

Alderley Park Development Framework Statement of Consultation

May 2015

1 Introduction

- 1.1 The Alderley Park site at Nether Alderley is of importance to the sub-regional economy as a strategic employment site. When, in 2013, AstraZeneca's announced the planned withdrawal of their research and development function from the Alderley Park site and their sale of the site, the Council therefore resolved to produce a planning guidance document to help guide the future repurposing of the site. This is the function of the Alderley Park Development Framework.
- 1.2 The Cheshire East Local Development Framework Statement of Community Involvement (SCI) adopted on 14th October 2010, sets out how Cheshire East Borough Council will consult when producing planning documents including Supplementary Planning Documents.
- 1.3 Whilst the Alderley Park Development Framework is not intended to have the full status of a Supplementary Planning Document, it has been subjected to a significant degree of consultation and publicity broadly in line with that carried out for Supplementary Planning Documents as set out in the SCI.
- 1.4 This Statement sets out the details of publicity and consultation undertaken to prepare the Cheshire East Borough Council Alderley Park Development Framework and outlines the key changes made to the Framework as a result of responses received pursuant to that consultation.

2 Consultation during pre-production stages

Consultation with key stakeholders through the Alderley Park Taskforce

- 2.1 In spring 2013, when AstraZeneca announced their intentions to withdraw their research and development function from the Alderley Park site by 2016, a taskforce comprising key stakeholders from the public sector, industry, and academia, was established to consider how best to secure sustainable high value employment and investment at this major employment site. The Taskforce commissioned studies to understand the implications of AstraZeneca's decision and to predict demand for floorspace for life science activities on the site going forward. They also established a shared vision for the site, based on their

extensive knowledge of the sector, the sub-regional economy and having regard to the studies they had commissioned. Aside from the Leader of Cheshire East Council, the Taskforce comprised:

- The Government's Life Sciences Adviser
- The Vice President of AstraZeneca
- The Chair of Cheshire and Warrington Local Enterprise Partnership
- The Leader of Manchester City Council
- The Member of Parliament for Macclesfield
- The Chair of BioNow
- The President and Vice Chancellor, Manchester University (also a Non-Executive Board member of AstraZeneca)

2.2 The Alderley Park Development Framework (Consultation Draft) has been drawn up with the intention that it fully accords with and supports the realisation of the vision of this Taskforce.

Public consultation through the Local Plan Consultation process

2.3 As the vision of the Alderley Park Taskforce emerged, it was translated into an draft spatial planning policy in the emerging Cheshire East Local Plan Strategy put out to public consultation in the **Cheshire East Pre-Submission Core Strategy** in November 2013. The form of that draft policy for the Alderley Park Site (Pre-Submission Core Strategy policy CS29) is set out in **Appendix A**. The consultation on the Cheshire East Pre-Submission Core Strategy took place between 5 November and 16 December 2013 and included the following:

- Stakeholders were invited by e-mail or letter to make representations, with full details of the consultation being available on Cheshire East's website. The e-mails were sent to 10,490 e-mail addresses and the letter was sent to 1,736 consultees, without an e-mail address. All stakeholders are registered on Cheshire East's Consultation Portal. All Cheshire East Council Members and Town and Parish Councils in and adjoining Cheshire East were also sent e-mails and letters.
- The Pre-Submission Core Strategy was accessible through Cheshire East Council's Consultation Portal. Copies were also made available at all of the libraries in the Borough and at the Council's Customer Service Centres in Crewe and Macclesfield, Cheshire East Council's offices in Sandbach and the Planning Help Desk, Municipal Buildings, Crewe. Comments forms were also made available to take away at the above venues. Further copies were provided to all Cheshire East Council Members, all Town and Parish Councils, all MPs that cover the Cheshire East area, along with Natural England, English Heritage, the Environment Agency and Natural Resources Wales.
- A press release which resulted in a number of articles being published in the press, as well as local radio coverage of the consultation and a number of articles placed on various local websites.

- 2.4 As a result of this extensive public consultation process on the Pre-Submission Core Strategy consultation 8,585 comments were received. Of these 74 comments are recorded on the consultation portal in relation to the proposed wording of draft policy CS29 relating to the allocation of Alderley Park as an Opportunity Site.
- 2.5 Key issues raised related to:
- General support for retention of Life Science facility on the site;
 - More mixed response to concept of mixed redevelopment on the site but some support in a number of representations for the concept of limited housing supporting life sciences;
 - Concern regarding any scope for development on currently undeveloped areas of the site;
 - Concerns regarding impact on the character of Nether Alderley;
 - Concern regarding negative impact on infrastructure, doctors, schools, traffic and parking congestion;
 - Some objections to any or significant housing development (some representations raised no objections to housing provided it was limited to previously developed parts of the site);
 - Less commonly, some objectors suggested more of the site should be given over to housing and less to employment given the brownfield nature of this site and the pressure for housing on other sites (greenfield) in the Green Belt elsewhere;
 - Requests for reference to housing development to be made more explicit in the policy;
 - Requests for leisure facilities for the whole community, enhancements to nature conservation and provision for a quality hotel.
- 2.6 All representations were taken into account and, having regard to representations, policy CS29 was further refined to the form outlined in the **Cheshire East Local Plan Strategy - Submission Version** set out at **Appendix B**. As can be seen when comparing the two versions of this policy, key changes include more explicit reference to housing for clarity, and reference to proposals not being prejudicial to the longer term growth of life sciences. These changes resulted from reconsideration of the policy in light of the representations which had been received at that stage.
- 2.7 The Local Plan Strategy - Submission Version was also published for a six-week period prior to submission, during which time people were able to put forward representations that they wished to be considered by the Planning Inspector as part of the Local Plan Strategy examination process. The consultation on the Cheshire East Local Plan Strategy - Submission Version took place between 14 March 2014 and 25 April 2014 and included the following:

- The document was made available to view on the Council's website together with supporting documentation. Copies were also made available at all of the libraries in the Borough and at the Council's Customer Service Centres in Crewe and Macclesfield, Cheshire East Council's offices in Sandbach and the Planning Help Desk, Municipal Buildings, Crewe. Further copies were provided to all Cheshire East Council Members, all Town and Parish Councils, all MPs that cover the Cheshire East area, along with Natural England, English Heritage, the Environment Agency and Natural Resources Wales.
- A Statutory Notice was published in the local press.
- The Report on Consultation for this document sets out that notification of the formal 6 week period for representations was sent to all those registered on the Council's Consultation Portal including emails sent to 10,490 e-mail addresses and letters to 2370 consultees.

2.8 As a result of this further consultation exercise 3,402 representations were received.

2.9 Key issues raised in this consultation exercise in relation to CS29 relate to:

- Significant level of support for development of Alderley Park as a world class science park
- Some objections to any development other than for life science activities;
- Some suggestions alternative employment uses would be preferable to housing;
- Some suggestion any residential development on this site would be contrary to the NPPF and this is not a sustainable location for housing;
- Some questioning whether high value uses such as residential are genuinely required to sustain a life science park when there has been no need for such uses in the past;
- Some suggestions that life science activities on this site should not be limited to human health science activities (the policy does not in fact seek to do this as it allows for 'complementary uses' which would include other appropriate life science activities);
- Questioning the extent of the defined previously developed land particularly with reference to sports pitches;
- Some objection to any reference to development outside previously developed land even in instances where Very Special Circumstances have been demonstrated;
- Concerns over pressure on infrastructure such as local primary school;
- Concerns regarding impact of housing on character of Nether Alderley;
- Request specific reference to need to preserve setting of Nether Alderley Conservation Area.

2.10 Representations submitted in respect of emerging policy CS29 have been taken into account in formulating the Alderley Park Development Framework Consultation Draft and have helped shape the draft document. In particular:

- Concerns expressed regarding development on open sports pitches have led to the Framework setting out that no built development either for life

sciences or housing should be allowed on the cricket pitch on Congleton Road;

- Concerns regarding the inclusion of sports pitches within the defined previously developed land have led to specific clarification for developers that, even though the sports pitches are, on this particular site, considered to fall within the definition of previously developed land, building on the pitches will be considered to represent inappropriate development in Green Belt terms. As such new buildings on any pitches could only be considered acceptable if convincing very special circumstances were demonstrated;
- Concerns that housing should in no way restrict employment growth nor result in expansion of the previously developed land, has led to the Framework seeking to ensure the core life science area around Mereside is reserved for Life Science focused activities;
- In light of requests for enhancement of nature conservation and leisure facilities, the Framework seeks to clearly encourage this.

3 Consultation on Alderley Park Development Framework (Consultation Draft)

- 3.1 On 6th January 2015 Cheshire East Council Cabinet approved the Alderley Park Development Framework (Consultation Draft) as a draft document to be subjected to public consultation. The Cabinet agreed the draft document should be made available in a range of formats in public buildings and online for a period of 6 weeks, and that the consultation period should be advertised in the press in line with the Council's Statement of Community Involvement.
- 3.2 The Council's Statement of Community Involvement sets out that for formal Supplementary Planning Documents the following will be undertaken by way of consultation prior to adoption:
- Hard copies of the draft document and associated documentation will be made available for inspection at Council offices at Westfields Sandbach, Town Hall Macclesfield and Delamere House Crewe as well as at Cheshire East Libraries;
 - The draft document and associated documents will be published on the Council's website and consultation portal;
 - Public notices will be placed in newspapers and on the Council's website;
 - A press release will be issued;
 - Letters or emails will be sent to those on the LDF database.

- 3.3 In addition, the SCI sets out that further consultation activities may be carried out in the form of exhibitions, presentations, questionnaires/surveys, focus groups or workshops and theme based fora.
- 3.4 Although the Alderley Park Development Framework is not to be adopted as a formal Supplementary Planning Document, public consultation on the draft document has been carried out to a similar level as follows:
- Hard copies of the draft document and associated documentation were made available for inspection at Council offices at Westfields Sandbach, Town Hall Macclesfield, and Delamere House Crewe, as well as at Cheshire East Libraries;
 - Hard copies were sent to Nether Alderley and Over Alderley Parish Councils and the adjoining parish councils;
 - The draft document and associated documents were published on the Council's website and consultation portal;
 - A drop in exhibition/question and answer session was held in Nether Alderley Parish Hall with invitations to attend sent to the following parish councils: Nether Alderley, Prestbury, Over Alderley, Alderley Edge, Chorley, Chelford, Siddington, Henbury as well as to immediate site neighbours by letter and local site notices;
 - Emails were sent to those on the LDF database with an email address, which currently amounts to over 11,000 addresses;
 - Letters were sent to key organisations on the LDF database without registered email addresses;
 - Notices were placed in the Macclesfield Express, the Wilmslow Express and on the Council's website (Copied at appendix C);
 - A press release was issued to the Macclesfield Express and Wilmslow Express (Copied at Appendix D).
- 3.5 A full 6 week period was allowed for consultation.
- 3.6 Representations have been submitted electronically via the consultation portal, by letter, and in comments slips at the drop in event. All representations submitted in response to the consultation within the specified period have been logged and carefully considered by officers. The consultation draft version of the Framework has then been reconsidered in light of representations received and a number of changes made to the draft document to form the recommended final version.
- 3.7 A summary of key issues raised as a result of consultation and of changes to the framework resulting are set out in the Table at Appendix E.

