

Pre-Submission Core Strategy Sustainability Appraisal Report 2013

Table D.5 Pre-Submission Core Strategy SA Report 2013 Consultation Responses

Doc Ref	Consultee Comment Summary	Response	Changes
NTS. Para S1.	<p>"...how the appraisal process was utilised to assist in planning for development and use of land as required by planning legislation and Government guidance.identify how the Core Strategy will contribute towards meeting environmental, social and economic planning.." I can't see much evidence of this in the appraisal or the Pre-Submission Core Strategy doc.</p> <p>Carry out a more sentient appraisal and then actually apply it.</p>	Opinion noted. Paragraph S.31 sets out the Sustainability Appraisal (SA) framework, which includes the environmental, social and economic objectives for the Core Strategy to be assessed against. Paragraphs S.40 to S43 explain the effect of the plan on the sustainability objectives. Paragraphs S.44 to S.45 explain how the SA has influenced the development of the Core Strategy.	No change.
General	<p>1.11.7. the inadequacy of the SEA as a putative basis for classifying the Gorstyhill Lands as 'non preferred' at this early stage.</p>	It should be noted that whilst the SA findings are considered by the Council in its selection of options and form part of the evidence supporting the Core Strategy, the SA findings are not the sole basis for a decision.	No change.
	<p>8. THE INADEQUACY OF THE STRATEGIC ENVIRONMENTAL ASSESSMENT AS A BASIS FOR CLASSIFYING THE GORSTYHILL LANDS AS 'NON PREFERRED'</p> <p>8.1. In the context of Strategic Environment Assessment ('SEA') the Core Strategy will have - by virtue of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment to satisfy the requirements of the regulations whereby these have been transposed into domestic law namely the Environmental Assessment of Plans and Programmes Regulations 2004 SI no.1633.</p>	Noted.	No change.





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	8.2. We note that 'The Sustainability Appraisal of Focused Changes (2013)' sets out to analyse issues in respect of a range of sites including the Gorstyhill Lands on pages 5 and 13 in brief detail in particular in paragraph 6.56 - 6.59.		
	8.3. That summary establishes that the appraisal of sustainability has been flawed in at least the following respects: 8.3.1. it classifies the Gorstyhill Lands as 'Greenfield' they are in fact (and for the planning purposes of the NPPF) previously-developed land however;	Opinion noted. The NPPF defines previously developed land in Annex 2. This definition excludes ...'land in built-up areas such as private residential gardens, parks, recreation grounds and allotments.' For purposes of the SA, Gorsty Hill Lands was considered to be a greenfield site as it mostly consisted of a golf course (a recreational area) adjacent to a built up area.	No change.
	8.3.2. it mis-states the envisaged potential number of housing units by over 10 % - circa 900 units are contemplated by HPDL not 1000;	Noted and disagree. The figure of 1,000 was taken from the Possible Additional Sites Proposed by Developer and Land Interests Consultation Document, where Gorsty Hill Golf Course was included as Site J.	No change.
	8.3.3. It purports to have identified 'negative effects' on the causes and effects of climate change but by sustainable co-location of employment with housing and the introduction of sustainable public transport arrangements between it and Crewe and the making good of existing deficits in sustainable travel patterns between Crewe and the existing settlements south-east of Crewe, there would be no negative effect in climate change terms as far as emissions are concerned;	Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 identified both positive and negative effects on the SA Objective relating to climate change – please see Appendix G (pages 1405 to 1406). On page 1405, it is identified that 'Mixed-use development including employment areas could mitigate' [increases in vehicle emissions resulting from development]. It also acknowledged	No change.

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		that 'implementation of emerging policy CS8 will ensure development is accessible by public transport, walking and cycling.'	
	8.3.4. It purports to have identified 'negative effects' in terms of 'pollution' but the development of the Gorstyhill Lands does not contemplate any polluting land uses whatsoever and any concern about emissions from vehicles is capable of being alleviated through public transport subsidy arrangements which a development of this scale could readily put into place;	Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 identified the potential for development to 'negatively impact upon water quality and air pollution'. This pollution can result from construction activities and operational activities for example increased vehicle emissions – please see Appendix G (pages 1407 to 1408).	No change.
	8.3.5. It purports to have identified 'negative effects' on 'biodiversity and geodiversity' but since it is not an SPA, SAC, in an AONB nor does it contain any SSSI, nor is it even in fact a greenfield site - this is unjustifiable;	Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 identified that the site was within 240 m of an SBI and that 'the site may contain designated fauna and ponds which may provide habitats for certain flora and fauna - please see Appendix G (pages 1408 to 1409). Please also see response to Consultee Comment 8.3.1 above.	No change.
	8.3.6. It purports to have identified 'negative effects' on 'heritage, landscapes and townscapes' but there are no listed buildings or conservation areas or the settings for either of the same on or in proximity to the Gorstyhill Lands this is inexplicable as far as heritage is concerned and since the Gorstyhill Lands centre upon a redundant golf course it is equally unjustified as far as 'landscape' is concerned;	Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 identified that 'development could result in the loss of open countryside and a golf course and land within the Lower Farms and Woods Landscape Character Type, and could also	No change.





