code 4 could significantly affect the viability of development. Imposing requirements such as Level 4 of the Code for Sustainable Homes will impact upon the viability of developments and thus the provision of other Section 106 Agreements such as affordable housing provision. This IPP is about delivering development in order to maintain at least a 5 year supply of housing land and it is considered that imposing a requirement to achieve Level 4 of the Code could impede this. The Development Industry fully supports the Governments approach to Building Regulations, and taking the above into consideration, the Council are requested to amend the Revised IPP to reflect that the identification of the Code for use in housing developments is a matter for Building Regulations and the staged introduction or requirements to provide the Code will be dealt with through this regime. Furthermore, there is no statutory Development Plan Policy in place requiring compliance with Code Level 4; therefore the weight to be attached to this requirement is limited if not nil. As already highlighted if the restrictions on site size and development density that are suggested in the earlier part of this policy are adopted then it is highly unlikely that these small greenfield sites will be able to deliver the additional requirements and benefits outlined above.

#### Requirements of Mixed Use Redevelopment Sites

The final part of the IPP sets out 3 requirements which housing development on mixed use redevelopment sites will be expected to deliver. These requirements are expressed to be subject to economic viability considerations, which is supported. A minimum of 30% affordable housing in accordance with the interim planning statement on affordable housing The requirement for 30% affordable housing is in line with the Interim Planning Statement on Affordable Housing (2011), however it is important that viability is taken into account in all cases and assessments are made on a site by site basis taking into account individual site constraints and the merits of the scheme.

#### Employment, town centre and/or community uses within the site

Whilst it is important to considered market viability, no further comments are made on this point.

#### Code for Sustainable Homes Level 3 or above

Please see the comments above about imposing targets/requirements for new

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development to achieve certain levels of the Code.

#### Other comments

I would also like to comment and object to the suggestion in paragraph 3.4 of the Revised IPP that conditions may be attached to planning permissions requiring sites to be started within a prescribed period. Whilst we appreciate that conditions will be attached to all permissions requiring commencement of development within a prescribed period, however imposing a condition requiring the actual construction to be begun is onerous, unacceptable and unlawful. Paragraph 206 of the NPPF states planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other aspects. It is felt that imposing conditions requiring development to start does not accord with NPPF and if development had been commenced the permission should therefore remain extant and not be subject to a further timescale to begin constructing the development.

#### Conclusion

In conclusion, while the addition of other locations for the focus of future residential development is supported in principle, I would still like to register strong objection to the actual need and purposes of the Revised IPP and also the onerous criteria and requirements that sites must address and adhere too. The intention of the Revised IPP is to address the shortfall in housing across Cheshire East, however it is considered that due to the large number of restrictions on the type and size of site that are able to come forward it does not represent a realistic solution and is very much at odds with NPPF. Given the consistent shortfall in housing across Cheshire East a proactive and positive approach to residential development should be adopted that is based on the NPPF and its presumption in favour of sustainable development rather than being onerous and restrictive on allowing suitable sites to come forward. In summary there is objection to the Revised IPP but this letter sets out why objections have been raised and these are soundly based and will hopefully assist the Borough in securing an IPP that supports the delivery of residential development to assist the LPA in meeting its housing land requirements, which is the purpose of the IPP. Our Client remains committed to delivering viable and attractive new homes in sustainable locations in Cheshire East and seek policies that support this delivery.

ID	Other comments - Please provide any other comments on the Revised Interim Planning Policy on the Release of Housing Land. Please indicate the paragraph number that any specific comments relate to.
RIPP87	<p>1. It is considered that the proposed IPP should not be carried forward and that the LPA should make decisions on applications based on paragraph 14 of the National Planning Policy Framework (NPPF). IPPs have no status in decision making as they are, by definition, not in conformity with statutory development plans. NPPF is very clear on decision making where development plans are out of date and using IPPs is not part of that process.</p> <p>2. Para. 47 of NPPF states that the LPA must identify specific deliverable sites sufficient to provide five years worth of housing against the requirements with an additional buffer of 20% if there has been a record of persistent under delivery of housing. The IPP acknowledges that Cheshire East does not have a 5-year deliverable housing land supply as required by para. 47 of NPPF; it does not however fully acknowledge that it has persistently under-delivered housing and must therefore identify an additional 20% buffer. The deficit in the required supply is therefore significantly more serious than that expressed in the IPP.</p> <p>3. Para 49 of NPPF states that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Para. 14 states that where relevant policies are out-of-date, LPAs should grant permission unless: - Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or - Specific policies in that Framework indicate that development should be restricted.</p> <p>4. Of course, the IPP does not identify specific sites to provide the required deliverable supply and therefore it can be argued that it would be out-of-date from the day it is published. Decision making would simply revert to para. 14 of NPPF. In the absence of the required 5-year (+ 20%) supply the publication of the IPP would be futile. Until such time as it has the required housing land supply, the LPA should base decisions on applications for residential development on para. 14 of NPPF and the presumption in favour of sustainable development.</p> <p>5. It is also of relevance that previous IPPs have been given only limited/very little weight in the decision making process by Planning Inspectors. For example, para. 165 of the decision on appeal ref: 2140255 states: As for, the IPP, Council officers recognised, in reporting this document to their Strategic Planning board, that it can only carry limited weight and I see no reason to conclude otherwise.</p> <p>6. Furthermore, para. 87 of the Inspector's decision on appeal ref: 2141564 states the following: By the Council's own admission, its Interim Planning Policy does not usurp the Development Plan, not does it have the status of a Supplementary Planning Document. I therefore consider that it should attract very little weight. Indeed, I note that the Council does not rely on the IPP to support its case in this appeal.</p> <p>7. The lack of weight given to previous IPPs demonstrates further that the proposed IPP should not be taken forward by the LPA. The first appeal decision following the publication of the IPP would in all likelihood contain wording similar to the above quotes and the IPP would be given only very little weight from that time on.</p> <p>8. The IPP also imposes criteria that are not appropriate. Part 3, which permits development adjacent to the settlement boundaries of key service centres, requires that applicants demonstrate that: - the site is less than 1ha in size or has the capacity for no more than 30 net additional dwellings; - the site does not represent the subdivision of a larger site; and, - development will not pre-empt or prejudice the future scale and direction of development within the individual town.</p> <p>9. The justification given for these criteria is that there is also scope for the release of smaller sites in sustainable locations on the edge of the other ten larger towns in the</p>