Extract from Cheshire East Local Plan Pre-Submission Core Strategy, November 2013

Site CS 29: Alderley Park Opportunity Site

15.376 Alderley Park is an existing employment site located to the south east of Nether Alderley, occupied by the worldwide pharmaceutical company AstraZeneca. Whilst the site currently provides 2,900 jobs, ⁽⁸¹⁾ the majority of which are highly skilled research and development posts, AstraZeneca has announced plans to scale down its facility at Alderley Park. There is therefore a need to reconsider the future of this strategic employment site.

15.377 As a previously-developed site within the Green Belt, it is not proposed to alter the existing Green Belt boundary at Alderley Park.

Site CS 29

Alderley Park Opportunity Site

The Council will support the redevelopment of the Alderley Park site subject to all of the following criteria being met:

1. Uses should be for Science for Life activities ⁽⁸²⁾. Other uses will be supported where it has been demonstrated that they are either:
 - i. necessary for the delivery of Science for Life activities; ⁽⁸³⁾ or
 - ii. complementary to Science for Life activities, and are in accordance with the Site Masterplan / Planning Brief.⁽⁸⁴⁾
2. Development is restricted to the Previously Developed Land (PDL)⁽⁸⁵⁾ on the site unless:
 - i. very special circumstances are demonstrated to justify use of other land on this site outside the PDL; and
 - ii. the equivalent amount of PDL on the site is restored to greenfield status, to an equivalent or better quality than that other land.
3. Development would not have a greater impact on the openness and visual amenity of the Green Belt and the purposes of including land within it than existing development;
4. Development is of a quality which respects the heritage and landscape assets on this site and accords with the principles set out in the Site Masterplan/Planning Brief

⁽⁸¹⁾ AstraZeneca (www.astrazeneca.co.uk/astrazeneca-in-uk/our-uk-sites), September 2013

⁽⁸²⁾ The life sciences industry is defined by the application of Biology, covering medical devices, medical diagnostics and pharmaceuticals, through to synthetic and industrial biotechnology. (Strategy for UK Life Sciences, March 2012, Department for Business Innovation and Skills).

⁽⁸³⁾ In the context of this policy this is envisaged as comprising limited high value uses which would release funds used to subsidise the development of Science for Life activities

⁽⁸⁴⁾ It is intended that a Masterplan, Planning Brief or similar document be developed and adopted as an Supplementary Planning Document or similar, to provide guidance on the development and design principles for this site, and to define the heritage and landscape assets.

⁽⁸⁵⁾ The PDL has been defined by the Council as shown on the plan accompanying this policy

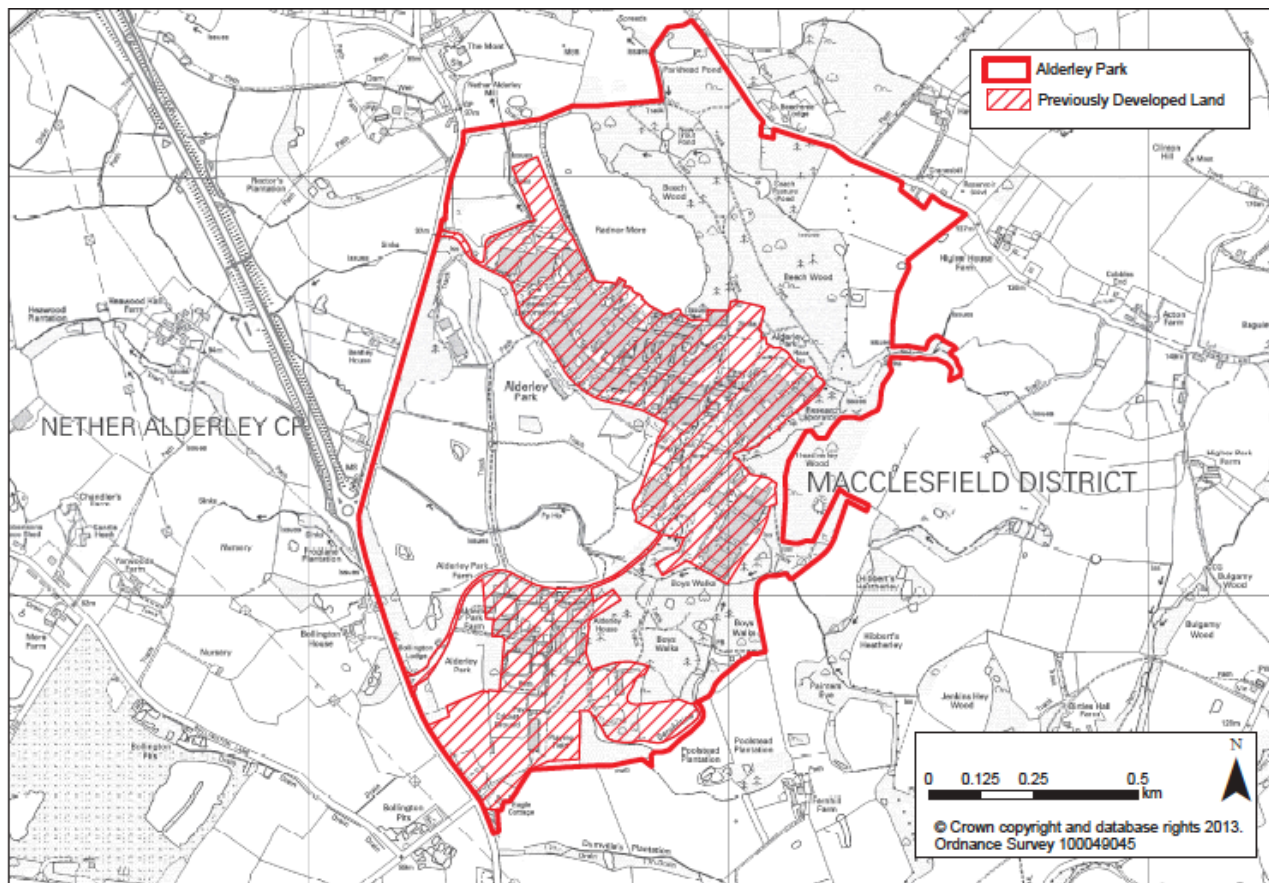


Figure 15.50 Alderley Park Opportunity Site

Extract from Cheshire East Local Plan Strategy- Submission Version, March 2014

Site CS 29: Alderley Park Opportunity Site

15.396 Alderley Park is an existing employment site located to the south east of Nether Alderley, occupied by the worldwide pharmaceutical company AstraZeneca. Whilst the site currently provides approximately 2,900 jobs(96), the majority of which are highly skilled research and development posts, AstraZeneca has announced plans to scale down its facility at Alderley Park. There is therefore a need to reconsider the future of this strategic employment site.

15.397 As a previously-developed site within the Green Belt, it is not proposed to alter the existing Green Belt boundary at Alderley Park.

Site CS 29

Alderley Park Opportunity Site

The Council will support development on this site to create a life science(97) park with a focus on human health science research and development, technologies, and processes, where criteria 1-5 below are met:

1. Development shall be:
 - i. For human health science research and development, technologies and processes; or
 - ii. For residential or other high value land uses demonstrated to be necessary for the delivery of the life science park(98) and not prejudicial to its longer term growth; or
 - iii. For uses complimentary to the life science park and not prejudicial to its establishment or growth.
2. Development shall be in accordance with the site Masterplan / Planning Brief(99)
3. Construction of new buildings for uses in criterion 1 above shall be restricted to the Previously Developed Land (PDL)(100) on the site unless:
 - i. very special circumstances are demonstrated to justify use of other land on this site outside the PDL; and
 - ii. the equivalent amount of PDL on the site is restored to greenfield status, to an equivalent or better quality than that other land.
4. Development would not have a greater impact on the openness and visual amenity of the Green Belt and the purposes of including land within it than existing development.
5. Development shall preserve or enhance the significance of Listed Buildings and other Heritage and Landscape assets on and around this site.

96 AstraZeneca (www.astrazeneca.co.uk/astrazeneca-in-uk/our-uk-sites), September 2013

97 The life sciences industry is defined by the application of Biology, covering medical devices, medical diagnostics and pharmaceuticals, through to synthetic and industrial biotechnology. (Strategy for UK Life Sciences, March 2012, Department for Business Innovation and Skills).

98 In the context of this policy 'demonstrated to be necessary' is envisaged as releasing funds to subsidise and thus enable the delivery of the life science park.