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	<p>there are no towns at the Gorstyhill so townscape impact is entirely imaginary also;</p>	<p>result in the loss of Historic Landscape Character Types; Ancient Field Systems, and 20th Century Field Systems leading to negative effects. It was noted that the 'site does not contain and is not close to any heritage assets' - please see Appendix G (pages 1409 to 1410).</p>	
	<p>8.3.7. It purports to have identified 'overall very negative impacts on sustainable access to jobs services and facilities'- but employment development, services and additional facilities can all be accommodated on-site within a sustainable development at the Gorstyhill Lands and CEC has already acknowledged that '[the Gorstyhill] site may be of a sufficient size to create a sustainable settlement' in the 2013 SHLAA. That is clearly the case and development of the Gorstyhill Lands would naturally be a 'mixed' use scheme since together with the circa 900 units of housing appropriate additional employment, retail, community and other development could readily be accommodated within the 64 ha of the Gorstyhill Lands. This negative conclusion on CEC's part is contradicted by the recognition in the SHLAA of its capacity to be developed sustainably in this respect, and cannot be justified. Clearly there will be some services and facilities for which residents would travel to Crewe but since: (a) sustainable public transport arrangements with Crewe would be integral to any development of the Gorstyhill Lands; and (b) the southern edge of Crewe is already close to the Gorstyhill Lands - and would become even closer if developments at West Basford and East Basford were to proceed- the expression 'overall very negative' represents severe over-statement and is wrong.</p>	<p>Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 has presented potential opportunities and mitigation to prevent certain effects. It was found that 'the site significantly fails to meet accessibility standards for existing services, facilities and jobs, potentially conflicting with emerging policy CS9 - please see Appendix G (pages 1399 to 1400). See also Pg. 1632 of Appendix K (Accessibility Assessments).</p>	<p>No change.</p>
	<p>8.4. The summary is also incoherent in itself. Since for example the Gorstyhill Lands are acknowledged in paragraph 6.57 to be '..likely to have an overall positive impact....?' (emphasis added) in terms of ability to deliver:</p> <p>8.4.1. Equality and social inclusion;</p>	<p>The detailed appraisal for Site J (Table G.5) provided in Appendix G found that a mixed use development has the potential for positive effects on a number of SA Objectives through the provision of</p>	<p>No change.</p>

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	<p>8.4.2. Healthy and active lifestyles;</p> <p>8.4.3. Safety and the discouragement of crime;</p> <p>8.4.4. Infrastructure ,services and facilities;</p> <p>8.4.5. Energy efficiency and use of renewables;</p> <p>8.4.6. A sustainable, competitive, low carbon economy;</p> <p>8.4.7. Vital,vibrant and diverse town and village centres; and</p> <p>8.4.8. Education training jobs and employment opportunities</p> <p>The Sustainability Appraisal simply cannot justify the ‘overall very negative’ impacts asserted in paragraph 6.58 to arise in respect of access to exactly the same employment opportunities , services and facilities which in the immediately preceding paragraph have been acknowledged to be positively available.</p>	<p>employment, housing and services/facilities. The SA found that there is the potential for negative effects against SA Objective 2 (Sustainable access to jobs, services and facilities) as the site significantly fails to meet accessibility standards for existing services, facilities and jobs, potentially conflicting with emerging policy CS9. The appraisal was informed by the Accessibility Assessment in Appendix K.</p>	
	<p>8.5. As to the regulations, regulation 8 prohibits a plan being adopted until regulation 12, amongst others, has been complied with.</p> <p>8.6. Regulation 8 also prohibits the adoption of a plan before the environmental report and the consultation response have been taken into account.</p> <p>8.7. Regulation 12 (2) (b) then requires an environmental report ‘to identify, describe and evaluate the likely significant environmental effects of implementing the plan, and of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.’ (emphasis added)</p>	<p>Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 has been carried out in accordance with the SEA Directive and Regulations.</p>	<p>No change.</p>