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	<p>borough without prejudicing the identification of larger strategic development sites, which should be undertaken through the Local Plan process. However, the release of small sites (less than 1ha) as opposed to larger sites that might be in more sustainable locations does not represent sustainable development. For example, we are currently agent for application no. 12/0893C which is for outline permission for up to 65No. dwellings at land off Crewe Road, Alsager. The application site was considered the most sustainable greenfield site in Alsager by the previous LP Inspector, yet under the IPP, it would not come forward. The IPP would result in other smaller sites being developed in far less sustainable locations around Alsager. Why develop two small sites that are not as sustainably located as one larger site?</p> <p>10. For development on greenfield sites on the edge of the key service centres the IPP also seeks to require 35% affordable housing and development to Code for Sustainable Homes Level 4 or higher. Contrary to para. 173 and 205 of NPPF, there is no mechanism to allow viability to be tested and, in any event, these additional financial burdens on development should not be imposed through an IPP which is designed to increase housing development. Additionally, the affordable housing requirement must be based on robust evidence and Building Regulations control regarding the Code should not be duplicated in the IPP.</p> <p>11. The IPP also requires development on greenfield sites on the edge of the key service centres to improve the strategic and local highway network, public transport, and pedestrian and cycle routes. To do this if it were not necessary to make the development acceptable in planning terms, directly related to the development or fairly and reasonably related in scale and kind to the development would be contrary to NPPF and the CIL Regulations.</p> <p>12. To conclude, the IPP should not be taken forward: it will be out-of-date from the day it is published and will have very little weight in the decision making process. Furthermore, by allowing only small sites to come forward it will prevent the most sustainable development coming forward; and, it imposes unacceptable burdens and acts as a barrier to development contrary to NPPF.</p>
<b>RIPP139</b>	The only comment I would earnestly make in these days of making savings is that your attachment is in great need of condensation. If condensed, I would suggest that you would save at least 50% of your and my paper costs and also the very expensive ink. My comments are meant to be helpful. If you cannot do this then I suggest you warn your readers not to print a copy off as the reproduction costs are very expensive indeed.
<b>RIPP72</b>	Suggest that SHLAA site 2908 would be suitable for development. Further details have been provided separately.
<b>RIPP102</b>	I understand the Authority's feeling of vulnerability but I dislike the introduction of an interim policy as it almost always encourages early speculative proposal/applications attempting to sneak in front of the local plan just as much as the policy defends its preparation. I am also suspicious that it is useful to elected administrations who wish to avoid the pressures associated with decisions on allocations. However as the Authority is intent upon adopting such a policy it should be prefixed to emphasise releases would be limited to only that necessary in the very short term to address the 5 year land-bank requirement. I accept the policy needs robust enough to defend against the speculative pre-emptive strike proposals. However the wording needs to clear so releases are sequential and judged against the criteria.

ID	Other comments - Please provide any other comments on the Revised Interim Planning Policy on the Release of Housing Land. Please indicate the paragraph number that any specific comments relate to.
<b>RIPP75</b>	<p>Other matters We also wish to comment and object to the suggestion in paragraph 3.4 of the Revised IPP that conditions may be attached to planning permissions requiring sites to be started within a prescribed period. Whilst we appreciate that conditions will be attached to all permissions requiring commencement of development within a prescribed period, imposing a condition requiring the actual construction to be begun is onerous, unacceptable and unlawful. Paragraph 206 of the NPPF states planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other aspects. Imposing conditions requiring development to start does not accord with NPPF and if development had been commenced the permission should therefore remain extant and not be subject to a further timescale to begin constructing the development. Conclusion In conclusion, while the addition of other locations for the focus of future residential development is supported in principle, we must register strong objection to the actual need and purposes of the Revised IPP and also the onerous criteria and requirements that sites must address and adhere to. The stated intention of the Revised IPP is to address the shortfall in housing across Cheshire East, however it is considered that due to the large number of restrictions on the type and size of site that are able to come forward it does not represent a realistic solution and is very much at odds with NPPF. Given the consistent shortfall in housing across Cheshire East a proactive and positive approach to residential development should be adopted that is based on the NPPF and its presumption in favour of sustainable development rather than being onerous and restrictive on allowing suitable sites to come forward. In summary our aim in this letter is to set out why objections have been raised which will hopefully assist the Borough in finalising an IPP that supports the delivery of residential development and thereby assist the LPA in meeting its housing land requirements.</p>
<b>RIPP77</b>	<p>We act on behalf of the owners of land at Adlington Road, Wilmslow which is currently allocated as Safeguarded Land in the Macclesfield Local Plan. In this respect, we respond to the Draft Revised Interim Planning Policy: Release of Housing Land. We consider that due to the need to plan positively for the future housing needs of the Borough, and the current lack of 5 year housing supply, land which was safeguarded from development in the Local Plan for future growth beyond the lifetime of the plan should now be considered seriously for development. The former Macclesfield Local Plan was intended to be used to plan for development to 2011. This date has now passed and now is the time to release appropriate sites for housing development in a planned and well managed way. Whilst we acknowledge that the Interim Policy cannot pre-empt strategic decisions on strategic development sites, sites that were safeguarded to protect them for future development have already been assessed through due process and should now be considered appropriate to accommodate some of the Borough's future growth.</p>
<b>RIPP132</b>	<p>The Parish of Great Warford, as a very rural parish with little infrastructure (no bus service, no schools, no shops etc), would struggle to cope with any major development regarding affordable housing. There is no suitable land available as it is mostly given over to agriculture and their view is that development would be more appropriate in larger parishes with facilities.</p>
<b>RIPP70</b>	<p>It is disappointing to see the lack of reference in your documents to the provision of utilities infrastructure.</p> <p>Cheshire East text 2.3 At the heart of the NPPF is a presumption in favour of sustainable development. In terms of dealing with planning applications this means that:</p>



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- Planning applications for development that accord with the Development Plan should be approved without delay
- Where the plan is out-of-date, silent or absent, planning permission should be granted unless adverse impacts significantly outweigh the benefits or specific policies in the NPPF indicate otherwise. United Utilities PLCs comments The Framework 14 For decision-taking this means:[10 ]
- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out of date, granting permission unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  - specific policies in this Framework indicate development should be restricted.[9] 9 For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion. 10 Unless material considerations indicate otherwise.

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Cheshire East text 2.4

The NPPF sets out 12 core principles that should underpin plan making and decision taking. Planning should be:

- Plan led, giving people the power to shape their surroundings through up-to-date Local and Neighbourhood Plans setting out a positive vision for the future of their area.
- A creative exercise in finding ways to enhance and improve communities.
- Proactively driving and supporting sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving places that the country needs.
- Seeking high quality design.
- Taking into account the different roles and character of different areas including promoting the vitality of our main urban areas, protecting the Green Belt and recognising the intrinsic character and beauty of the countryside.
- Supporting the transition to a low carbon future.
- Contributing to conserving the natural environment.
- Encouraging the effective use of land by reusing brownfield land.
- Promoting mixed use developments and recognising that some open land can perform many functions such as for wildlife, recreation, flood risk mitigation, carbon storage and food production.
- Conserving heritage assets.
- Managing patterns of development to make the fullest use of public transport, walking or cycling.
- Supporting local strategies for improving health, social and cultural wellbeing

United Utilities PLCs comments

The Framework: There are three dimensions to sustainable development: economic,

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social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- an environmental role contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.

**Cheshire East text 2.5**

Paragraph 47 of the NPPF requires local planning authorities to identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. An additional buffer of 5% should also be provided to ensure choice and competition in the market for land and an additional 20% in areas where there has been a persistent record of under delivery.

**United Utilities PLCs comments**

Unfortunately this increases the uncertainty and identification of a sustainable infrastructure solution; if not managed correctly this will lead to unsustainable reactive process instead of a proactively plan-led. In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development.