- 99 It is intended that a Masterplan, Planning Brief or similar document be developed and adopted as a Supplementary Planning Document or similar, to provide guidance on the development and design principles for this site and to define the heritage and landscape assets and complimentary uses.
- 100 The PDL has been defined by the Council as shown on the plan accompanying this policy

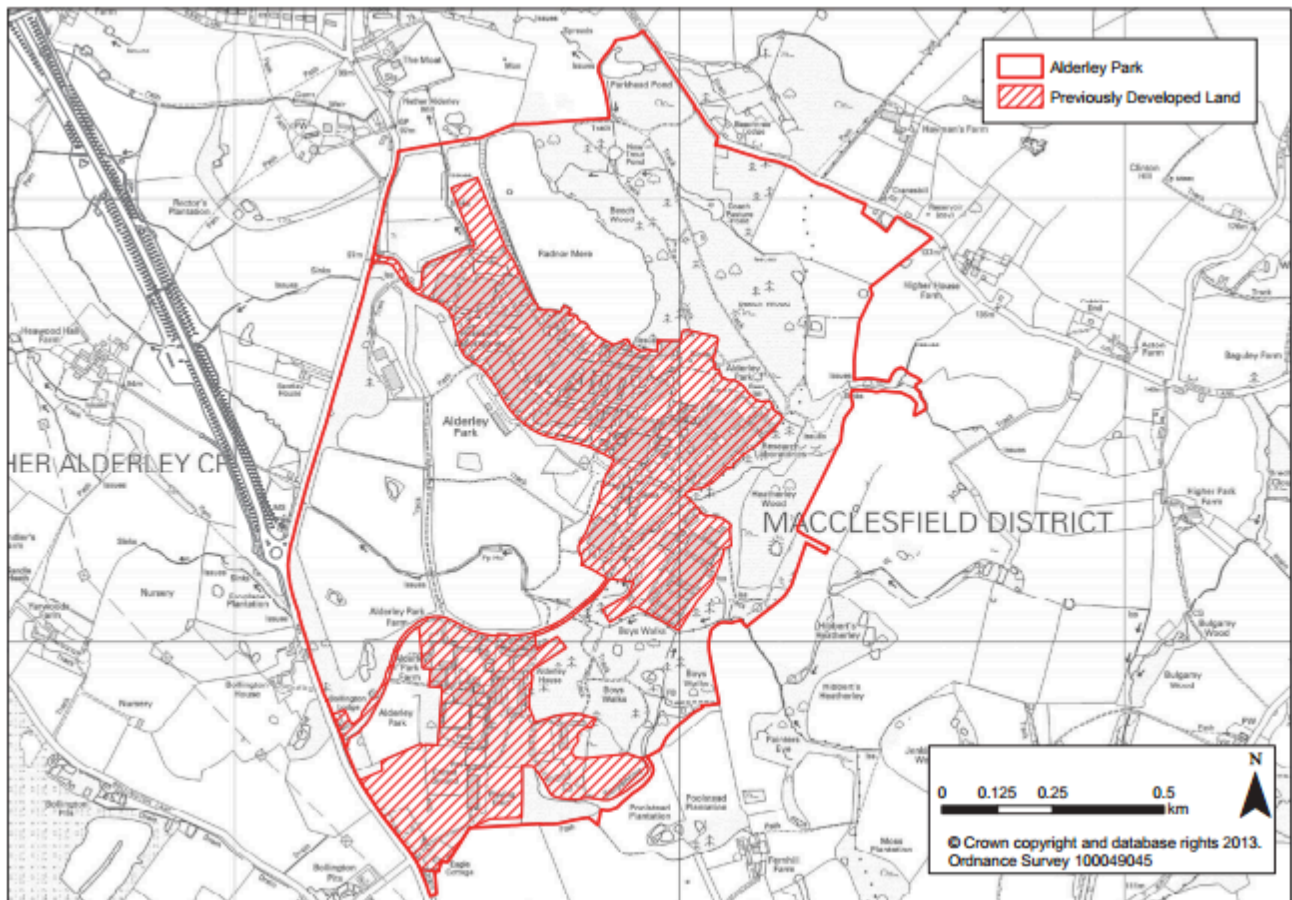


Figure 15.50 Alderley Park Opportunity Site

Appendix C

Public Notice advertising Consultation on Draft Framework

CHESHIRE EAST BOROUGH COUNCIL

Draft Alderley Park Development Framework

Notice of arrangements for public consultation on proposed planning guidance document
Notice is hereby given that Cheshire East Borough Council is preparing a planning guidance document in relation to land at Alderley Park, Nether Alderley, Macclesfield, Cheshire, SK10 4TF, to be known as the 'Alderley Park Development Framework'.

The Framework will provide planning guidance relevant to potential development on the Alderley Park site.

For six weeks between 30th January 2015 and 13th March 2015, Cheshire East Council are inviting comments on this draft planning guidance document.

The draft Alderley Park Development Framework and supporting documentation, will be available to view during this period at:

- <http://cheshireeast-consult.limehouse.co.uk/portal/planning/dfb/alderleypark>
- Cheshire East libraries
- Cheshire East Headquarters, Westfields, Sandbach
- Town Hall Macclesfield
- Delamere House Crewe.

Representations should be made either:

- online at: <http://cheshireeast-consult.limehouse.co.uk/portal/planning/dfb/alderleypark>
- by letter to: Jo Wise, CEC Spatial Planning Team, c/o C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ.

Representations must be received no later than 5pm on 13th March 2015. All representations received by the deadline will be considered and will help to inform preparation of the final version of the document.

Any representation submitted in relation to the draft planning guidance document may also be accompanied by a request to be notified of the adoption of the document.

www.cheshireeast.gov.uk

Appendix D

Press release on Public Consultation

Public consultation commences on development framework for Alderley Park January 26, 2015

A six-week consultation period on the draft development framework for Alderley Park will commence on Friday, January 30, 2015.

Comments are invited from technical bodies, amenity groups, residents, businesses, developers and anyone with an interest in the planning and development of this 400-acre strategic employment site.

The draft framework outlines Cheshire East Council's expectations for future development on the site following the planned withdrawal of AstraZeneca's research and development function.

It outlines the ambition for Alderley Park to continue as a world class life science centre, reconfigured from a single user to a hub for life science activities. It also aims to clarify the parameters for any future development which may come forward on the site.

Manchester Science Partnerships (MSP), the new owner of Alderley Park, is proposing to invest some £107m over 10 years to improve the site, repurpose buildings to make them suitable for multi-occupancy, decommission redundant facilities, and maintain and improve key assets to retain the site's world class R&D capabilities.

As set out in the framework, there may be scope for development for alternative uses on the site, including residential, to create a mix of uses which will provide income to support the establishment of the life science hub.

Rowena Burns, Chief Executive Officer of MSP, said: "The future of Alderley Park as a high quality bioscience centre is vitally important to the local economy.

"Since MSP purchased the site we have been working on how we can deliver the high-quality, sensitive and appropriate development within the site necessary to secure that future."

Councillor Michael Jones, Leader of Cheshire East Council said: "Our aim is to create an independent, self-sustaining, world-class hub for life sciences, while also protecting the heritage of this unique site.

"The early signs are very promising and we hope that with the right planning framework in place we can ensure this site remains a strategic life science site of world-class quality."

Anyone interested can [view the draft framework at Moderngov](#). Copies will also be available to view in Cheshire East libraries and at council offices in Macclesfield, Crewe and Sandbach.

Comments and representations can be made between Friday, January 30 and March 13, 2015, either:

- online at - [Cheshire East consultations portal](#)
- by letter - to Jo Wise, CEC Spatial Planning Team, c/o Municipal Buildings, Earle Street, Crewe CW1 2BJ.

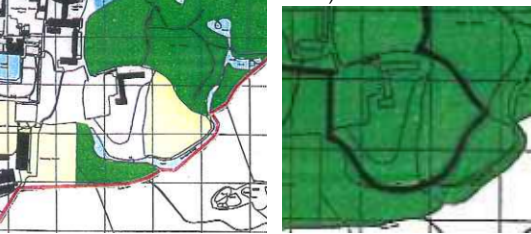
Appendix E

Summary of issues raised in representations and changes made in response

Issues/comments raised (in summary)	Action/Response	Changes
Concept of Life Science Park		
<p>General strong support for Life Science Park to retain opportunities for skilled employment including representations from a number of key bodies including:</p> <ul style="list-style-type: none"> • Greater Manchester LEP strongly supportive of Life Science Park on this site and see it as complementary to other scientific and technology economic assets in Greater Manchester. Also stress maintaining momentum is critical • East Cheshire Chamber of Commerce and Enterprise stress the importance of this site remaining at the forefront of scientific research and the significant impact the loss of jobs resulting from AstraZeneca's withdrawal will have on the wider economy. Welcome the Framework as an important step forward and recognise the need to generate funds from high value uses to secure the future of the site. Fully support the aims of the Framework. • Nether Alderley Parish Council in full support of the objective to establish and grow a Life Science Park and to increase skilled employment and job opportunities in Life Sciences • Warrington Chamber of Commerce totally support the proposals for Alderley Park • AstraZeneca write in support of the Framework as a key part of the Taskforce Vision • MSP support the Framework as outlining a plan which will enable them to make the life science agenda central to the success of the site • Recent Parish Survey shows 95% of local people support a Life Science Park 	<p>Support noted.</p> <p>In view of the apparent strength of support for Life Sciences on this site the Land Use Policy section in the Draft Framework has been amended to place additional emphasis on this being the overall aim and desire. In addition definition of life sciences now included to improve clarity.</p>	<p>Page 11 - additional sentences added to place more focus on life science uses being particularly desirable.</p> <p>Page 53 - footnotes from CS 29 added to clarify emerging policy</p>
<p>Some comments received regarding focus on life sciences/human health sciences:</p> <p>Some support for this not becoming a general office park, however view also expressed that park should not be restricted to Life/Bio Science and that if demand is not sufficient for Life Sciences the site should be opened to other science research.</p>	<p>Whilst the Framework specifically seeks to encourage life science focused uses it does not preclude other science research activities which would complement the science park.</p>	
<p>Suggestion that long term plan should be in place to detail how Life Sciences to be supported long term and that there should be a back up plan to address the threat of long term vacancy/deterioration if buildings are not taken up by the market</p>	<p>Additional text has been inserted into the Framework to make it clear that a business plan will be required alongside a viability report to accompany planning applications seeking to justify any housing on the basis of them supporting Life Sciences. MSP has confirmed that should the Life Science Park not be a success in the long term then they would seek to utilise the existing B1 lawful use of the buildings to bring in a wider range of business uses.</p>	<p>Pages 13, 40 and 62 - Requirement for submission of business plan inserted.</p>
<p>Comment that the need to find a positive outcome for the site should not be seen as an opportunity to allow unfettered development and reference to recent Parish Survey shows around half of local people oppose new commercial development in the Green Belt</p>	<p>The Framework seeks to impose strict controls over the parameters of potential new buildings within the Green Belt. It makes clear Green Belt planning policy will be applied and any development which would be classed as 'inappropriate' in Green Belt terms will only be allowed if justified by very special circumstances in accord with normal national and local Green Belt policy. Changes made to Masterplan to reduce areas shown as potentially suitable for housing.</p>	