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	<p>8.8. Our concern in all the circumstances, however, is that the requirements of the regulations and of the Directive will not be met unless an objective appraisal has been made.</p> <p>8.9. No such appraisal has been made; in particular the approach taken towards the Gorstyhil Lands both in itself and in terms of objective evaluation of the alternative of the Gorstyhill lands as against the heavily constrained Crewe Hall Site has been seriously flawed.</p> <p>8.10. CEC has not undertaken a legally compliant SEA process and lacks evidence or reasoned objective assessment of environmental effects which could justify the relevant conclusions it purports to have reached.</p> <p>8.11. That claim that the south Cheshire growth village should be located at Crewe Hall rather than Gorstyhill does not appear capable of being substantiated if an objective assessment is made in accordance with the regulations and the Directive. It is moreover strongly refuted in this objection.</p> <p>8.12. HPDL's interests have been prejudiced accordingly.</p>		
	<p>Since the Sustainability Appraisal has not effected an adequate objective assessment of the relative merits of potential sites - and for example has failed to do so in respect of site SL 3 (South East Crewe) where weighty relevant planning/environmental constraints exist - as opposed to the Gorstyhill Site where those constraints do not exist and a sustainable development is achievable on site</p>	<p>Opinion noted. Please see the above responses.</p>	<p>N/A</p>
	<p>The Core Strategy should recognise the Gorstyhill Site as the preferred location for a sustainable growth village south-east of Crewe</p>	<p>This is a planning matter and will be addressed by CEC's Core Strategy consultation response procedure.</p>	<p>No change.</p>

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Paragraph 5.37 (page 52)	<p>Table 5.9 Option 6, Growth reflecting the principles of the Town Strategy documents. Poynton – Draft strategy aims for between 200 and 400 homes, including sites that currently have been completed or have planning permissions. BUT Draft Infrastructure Delivery Plan, November 2013 proposes housing growth distribution for Poynton as requiring 200 homes (and 10ha) after taking out the 10 homes committed at 31.3.2013. Clarify which is applicable. Has the additional homes up to 400 now been ruled out and it is only 200 homes that are needed over the plan period up to 2030? Thank you.</p> <p>Change to read only 200 homes needed for Poynton up to 2030.</p>	<p>The figure of 200 as quoted in the Draft Infrastructure Delivery Plan (2013) is correct. This has evolved from previous options looked at in the various iterations of the Local Plan Sustainability Appraisal.</p>	<p>No change.</p>
Paragraphs 5.552 (Page 115), 5.555 (Page 116), 5.559 (Page 116), 5.568 (Page 117)	<p>This site, together with the other alternative non strategic sites identified in this Sustainability Appraisal Document have all been found overall positive in terms of their ability to deliver an appropriate quality and quantity of housing. in the numbers that have been quoted. I would like to see some assurance that such developments would not impact adversely on Poynton. In total, Poynton 1 to 5 inclusive represents some 2610 houses (i.e 1000 + 550 + 670 + 390). Set against this, the Draft Infrastructure Delivery Plan, November 2013 proposes a housing growth distribution for Poynton of 200 houses. This gives an excess of potential over proposed of 2,410 houses. Expressed another way, the potential for housing is approximately 13 times higher than which the pre-submission document deems to be needed. Consequently, I have concern that, in the absence of an agreed Local Plan, there will be pressure from developers to seek to build on these greenfield sites and Poynton may end up with more houses than is needed by the local community and the possibility that housing will be taken up by people coming from outside the local area. (Possibly attracted by developments around the Manchester Airport and made more accessible by the introduction of new roads in the Poynton area.) My concern here is to retain the rural surroundings that characterise and distinguish Poynton and to avoid any unmanageable impact on local services.</p>	<p>The 5 sites considered through the SA for Poynton are potential alternatives for development, they are not allocations. Sites for allocation in Poynton will be considered through the Site Allocations and Development Policies Document.</p>	<p>No change.</p>





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Table 5.14 Progression of Strategic Site Options (Development Strategy 2013) (page 139)	Comments relate to Poynton. Can sites in Poynton be looked at before the Site Allocations and Development Policies Document is produced or does this depend upon the Local Plan (Core Strategy) being agreed first? Concern here is that developers may come forward with planning applications before the Local Plan (Core Strategy) is in place.	This is a planning matter and will be addressed by CEC's Core Strategy consultation response procedure.	No change.
NTS Paragraph S.1	This document is totally unsustainable. It is so fragmented that it is unreadable. It looks like a pure box-ticking exercise to support the "Core`Strategy". It has an added-value of absolutely zero. Withdraw this meaningless/pointless document.	Opinion noted. The Pre-Submission Core Strategy Sustainability (Integrated) Appraisal November 2013 has been carried out in accordance with the SEA Directive and Regulations.	No change.
Paragraph 4.1 (SA of Issues and Options 2010)	Whilst I believe that the NPPF is a flawed document and itself is unsustainable in the long term, one must recognize that there is a need for controlled housing growth. This growth must be instep with suitable local employment relative to the type of housing, services/education growth and the infrastructure of the locality. In accepting the NPPF directive as a policy I believe that there is a need to make greater use of brownfield locations that do not impact on industrial growth. Preserve agricultural land where possible, Britain will need the land in future to feed itself as population rises and food import costs rise. Agricultural land helps to preserve gaps between communities preventing urban sprawl.	Noted. The SA Scoping Report 2012 recognised the importance of protecting and enhancing high quality agricultural land and optimising the re-use of previously developed land, buildings and infrastructure through Sustainability Objective 16 (page 34) in accordance with the NPPF. The Issues and Options Paper consulted on three alternative levels of growth. These	No change.