**Cheshire East text 2.23**

The release of sustainable small sites, however, would avoid significant harm to the Development Plan process and would be unlikely to cause harm to the countryside or the settings of settlements. Small sites, moreover, can often be developed quickly and without major infrastructure requirements and provide a good opportunity to improve the housing land supply for the Borough.

**United Utilities PLCs comments**

The cumulative affect of numerous small sites needs to a major consideration in a plan-led process [this is reflected in the attached suggested amendments];

- Sustainable development can only be achieved through proactive delivered infrastructure; reactive infrastructure is implemented to address the resulting

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- issues of a failed plan-led process; and
- How will the utility infrastructure providers determine the true impact on the existing infrastructure or provide a clear sustainable investment plan for the future.

Cheshire East text 2.24

It is proposed therefore to broaden the policy to allow for modest housing developments on sustainable sites on the edges of towns other than Crewe. To avoid prejudice to the Development Plan process or undue harm to the countryside and settings of towns, the following key principles will be incorporated into the revised policy:

- Developments should be small scale
- Developments should not prejudice key strategic decisions about the growth of a town
- Sites should not be within the Green Belt or the Green Gap
- Impact on the countryside should be minimised
- Locations should be sustainable.

United Utilities PLCs comments

Generally green belt sites; open countryside and/or edge of settlement sites have limited or no supporting water supply and/or sewerage infrastructure assets; they may be adjacent to existing infrastructure assets that are located on the fringe/limits of the existing water supply and/or sewerage infrastructure networks which are of a small diameter and have limited capacity to support additional capacity.

Cheshire East text Interim Planning Policy on the Release of Housing Land

When it is demonstrated through the Annual Monitoring Report that there is not a five year supply of housing land as defined by the National Planning Policy Framework, subject to other saved policies of the relevant Local Plan being satisfied, residential development will be permitted in the following locations.

United Utilities PLCs comments

The Interim Planning Policy on the Release of Housing Land does meet the requirements of the Framework. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

Crucially, Local Plans should: plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; No reference has been made in the policy text to sustainable development; flood risk and/or the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk

If these elements are covered in historical documents then a specific reference and/or text should be included with the body of this document as proposed within the enclosed suggested amendments.

ID	Other comments - Please provide any other comments on the Revised Interim Planning Policy on the Release of Housing Land. Please indicate the paragraph number that any specific comments relate to.
<b>RIPP146</b>	<p>I would therefore point out that in that Local Plan, and the Inspector's determination at the Public Inquiry, the area to the south of Alsager was identified as Green Belt and Alsager was identified as an Area of Restraint. I understand that this long standing policy is intended to provide both an area of open countryside between Alsager and the northern fringes of Stoke on Trent and also to constrain the tendency of population being drawn into Alsager to the detriment of Stoke on Trent. Since the National Planning Policy Framework (April 2012) requires local planning authorities to identify sufficient deliverable sites to provide 5 years' worth of housing against their housing requirements, plus a 5% buffer, the new Local Plan scheduled to be adopted in 2014 requires provision to the year 2021. Clearly the housing provision already identified for the three Brownfield Sites is sufficient to meet this need. In addition there is also the possibly increase in the number of brownfield sites as the Excalibur site ceases to be entirely suitable for companies and they relocate to the more attractive Radway site, with its easy access to the M6 motorway, or even the MMU site. The existing Excalibur site is landlocked, on all sides, by existing housing development and would therefore be ideal for future housing needs if indeed it were vacated. Finally it is difficult to respond to the Draft Revised Interim Planning Policy: Release of Housing Land without making reference to the recently published Draft Alsager Town Strategy Consultation document. I feel this is necessary because in its present form this Draft Alsager Town Strategy conflicts totally with the points made in paragraph 1&amp;2 above. Firstly there is no reference to the existing policies on Green Belt or Restraint and secondly it aims to identify a housing provision of 1000 new homes by 2030 when there is no supportable argument for arriving at that number in the first place and they identify Greenfield sites as a preferred option. Less generous residents have suggested that rather than a DRAFT Alsager Town Strategy it should have been entitled the DAFT Alsager Town Strategy.</p>
<b>RIPP115</b>	<p>I am a resident of Sandbach and have been all my life. I am disgusted by the incompetence of our planning department in their inability to protect our town from the greed of builders by having a planning policy in place. Obviously all builders will want to build in Sandbach as it has one of the highest average house prices in Cheshire not because Sandbach needs this amount of housing. To this end I suggest three options Place a moratorium on all major planning applications e.g. 25 houses and over until you have your policy in place ( 5 year and 20 year housing policy ) Make all greenbelt and open countryside surrounding Sandbach into local green space until your planning policies are in place to allow controlled building in Sandbach and not just a free for all. The policy should contain an explicit statement that any application should be rejected even if the site only marginally fails any of the conditions. I feel disgusted that for the sakes of waiting until next year for a planning policy that is discussed and agreed by the residents of Sandbach you are willing to allow the builders to dictate and destroy the town of Sandbach forever through greed.</p>

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<b>RIPP97</b>	<p>While the document is an improvement on the earlier version we are nevertheless concerned that the document as currently drafted requires amending to bring it into conformity with the National Planning Policy Framework (NPPF). Section 2 of the draft document sets out key requirements from the recently published NPPF but the translation of these into the Policy itself at Section 3 is limited. While there may be a desire to minimise the amendments to the previous version it has be remembered that the earlier document, which was adopted on 24th February 2011, was produced before either the draft or final version of the NPPF were available and, consequently, we would have expected a greater level of revision to bring it into conformity. Our main concerns are that, in order to comply with the NPPF, all developments falling under this Policy must clearly demonstrate that they are sustainable. To achieve this, all developments must be subject to a sustainability assessment, not just the greenfield sites and the requirements of the assessment itself must be more robust and clearly set. We are also concerned over the lack of emphasis on brownfield sites as this is also a key requirement of the NPPF. Our detailed comments on both of these issues are set out later in our response.</p>
<b>RIPP142</b>	<p>I have read through the document, but nowhere does it tell me which act of parliament all this is supposed to be in response to . It appears to me to be a lot of gobbeldy gook to keep people employed on doing the least amount of good for local rate payers. Why do we have to constantly update 5 / 20 year plans? I understand from news reports that planning laws are being simplified to give local people more say; I notice that you do not seem to agree with that view, as you have ignored the local Alsager view, that NO development should be considered on green field sites until full use has been made of all brown field sites; this has been said in several planning meetings that I have attended in the Civic Centre.</p>
<b>RIPP71</b>	<p>The Vision document specifically says in relation to several of the proposed Green Belt sites. The area has not been put forward for development in the SHLAA. Inspection of the SHLAA has proved this statement to be untrue. In fact, not only has every Green Belt site described within the Vision document been included within the SHLAA, there are additional Green Belt sites within the SHLAA that are not included within the Vision document. Which is correct, the Vision document or the SHLAA? Also, there are several possible sites identified within the SHLAA that could be developed with far less impact on Green Belt, but despite the fact that the sites are not in use for any other purpose, some of the sites are labelled as not currently developable with no detailed explanation given It is believed that at least one of these sites is in the ownership of Cheshire East Council. I think that the residents of Wilmslow deserve an explanation as to why this is the case? Strategic Housing Market Assessment Again, as I am sure you are aware, in putting together a Local Plan the Local Authority is required to undertake a Strategic Housing Market Assessment. Cheshire East Council does have a Strategic Housing Market Assessment, albeit based on the results of a survey carried out in 2009. However, the assessment barely makes reference to Wilmslow and all the detailed statistics appear to reflect the larger towns of Crewe, Nantwich, Congleton and Macclesfield. The figure contained within the Vision document of 1500 new homes in Wilmslow by 2030 would therefore very much appear to be an arbitrary number. I believe that this raises two very important issues. Firstly, one of the key points of the National Planning Policy Framework is take account of the different roles and character of different areas. Without a detailed housing market assessment of Wilmslow, I do not believe that the existing SHMA in any way justifies the need for additional housing or development within Wilmslow's Green Belt. Secondly, unlike the towns of Crewe,</p>