Concept of Increased public access	Action/Response	Changes
<p>Some limited concern expressed that opening access could jeopardise security at the park and hence reduce attractiveness to some occupiers. Vast majority of representations support increased public access through/in the site with linkages to existing recreational routes in the locality, including the following:</p> <ul style="list-style-type: none"> Recent Parish Survey suggests 87% of local people welcome public access The Edge Association supports increased access and leisure facilities Cheshire East Local Access Forum (CELAF) support general approach to increase access to the public and suggest routes across the site should be multi-user suitable for pedestrians/cyclists/horse riders/carriages and disabled users and enable connections with routes such as Laureen's ride and Cheshire Cycleway. CEC Countryside Access officer notes that improved access within the site will support CECs statutory Rights of Way Improvement Plan and policies within the emerging CELPS which seek to support healthy, active lifestyles and sustainable patterns of development/ access to sustainable means of transport, improving links between neighbourhoods, reducing the need to travel. Suggests both circular routes and connecting routes would be beneficial and promotes a route network which accommodate users of all categories. Specifically draws attention to the very limited routes available in the Borough for riding and carriage drivers. Nether Alderley Parish Council supports opening the park for recreation and installing new footpaths to Nether Alderley Mill, the Mere and the Edge <p>More specific comments on public access include:</p> <ul style="list-style-type: none"> CELAF encourage pedestrian access to Mere if possible. Suggestion that clarification should be sought regarding future long term management of parklands and woodlands and access routes and clarity regarding potential for charges for access and status of routes East Cheshire Ramblers and others suggest particular routes which would be useful: <ul style="list-style-type: none"> Radial footpaths as follows: To NE to join Hocker Lane (BR 39 and OA13), and via Over Alderley footpath 13, bridleway 23 and bridleway 40 to link with the Wizard Trail cycle route and Laureen's Ride. To the SE to join NA30 and OA19, to the SW to join Congleton Road path and to the NW to join NA 33, NA34 and NA22; `A route at the west of the site to link to Nether Alderley Footpath 26 and the Bypass shared cycle pedestrian facility. Pedestrian links between residential areas. Access to Radnor Mere. Radial routes to be joined together with 2 short additional paths to improve connectivity A new footpath/cycleway alongside Congleton Rd within site boundary to link NA30 with NA26 A circular route around the Park A route linking the site to Nether Alderley Mill (and potentially with further parking for the Mill provided on site) Cheshire Gardens Trust support minimum additional paths to avoid damaging the historic parkland and increasing burden of maintenance Comment that Hocker Lane is private and care should be taken regarding impacting on maintenance Request that any footpath link to Hocker Lane does not link by Cranesbill Farm Noted that public access near the Mere could disturb herons in the heronry. 	<ul style="list-style-type: none"> General strong support for public access is noted It is not anticipated that public access would be throughout the entire site. MSP are amongst the UK's largest science park operators and hence will have a good understanding of where public access may prejudice effective operation of the site. It is considered inappropriate for the LPA to seek to influence experienced commercial operators regarding maintaining adequate security for commercial uses. Public access section amended to take account of comments suggesting multi-user routes and specific suggestions submitted regarding particularly useful routes. It should be noted however that this has been added to suggest developers should consider, not to seek to require any particular level of access. Future management of parkland is an issue which could be considered as part of any planning application proposing public access to the site and could be secured at that stage via condition or S106 if justified. A sentence has been added to Landscape Setting and Green Infrastructure section to make clear future maintenance of these areas should be considered by developers when submitting applications. Although Hocker Lane is private this is already a Bridleway and hence public access on foot, by cycle and on horseback is already allowed. The impact of any new footpath on the amenity of neighbours would be considered as part of any planning application proposing that access. With regard to potential impacts on the heronry from public access the Framework already references the need to protect ecological features on pages 27. Consideration has been given to referencing the existence of herons around the Mere and this has now been added. 	<p>Pages 26 - amended to reflect particular suggestions on routes linking with Nether Alderley Mill, the Mere and Alderley Edge.</p> <p>Page 64 - Additional appendix added (Appendix E) giving detailed suggestions regarding provision of specific routes.</p> <p>Page 26 - Fig 4.2 amended to include footpath references as referenced in new Appendix E and link shown to Nether Alderley Mill.</p> <p>Page 27- amended to make reference to need for consideration of maintenance of publicly accessible areas at planning application stage.</p> <p>Page 14 - reference added to existence of herons around the Mere.</p>

Green Belt Issues	Responses	Changes
If the Council considers the Green Belt has outlived its purpose it should amend the boundaries through the Local Plan process	The Framework is not seeking to change Green Belt boundaries but to set out that within Green Belt policy, given that this is a major previously developed site, facing significant changed circumstances since it was allocated for pharmaceutical (B1) purposes that there may be some scope for housing, particularly taking into account the importance of this site to the North West Life Science ecosystem and the desirability of that being maintained if possible. This could be made clearer in the document.	Page 12 - Additional sentence added to para 1 to confirm no changes proposed to the Green Belt boundary i this locality.
The appendices should include detailed coverage of the Green Belt paragraphs of the NPPF.	Page12 of the Framework references paras 87-90 of the NPPF and further text has been added to this section to clarify that the Council has not at this stage accepted VSC exist justifying inappropriate development in the Green Belt. A link to the NPPF is then also included in Appendix A (page 54). It is not considered necessary to extract all the relevant paragraphs from the NPPF and include into the document when a link is given and the relevant paragraphs have been quoted.	
Green Belt policy should be strictly applied- some of the proposed uses constitute inappropriate development in the Green Belt	Page 12 references the fact that development outside the PDL or in areas within it which are currently relatively open would constitute inappropriate development. Page 13 has been amended to strengthen this	Page 13 - amended with additional paragraph setting out more clearly that VSC will be needed at planning application stage for any 'inappropriate' development in the Green Belt.
The Framework does not sufficiently address how development might impact on the purposes of the Green Belt and the value of the site in Green Belt terms has not been assessed in the Green Belt Assessment undertaken to support the CELPS. This assessment should be undertaken.	The site has not been assessed in the Council's Green Belt Assessment because it is not intended to remove it from the Green Belt. The impact of any development proposal on the Green Belt would be undertaken at planning application stage when details of the scale and exact location of any development are available.	
Visual impact of replacement buildings needs to be properly assessed through appropriate Visual Impact Assessment and heights predicted on site specific view analysis	This would be expected at planning application stage. Appendix D references the need for a Visual Impact Assessment to accompany future planning applications.	
<p>Comments on Very Special Circumstances :</p> <ul style="list-style-type: none"> • Most of the significant factors which are suggested as contributing to very special circumstances are common to many sites and to allow economic circumstances to be argued and very special circumstances (VSC) should only be done in a rigorous way on a case by case basis as individual circumstances come forward. The list of possible VSC should be removed from the document • Para 91 of the NPPF allows for environmental benefits not economic benefits to count as very special circumstances • There is a presumption that very special circumstances exist to justify development when this case has not been proven. 	It is agreed that VSC can only be considered on a case by case basis at planning application stage. Rather than removing the list of possible VSC, additional text can be added to pages 12 and 13 making it clearer that the production of the Framework does not suggest the Council has accepted at this stage that VSC exist and specifying more clearly that this case must be made in detail at planning application stage supported by detailed viability and business model reports. Para 91 does not preclude economic considerations being viewed as VSC.	Pages 12-13 - Text changes to clarify the Council's position that VSC should not be assumed to have been accepted at this stage.

Green Belt Issues continued	Response	Changes
<p>Comments of area of defined Previously Developed Land</p> <ul style="list-style-type: none"> Concern that defined PDL is larger than Major Developed Site boundary in 1999 Development Brief which excluded playing pitches/Suggestion PDL should follow boundary of Major developed Site boundary asset out in the MBLP. National Trust notes the inclusion in Section 3 paragraph 3 (page 12) on Green Belt policy the reference to development on open areas within the PDL still being classed as inappropriate development and supports this paragraph Nether Alderley Parish Council is opposed to any development outside PDL and strongly affirms that temporary car parks and sports pitches should not be classed as PDL Recent Parish Survey suggests 86% want development restricted to 'sites of existing buildings' Recent Parish Survey suggests 85% are concerned that the PDL land swap provision would allow to creep into the Green Belt and representations that land swaps should not be allowed Any play areas should be within PDL 	<p>The boundary of the Major Developed Site as defined in the MBLP does not include most of the sports pitches but does include part of the south east sports pitch and an area of adjacent woodland (see below). The area of woodland is excluded from the PDL boundary.</p>  <p>The Major Developed Site boundary was defined applying the criteria applicable at the time and was not defined as PDL. It dates back to at least 1999. The boundary of the PDL has been drawn up applying the definition of PDL as set out in the NPPF. The NPPF defines PDL as <i>“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”</i> When defining the PDL regard to the fact that the sports pitches on this particular site were provided for the use of employees and were therefore classed as within the curtilage of AstraZeneca. It should be noted however that it is not the case that the Council is suggesting all development within the PDL would be classed as appropriate in Green Belt terms and buildings on sports pitches would normally be considered inappropriate despite being within the defined PDL, aligning with the text in racks above.</p> <p>The concerns regarding the temporarily approved car park at Mereside have been noted and acted upon with this area - although still currently PDL being removed from the areas suggested as potentially suitable for redevelopment.</p> <p>Concerns regarding 'land swap' are noted. This stems from the draft policy in the emerging CELPS which includes a clause suggesting that even in instances where VSC are demonstrated to justify inappropriate development outside the PDL, land within the PDL should be restored to greenfield status. This goes beyond the requirements of the NPPF and is intended to provide additional security against 'creep'. This clause remains to be tested at examination in public.</p> <p>The position of any play areas to support new development would be considered at planning application stage however the NPPF does allow for provision of appropriate facilities for outdoor sport, outdoor recreation as appropriate development within the Green Belt in certain circumstances.</p>	