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		<p>options/alternatives were also considered as part of the SA of the Development Strategy and assessed against the revised SA Objectives set out in the Revised SA Scoping Report in 2012. This is explained in paragraph 5.4 (page 42) of the Pre-Submission</p> <p>Core Strategy Sustainability (Integrated) Appraisal November 2013.</p>	
Table F.107 SA of Wilmslow Strategic Site Options 7 to 9	For Wilmslow 8 (Wilmslow Business Park) whilst the Sustainability Appraisal identifies the site's development as anticipated in the Development Strategy was likely to have 'overall negative impacts' on: biodiversity and geodiversity; and on heritage, landscape and townscapes, the Core Strategy sets out a number of 'site specific principles of development' within Site CS 27 to mitigate against any potential impacts. Additionally, an Ecology Scoping Report and a Preliminary Landscape and Visual Overview have been undertaken on the site to assess any potential consequences of the development and, where appropriate, make recommendations for mitigation of any adverse effects.	Noted. It is likely that the mitigation set out in the CS will help to address the identified significant negative effects. It should also be noted that further mitigation will also be available at the project level.	
Table 5.14 Progression of Strategic Site Options (Development Strategy 2013)	4.1 The Council's choice of preferred Strategic Sites (including CS24) relies on a sustainability (integrated) appraisal process that has been on-going for several years as the Core Strategy has developed. The sustainability appraisal process is described as 'integrated' in its full title because it includes four main parts: Sustainability Appraisal (broadly sustainability/environmental effects). Equality Impact Assessment. Health Impact Assessment. Rural Proofing Assessment. Accessibility Assessment.	<p>Noted.</p> <p>Para 33 within the NTS states that the Accessibility Assessment has informed the SA. Para 7.35 in Chapter 7 also states that the Accessibility Assessment has informed the Integrated Appraisal (IA). The detailed appraisal matrices in Appendices F and G also stated that they were informed by the Accessibility</p>	No change.





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	<p>4.2 Paragraph S.33 of the Council's 'Sustainability (Integrated) Appraisal Report' [(S(I)A Report)] for the November 2013 'Pre-Submission CS' document states that the Health Impact Assessment (HIA), an Equality Impact Assessment (EqIA), Rural Proofing Assessment and Accessibility Assessment have informed the SA.</p> <p>4.3 Although not stated as so, we had assumed that the detailed assessment on sites reported in the Accessibility Assessments (Table K.9) (Appendix B) has informed the Sustainability Appraisal of Nantwich Strategic Site Options 1 to 3 (Table F.97), logically filtering down to the 'Reasons for Progression or Non-Progression of the Option in Plan Making' (pages 138 and 139 of Sustainability (Integrated) Appraisal and the summaries of the SA findings (paragraphs 5.308 to 5.701).</p> <p>4.4 However, this is by no means clear and we have noted discrepancies within and between the assessments presented, as detailed below. These discrepancies are discussed in order from the most detailed and bespoke assessment data to the broadest, most summarised data, to assist in identifying the source and nature of errors as they have involved within the integrated SA process.</p>	<p>Assessments. The various information sources used to carry out the IA are presented in Chapter 11 of the Report.</p>	
	<p>General</p> <p>4.5 It is apparent that the detailed matrix-style assessments on sites reported in Appendix F of the S(I)A Report (e.g. Appendix C) have been summarised in a shorter text assessment on sites in Chapter 5 of the S(I)A Report, which is described (at paragraph 5.305 of the S(I)A Report) as dealing with the SA of the January 2013 CS Development Strategy and Emerging Policy Principles documents. However, as paragraph 6.1 of the S(I)A Report explains, the Appendix F matrix data has been updated (using underlined red text) to incorporate changes resulting from the responses to the January 2013 Development Strategy and Emerging Policy Principles consultation. It is clear from the summarised assessment text in Chapter 5 of the S(I)A Report that these post-January</p>	<p>Noted and agreed.</p>	<p>The site summary findings in Chapter 5 and 6 of the Report will be amended to take account of any changes to the detailed</p>