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Congleton and Macclesfield, Wilmslow has a large commuter population with many people commuting into Manchester. Increasing the population of Wilmslow is likely to do nothing other than increase the commuting population, which flies in the face of clause 37 of the NPPF, which says Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment. In view of the number of additional homes mentioned in the Vision document, I believe that Cheshire East Council should have undertaken a Transport Assessment Plan, as defined within the NPPF. Green Belt policy. The NPPF states The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and goes on to say that once established, Green Belt boundaries should only be altered in exceptional circumstances. The Green Belt around Wilmslow has been in existence for decades and I do not believe that Cheshire East Council or the Vision document has demonstrated that exceptional circumstances exist, particularly in the absence of a Strategic Housing Market Assessment for the Wilmslow area. Alternative Sites I do not believe that the Vision document in any way demonstrates that all options for alternative brownfield sites have been fully explored. As an example, one the proposals development on Green Belt land within the Vision document is site F, land to the east of the Royal London site, which has been designated as employment/mixed use. On the other side of Wilmslow there is a vacant 11.5 acre site owned by Cheshire East Council, allocated as an employment site. I think that I am correct in saying that Cheshire East Council has been trying to let this site for over fifteen years without success. As far as I am concerned, this proves two things, firstly, that there is little demand for employment sites within the Wilmslow area and secondly, there is absolutely no need to use Green Belt land for this purpose. Alternative use policy The NPPF clearly states that Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Neither the Vision document nor the Cheshire East SHLAA demonstrates that alternative uses for sites have been considered. Of particular relevance is the aforementioned 11,5 acre site owned by Cheshire East Council that has been vacant for over 15 years. Agricultural policy Clause 112 of the National Planning Policy Framework says Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Neither the Wilmslow Vision document nor Cheshire East Council's Strategic Housing Land Availability Assessment distinguishes the agricultural merits of any of the proposed Green Belt sites. At least one of the Green Belt sites within the Vision document (site E, land off Welton Drive) is productive, prime agricultural land. With mounting pressure on the country's ability to feed itself, it is scandalous that prime and productive agricultural land is being considered for development, particularly when there is unused land of lesser value in the vicinity. With regard to the proposal at Welton Drive, the field in question is the largest field within a group of fields presently farmed by the same farmer. Using the largest field for development would doubtless render the remaining fields as economically unviable, therefore reducing productive agricultural land by twice the size of the housing development. Education and Health Facilities Clause 72 of the National Planning Policy Framework says The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet

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the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. With around 2000 pupils, Wilmslow High School is already one of the largest schools in the country and it is presently over-subscribed. The Wilmslow Vision document makes to reference to how the existing education system could cope with additional demand. In addition to the lack of school places, the Vision document fails to address the pressure on other public services, in particular health care. Environmental issues and biodiversity One of the key aims of the NPPF is contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity. Large scale development on the Green Belt, as proposed within the Vision document, would have a devastating effect on the habitat of local wildlife and biodiversity. Again, this is not even mentioned within the consultation document. Working across local boundaries Clause 178 of The National Planning Policy Framework states Public bodies have a duty to cooperate on planning issues that cross administrative boundaries. We have a situation in Wilmslow where a major development is planned to take place just over the Wilmslow boundary. The development is on the former British Aerospace facility at Woodford. And is understood to include a considerable number of new homes. This will doubtless have a large impact on Wilmslow in many ways, yet there is no mention of this at all within the Vision document. Open spaces and playing fields The National Planning Policy Framework says that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless surplus to requirements or alternative facilities are being provided. The proposed scheme E within the Vision document includes an existing playing field with no explanation as to whether alternative facilities will be provided. Planning moratorium on residential applications imposed by Macclesfield Borough Council Until quite recently Wilmslow has been subject to a planning moratorium imposed by Macclesfield Borough Council to prevent planning applications for new homes on brownfield sites. The moratorium was imposed because too many approvals had been granted in recent years and not enough of those approvals had been built. I believe that this was due to the fact that developers were only interested in the prime sites and that they did not want to build on less attractive (profitable) brownfield sites. It seems incredible that we have gone from a situation where Macclesfield Borough Council were refusing to accept planning applications for new homes on brownfield sites to now considering building on the Green Belt. just how many planning consents exist for new homes in the former Macclesfield Borough that still haven't been built?

ID	Other comments - Please provide any other comments on the Revised Interim Planning Policy on the Release of Housing Land. Please indicate the paragraph number that any specific comments relate to.
RIPP86	<p>On 6th April 2012 the Town and Country Planning (Local Planning) (England) Regulations 2012 came into force. Regulation 5 of this document states that documents which are to be prepared as local development documents are any documents which contain; (i) statements regarding the development and use of land which the planning authority wish to encourage during any specified period, or (ii) development management and site allocation policies which are intended to guide the determination of applications for planning permission. Regulation 6 states that any document that contains the above issues is a Local Plan. Therefore these documents would have to follow the due process for Local Plan preparation including public examination. Given that the proposed Draft Revised IPP relates to policies which would guide development management decisions, it should be brought forward as part of the Local Plan not as an interim policy. It is considered that the Revised Draft IPP is therefore ultra-vires. Notwithstanding the above, the Draft Revised IPP is also contradictory of national policy set out in the National Planning Policy Framework (NPPF) and the most up to date Strategic Housing Market Assessment evidence. The implication of the interim policy will be to create a 'moratorium' of suitable, available, achievable and therefore deliverable greenfield sites anywhere other than Crewe and small sites in the other key service centres. Therefore, this policy appears to be politically motivated and not based on planning principles. Please find our interpretation of the issues in the draft revised interim policy presented below.</p> <p>Annual Housing Requirement The Council's Strategic Housing Market Assessment (SHMA) was published in September 2010 and is the most up to date evidence base of housing need in Cheshire East. It concludes that there is an annual requirement for 3,616 market houses and 1,243 affordable houses. The evidence based requirement for Cheshire East is therefore 4,859 dwellings per annum not 1,150 dwellings. There is, therefore, compelling evidence that the housing requirement within Cheshire East should be substantially higher than 1,150 units per year to address the need for housing in the district. Indeed, a requirement of 1,150 dwellings will not even meet the affordable housing requirement of the Authority of 1,243 dwellings. NPPF states in para 47 that local planning authorities should use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. Once Regional Spatial Strategy (RSS) is revoked, which the Government intends to do as soon as possible, it will be for local authorities to adopt their own housing targets. Any target selected will have to be thoroughly tested during the examination process against this advice and the authority will need to be ready to defend them with robust evidence. It is clear that as presently set out, the emerging Local Plan for Cheshire East Council is not in conformity with NPPF and the Draft Revised IPP does not go far enough to assist the Council in meeting its full housing needs in the absence of the Local Plan. Electing to adopt a housing target substantially below the SHMA is unsound and will be subject to challenge through the LDF and appeal processes. Five Year Housing Land Supply Paragraph 2.9 of the Draft Revised IPP states that the Council accepts that there is not a deliverable 5 year supply of housing land and that the latest assessment indicates a supply of 3.94 years. In addition, the Council is considered to have persistently under-delivered against its housing targets in the past (a fact that the Council accepted in the Strategic Planning Committee 11 April 2012 Application 11/2818/N). The Council should therefore be providing an additional 20% buffer of housing land, moved forward from later in the plan period, to provide a realistic prospect of achieving the planned supply. As Cheshire East clearly cannot demonstrate a 5 year supply of housing, and this is exasperated by the addition of a 20% buffer, para 49 of NPPF would apply. This states that housing applications</p>