Concept of housing	Response	Changes
This development proposal would double the quantum of housing in Nether Alderley placing unacceptable strain on infrastructure and services such as doctors, schools etc	Where there are capacity issues with existing infrastructure and services, it would be expected that developers would pay contributions via a S106 in the normal way to help provide for additional/improved services/ infrastructure. According to the NHS website, Alderley Edge Medical Service are currently accepting new patients. It is also understood from MSP that the current school intake has dropped significantly since the news of AstraZenecas withdrawal.	
Proposed level of development is against the spirit of Green Belts and housing not compliant with NPPF and housing/mixed use would not be in accord with a number of existing MBLP policies or emerging policy CELPS SE7.	Some parts of the site, such as the area to the south east of Mereside currently occupied by large scaled buildings, could be redeveloped with an overall reduction in volume of built development and would likely therefore to be classed as 'appropriate' development in Green Belt policy terms as the NPPF allows the <i>'redevelopment of existing 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'</i> . In more open parts of the site such as on existing pitches, housing would indeed be normally considered 'inappropriate' within the Green Belt. Any applications including significant housing in such areas would only be allowed if the Local Planning Authority were satisfied that very special circumstances existed justifying departure from normal Green Belt policy. This is set out clearly on page 12 of the Framework.	
Concern that housing could restrict the long term expansion of Life Science Park or eventual expansion of developed area. Suggestion that the Council should not commit to allowing housing at such an early stage. Nether Alderley Rural Protection Association (NARPA) suggest the planning timeframe for the site should stretch for 30 years and sufficient land should be reserved for expansion for 30-50 years to avoid future pressure to release more land from the Green Belt to development. They suggest all PDL should be reserved for future expansion of life sciences with a moratorium on any housing for 10 years	There is clearly a balance to be struck between supporting the new site owners to enable the work required to successfully transform this site to a multi user life science park and the desire to avoid the longer term scenario of the parks success being prejudiced by the constraints placed upon it by its Green Belt location. Having regard to the demand study which was commissioned by the Alderley Park TaskForce, it is not considered likely that there would be any need to expand beyond the existing PDL for additional life science space before 2030 even allowing for release of certain areas of the PDL for high value land uses to pump prime the transition of the site. The moratorium suggested would ignore the concern that if the site is not remodelled to become a successful life science site in the short term, much of the skill and knowledge base may become dissipated.	
Other options to secure funding should be explored before land is allowed to be released for housing	There is in effect an inbuilt check on this within the planning application process for any development which would normally be considered inappropriate in the Green Belt. If a sufficiently robust case is not made at planning application stage for a Very Special Circumstances case, permission would not be granted for inappropriate development. Inadequate explanation of alternative options will significantly weaken any very special circumstances case. In addition the emerging policy CS29 seeks to ensure applicants demonstrate high value uses are necessary. If alternative options have not been explored it is difficult to see how development could be argued to be necessary.	
No case has yet been proven that housing is necessary and the Framework is presupposing housing will be a necessity. Other science parks have not found it necessary to develop housing.	No single operator has come forward to purchase the site for Life Science purposes. If AP is to be brought forward as a world class LSP suitable for multiple occupiers it will be necessary to demolish outdated buildings and redevelop parts of the park previously occupied by AZ. Initial viability testing suggests that it will be necessary to bring forward some high value uses, the funds from which are to be released to deliver the world class Science Park. The site owners will pursue both National and International Funding investment, however, the current indication is that there will be a shortage of funds in the shorter term to repurpose the site. Residential uses have helped repurpose other large sites when they have become vacant, especially when looking at harnessing specific specialist employment opportunities.	
NARPA suggest allowing housing for short term profit is an unsound planning objective and there should be disclosure of both the financial gap which exists and other routes to financing which have been explored.	Repurposing part of the site for housing would not be carried out with the intention of providing short term profit. It would be a way of ensuring that redevelopment of the Life Science Park can take place rapidly and maintain momentum in delivering a viable future for the park. Provisions have now been added requiring the submission of a clear business plan to show how funds released from any housing allowed on the basis it is to support the Life Science Park would be ploughed back into the site. Furthermore the Framework is not accepting the case that housing will definitely be required where it would normally be inappropriate, merely that there is potential for this if very special circumstances are adequately demonstrated at planning application stage.	

Comments on housing continued	Responses	Changes
The housing on this site would not meet the criteria for rural exception housing as set out in Policy SC6. The Framework should address each of these forensically	It is correct that the housing would not meet that policy. However, the circumstances of this site are unique and the circumstances of this case MAY justify some housing where it would not normally be allowed.	
Nether Alderley Parish Council and others suggest that should residential development be demonstrated as necessary then the minimum number of houses required should be developed to minimise pressure on locals services. Open market housing should only be allowed on PDL at a level to justify the cross subsidy of on-going biotech functions on the site.	The principle of allowing no more housing than necessary to support the life science park is agreed. It will be necessary to test the quantum of this via detailed viability work at planning application stage. It is not possible to quantify the number of houses required until details of the size of those houses has been set. The Framework does not suggest housing would be allowable in any part of the site which would conflict with normal current planning policy unless it is robustly demonstrated that it is necessary for the cross subsidy of the Life Science Park and robustly demonstrated as such at planning application stage	
Several representations suggest viability work should be made available up front to the community before the Framework/ emerging policy had been drafted/Any housing proposal must be supported by a full development appraisal to demonstrate it is needed for cross subsidy and this should be made explicit in Key principle 1 and section 6.	<p>As the Framework is not necessarily accepting the case that there <u>are</u> very special circumstances which would justify any housing normally considered inappropriate in Green Belt terms it is not necessary for a detailed viability appraisal to have been submitted at this stage. The actual decision as to whether VSC exist to justify any inappropriate development could only be made at planning application stage. Furthermore certain forms of residential development are of course appropriate within the Green Belt. Namely, where they would be built by the partial or complete redevelopment of previously developed sites (brownfield land),(excluding temporary buildings) and would not have a greater impact on the openness of the Green Belt and the purpose of including land within it that the existing development. In addition, the re-use of buildings provided that the buildings are of permanent and substantial construction would also not be inappropriate. The site owners would submit a report on viability to accompany any future planning application, proposing 'inappropriate' housing development on the basis it was needed to support the Life Science park. This would normally be withheld from the public as its disclosure could prejudice commercial interests. The Local Planning Authority would of course ensure that the viability report is appropriately assessed as part of its decision making process.</p> <p>Key principle 1 relates to design however more explicit reference to viability work has been included in section 6.</p>	<p>Page 25 - Additional text added to suggest chosen housing mix should have regard to the desire to maximise funds to support the Life Science Park whilst minimising harm to the openness of the Green Belt.</p> <p>Pages 13 and 42 - additional references inserted relating to the requirement for viability appraisal at planning application stage.</p>
Some positive support for selective well designed housing on this site on the grounds that it should reduce need for release of Green Belt for housing around Macclesfield and request that this is taken into account when allocating sites for development around Macclesfield	Noted	
The site is a not a sustainable location for residential development given the distance to Alderley Edge/services and amenities. A site is being promoted (for removal from the Green Belt) at Ryleys Lane Alderley Edge which is a more sustainable location.	Although the site being promoted at Ryleys Lane, is closer to the centres of Alderley Edge and Wilmslow, its development would not release funds to be used to establish the Life Science Park, neither would any of it be on a significant existing major developed site. A more accessible site is not necessarily more sustainable in the round. development on brownfield land, support for the economy etc are all to be factored in.	
Request for decision makers should take into account the results of recent Parish Surveys which demonstrate a significant majority of local people oppose significant new housing in the area	The results of both the surveys have been considered by officers. The first predates the decision by AstraZeneca to withdraw from this site and hence does not consider the potential for housing on the Astra Zeneca site.	
There are no 'estates' in Nether Alderley creating new housing could create separate communities rather than a healthy integrated community	No reason has been put forward to suggest why new residents would not integrate with existing. Opening the parkland to public access will create new opportunities for the existing and new residents and employees to come together.	

Comments on specific types and areas of housing	Response	Changes
Macclesfield Civic Society suggest consideration to combined live work units especially for start ups	Live work units could be desirable for certain businesses linked to Life Sciences widening the choice if homes are to be allowed on this site. The widening of choice in housing is supported by the NPPF. This is a useful suggestion and reference could be made to the potential for live/work units in the Framework.	Page 25 - Live work units now mentioned as potential means of improving choice of housing types.
Site should provide homes affordable and suitable to young science graduates- small state of the art apartments should be built to rent or buy to attract them in the spirit of the model workers accommodation constructed by the likes of Lord Lever and Sir Titus Salt. The advantages would be huge with people walking to work rather than clogging up roads with commuting traffic and with further facilities such as a school added in time. Such a project would attract attention nationwide./High value housing is not the best choice for this site- good quality middle priced housing to meet the majority of staff to be employed on site should be preferred or risk having a site of 'managers' with no 'workers' (process upwards of £250K suggested)	It is agreed that housing suitable for employees on the site would offer clear benefits in terms of reducing travel to work times. To offer a choice of housing is in line with the NPPF which supports widening the choice of quality homes and encouraging inclusive and mixed communities.	Page 29 - Key principle 5 expanded to encourage any new housing to provide a choice of dwellings of different sizes and prices suitable for a wide range of people of different ages, incomes etc.
Suggestion that there may be a need for elderly persons bungalows in the locality	Noted, reference to housing for all stages of life to be included in final version.	Page 29 - Wording in key principle 5 now references the need for a housing mix suitable for all ages.
Suggestion that the only housing to be allowed should be for workers on site and should be rented to staff on short term contracts	This suggestion does not really address the fact that one of the key reasons for justifying any housing is likely to be to release capital to support the Life Science site in the short term by 'pump priming'.	
Comment that the sites location will be a detractor for university presence and that collaborating with universities to include student accommodation, through repurposing an existing building on site, could be facilitative	The change of use of an existing building to provide a student accommodation would require planning permission but could potentially be considered to be a complementary use. Figure 3.1 is not intended to provide a comprehensive list of potential uses.	
Concern expressed in a number of representations about the reference to the likely need to relax normal affordable housing requirements on this site particularly given the lack of affordable housing in this area. Views expressed that the Council should not allow its commercial interests in this site to in any way influence its responsibilities to seek appropriate affordable housing provision/ the full 30% requirement for affordable housing should be delivered as part of any residential development on this site.	It is correct that the Council should not allow its commercial interest in this site to influence any decision on planning matters. This will be highlighted in the Cabinet report seeking approval of the final draft to ensure all members are absolutely clear on this point. A degree of affordable housing is likely to be required to be provided in association with any housing on this site and could for example be very sustainable if located on site and suitable for eligible future site employees. Nevertheless there may be a case to be made for relaxing the quantum of affordable housing if to provide 30% would cause more harm to the openness of the Green Belt. This needs to be considered in detail once detailed viability and financial business modelling work has been undertaken and different options explored and such financial information would need to support any planning application for housing not meeting normal policy requirements on affordability.	