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	<p>2013 changes to the Appendix F matrix assessment have not all been included in the summary assessment text in Chapter 5. For example, additional adverse health impacts on sites noted in red font under Sustainability Objective 4 are not included in the shorter text assessment on sites in Chapter 5.</p>		<p>appraisal matrices presented in Appendix F.</p>
	<p>4.6 Overall summary site assessments are given in Table 5.14 of Chapter 5 of the S(l)A Report, which sets out the options/alternatives for the Strategic Sites considered through the Development Strategy, with an outline of the reasons for their progression or on-progression where relevant (Paragraph 5.702). The paragraph text makes it clear that ‘the SA findings are not the sole basis for a decision; other factors, including planning and feasibility, play a key role in the decision-making process’. As noted above, the summarising process for the SA findings themselves is questionable. In addition, whilst, the sources of the evidence base for the ‘other factors’ are listed in paragraph 15.8 of the November 2013 CS Pre-Submission document, the substance of evidence base for the ‘other factors’ is absent in the suite of November 2013 documents. This makes the ultimate reasons for site progression or non-progression unclear and un-transparent. One can guess that the SHLAA site assessment data has been heavily relied upon, providing as it does information on planning and feasibility issues. However, this is not explicit.</p>	<p>Noted. Please see Appendix D (Evidence and links) of the Pre-Submission Core Strategy.</p>	<p>No change.</p>
	<p>Conclusion</p> <p>4.7 In summary, this lack of internal and external integration between the statutory Sustainability (Integrated) Appraisal and Local Plan Preparation processes is unfortunate and raises concerns as to whether the plan is ‘justified’ (one of four tests for plan soundness), since the plan may not be ‘the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence’ (Paragraph 182 of the NPPF; underline emphasis added).</p>	<p>Noted and disagree. The SA process has appraised all reasonable alternatives considered through the Core Strategy with its findings informing the Council’s decision-making process. Paragraphs S.44 – S.45 explain how the SA has influenced the development of the Core Strategy.</p>	<p>No change.</p>





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	The discrepancies and lack of integration between the assessments presented in Core Strategy and its Sustainability (Integrated) Appraisal suggests there is a lack of proportionate evidence and the former is, therefore, not 'justified' and must be 'unsound'.		
	4.8 Paragraph 165 of the NPPF states that 'a sustainability appraisal'..' should be an integral part of the plan preparation process and should consider all the likely significant effects on the environment, economic and social Factors'. The lack of integration between the assessments presented in Core Strategy and its Sustainability (Integrated) Appraisal suggests the latter is not integrated with the former and the former is, therefore, not 'justified' and must be 'unsound'.	Noted. The SA has been carried out in accordance with the NPPF which states that 'a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors' (paragraph 165). Paragraphs S.44 to S.45 explain how the SA has influenced the development of the Core Strategy.	No change.
	The summarising process for the SA findings themselves is questionable. lack of internal and external integration between the statutory Sustainability (Integrated) Appraisal and Local Plan Preparation processes is unfortunate and raises concerns as to whether the plan is 'justified.'	Noted and disagree. Please see response above.	No change.
Paragraphs 5.523 and 5.528 (pages 138 – 139) Nantwich Site 1 (Kingsley Fields) and Site 2 (Snow Hill),	5.1 The written summaries of the sites (within pages 138 - 139 and Paragraphs 5.523 and 5.528) are misleading and do not sufficiently convey the environmental constraints of the site.	Noted. The site summary findings in Chapter 5 and 6 will be amended to provide a clearer indication of the potential sustainability effects. Table 5.14 on Pgs 138 & 139 sets out the reasons for the selection or rejection of options in plan-making. It does not provide a summary of the findings for the SA of those options.	The site summary findings in Chapter 5 and 6 of the Report will be amended to provide a clearer indication of

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			the potential sustainability effects.
	5.2 These two preferred sites are both within an area of ‘significant’ Flood Risk. The Environment Agency advise that the ‘chance of flooding each year is greater than 1.3% (1 in 75) (this takes into account the effect of any flood defences that may be in this area). Flood defences reduce but do not completely remove the likelihood of flooding and can be over-topped or fail in extreme weather conditions.’	In Appendix F (page 1171), both sites were identified as being partially located in an area of flood risk (flood risk zones 2 and 3) and given an overall negative rating against the SA Objective of ‘water management’. It was also stated that the development could occur outside of the flood risk area. The CS seeks to protect the floodplain from development at these sites.	No change.
	5.3 Table F.97 correctly reports that the sites are within an area of Flood Risk. However, the subsequent explanation of ‘Reasons for Progression’ (pages 138 -139) does not report this key environmental issue. Moreover, the synopses of the SA findings overly summarises the issue, merely stating that there are negative impacts in terms of ‘water management’ (Paragraphs 5.523 and 5.528). 5.4 We consider this to be misleading and, therefore, at the very least, this needs to be considered and addressed within ‘Reasons for Progression’, to enable proper consultation on the sites and their constraints.	Opinion noted. Table 5.14 only presents reasons for progression or non-progression in Plan-making – it does not summarise the key environmental issues of the options. The approach taken to summarising the overall effects for Nantwich Sites 1 and 2 has been consistently applied to all summarises in Chapter 5. The detailed site assessment findings regarding ‘water management’ have been included in Appendix F (page 1171).	No change.
	Amend site summaries to cover environmental constraints of site.	Noted. The site summary findings in Chapter 5 and 6 will be amended to provide a clearer indication of the potential sustainability effects.	The site summary findings in Chapter 5 and 6 of the