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should be considered in the context of a presumption in favour of sustainable development and that policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a 5 year supply of deliverable housing sites. It is therefore considered that the existing local plans for Congleton, Crewe and Nantwich and Macclesfield are out-of-date in relation to housing supply. Additionally, under para 215 of NPPF, these plans should only be afforded due weight based on their consistency with the NPPF. It is considered that as these plans are not consistent with the NPPF they should be afforded very little weight in decision making. Draft Interim Planning Policy on the Release of Housing Land The implementation of the Draft Revised IPP in response to not having a 5 year deliverable housing land supply is considered to be ultra-vires (Town and Country Planning (Local Planning) (England) Regulations 12) severely flawed, contrary to the NPPF, LDF evidence base, and completely unjustifiable. The Draft Revised IPP is in direct conflict with NPPF which requires development that is sustainable to go ahead without delay. NPPF also states that where the development plan is absent, silent or relevant policies are out of date (see above) permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Given the lack of a demonstrated 5 year supply of housing land and the fact that this renders the policies of the local plan governing housing supply out-of-date (NPPF para 49), there is no longer a policy basis contained within the Local Plan to give effect to the Draft Revised IPP. The Draft Revised IPP should therefore carry no weight in the decision making process. Clearly restricting the sites coming forward to those on the edge of Crewe and small scale sites on the edge of the key service centres is also in conflict with this guidance as larger scale sites that are in sustainable locations on the edge of key service centres may well be able to be brought forward without any adverse impacts. Larger scale sites would also help to deliver housing to meet the considerable shortfall in current supply and may well be able to provide a full complement of community facilities to help to address local issues which the smaller scale sites would struggle to deliver because of their scale. This is particularly the case with the provision of affordable housing as the shortage of this type of accommodation is acute in Cheshire East and the release of larger scale greenfield sites on the edge of settlements will help the Council to address this critical issue. When the latest information contained in the evidence base is analysed the findings prove that the number of units that can be delivered, on small scale sites (less than 30 or 1ha), on the edge of the 9 Key Service Centres, that are identified in the SHLAA as being deliverable in the 1-5 year timeframe is less than 100 units. Even when this is expanded to include similar sites in the 6-10 year timeframe (excluding Green Belt sites) this only increases to 200 units. The Council's own evidence therefore clearly identifies that the Draft Revised IPP will not significantly increase housing delivery within the borough and will certainly not address the critical situation that is faced by the Council in terms of the serious housing shortage. In fact, the scale of the housing land supply problem in Cheshire East would necessitate the delivery of over a 100 small sites on the edge of the key service centres. The Draft Revised IPP states, in para 2.13, that in the case of a refusal of planning permission, appeals may be upheld on the grounds that the proposed developments are in sustainable locations and there is not a 5 year housing land supply. The Council seem to see this as a threat, whereas this is just the proper application of the advice in NPPF. The Draft Revised IPP allows for residential development as part of mixed developments in town centres and regeneration areas to support the provision of employment, town centre and community uses. Mixed use developments within settlement boundaries could come forward under the current Development Plan in any event – but there is



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no evidence that additional deliverable sites that are not already in the 5 year land supply exist or are likely to come forward. The only realistic source of such sites are existing employment sites, the use of which for housing would be contrary to established planning policy, although the Draft Revised IPP seeks to introduce the ability for housing development to take place on parts of allocated employment areas in Crewe. This approach brings its own issues as one of the key drivers for the anticipated need to grow the population of Crewe is to provide a workforce for the major redevelopments that are planned or anticipated for the town, including the redevelopment of the town centre commercial area, the further development of MMU, the further occupancy of Crewe Business Park and, most significant of all, the development of the Basford strategic sites. If employment sites are to be lost to residential development, even in part, then this weakens the case for all significant housing releases under the Draft Revised IPP to be directed towards Crewe. In addition, the Council's own document All Change for Crewe identified a functional economic boundary for Crewe, termed 'Crewe Outer', which included the towns of Nantwich, Sandbach and Alsager, which according to the SHMA sit in an adjacent housing market area. If it is a clear aspiration of the Council to support the economic development of Crewe as a priority, then surely the release of a range of housing sites on the edge of these settlements would assist the Council in delivering the economic growth anticipated for Crewe given that they are located within Crewe's functional economic boundary. It is also unclear why a policy position is proposed that only allows the release of small scale sites on the edge of the key service centres and greenfield sites on the edge of Crewe. Why is it permissible to restrict housing development to only these areas when Crewe has over delivered against housing targets in the past and settlements in the former Macclesfield and Congleton boroughs have under-delivered housing against targets? This is especially the case when Table 5.1 of the SHMA demonstrates that market demand is least likely to be satisfied in the former Macclesfield area (74.2% of identified demand likely to be satisfied), followed by the former Congleton area (78.9%), with demand most likely to be satisfied in the former Crewe and Nantwich area (80.6%). Para 197 of NPPF states that in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development. This is especially the case where there is a significant under-supply of housing. The correct response to the shortage of land supply in these cases is absolutely clear "it is to release sustainable, deliverable housing sites quickly by considering planning applications favourably, and not to delay delivery by introducing an unjustified Interim Policy. By seeking to adopt a different response to the acute housing shortage by inventing an alternative strategy which has no basis in national policy is counter-productive. It is worth noting that one of the policy's requirements is for sites to be capable of being fully developed within five years of the granting of outline planning permission. Based on current average build rates from the House Builders Federation (HBF) of as low as one dwelling a month, sites in the current market may only deliver 42 houses within 5 years if planning permission were granted today (assuming that outline permission, reserved matters and discharge of pre-commencement conditions takes 18 months). This will not adequately address the 5 year land supply, as there is no evidence that there are enough deliverable small scale sites adjacent to the key service centres and sites adjacent to Crewe to address the significant under-supply. The Revised Draft IPP will restrict development to only small scale schemes in the housing markets of the former boroughs of Congleton and Macclesfield where the shortage in supply is currently most acute. One of the priorities for Cheshire East identified in the SHMA (paragraph 6.6) is to maximise the benefits of being part of



