

Appendix 1: Consultation Response to the draft Sandbach Neighbourhood Plan.

The emerging Sandbach Neighbourhood Plan contains a series of policies that seek to deliver sustainable development and include positive approaches to planning. There are areas that would benefit from further policy development and from the preparation of further evidence to support the position already preferred by the town council.

2.2 Vision and Aims

Supportive, no further comments

3.1 Protecting the Countryside

Policy PC1 – Areas of Separation

The urban form of Sandbach has evolved over time to join the three settlements of Wheelock and Ettiley Heath, Elworth and Sandbach Heath resulting in some areas of green space being retained within the larger settlement of Sandbach. A policy to retain such space for community, natural and amenity purposes is a positive approach to ensuring sustainable development in Sandbach. The position reached does not conflict with the existing Development Plan (DP) and is in accordance with the emerging CEC Local Plan Strategy (LPS). The policy principle is supported.

Recommendations:

A clearer definition of Green Gap/Area of Separation is needed, as is a fuller evidence base to underpin the justification for the policy. The policy position may be strengthened through a series of amendments and further work:

1. Terms of reference would benefit from consistency. Policy PC1 refers to 'Areas of Separation' and 'Green Gaps' within the policy text. For clarity a single term of reference is recommended, either 'Green Gap', or 'Area of Separation'
2. The term should be more clearly defined to identify the factors that contribute to the allocation of land as a gap/area of separation'. Such factors may include an assessment of amenity value, landscape value, recreation value, conservation value etc.
3. The proposed policy does not clearly articulate what is being separated or what the proposed gaps are between. If the gap is intended to refer to future development pressures arising outside of Sandbach (as the large scale extent may imply), this is not clearly stated in the definition of the function of the policy and no evidence is presented to support this approach. Understanding these issues will assist in understanding if it is appropriate to apply the policy to any particular area of land and whether the extent of the allocation is appropriate to the purpose of the policy.
4. In association, and as a recommended part of this work, the distinct and separate characteristics of the three settlements of Wheelock and Ettiley Heath, Elworth, and Sandbach Heath would benefit from an assessment to articulate their historic development and the features that define each of these areas as distinct within the wider town of Sandbach. This should identify any distinctive characteristics of the areas and how their setting within the landscape contributes to this distinctiveness.

5. The proposed Areas of Separation/Green Gaps as identified on the proposals map do not recognise the existence of existing planning permissions. The policy cannot apply retrospectively to land already granted permission for development and should clearly identify that land to which it applies; it is recommended that land subject to existing planning permission should be identified on the proposals map and should not be subject to Policy PC1.
6. A full assessment of the landscape value within areas identified as 'Green Gaps/Areas of Separation' will assist to understand what contribution such areas make to frame the setting of Sandbach and the sensitivity of this setting to future development pressure.
7. To assist toward the policy aim, the policy should assess the contribution of other identified policy aims and particularly draw on evidence identified in Policies PC2, PC3, PC4, PC5 and PC6. These policies identify distinct single issues that may contribute to the function of a 'Green Gap/Area of Separation' and help inform the definition of what a 'Green Gap/Area of Separation' is and how it promotes sustainable development. The policy could be enhanced by cross reference to these policies and a clearer definition of the role and function of a 'Green Gap/Area of Separation'.

Policy PC2 – Landscape Character

The policy does not conflict with the emerging CEC LPS or the adopted DP. The policy principle is supported

Recommendation:

The policy position can be strengthened through a clearer articulation of the relationship between the identity of Sandbach and how the character of the surrounding countryside and its farmland setting contributes to this end. A more detailed assessment of landscape characteristics and an assessment of their contribution to Sandbach as a historic market town would assist here alongside a fuller assessment of landscape sensitivity to future development pressure.

Policy PC4 – Local Green Spaces

The policy does not conflict with the emerging CEC LPS or the adopted DP. The policy principle is supported. In its current wording the policy does not offer any flexibility and does not address impact from development within proximity to the sites.

Recommendation:

Consider an alteration to the policy wording to introduce some flexibility and to consider impact of development arising in proximity to the sites.

Policy PC6 – Footpaths

The policy does not conflict with the emerging CEC LPS or the adopted DP.

Recommendation:

The policy references 'very special circumstances'. For decision takers the policy would benefit from the identification of the criteria that form 'very special circumstances'

3.2 Preserving Heritage and Character

Policy HC1 – Historic and Cultural Environment

The policy does not conflict with the emerging CEC LPS or the adopted DP however the policy makes reference to an unadopted version of the Sandbach Conservation Area Assessment currently under preparation by CEC.

The Sandbach Conservation Area Assessment is a document prepared by Cheshire East Council, outside of the neighbourhood plan process and will be periodically reviewed and updated by Cheshire East Council.

Recommendation:

To ensure consistency with the most up to date evidence undertaken and adopted by CEC, the , the policy should refer to the 'most recently adopted CEC Sandbach Conservation Area Assessment'. This will enable the policy to remain consistent with any updated approaches to the Sandbach Conservation Area as undertaken by the Local Planning Authority.

3.3 Managing Housing Supply

Policy H1 – Housing Growth

The policy does not conflict with the emerging CEC LPS or the adopted DP. However, the restriction of new development to 30 dwellings or less may have an impact on the viability of sites and therefore the contributions that can be made through the S106 or CIL (once adopted) process.

Recommendation:

To ensure a consistent point of reference, reference should be made to commitments and completions at a specific date. Some further information on the definition of an 'organic growth rate' would assist with interpretation of the policy. There is an exception to the policy in H5 that would be helpful to address within this policy.

Policy H2 – Design and Layout

The policy does not conflict with the emerging CEC LPS or the adopted DP

Recommendation:

As per Policy PC1, to assist with assessing how development proposals will be assessed as 'in keeping with the unique character of Sandbach and it's surrounding countryside', an assessment and definition of the features that contribute to the character of Sandbach and it's countryside is recommended.

Policy H4 – Housing and an Aging Population

The policy does not conflict with the emerging CEC LPS or the adopted DP

Recommendation:

Consider including within Policy H3.

3.4 Promoting Jobs and the Local Economy**Policy JLE1 – Preservation of Areas Allocated for Employment**

Planning policy should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose (NPPF para 22).

The CEC LPS identifies the site for the delivery of up to 20ha of employment land and the future delivery of 200 homes in the southern section of the site. A planning permission has been granted under application 12/3948C including the development of up to 250 homes.

Whilst the policy to restrict future housing development on the site (over and above that granted planning consent) is supported in principal, the policy must be satisfied that the remainder of the site can be opened for employment development without the need to deliver further mixed uses.

Recommendation:

Policy should be re-worked to introduce flexibility in accordance with the NPPF and also to recognise the site's designation as identified in the emerging CEC LPS and the existence of a consent that grants permission for up to 250 new homes.

Should the position be retained it is recommended that evidence be provided to demonstrate that an employment use is viable and deliverable without the need to accommodate market housing.

3.5 Improving the Infrastructure**Policy IFT2 – Transport and Safety**

The policy does not conflict with the emerging CEC LPS or the adopted DP.

Recommendation:

To ensure the policy remains consistent with changes to CEC development plan documents, rather than reference to the 'Cheshire East Local Plan Strategy Submission (2014)', the policy should reference 'most relevant, recent and up to date Development Plan Document held by Cheshire East Council'.