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			Report will be amended to provide a clearer indication of the potential sustainability effects.
Table K.9 Nantwich Strategic Site Options Accessibility Assessment (page 1617)	<p>Nantwich Site 1 – Kingsley Fields</p> <p>5.5 It is unclear as to how the detailed tabular accessibility assessment on sites reported in Appendix K of the S(I)A Report (see Appendix C) have been taken account of in Table F.97 (“Sustainability Appraisal of Nantwich Strategic Site Options 1 to 3) (Appendix D).</p> <p>5.6 The “local amenities” part of Site 1’s Accessibility Assessment reports that the site:</p> <ul style="list-style-type: none"> - “met” the minimum distance standard for 4 services/amenities. - “failed to meet” the minimum distance standards for 8 services/amenities. - “significantly failed to meet” the minimum standards for 3 services/amenities. <p>5.7 This therefore demonstrates that the site is not overly accessible to local services/amenities.</p> <p>5.8 However, this is not conveyed within table F.97, which states that, when assessed whether it will “provide good opportunities to access facilities and services”, the answer given was “++” (i.e. “very positive effect”).</p>	Appraisal of this site was considered to be justifiable due to the proposed inclusion of a local centre on the site. This factor improved the score with regards to services and facilities.	No change.

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	<p>5.9 As such, we consider that the subsequent sustainability summaries of the site are unfounded and misleading based on the evidence. To illustrate, Paragraph 5.521 states that the site has “overall positive impacts in terms of delivering sustainable access to jobs, services and facilities”. We fail to see how this can be reasoned, considering that the site failed more of the tests than it met.</p>		
<p>Table K.9 Nantwich Strategic Site Options Accessibility Assessment (page 1617)</p>	<p>Nantwich Site 1 (Kingsley Fields) Compared with Discounted Site A (Land Around Acton Village) (Draft Nantwich Town Strategy)</p> <p>5.10 Land around Acton Village was originally discounted at the Town Strategy Stage. This section compares the Sustainability (Integrated) Assessment of ‘Land around Acton Village’ with Kingsley Fields.</p> <p>5.11 It is firstly important to highlight that the Authority have incorporated the four individual sites submitted for consideration from the beginning of the Local Plan process into one area of land known as ‘Land Around Acton Village.’ This is despite the land being split and submitted to the Local Authority as different sites throughout the emerging Local Plan and SHLAA process.</p> <p>5.12 Accordingly, we would expect the Sustainability (Integrated) Appraisal to assess each site put forward separately (Appendix A). However, this is not the case and we consider this has led to some of the sites noted in Appendix A being incorrectly discounted during the Sustainability Appraisal process (demonstrated below).</p> <p>5.13 Therefore, whilst we maintain that all sites within Appendix A should be allocated for development considering their acceptability in terms of relationship to the existing settlement of Acton and their ability to meet Acton’s housing needs, for the purposes of the next section (Accessibility), we have concentrated on site ‘Land at Acton Marina’</p>	<p>Noted and disagree. Whilst the accessibility assessment provided does appear to show that Site 4 (Land at Acton Marina) within Site A Land around Acton Village meets 3 more minimum standards than Nantwich Site 1 Kingsley Fields, it also shows that the site significantly fails to meet 3 more of the minimum standards than Nantwich Site 1 Kingsley Fields. The accessibility assessment provided also only considers a small section of the area that was considered in Appendix F of the Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012).</p>	<p>No change.</p>