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	<p>several strategic economic areas. Paragraph 6.26 of the SHMA also states: New housing development needs to support planned economic growth and wider regeneration initiatives. Housing that is accessible and desirable to the local workforce plays a key role in maintaining and supporting economic development. This research demonstrates strongest aspirations for traditional houses (three bedrooms in particular) from groups most likely to be economically active. There is a need to stimulate the housing market at all levels to ensure an adequate supply to accommodate a range of household types and income levels. Evidence suggests that across Cheshire East there is considerable market imbalance, with demand exceeding supply. To not immediately address the evidenced need for housing throughout the whole of Cheshire East through the implementation of the advice contained in the NPPF of a presumption in favour of sustainable development is an irresponsible approach to adopt, particularly considering the affordable housing need that exists and the current economic climate where development should be encouraged. This should not just be restricted to Crewe and small scale sites on the edge of the key service centres. Summary Overall, it is clear that the Council's approach that it is seeking to adopt in order to address the acute shortage in housing supply is flawed, without any policy basis and highly unlikely to be successful. The proper approach is to consider favourably planning applications which are before the Council that will make a meaningful contribution to the shortage in supply, and provide much needed affordable housing. Further, the proposed housing target of 1,150 dwellings per annum will not even meet the shortage in affordable housing, and nor is it anywhere near the level identified in the Council's own SHMA. The evidence base clearly signals a much higher housing target than 1,150 dwellings per year. Para 2.26 of the Draft Revised IPP states that the revised policy will be used in the consideration of planning applications with immediate effect and will be considered to be a material consideration even though it is recognised the policy will not carry full weight. It is our contention that the preparation of the Draft Revised IPP is ultra-vires and should be afforded no weight in the consideration of planning applications. Even if the Council continues with its preparation, it is not consistent with National Policy and there is no policy hook in place to hang the IPP off. The preparation of the Draft Revised IPP should therefore be terminated and the existing IPP that has already been adopted should be revoked.</p>
<b>RIPP109</b>	<p>Our representations support the Council's general approach to the release of housing land in so far as it acknowledges the IPP is a tool to address the lack of five year supply; but we have reservations over several criterion included within the policy itself. We also reserve comment concerning the statutory weight of this document in the decision making process and we are aware that the status of the preceding IPP document has been challenged by the SoS. We therefore welcome the publication of the revised IPP which seeks to tackle both issues and to assist the decision taker in the positive determination of housing proposals.</p>

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RIPP89	<p>Status of the IPP The status of the IPP needs to be clearly defined in the introduction to the document. The IPP is not part of the statutory development plan and therefore its weight is limited. Recent appeal decisions, and in particular the Fox Land High Court Judgement at Sandbach, have concluded that the current IPP should be given limited weight. Further, we consider that the IPP is contrary to the NPPF. The consultation document states that it is the council's intention to apply the IPP at such times as it is unable to demonstrate a 5-year supply of housing land. However, this has been overtaken by events as the NPPF is clear (paragraph 49) that in such circumstances relevant policies for the supply of housing should not be considered up-to-date and the presumption in favour of sustainable development as set out in paragraph 14 of the NPPF is engaged. This means that housing development should be granted, unless the adverse impacts of doing so would significantly outweigh the benefits when assessed against the policies of the NPPF or where specific policies in the NPPF indicate development should be restricted. In short, the NPPF becomes the interim policy for Cheshire East. Consequently, even if the IPP was part of the statutory development plan, which it is not, when the council is unable to demonstrate a 5-year supply of housing land, it would be considered out of date and the presumption in favour of sustainable development would be engaged across the borough and not just to the areas described in the IPP. Therefore we question the need for the IPP and the weight it can be given in decision making. Success of the IPP We note that paragraph 2.15 of the consultation document states that the IPP has been operating successfully since its adoption and has led to an increase in the supply of housing as developers have submitted planning applications on a number of sites adjacent to the settlement boundary of Crewe, resulting in the approval of about 1,150 additional homes. Whilst this may be the case, it is important to note that given the council's failure to demonstrate a 5-year housing land supply; these sites would be acceptable within the provisions of paragraphs 69 and 71 of PPS3 and subsequently paragraph 49 of NPPF, regardless of the IPP. Moreover, it is incorrect to state that the IPP has been operating successfully. Firstly, the purpose of the IPP is to "maintain a 5-year housing supply. The IPP has failed to achieve this. In fact, the housing supply has decreased from 4.58 years at 1st April 2010 to just 3.94 years at 1st April 2011 according to the SHLAA. Secondly, the IPP has not prevented permission being granted on greenfield land outside of the areas identified within it. For example, the appeal at Elworth Hall in Sandbach (LPA ref: 10/2006C, PINS ref: APP/R0660/A/11/2145229) demonstrates this. Additional buffer We note that paragraphs 1.2 and 2.5 of the consultation document make reference to paragraph 47 of the NPPF and the requirement for local planning authorities to identify a supply of specific deliverable sites sufficient to provide five years worth of housing against their requirement plus an additional buffer of 5% or 20% depending on their record of delivery against requirements. As the council has persistently under delivered against its requirement every year since and including 2008/09, the IPP needs to state that it must demonstrate a 5-year supply plus an additional buffer of 20%. This has been confirmed as the case in recent committee reports and should be included in the document. Annual housing requirement We note that paragraphs 2.9 and 2.10 of the consultation document set out the council's housing requirement of 1,150 dwellings per annum in line with policy L4 of the RSS. However, the IPP also needs to state that owing to the shortfall in delivery between April 2003 and March 2011 the residual annual requirement to 2021 is 1,215 dwellings per annum. This is set out in the table below: Requirement A RSS requirement 2003-21 - 20,700 B Completions April 2003 to March 2011 - 8,550 C Residual requirement 2011-21 (A-B) - 12,150 D Annual requirement (C/10) - 1,215 E Residual 5 year requirement (D*5) - 6,075 Interim policy</p>