Comments on specific areas /types of housing	Response	Changes
Nether Alderley Parish Council understand it is not necessary to adhere to usual requirements for mix of housing (no comment made)		
Relaxation of affordable housing standards can be justified in this instance but any relaxation of affordable housing requirements should be supported by full viability study	This point is absolutely supported. Additional text has been added to page 40 to stress this.	Page 22 - Additional text added to stress need for viability appraisal to support any applications for residential development with affordable housing below policy levels.
Other locations which do not require 'enabling development' are better placed to provide much needed affordable housing/ if affordable housing is not to be provided on site it should be provided elsewhere.	The need for affordable housing in this area is not disputed. The wording of the affordable housing section has been amended slightly to suggest housing off site could be part of a solution.	
MSP support the approach to explore the delivery of some affordable housing as part of future development proposals which could include contributions to provision off site or key worker housing and this could be referenced as potential options in the Framework whilst ensuring viability is not unduly hindered	Noted	Page 22 - text added to make it clear that some provision of affordable housing is expected associated with any housing development on this site with specific mention of the potential for affordable housing aimed at key site workers.
Any affordable housing should be only for children of residents of Nether Alderley	The eligibility criteria for any affordable housing would not normally be set by the Planning Department	
The different areas of the site which are suggested as potentially suitable for housing are not all equal and this should be made clear. Some fall within PDL and the boundary of the Major developed Site as set out in the MBL others are more open and development in these would be contrary to Green Belt policy. Specifically, the area in Mereside (zone 1 area d) should not be developed and neither should the part of area b south of d and c/e in South Campus (zone 3) extending towards the A34 and outside the boundary of the Major Developed Site. This contrasts with areas such as that in Parklands, and areas c, d and e in South Campus which should be supported.	It is agreed that not all areas shown as having potential for housing are not equal, particularly in terms of Green Belt policy. Para 4 on page 12 does set this out but it could and now has been made clearer with additional text in the amended version of the Framework. zone 1 area d has now been removed from those areas marked as having potential for housing development as has part of the area in zone 3.	Page 12- Additional text inserted to ensure it is clear that all areas shown as potentially being suitable for housing are not equal in terms of Green Belt planning policy.
Particular objections have been raised by many people/groups to the idea of housing development on the car park adjacent to Radnor Mere on the basis that this car park was only approved on a temporary basis and should have been returned to greenfield land, given the sensitivity of the Mereside location in terms of potential impacts on wildlife and because of concerns on the character of the area given proximity to Nether Alderley.	The history of this car park has been checked and it is correct that it was allowed on a temporary basis. It is no longer suggested as potentially suitable for housing in the revised Framework	Pages 30 and 32 - Zone 1 area d removed from Masterplans as having any potential for housing. Now suggested should be reverted to farmland unless it is demonstrated via a planning application that very special circumstances exist justifying it not being reverted. para 3 page 32 amended.
Some specific reservations submitted including from Macclesfield Civic Society regarding housing development on open areas adjacent to/visible from the A34/Congleton Road	The concern re impact of housing in this area has been noted and after consideration, the area suggested as potentially suitable for housing has been pulled back away from Congleton Road to the line of the existing surface car park	Pages 30 and 36 - Changes to Masterplan and South Campus plans to remove area immediately adjacent to Congleton Road to allow for rural open character to be retained here.
Generally less specific objections to sympathetic housing development on other suggested locations although one specific objection to possibility of housing on south eastern football pitch.	Noted. Any housing in this area would be classed as inappropriate and all harm including harm to public views would need to be weighed against any VSC case.	
The Edge Association suggests any housing should be more than an insular walled development of housing and support an element of affordable housing for workers	Support for affordable housing noted and text changes made as referenced above re affordable housing.	

Comments on quantum of housing	Response	Changes
If housing is to be introduced it needs to have a limit of 300 units	In effect maximum parameters have been set for areas which might potentially be considered for housing subject to an appropriate case being made and these parameters together with design criteria relating to for example protection of trees within those areas, protection of the setting of heritage buildings etc would necessarily have the effect of restricting areas available for housing even further. It is however very difficult to put a figure on the number of units which could be expected as this is entirely dependent on density and size of dwellings. To estimate a figure based on an average density of say 30 dwellings per ha but without detailed design work being undertaken could then give a false impression to potential developers.	
Housing numbers have not been disclosed and is important for assessing sustainability impacts	Any application for housing whether outline or full would need to set out a number of units to enable impacts on services etc to be taken into account. The Framework does not replace the need for planning permission.	
One suggestion to allow one replacement for the former 'Country House' lost from this site rather than a number of smaller dwellings/Some suggestion it would be better to build fewer more expensive houses to alleviate impact on services and infrastructure	These suggestions are noted. However it is also noted that a number of representations refer to the benefit of providing housing which would be affordable to employees on site/existing members of the community. Ultimately the owner will need to consider what style and size of housing mix will be most beneficial to support the Life Science Park and will need to make an appropriate case to support it. If a lesser number of homes can provide appropriate funds then this will of course be easier to justify at planning application stage as any harm caused to the Green belt would be less.	

Highways Issues		
Development will increase congestion and rat running	Although areas are suggested for redevelopment, a number of these currently house a significant amount of B1 office space and this will need to be borne in mind when assessing any overall changes to traffic movements. A Transport Assessment will be required at planning application stage as referenced in the Framework. This will assess the traffic impact of the development on the road network and will consider any additional congestion and rat running of vehicles.	
No disclosure has been made of any studies regarding impacts on safety of road users, pedestrians and cyclists and no independent traffic report with regard to impacts on congestion has been referenced	A Transport Assessment will be required at planning application stage. This will assess the traffic impact of the development on the road network.	
Consideration should be given to residential and commercial areas having separate access points.	Officers within the Local Highway Authority have expressed the view that it is likely to be sensible to split the main commercial access point from any serving residential development. It is noted that this suggestion is somewhat at odds with that also submitted suggesting that use of the northern access should be discouraged.	
Consideration should be given to pedestrians inability to cross the A34 (near Monks Heath) due to speed of traffic and lack of crossing time for pedestrians at the Monks Heath traffic lights meaning they cannot access bus services 130 and 27	A assessment of the Monks Heath junction in capacity terms to cater for the redevelopment will have to be undertaken at planning application stage and this should include catering for pedestrian movements crossing the A34.	
Best practice cycle facilities should be provided and any highway routes should include accessibility for cyclists and developers should ensure they make site users aware of sustainable routes and facilities for cyclists etc	More references have been added to the Public access section of the Design Guidance to stress the importance of encouraging sustainable transport modes and the benefits of providing routes suitable for a variety of modes of transport.	Page 26 - additional text added to require developers to identify how they are encouraging sustainable transport.
Nether Alderley Parish Council and others raise concerns regarding current speed of traffic being hazardous to pedestrians (C842) and request speed limits be reduced to 30mph in view of increased movement exacerbating existing hazard. Speed cameras also suggested.	This issue does not relate specifically to the Framework. At this stage, there has been no assessment made of impacts on vehicular movements associated with the site. The concern has therefore been raised with officers within the Local Highway Authority via email for separate consideration.	
Additional traffic at northern site entrance will increase traffic on the old A34 so efforts should be made to ensure traffic is diverted to the southern entrance to minimise impact on the old A34 and encourage cars to access the bypass. Right turn traffic only from northern entrance would not work.	A Transport Assessment will need to be submitted to support any major planning application on this site as is referenced in the access and movement section of the Framework (P 20) . Such an assessment would consider impacts on the highway network. Concerns regarding the impact of additional traffic turning right out of the site have been raised with MSPs planning team for consideration. The current access points to the site are likely to be sufficient to cater for the redevelopment although the capacity of the junctions will need to be tested in the Transport Assessment. The LHA has suggested there may be no need to promote traffic to use one particular access.	
No construction vehicles should be allowed on the old A34	If this was a concern for either highway safety or amenity reasons it should be picked up via either the LHA or Environmental Protection Service when consulted at planning application stage.	
Concern that development on existing car parks could lead to insufficient parking provision	Suggest requirement set out in Framework for parking appraisal/strategy to ensure future parking needs are met with any redevelopment of existing car parks	Pages 21and 62 - requirement for parking strategy added.
The Edge Association and others suggest existing public transport is poor and consideration should be given to subsidising it.	Noted. Draft Framework suggests developers should look to 'support existing bus services' - could be strengthened	Page 21 - support existing bus services changed to 'support and supplement'

Biodiversity and Natural Environment	Responses	
Woodland Trust: -Support Key principle 7 but suggest it could be strengthened by specifying that any ancient or veteran trees should also be given strong protection - Suggest buffer zones to ancient woodland – case law suggests a 15m buffer may be appropriate but this varies from case to case- buffers may be semi natural habitats - Suggest opportunities should be taken to plant new woodland where possible	Point on ancient and veteran trees noted and amendments made	Page 26 - Key principle 7 amended to refer to ancient and veteran trees as well as ancient woodland
Natural England: -Welcome Key Principles 7 and 8 and stress that green infrastructure is recognised in Planning Policy as something which should be planned for, enhanced and managed and built in to any development proposals - Request due regard is given to advice on protecting ancient woodland given its scarcity and importance to wildlife and landscape etc. -The LPA should ensure consistency with the SA and HRA for the CELPS.	-Include reference to Forestry Commission website for standing advice issued by Natural England/Forestry Commission on Ancient woodlands in Appendix. This site has been included in the SA and HRA for the CELPS	Page 54 - Link to Forestry commission website now included in Appendix A.
National Trust: Whilst strongly supporting section 5 (page 38) suggest it should reference a clear set of mechanisms used to achieve and manage both new access provisions and existing routes in a timely manner -Suggest section 3 p14 should be subdivided into landscape and biodiversity/nature conservation -Suggest Mereside character area is not homogenous and should be reconsidered -Suggest Design Principle 1 should make reference to funds supporting not just life sciences but long term management of parkland and heritage features	Points on maintenance and management of public routes noted and draft amended. Section 3 subdivided for clarity as suggested. Consideration given to including Mere and parkland to north west within Woodland and Farmland rather than Mereside. Image on page 31 amended accordingly Design Principle 1 not amended because emphasis is on Life Science Park but instead Principle 7 amended to reference need for new development to provide for long term maintenance of the site's historic landscape.	Page 38 - Additional text added referencing introduction of public access and future management/ maintenance. Pages 9 and 31 - Figs 2.2 and 5.2 amended to revise boundary of Mereside excluding Mere and farmland. Page 26 - principle 7 slightly amended to reference need to consider long term maintenance of landscape and woodland.
Given the biodiversity interest of the site there is a need to ensure adequate survey and understanding for safeguarding and enhancement of habitats	Appendix D references supporting documents likely to be necessary for planning applications to include Ecology Statements and EA.	
Link to BAP is missing from Appendix A	Corrected	Page 54 - App A updated
Woodland is a rarity and should be preserved at all costs	Tree survey and report would be required for any planning application as set out in Appendix D. Principle 7 relating to landscape strengthened.	Page 26 - Principle 7 strengthened.
There are badger setts on site which are not mentioned in the Framework	Because Badgers and their setts are protected by law it is normal not to disclose publicly the location of any setts found. If setts exist on site and are picked up in an ecological survey it is expected this would be included in a confidential annex.	
The proposal is contrary to a number of natural environment policies in the MBLP	Officers do not consider this to be the case	
There is a need for an FRA to support any application for development over 1ha	Appendix D already references need for flood risk report to be submitted at planning application stage	
Although the Framework shows 3 great crested newt ponds, one (to the east of Radnor Mere known as Coach Pool or Coach Pasture Pond) has not been shown	MSP has confirmed the recent ecological survey has only identified great crested newts in the 3 ponds identified.	
Concern that public access adjacent to Mere could disturb Herons/Waterfowl at Radnor Mere need to be considered and protected.	Key Principle 8 suggests 'controlled access' alongside protection of ecology. Any proposals would need to be supported by ecological surveys such that protection of wildfowl/herons would be taken into account before any public access which required planning permission was allowed.	Pages 14 and 63- Reference to heronry added page 14 and suggestion to contact British Trust of Ornithology regarding herons added to new Appendix E.