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	<p>(Appendix A, site no.4), to test whether this site is more sustainable (in this respect) than the preferred site of Kingsley Fields. Accessibility (Appendix B)</p> <p>5.14 This section assesses the two sites accessibility to local services, amenities and public transport nodes. We have undertaken our own review for Land at Acton Marina (which is included within Appendix A, site no.4), Land around Acton Village). Measurements were taken from the centre of the site. This was undertaken as we consider this is the most sustainable site (of those contained within Appendix A) and, considering its size, it should be allocated within the Core Strategy (although if the Authority does not this should not prevent its allocation within the subsequent Site Allocations Development Plan Document as a secondary option). This assessment shows that, whilst the accessibility of 'Land at Acton Marina' and 'Kingsley Fields' is finely balanced, 'Land at Acton Marina' scored higher overall, as the site reached three more 'minimum Standards'.</p>		
Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012)	<p>Sustainability Appraisal Tables (Appendix C)</p> <p>5.17 We disagree with some of the results for Site A.</p> <p>5.18 As the above section demonstrates that "Land around Acton Marina" meets more of the accessibility minimum standards than fails them, the "+ -" score needs to be amended to "+"</p>	<p>Noted. These comments refer to the appraisal of Area A (Land around Acton Village) presented in Appendix B of the Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012). The SA Report accompanied the Draft Nantwich Town Strategy on consultation from 31st August to 1st October 2012.</p>	No change.
	<p>"Land Around Acton Village" is scored as a double negative for "Biodiversity and Geodiversity". Whilst we acknowledge that there will be loss of open countryside, the description confirms that the site does not contain any designated biological or geological features and is not known to contain any designated flora or fauna. In comparison, Kingsley Fields is scored as a "?" despite the statement that it "could contain</p>	<p>Noted. When the SA of the Draft Nantwich Town Strategy was carried out there were no Cheshire East Local Plan policies to provide mitigation. Site B (Land to the north west of Nantwich, to the north of Waterlode) now referred to as Nantwich 1</p>	No change.

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	<p>designated flora and fauna”. Accordingly, to ensure a consistent and fair approach, at the least the score for Land around Acton Village needs to be amended to a “?”.</p>	<p>(Kingsley Fields) was similarly considered to have negative effects against SA Objective 11 in Appendix B of the Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012).</p>	
<p>Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012)</p>	<p>Under “Heritage, Landscapes and Townscapes” Site A is scored as “-” because it is within a Conservation Area and Registered Battlefield, is in close proximity to a Scheduled Monument, Registered Parks and Garden and listed Buildings and would result in the loss of historic landscape character. We disagree with the notion that new development within or close to heritage assets is scored as a negative as we consider that new development (if sensitively designed) can actually improve the setting, character and appearance of heritage assets. This view is supported by the NPPF which states that “Local Planning Authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance” (Paragraph 137). Instead, considering that development could negatively or positively impact (dependant on the scheme specifics) a more fair approach would be to score the site as a “?”.</p> <p>Upon reviewing “Land Around Acton Village” alone, the site is outside the Conservation Area, and further away from the majority of nearby Listed Buildings (centred around Acton Village) and</p> <p>Scheduled Ancient Monument (Monks Lane Moated Site). Therefore, whilst we maintain that both sites “Land Around Acton Village” and “Land Around Acton Marina” should be scored as “?”, at the very least when considering “Land Around Acton Marina” there is even more justification for the result to be a “?”.</p>	<p>Noted. These comments refer to the appraisal of Area A (Land around Acton Village) presented in Appendix B of the Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012). The SA Report accompanied the Draft Nantwich Town Strategy on consultation from 31st August to 1st October 2012.</p>	<p>No change.</p>





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	<p>The Authority considers that “Land Around Acton Village” has a scoring of “? +” for energy efficiency and renewable energy. However the supporting commentary exactly replicates that for Kingsley Fields which is scored as a “+”. Therefore, to ensure a consistent and fair approach, the score for “Land Around Acton Village” needs to be amended to a “+”.</p> <p>Land Around Acton Village is given a score of “? –”, however, the sub-criterion’s grading (which feed into the overall mark) are mainly “?” (80%) with only one sub-criterion being “-”. We consider this must be an error and as such the overall mark should be amended to “?”.</p>	<p>Noted and disagree. Site B (Land to the north west of Nantwich, to the north of Waterlode) now referred to as Nantwich 1 (Kingsley Fields) received the same ‘score’ as Area B (Land around Acton Village) in Appendix B of the Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012).</p>	No change.
	<p>The site assessment states that Kingsley Fields scores a “++” for “education, training, jobs and employment opportunities”. Logically, the positive score must relate to the associated commentary that “the site could create additional employment opportunities, additional education opportunities and is close to education facilities”. In comparison, “Land Around Acton Village” is scored a “?”. This is despite being “in proximity of education facilities” and ignoring the site’s capacity to also “create additional employment opportunities” (as stated within our Vision for Land at Acton Marina). Accordingly, the score for Land at Acton Village needs to be amended to at least a “+”.</p>	<p>Noted. These comments refer to the appraisal of Area A (Land around Acton Village) presented in Appendix B of the Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012). The SA Report accompanied the Draft Nantwich Town Strategy on consultation from 31st August to 1st October 2012.</p>	No change.
	<p>The amended summary table demonstrates that “Land Around Acton Village” is as sustainable as “Kingsley Fields” if not more sustainable as there no “negative” or “very negative” effects.</p>	<p>Noted and disagree. Please refer to the responses above.</p>	No change.
	<p>When combining the two assessments (Accessibility Sustainability Appraisals), it is clear that “Land Around Acton Village” and in particular “Land at Acton Marina” (Appendix A, site no.4), is more sustainable than Kingsley Fields. Therefore, from a sustainability perspective, there is no reasoning why Kingsley Fields is being preferred for allocation over “Land Around Acton Village” and “Land at Acton Marina”.</p>	<p>Noted. Please refer to the responses above. As noted, Para 5.702 states that the SA findings are not the sole basis for a decision; planning and feasibility factors play a key role in the decision-making process.</p>	No change.