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to manage the release of housing land We also have significant reservations on whether the IPP is fit for purpose. We have noted that the shortfall in housing land is significant, particularly when the 20% buffer is applied. This equates to a shortfall of some 2,500 dwellings. The only way forward is for greater flexibility in the IPP. This would allow for: - sites over 1 hectare or 30 dwellings the reality is that there are very few sites that are self contained and are below 1 hectare or 30 dwellings. Therefore sites over these thresholds should be included and across a wider range of settlements to include sustainable villages. - Sites within the Green Gap Policy NE4 of the local plan allows for development in the Green Gap provided it meets the two tests in that policy. There are sites which accord with those tests and should be allowed to come forward; - Sites within the Green Belt "a recent decision by the Secretary of State (APP/M9565/V/11/2154021) allowed 350 dwellings on an unallocated site in the Green Belt. In the decision, he concluded that this harm should be viewed in the context of the harm that a neighbouring development, identified as a potential location for development by the local authority would cause in the future, "thereby considerably lessening the overall harm of this proposal. On that basis there may be opportunities across Cheshire East; and, - Flexibility as to the application of the criteria. At present applicants must meet all ten criteria in part 3 of the policy to accord with the IPP. The issue is that the criteria are so prescriptive that very few sites will actually meet the criteria and therefore it is highly unlikely that the IPP will increase housing land supply to meet 5 years, never mind the additional 20% required by the NPPF. - The distances for local services and facilities should be approximate and not used as maximum distances. Affordable Housing The percentage of affordable housing has been increased from 30% to 35%. Sites that are released under the IPP are required due to the settlement boundaries being out of date. They are not exception sites but critical to increasing housing supply. Therefore sites that accord with the IPP should be treated under the normal policies for Cheshire East which is 30% affordable housing as set out in the Interim Planning Statement on Affordable Housing. Some developers may of course decide to offer a higher percentage but the 30% requirement must remain. Design Standards We make the same points with relation to design standards as the sites that are released under the IPP are required due to the settlement boundaries being out of date and should be treated under the normal development plan policies for Cheshire East. Conclusions To conclude: - we question the need for the IPP following the publication of the NPPF; - even if the IPP is progressed it will not materially increase the supply of housing land due to the restrictive nature of the 10 criteria in part 3 of the policy; - there needs to be greater flexibility to allow for larger sites adjacent to the towns and villages across Cheshire East so that more sites can come forward; and, - the more onerous requirements for affordable housing and code level 4 should be removed.

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RIPP98	<p>The Council's position with regard to a 5 years supply of housing land is noted. Coverland (UK) Ltd notes that the Interim Policy seeks, amongst other things, to encourage the early development of housing land on sites previously allocated for employment purposes, particularly where this would help to secure early infrastructure investment and improvements. It is further noted that the policy seeks not only to encourage such housing development in Crewe, but on a range of small-scale sites on the edge of the District's other towns. You will be aware of the location and nature of the residential development that is nearing completion at Wychwood Village and which is surrounded not only by the Gorstyhill Golf Club but also by a substantial area laid out as a Country Park. The National Policy Framework (March 2012) recognises, at paragraph 52, that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principals of Garden Cities...Gorstyhill Golf Course is severely affected by competition from the many nearby other Golf Courses within a ten miles radius. The proximity of the Wychwood Park Golf Club is a significant factor in that regard. Coverland (UK) Ltd considers that the Gorstyhill Golf Club could be redeveloped, along the lines already well established at both Wychwood Park and Wychwood Village, to form a series of inter-connected residential areas supporting new community facilities, local shopping and employment opportunities. A new residential development would respect existing topographical features and the Country Park and could, in my client's opinion, provide for between 500 and 600 new homes over a relatively short development period. This location is not wholly dependant on the private motor car as a means of transport because of the existence of bus routes along the A531 in a both easterly and westerly direction that serve, in particular, employment areas within Crewe itself. Coverland (UK) Ltd believes that there is a very significant opportunity here to carry out new housing development, much along the lines envisaged in paragraph 55 of the NPPF, and I shall be pleased to discuss these opportunities with you. They are seen as providing an alternative, in particular, to the use of employment land within Crewe where it is considered that there will be significant disadvantage in carrying out redevelopment for housing purposes rather than in fostering job creation. Since the site in question lies only a short distance to the east of Crewe and is very readily accessible to the A500 and the M6 motorway, I trust that the factors set out above will be given considerable weight when the responses to the consultation process are analysed.</p>

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<b>RIPP101</b>	<p>The latest revision has been prepared to take into account changes in circumstances since the original Policy was adopted and to ensure that new housing development takes place in locations where the Council and the local community considers appropriate. This is clearly appropriate and right to ensure that there is the controlled release of housing land in line with the up-to-date planning framework. Where the local authority cannot demonstrate that it has a deliverable 5 year housing supply then there is a presumption in favour of sustainable developments. This is welcome however, if this continues for the next two years there will be a significant shortfall and a persistent record of under delivery. If that is the case then an additional 20% buffer will need to be identified in the short to medium term. The revised Interim Planning Policy aims to continue to focus on Crewe and allow appropriate mixed use developments in other settlements in the Borough. Whilst the thrust of the document remains the same, additional provisions are included in relation to allocated employment areas. We would urge that this is not adopted where it would compromise the ability of Cheshire East to provide a good supply of employment sites to meet the requirement in the NPPF to support sustainable economic growth. A welcome piece of planning documentation that articulates the current position in a transparent manner. Could the document go further to draw in the opportunities on the fringe of urban areas that meet the criteria of the NPPF to come forward sooner and assist the LPD process by agreeing phased completions in a fair and transparent way to avoid a land supply monopoly being created in key market towns across the Borough?</p>
<b>RIPP110</b>	<p>The revised Interim Policy seeks to prevent suitable, achievable and deliverable sites coming forward anywhere other than Crewe and adjacent to the boundary of Macclesfield and the nine Key Service centres. This contradicts national policy, is overly prescriptive and appears to not be based on sound planning principles. Accordingly this consultation response seeks to highlight the acute and chronic undersupply of deliverable housing land within Cheshire East. It will consider the implications of the introduction of the National Planning Policy Framework, the Annual Housing Requirement, the Council requirement to supply a Five Year supply of deliverable housing and the affordable housing requirement as set out in the draft revised policy. Relevant policies for the supply of housing land in Local Plans should not be considered 'up-to-date' if the Local Planning Authority (LPA) cannot demonstrate a five year supply of deliverable housing. Where a five year supply of housing cannot be shown planning applications for housing development should be considered in the context of the 'presumption in favour of sustainable development". Cheshire East Councils' latest assessment of their five year housing supply indicates a supply of 3.95 years as of 1st April 2011/2. Accordingly Cheshire East Council in the determination of planning applications should give favourable consideration for housing development outside of settlement boundaries. As a result the prescriptive nature of the Revised Interim Policy, which seeks to prohibit development anywhere other than Crewe and adjacent to the boundaries of Macclesfield and the nine Key Service centres is contrary to the advice contained within the NPPF and is not sufficiently flexible to allow the Council to meet its chronic under supply of housing. Further investigation into the Councils assessment of their 5 year housing supply has shown that their latest assessment of 3.95 years supply is optimistic and is likely to result in a further shortfall in the delivery of housing. This is explored in section 4.0 of this submission. Additionally paragraph 17, bullet point 8 of the NPPF identifies that the LPA should encourage the effective use of land by reusing land that has been previously developed (brownfield land). Whilst the Revised Interim Planning Policy: Release of Housing Land does support the re-use of previously developed land it</p>