Design	Response	Changes
Proposals would dramatically impact on the rural character of the area and ignore CE stated principles of respecting the character of distinctive places and maintain and enhance separate character of villages	Key Principle 5 references the need to respect local settlements. The masterplan has been amended to retain further open areas visible from Congleton Road to better protect rural character.	Masterplan amended
Design should give priority to sustainable transport modes and this should be encouraged	Key Principle 6 mended to encourage sustainable modes of transport not just walking and cycling	Page 26 - Key principle 6 amended to reference sustainable transport
Nether Alderley Parish Council requests that if housing to be allowed style is in keeping with houses in wider community and that PC are involved at planning application stage	Concern noted. Planning policy does not generally support strict requirements regarding architectural style requiring development to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. Areas of housing more visible from Congleton Road have now been removed from those areas suggested as potentially suitable for housing and high quality design is required by the Framework. Parish Council would certainly be consulted at Planning Application stage.	
Routes for non motorised users should be provided between new residential areas	key principle 6 requires a movement strategy. Note added in Appendix E to reflect this suggestion.	
Sensitivity is needed to ensure the site retains an outwardly rural feel		Page 25 - 'and retain a rural character' added at end para 1.
As proposed this will become another bland business park/hotel/complex/garden centre/housing area- a more robust document is needed	The Framework seeks to guard against this.	
Layout and lighting need to have regard to need to protect herons from disturbance particularly during sensitive periods	Suggestion for designers to speak to Cheshire representative of the British Trust of Ornithology when refining proposals.	Page 63- Note added to Appendix E
Where parts of Mereside and Parklands are to be redeveloped Masterplans should be produced and utilised	Policy SE 1 of emerging CELPS requires Masterplanning and Design Coding to form an integral part of the design process. The APDF references this policy on page 22	
Security of future residents needs to be considered given the isolated location and mix of uses proposed		
Surface water should be attenuated in accordance with the surface water hierarchy with the aim of not increasing and if possible reducing surface water discharge and given the scale of the site an overarching holistic drainage strategy should support future applications	Reference to need for strategy in Framework and reference to contact UU for further guidance	
Key Principle 1 should make it clear that all new buildings should be of the highest standards of design.	This is required by Key principle 5	
Figure 3.1 should include specific reference to the need for quality design for B2/B8 uses	Fig 3.1 can be slightly strengthened by incorporating reference to design	Page 11 - 'Design' inserted for B2/B8 uses
Key Principle 4 should make it clear that it is not acceptable to allow old buildings to become redundant to justify new buildings on greenfield sites.	This principle already limits development to the PDL.	
The term townscape is unsuitable in this location as used in Key Principle 5 it should also be made clear landscape proposals should accompany all development schemes and should not be designed to screen development	Concern regarding word townscape noted and changes made to page 25	Page 25 - 'Townscape' changed to 'Development' and text added to stress need for appropriate landscaping
4.3 is inaccurate and a full Historic Landscape Assessment is needed	4.3 marked as indicative. Appendix D amended to include reference to need for Historic Landscape Assessment as part of Heritage Assessment for clarity	Page 62 - reference to HLAassessment added
Concern regarding height of any new multi-storey parking	Green Belt policy allows for infilling on existing brownfield sites only where there is no harm to the Green Belt. Overly high buildings would harm the Green Belt.	

Complementary Uses	Responses	Changes
<ul style="list-style-type: none"> Some question need for any retail/restaurants on site but convenience store of appropriate scale and cafe/restaurant generally viewed as positive being potentially beneficial to the local community and likely to reduce traffic leaving the site at lunchtimes. Some support for a pub on the site Idea of a hotel seems more controversial and not supported by Nether Alderley Parish Council. Once objections received on grounds of competition with existing local guest house. Reference made to potential cemetery on site being inappropriate. Inference that proposals for manufacturing (aircraft manufacture) on the site have been allowed outside normal planning controls 	<p>General support for limited retail, A3 and pub uses noted to serve site occupiers/local community.</p> <p>Concern re hotel noted but a hotel of appropriate scale and aimed at an appropriate market considered as a use likely to complement the life science park.</p> <p>No cemetery is mentioned in the Framework and MSP have confirmed there are no proposals for a cemetery on the site.</p> <p>Concerns regarding possible industrial development noted but in reality it is not considered that such uses of appropriate scale, design and siting could reasonably be refused if all normal current planning policy requirements were met. Current policy would not be likely to prevent such uses on site within strict parameters.</p>	

Section 106 issues	Responses	Changes
S106 does not give adequate protection of open space/ woodland in the long term. Owners should ensure covenants are placed on the site for 100 years minimum for greater security	It is outside the scope of planning guidance document to require covenants on land.	
National Trust suggest that S106 Requirements (page 22) should make specific reference to secure the long term safeguarding of open spaces, woodland and water bodies	It is considered appropriate to reference the anticipation of this issue being covered in Heads of terms for a S106.	Page 22- Last para amended to reference desirability of Heads of Terms for S106 covering this issue.
Nether Alderley Parish Council request for funds to repair Grade II* listed Parish Hall as a centre for the village and also to enable new footpaths around this 'centre'. Also request consideration of extension of burial ground	<p>Suggestions of Parish Council passed to MSP for consideration once more details are known of proposals. It must be noted however that any S106 contributions must be compliant with CIL regulations that is they should meet all of the following tests:</p> <ul style="list-style-type: none"> - necessary to make the development acceptable in planning terms - directly related to the development; and - fairly and reasonably related in scale and kind to the development. 	
The Framework is premature and should be withdrawn until the Local Plan has been finalised with any applications simply being assessed against current policy	Any planning applications will be assessed against current policy but also other material considerations including the fact that that policy was written when it was anticipated Astra Zeneca would remain on site and indeed expand. The Framework is not seeking to rewrite policy but rather to give guidance to developers regarding the Councils thoughts on how the site could potentially be developed having regard to the current local policy, the NPPF, emerging local policy and the material circumstances surrounding AstraZeneca's withdrawal and the consequences of that for the local economy.	

Heritage Matters	Response	Changes
<p>English Heritage: Recommend that any applications which could impact on the significance of heritage assets should be in full not outline form</p> <p>Recommend that the Townscape and Character section gives a clear steer regarding the appropriate development of the site and explicitly refer to heritage and give guidelines on how development might reinforce local distinctiveness. This section should also encourage early engagement with English Heritage and the Cheshire Archaeology Planning Service as well as the CEC Conservation Team.</p> <p>Recommend that English Heritage guidance on assessing the visual impact of development should be used by developers and the Council in assessing impacts and specifically request links are included to the relevant guides.</p> <p>Recommend reference to specific listed buildings where development could affect their setting and specifically to the following grade II* and Grade I listed buildings in proximity to the site: Haymans House II* Church of St Mary I Old Hall II* Nether Alderley Mill II* Dam Wall II* Church Hall II* and the grade II buildings within the site itself.</p> <p>Recommend strongly inclusion of CEC Conservation Officer and Archaeological Advisory Service in drawing up the Framework</p>	<p>Page 40 strengthened to require full applications where proposals will impact on heritage assets or their settings</p> <p>Key principle 5 adapted to ensure reference made to respecting setting of heritage assets and advice included regarding early contact being made with these parties .</p> <p>Links to guidance to be included.</p>	<p>Page 54 - Links to guidance for assessing impacts on views and setting of heritage assets added in Appendix A: http://www.helm.org.uk/guidance-library/setting-heritage-assets/</p> <p>and Seeing the History in the view, http://www.helmorg.uk/guidance-library/seeing-history-view/ at Appendix A.</p> <p>Page 17 - Inclusion of additional listed buildings in Nether Alderley into Figure 3.4.</p>
<p>Cheshire Gardens Trust: Support the development of innovative housing in Parklands East and broadly support the proposals for the south campus provided proposals are informed by a Conservation Management Plan for heritage parkland/ assets</p> <p>Stress the narrow parkland link between the conservation area and the body of the historic parkland must be protected because link of historic and visual importance</p> <p>- Woodland and farm should be categorised as woodland and historic parkland - Identify the designed historic landscape is a key selling point and suggest greater consideration should be given to features of that landscape through a full assessment of the designed landscape and a requirement for a Conservation Management Plan in addition to a Heritage Assessment. Suggest this should be done before firm plans are made regarding which areas of PDL can be released.</p> <p>Suggestion explicit reference should be made to Netherly Alderley Mill as Grade 11* listed building dating from 1290 in location (section 2 page 6) and text on page 16. Furthermore Nether Alderley Mill which is a visitor attraction should be clearly identified on the plan on page 17</p> <p>Although Butts Farm is an asset of the National Trust it is not a visitor attraction- this needs correcting on page 17</p> <p>In the Landscape section (p14) reference should be made to Historic Landscape Character Assessment</p>	<p>Reference to both Heritage Assessment and CMP to inform any proposals to develop anything affecting significance of any heritage asset now included (page 62 and page 27)</p> <p>Reference to historic parkland made on pages 31 and 38</p> <p>Explicit references added</p> <p>Suggestion that Historic Landscape Character Assessment inform proposals added</p>	<p>Page 62 - Reference to need for Conservation Management Plan inserted in Appendix D</p> <p>Page 6 - specific reference added. Also added to Fig 4.2.</p> <p>Page 17 - plan amended to remove Butts Farm</p> <p>Page 14 - reference inserted to Historic Landscape Character Assessment</p>
<p>Nether Alderley Parish Council specifically support efforts to retain character of listed properties/structures</p> <p>Any development within proximity of heritage assets could harm these assets which have been carefully preserved/ all heritage features should be protected</p> <p>Where the document allows for housing to support life science uses this should also reference supporting ongoing long term maintenance of heritage landscape /wider parkland</p>	<p>Noted</p> <p>The Framework seeks to ensure developers are made aware of heritage assets on and near this site at the earliest opportunity and of the need to ensure their significance is protected</p>	<p>Page 27 - amended to reference need for maintenance plan for landscape</p>