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	<p>We maintain that “Land Around Acton Village” and “Land at Acton Marina” should still be allocated for development, over Kingsley Fields.</p> <p>Whilst the Sustainability Appraisal does consider a broad range of material planning considerations, it does not allow scope for much variance between the weighting of positives and negative impacts (only allowing two choices; positive or very positive). As a result, there will be some impacts which cannot be given as much weight as they should.</p> <p>To illustrate, the Sustainability Appraisal does recognise that the site would result in the “loss of landscape character”, which leads to a “ - ” scoring. However this “negative” is then simply weighed against other positives and other negatives (i.e. the true impact gets lost within the wider assessment). We consider that the impact of the scheme on landscape character will be significant and this overrides any positive benefits.</p> <p>The Kingsley Fields site would represent a significant visual intrusion into open countryside, being notably exposed to the north and west, clearly not “round off” the town’s existing pattern of development. The site’s topography is also very flat, offering extensive and uninterrupted views to and from the site which would be lost if development was allowed. As the site is open and uncontained by existing development, it has no defensible boundaries and this allows for potential development beyond the limits of the site put forward.</p> <p>In comparison, the various “Land Around Acton” sites are relatively minor in scale ensuring that sustainable growth is in keeping with the character of the village. It is important to allocate these sites either through the Core Strategy of Site Allocations DPD to ensure that the housing needs of Acton are met (see above).</p>		





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	<p>Furthermore, in comparison to “Kingsley Fields”, “Land at Acton Marina” is well-bounded by the canal and Chester Road and is a more modest size than “Kingsley Fields”. This, therefore, provides more opportunity to integrate into the existing community of Nantwich and lessens impact on landscape character.</p> <p>The site is strategically located along the A534 (Chester Road) which links Nantwich with areas to the north west such as Chester and areas to the east such as Wrexham and North Wales, thus representing a unique opportunity to deliver a “gateway” scheme which contributes to the high quality built environment of Nantwich and contributes to canal regeneration.</p> <p>At the very least, the proposed level of development planned for Kingsley Fields should be shared with “Land Around Acton Village” and/or “Land at Acton Marina”. This is considering the latter sites equal if not higher level of sustainability and the need to distribute growth evenly in and around Nantwich (in order to integrate development into the existing community and reduce the visual impact and that on infrastructure).</p> <p>Moreover, by delivering growth at smaller sites increases their chances of deliverability. For example, new infrastructure requirements would be less, ownership complications not as likely to occur and ultimately developers carry less risk with a smaller site. Distributing growth also ensures that the benefits of new developments (e.g. new community uses or open space) are evenly spread throughout the town.</p> <p>The overall summary site assessments are given in Table 5.14 of Chapter 5 of the S(l)A Report, which “sets out the options/alternatives for the Strategic Sites considered through the Development Strategy, with an outline of the reasons for their progression or on-progression where relevant” (Paragraph 5.702). The paragraph text makes it clear that “the SA findings are not the sole basis for a decision; other factors, including planning and feasibility, play a key role in the decision-making</p>		

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	<p>process". As noted above, the summarising process for the SA findings themselves is questionable. In addition, whilst, the sources of the evidence base for the 'other factors' are listed in paragraph 15.8 of the November 2013 CS Pre-Submission document, the substance of evidence base for the 'other factors' is absent in the suite of November 2013 documents. This makes the ultimate reasons for site progression or non-progression unclear and un-transparent. One can guess that the SHLAA site assessment data has been heavily relied upon, providing as it does information on planning and feasibility issues, however, this is not explicit.</p>		
<p>Draft Nantwich Town Strategy Sustainability Appraisal Report (August 2012)</p>	<p>Conclusion</p> <p>We have demonstrated that "Kingsley Fields" should not be allocated for development on the grounds of scale and the harmful visual intrusion site development would create.</p> <p>"Land Around Acton Village" (Appendix A, site no. 1 - 3) and "Acton Marina" (Appendix A, site no.4), are acceptable for development considering their ability to meet Nantwich's and Acton's established housing needs in sustainable locations strategically linked to the existing settlements. The sites are also available in the short term for development and, in the case of Acton Marina, the site has the ability to deliver significant positive regeneration benefits for the town (see Appendix D).</p>	<p>Noted. Please refer to the responses above.</p>	<p>No change.</p>

