

Cheshire East Local Plan

Report of Consultation: Housing Supplementary Planning Document

June 2022

Working for a **brighter future**  together



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1. Introduction

- 1.1 The Housing Supplementary Planning Document provides additional guidance on existing development plan policies found in the Cheshire East Local Plan Strategy (adopted July 2017), particularly focused on policies SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exception sites for local needs'.
- 1.2 The initial draft Housing SPD was published for six weeks consultation between the 26 April 2021 and the 07 June 2021. A report of consultation was prepared summarising the feedback that was received to that consultation and how this influenced the final draft version of the SPD.
- 1.3 The final draft of the Housing SPD, alongside a report of consultation prepared for the initial draft SPD, was consulted on from the 24 November until the 22 December 2021.
- 1.4 This final report of consultation sets out how consultation on the final draft of the Housing SPD was carried out and addresses the feedback received, including the final changes made to the SPD in response.
- 1.5 Consultation has been carried out in accordance with the requirements of the Council's Statement of Community Involvement (October 2020).

2. Consultation documents

- 2.1 Comments were invited on the final draft Housing SPD (November 2021) and accompanying report of consultation. A Strategic Environmental and Habitats Regulations Assessment Screening Assessment was also prepared as an appendix to the SPD and published alongside the consultation document for comment. An equalities impact assessment was also published, and this concluded that the final draft Housing SPD would not have a significant adverse impact on persons sharing any of the characteristics protected under the Equality Act 2010. Copies of the published EIA was published on the Council's website.

3. Document availability

- 3.1 Electronic copies of the consultation documents were made available on the council's consultation portal which could be accessed through the Council's website.
- 3.2 Printed copies of the consultation document were made available for inspection at public libraries in Cheshire East during opening hours.

4. Publicity and engagement

Consultation notifications

- 4.1 Notification of the consultation was sent to all active stakeholders on the council's Local Plan consultation database. This consisted of 418 printed letters and 2,425 e-mails sent on the 24 November 2021. The stakeholders on the consultation database included residents of Cheshire East, landowners and developers, as well as planning consultants, businesses and organisations, including statutory consultees.
- 4.2 Letters and e-mails were also sent to all town and parish councils in Cheshire East, elected members and MPs.

4.3 Examples of notification emails and letters are included in Appendix 1.

Other publicity

4.4 A number of pages on the Cheshire East Council website provided information and links to the consultation. These pages included:

- The homepage (in the 'have your say' section): www.cheshireeast.gov.uk
- The Cheshire East Supplementary Planning Documents webpage: https://www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/supplementary_plan_documents/supplementary_plan_documents.aspx
- The Council's Facebook and LinkedIn pages

4.5 Screenshots of webpages can be viewed at Appendix 2.

4.6 A media statement was issued informing people of the consultation. A copy of the media release is included in Appendix 3.

5. Submitting comments

5.1 Comments could be submitted in several ways:

- Using the online consultation portal, linked from the Council's website: https://cheshireeast-consult.objective.co.uk/portal/planning/spd/draft_housing_spd;
- By email to planningpolicy@cheshireeast.gov.uk;
- By post to Strategic Planning (Westfields), C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ.

5.2 Printed copies of consultation response forms were available for people to take away from public libraries during opening hours. The form could also be downloaded from the Council's website. A copy of the response form is shown in Appendix 4.

5.3 Information on how to submit comments was included on the consultation portal; in the printed and PDF versions of the draft SPD; and on the printed comments form.

6. Representations received

6.1 In total, 107 comments were received from 27 parties. These comments can be viewed on the consultation portal at: https://cheshireeast-consult.objective.co.uk/portal/planning/spd/final_draft_housing_spd

6.2 The comments received covered a range of topics and issues. The main issues raised during the consultation included: -

- As the draft SADPD is subject to outstanding objections, potentially subject to change and in examination, the SPD should not be adopted or used for development management purposes in advance of the adoption of the SADPD.

- SPDs and as set out within the NPPG, supplement the policies in an “adopted” local plan and not to introduce new planning policies into the development plan.
- References in the SPD to other relevant policies in the Local Plan Strategy, including Heritage Assets such as Listed Buildings.
- Minor modifications to the section on housing mix to be reflective of the policy approach of the Local Plan Strategy.
- The SPD should make reference to the demolition of buildings and the carbon impact this may have
- Reference to fire risk should be inserted in the SPD
- Reference to the Environment Act and associated regulations should be included in the SPD
- Further information required in the SPD about Registered Providers
- Comments concerning the calculation of vacant building credit and the example used in the draft SPD

6.3 A full summary of the key issues raised alongside the Council’s response and how the SPD has been amended as a result is set out in Appendix 5.