Conflict of Interest	Responses	Changes
CEC Cabinet should explain how it will avoid a conflict of interest influencing planning decisions	The Council's Constitution sets out that 'The Council will take into account all relevant considerations and will ignore those which are not relevant. A reminder that no weight should be given to any financial interest the Council has in this has been added to the Cabinet report relating to the adoption of this Framework to ensure Cabinet are aware of this position.	Page 4 - The fact that the Council has a commercial interest in the site has now been included to ensure transparency.
The document should have referenced any agreements of understandings between the Council and the developers regarding waiving of normal requirements for contributions to offset impacts on the physical, social community and environment	The Planning team has no knowledge of any such agreements or understandings existing.	
No disclosure has been made in this document regarding the Council's purchase of land opposite the site	No disclosure was made regarding this land because it was considered to be of no consequence to the Framework, being outside the area covered by the Framework.	
Consideration should be given to the approval of this document being referred to the SoS to avoid potential for conflict of interest	This is not considered necessary as this is only a guidance document and does not allow any development to be built without going through the normal planning application process, and any proposals for development which would have a significant impact on the Green Belt and which would be classed as 'inappropriate' in Green Belt terms would need to be referred at planning application stage.(see below)	
Planning applications should be passed to the Planning Inspectorate/SoS for consideration given the Council's commercial interest in the site	<p>The Town and Country Planning (Consultation) (England) Direction 2009 requires that where a local planning authority does not propose to refuse an application for planning permission for 'development which consists of or includes inappropriate development on land allocated as Green Belt in an adopted local plan, unitary development plan or development plan document and which consists of or includes-</p> <p>(a) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or</p> <p>(b) any other development which, by reason of its scale or nature or location, would have a significant impact on the openness of the Green Belt',</p> <p>then the authority shall consult the Secretary of State. A similar requirement to consult exists for certain development on playing fields which could also be relevant to this site.</p> <p>It is therefore the case that any significant scaled development on open area of the site would need to be referred.</p>	Page 40 - Reference to requirement to consult SoS on certain planning applications added.
Inference that proposals for manufacturing (aircraft manufacture) on the site have been allowed outside normal planning controls	Not relevant to consideration of Framework	

Impacts on local services	Responses	Changes
New homes will put pressure on parking, doctors, schools and dentists. Suggest a full impact assessment on all services and all aspects of life for affecting local villages should be undertaken. NARPA reference the need to take account of other planned developments.	Where there are capacity issues with existing infrastructure and services, it would be expected that developers would pay contributions via a S106 in the normal way to help provide for additional/improved services/infrastructure.	
Parking is already difficult in Alderley Edge and this development would exacerbate this problem	Increases in traffic and parking in Alderley Edge from new development on site would need to be offset by traffic and parking associated with floorspace to be demolished.	
Water main and sewers present within and adjacent to the site may need to be protected or diverted at the cost of the developer. Any reinforcement of any existing United Utilities infrastructure would need to be undertaken at the expense of the developer	United Utilities comments have been added to Appendix	<p>Page 64- Notes suggested by United Utilities added to new Appendix E as follows:</p> <p>United Utilities have requested the LPA point out that there are water mains and sewers present within and adjacent to the site that may need to be protected or diverted and any detrimental impact to this infrastructure during development will need to be repaired at the cost of the developer. In addition, should network reinforcement be required to provide water to the site, this will also be at the cost of the developer. United Utilities offer a fully supported mapping service and recommend the applicant contact their Property Searches Team on 0870 751 0101 to obtain maps of the site. UU also recommend that the developer contact them to discuss proposals at the earliest opportunity. United Utilities recommends that surface water associated with any new development should be managed in accordance with the Surface Water Hierarchy with surface water discharged in the following order of priority:</p> <ol style="list-style-type: none"> 1. An adequate soakaway or some other form of infiltration system. 2. An attenuated discharge to watercourse. 3. An attenuated discharge to public surface water sewer. 4. An attenuated discharge to public combined sewer. <p>Applicants wishing to discharge surface water to the public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. Given the scale of the site, it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.</p> <p>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency.</p>
Consideration should be given to relocation of the local primary school on site	This is not currently part of the proposals for the site although MSP are keen to work with the head teacher of the local school to enable sharing of sports facilities	

Sports facilities	Responses	Changes
<p>Variety of views expressed regarding Frameworks approach to sports facilities on site ranging from suggestions that loss of pitches would be contrary to MBLP policies to comments that re-provision is a pragmatic solution and requests for consideration for specific uses in any re-provision/change in provision on site. Key specific views:</p> <ul style="list-style-type: none"> • Sport England: <ul style="list-style-type: none"> - Welcome the clear explanation of their role in the Framework; - Suggest supporting text to key principle 10 makes it clear that proposals will be assessed against; Sport England and CEC policies and NPPF para 74 with link to SE website pages; - Suggest page 22 states that any replacement sports facilities should be designed to meet Sport England and national governing bodies standards with link to relevant information on SE website; - Suggest their Planning Policy Statement is included as a link in appendix A; - Would welcome sports provision in a hub rather than spread around the site • MSP suggest more explicit reference is made to changing circumstances surrounding need for sports facilities on site • Some objection to the Framework suggesting sports pitches may be acceptable outside the PDL without very special circumstances having been proven for example from NARPA • Some suggestions for re-provision include: private member pool and leisure facility, spa/health facility, tennis courts, possible golf and possible water sports. • Alderley United Junior Football Club: <ul style="list-style-type: none"> - welcome the opportunity the sites redevelopment brings to reconsider existing and future community (sporting) needs and support the redevelopment of the site on the condition that additional and improved sports facilities are provided to facilitate integration with new site occupiers and existing communities. - Specifically request developer be required to undertake direct consultation with local providers to establish demand and supply data. Reference issues with quality of existing pitches available to the club in Alderley Edge and suggest an opportunity exists on the site for provision of new facilities to meet the needs of the club. Suggest MSP work in partnership with AUJFC. - Raise concern with word 'modest' at 3.1 before sports needs assessment has been undertaken. - Suggest section 3 p 18 should not appear to assume reduction of sports facilities is accepted as likely. 	<p>Suggestions from SE noted with extra text and links added in response.</p> <p>Points regarding design of sports facilities and preference for hub added to document</p> <p>Note added to reference fact that some sports facilities may require vsc to be demonstrated</p> <p>MSP comments noted but no changes made to document as this would be picked up a robust needs assessment and this document should not prejudge the outcome of such an assessment.</p> <p>The word 'modest' can be replaced with 'appropriately'.</p>	<p>Page 28 - Additional text added to key principle 10</p> <p>Page 54 - links to SE website added to Appendix A</p> <p>Page 28 - Changes made to reference preference for hub and design standards fro sports facilities</p> <p>Page 28 - amended to reference fact that some sports facilities may require vsc to be demonstrated</p> <p>Page 11 - Fig 3.1 'modest' changed to 'appropriately'.</p>

Other Miscellaneous Issues	Response	Changes
<ul style="list-style-type: none"> Additional noise could be created at weekends 	The amenity of existing residents would be considered at planning application stage.	
<ul style="list-style-type: none"> Consideration must be given to two recent local surveys 	Survey results appended to Cabinet report for Members consideration	
<ul style="list-style-type: none"> The document gives undue weight to the emerging policy CS29 and limited weight to the MBLP, 1999 Planning Brief and NPPF. 	The Framework gives considerable weight to the NPPF and the policies of the MBLP. The 1999 Planning Brief is not given particular weight as it is viewed as largely outdated.	
<ul style="list-style-type: none"> This document appears to give Cheshire East total discretion to approve any developments on site a 'carte blanche' situation for developer's interests 	This is not accepted, as the Framework seeks to build in many safeguards and very clearly guides developers away from any development in the majority of the site.	
<ul style="list-style-type: none"> Further technical assessments, as required to support a planning application should have been undertaken to support this document. 	A balance has needed to be struck between producing a document to provide guidance on a timely manner and ensuring an appropriate evidence base exists for production of the document. The production of this guidance document in no way removes the need for more detailed assessments to support an application.	
<ul style="list-style-type: none"> A sustainability analysis (SEA) has not been undertaken and the Framework cannot therefore be demonstrated to be 'sound' 	This is only a guidance document. Supplementary Planning Documents are not required to be subjected to Sustainability Appraisals. Planning Practice Guidance suggests that a strategic environmental assessment is unlikely to be required where a supplementary planning document deals only with a small area at a local level unless it is considered that there are likely to be significant environmental effects.	
<ul style="list-style-type: none"> Ownership query raised regarding 2 areas: -small area of woodland abutting A34 to south of Eagle Lodge Cottage (southern entrance)(defined by posts and rusty wire); triangular area of land south of Serpentine 	MSP have checked their land ownership records and have confirmed that they do own the areas included within the site boundary.	
<ul style="list-style-type: none"> Buildings in Parklands East should be converted for reuse not demolished and replaced with new build 	Refurbishment of the large 'shed' style units in this area would not produce the returns to enable pump priming of the Life Science Park.	
<ul style="list-style-type: none"> Concern that CEC is just 'going through the motions' with this consultation exercise 	The many changes made as a result of the consultation (including significant changes to areas suggested as potentially suitable for housing) demonstrate this not to be the case.	
<ul style="list-style-type: none"> The development framework creates an improper precedent 	This is a unique site with a unique set of material circumstances.	
<ul style="list-style-type: none"> The Framework does not address the criteria and principles stated by CEC as being applied to development and leaves them open to Judicial Review/The Framework should be withdrawn and resubmitted only after it has been assessed against all stated principles and criteria laid down by the Council with regard to development 	It is not clear how it is being suggested the Council may be acting unlawfully. This is only a planning guidance document and is not seeking to create policy outside the normal planning system.	
<ul style="list-style-type: none"> One would expect independent analysis of all impacts so everyone can make an informed judgement/assessment 	It is not possible to assess impacts in detail until details of proposals are available. This will be done at planning application stage in the normal way.	
<ul style="list-style-type: none"> Need to ensure former contamination is adequately investigated prior to planning applications being submitted to enable proper consideration of any issues arising for more sensitive new uses 	Detail on known contamination issues from Environmental Health passed to MSP and their planning consultants 31.3.15 with a request to ensure these are covered in the scope of any EIA.	
<ul style="list-style-type: none"> The framework makes no mention of permitted development rights allowing change of use to residential 	class O of Part 3 to the T&CP (General Permitted Development) Order 2015 allows changes of use from B1 (business) to C3 (dwellinghouse) for a temporary period until May 2016. If considered necessary and reasonable and meeting all the tests relevant to conditions, there is possible for this right to be removed on this site at planning application stage.	
<ul style="list-style-type: none"> The site should have been identified at an earlier stage in the CELPS and consulting on this document at this time is inappropriate 	This document has been produced as a response to the circumstances surrounding AstraZeneca's withdrawal from the site. The site was included in the emerging CELPS at the first available opportunity following that announcement.	