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	<p>restricts it to the settlement boundaries of Crewe &amp; Nantwich, Macclesfield and the nine key service centres. Accordingly Cheshire East Council should look to favorably consider proposals that make effective use of land by using brownfield sites, regardless of their locality. This approach would see the release of further housing land in sustainable locations and produce a delivery led approach that addresses the acute housing and affordability crisis in Cheshire East. paragraph 47 of the NPPF requires that the Local Planning Authority identify an additional buffer of 5% on top of the 5 year supply in order to ensure choice and competition. An additional 20% should be provided in areas where there has been a persistent under delivery in supply. Consider Figure 2, which has been taken from Cheshire East Councils latest Annual Monitoring Report, this shows that since 2008/09 Cheshire East Council have had both a chronic and persistent under delivery in housing supply. Whilst supply may have exceeded demand prior to 2008/09 the continuing downward trend of housing supply since 2008/09 indicates a persistent under delivery of housing supply. Accordingly, in line with the NPPF Cheshire East need to provide an additional 20% on top of at least their annual requirement of 1,150 dwellings. This would represent a further 230 dwellings per annum, which over the five year period equates to an additional 1,150 dwellings. It is concluded that the prescriptive nature of the Revised Interim Planning Policy on the Release of Housing is not inline with the most up to date guidance contained within the NPPF. The policy needs to look to facilitate sustainable development that accords with the NPPF across the whole of the Borough, not prescribe development to certain localities within it. Furthermore the Cheshire East Council's own assessment of their 5 year housing land supply has been robustly challenged by several planning applications. Accordingly the quoted supply of 3.95 years, is in fact evidenced to be much lower, with supporting assessment to planning applications no's. 10/3471C and 10/2608C showing a supply of 2.66 and 2.95 years respectively. Consequently Cheshire East Council will have to consider favourably planning applications for residential development, most notably in the former Districts of Macclesfield and Congleton, where there is has been a chronic undersupply of land for housing. Finally the Council should seek to determine their affordable housing requirements on a more pragmatic and less prescriptive case by case basis that would in overall terms lead to a more sustainable form of development. The stipulation of 35% affordable housing in residential development will stifle sustainable residential schemes coming forward. Accordingly the Council should afford great weight to the economic viability of housing schemes in their current housing crisis.</p>
<b>RIPP111</b>	<p>In the context of the RIPP it is also proposed to promote as part of the overall sustainable mixed use strategy a suitable level of residential use on site A consistent with the parameters set out in order to support Sandbach as a key service centre. It is proposed that any residential development will be located and designed to read with the settlement of Sandbach and be of a scale of up to 1 hectare, whilst also offering potential for surveillance and screening. No more than 30 dwellings are proposed. This will appropriately comply with the key considerations set out in Section 3.3 of the Interim Policy in respect of density, affordability and design and will be taken forward in the further master planning of sites A and B (Ba / Bb). The inclusion of the appropriate level of residential development within Site A will support the overall economic viability and thus early deliverability and the ability to work comprehensively.</p>

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<b>RIPP112</b>	<p>Land off University Way, offers a good opportunity for the provision of additional housing numbers. The site is currently allocated for employment within the Crewe and Nantwich Local Plan and although the site currently has an extant permission for office buildings with associated car parking and landscaping (10/1146N) it currently remains undeveloped. There are huge viability issues with the development of the site for employment, in particular given the requirement for a Â£2m substation, and as a result the site will remain undeveloped on the grounds of its current permission/allocation. This site is a perfect example of what the Government are trying to avoid and indeed why the provisions set out in paragraph 22 and 173 are clearly set out within the NPPF. Given the Council's significant 5 year housing supply shortfall and given Crewe is the main settlement within Cheshire East, the land in question would provide an ideal opportunity in contributing towards meeting the Councils' shortfall in housing provision. To allow such sites to come forward it is important that the provisions of the IPP (in particular paragraph 2.20) provide greater flexibility and are open to alternative uses, including housing, coming forward on employment allocations where there is no reasonable prospect of the site being developed for that use and where an alternative use would contribute to supporting a sustainable community instead of merely being left vacant and unused.</p>
<b>RIPP113</b>	<p>The Society acknowledges that Cheshire East Council has to have a supply of housing development land to provide 5 years worth of housing, from various site options in order to provide an additional 1150 houses a year. We understand from the document that the Council currently has 3.94 years. The Society recognises that the absence of a planned approach may lead to speculative planning applications.</p> <p>The Society supports the National Policy Planning Frameworks core planning principles and would particularly highlight those principles that state that Planning should: - Give people the power to shape their surroundings. - Protect the Green Belt and recognise the intrinsic character and beauty of the countryside. (NB the Henbury Parish Plan 2011 showed that 96% of Henbury residents want the Green Belt to be retained and protected). - Conserve the natural environment. - Reuse brownfield sites.</p> <p>Finally we have noted references to improvements to the strategic and local highway network...The Henbury Society would be extremely concerned if these related to a re-introduction of proposals for the building of a new road from the A536 to join with the A537 around the Cock Inn, Henbury.</p>

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<b>RIPP114</b>	<p>We consider that land use swaps should be seen as a tool to help promote new housing development, this could allow the release of sites not traditionally considered as ripe for housing development (i.e. employment or community use sites). This could better facilitate the promotion of sites that are wholly conducive to housing development, while simultaneously allowing the relocation of existing uses, best suited to more appropriate locations. Blanket green field and Green Belt retention policies should be reconsidered as there are many Green Belt sites that may be overlooked, due to academic arguments not allowing them to be released; similarly, there are many non-traditional green field/Green Belt sites that may pose as an opportunity for redevelopment. National planning policy talks of rural exception sites for limited infill or urban extension development. Moreover, if it can be proven that proposals issue less of a material impact on the existing Green Belt land, that development should be permitted. The consideration of housing targets as well as how new proposals may seek to deal with issues such as sustainability, local transport/ retail/community facility provision, together with high quality design, the non availability of environmental complications (non flood risk/ no or easily rectified contamination issues) should be weighed up when assessing whether land is released for housing development, as opposed to just adhering to pure planning policy guidance. Should sites not be considered appropriate (either by the SHLAA or pre-application consultation), then clearer guidelines should be issued as to why they are not appropriate, together with a facility that allows a proper consideration of how such matters may be overcome. This could mean a formal process to allow for a review of how inappropriate sites could potentially be made appropriate.</p>
<b>RIPP118</b>	<p>The Council's latest Strategic Housing Land Availability Assessment indicates a supply of only 3.94 years at 1st April 2011. We believe that in reality, this significantly overstates the position and that less sites are truly available and deliverable, particularly having regard to the capacity of some sites which the Council relies upon. The principle of an Interim Housing Policy is to encourage the release of sustainable and deliverable sites is therefore welcomed and the acceptance of the Authority to extend the ability for windfall sites adjacent to the settlement boundaries of the Key Service Centres Both the Council's draft Core Strategy and the Strategic Housing Market Assessment (SHMA) identify the key relationship and interdependency between housing supply and economic growth. If the Council's ambitious growth aspirations are to be achieved, it is vital that there is an adequate supply of good quality, deliverable, viable housing sites to meet market needs, as well as to make inroads into the significant shortfall of affordable housing which has built up over many years.</p>
<b>RIPP124</b>	<p>Overall I think that your document is an excellent reply to answer those "critics" about the RSS lack of supply etc etc.</p>