Appendix 1: Example notification letters and emails

Cheshire East Local Plan - Final Draft Housing Supplementary Planning Document Consultation



PLANNING POLICY (East)
To
Cc: PLANNING POLICY (East)

Reply Reply All Forward ...

Wed 24/11/2021 12:44

Good afternoon,

Cheshire East planning policy document consultation

You have received this email as you have previously responded to a local plan consultation or you have asked to be kept informed of future local plan consultations. Cheshire East Council has published a planning policy document for consultation, please see below. *If you wish to unsubscribe from our consultation mailing list, reply to this email with 'unsubscribe' as the subject.*

Final Draft Housing Supplementary Planning Document ('Final Draft Housing SPD')

The Final Draft Housing Supplementary Planning Document ("SPD") has been published for consultation and provides further guidance on the implementation of policies in the Local Plan, including SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exceptions housing for local needs' of the Local Plan Strategy. This is the second stage of consultation on the SPD which, once adopted, will be a material consideration in decision taking.

The consultation will run from **12pm on Wednesday the 24th November 2021 to 8pm on Wednesday the 22nd December 2021**. Further information is available on the council's Final Draft Housing SPD consultation webpage below:

<https://cheshireeast-consult.objective.co.uk/portal/planning/spd/>

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

Kind regards,

Tom Evans
Neighbourhood Planning Manager



«Name»
«Address_1», «Address_2»
«Postcode»

Strategic Planning
Westfields, Middlewich Road
Sandbach
CW11 1HZ

Tel: 01270 685893 (please leave a message)
Email: planningpolicy@cheshireeast.gov.uk

DATE: 24/11/2021 OUR REF: Final Draft Housing SPD

Dear «Name»,

Cheshire East planning policy document consultation

The council has published a planning policy document for consultation:

Final Draft Housing Supplementary Planning Document (Final Draft Housing SPD)

The Final Draft Housing Supplementary Planning Document ("SPD") has been published for consultation and provides further guidance on the implementation of policies in the Local Plan, including SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exceptions housing for local needs' of the Local Plan Strategy. This is the second stage of consultation on the SPD which, once adopted, will be a material consideration in decision taking.

The consultation will run from **12pm on Wednesday the 24th November 2021 to 8pm on Wednesday the 22nd December 2021**. Further information is available on the council's Final Draft Housing SPD consultation webpage: <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/>

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

Yours sincerely,



Tom Evans
Neighbourhood Planning Manager

Appendix 2: Screen shots from the Council website / Social Media Pages

The screenshot displays the Cheshire East Council website interface. At the top, there is a green header with the council logo, a search bar, and utility links for 'Listen and translate' and 'A to Z site index'. Below the header is an orange banner for 'Coronavirus - COVID-19' with the subtext 'Supporting you during the COVID-19 outbreak'. The main content area features a 'I want to find...' section with a grid of 18 categories, each with a right-pointing arrow. Below this are two columns: 'In Focus' and 'News'. The 'In Focus' section contains a large image of a virus particle with the text 'Omicron Variant' and a sub-headline 'Residents asked to 'do the right thing' with new Covid threat'. The 'News' section lists several articles with dates and titles, each with a right-pointing arrow. To the right of the news is a 'Public Notices | Media Hub >>' link. Below the news is a 'Have your say' section with a green header, followed by 'Consultations' and 'Planning applications' lists. To the right of these lists are two logos: 'Cheshire East Council Working together to REDUCE CARBON' and 'livewell Cheshire East'. Below the logos is a paragraph about 'Live Well Cheshire East' services. At the bottom, there are 'Contact' and 'Social media' buttons, and a 'Cheshire East Family' logo.

Cheshire East Council

Enter Keywords

Coronavirus - COVID-19
Supporting you during the COVID-19 outbreak

I want to find...

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

In Focus

Omicron Variant

Residents asked to 'do the right thing' with new Covid threat

Wearing masks compulsory in shops and supermarkets

News

- 8/12/21 - New planning document urges developers to consider good housing mix in new schemes
- 08/12/2021 - Cheshire's Covid-19 Vaccination Programme marks one-year anniversary
- 08/12/2021 - Cheshire Youth Justice Service rated 'Good'
- 08/12/2021 - Quality of social work with children and families in Cheshire East has improved says Ofsted
- 08/12/2021 - Number of empty properties in borough falls significantly

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

Have your say

Consultations

- Final Draft Housing SPD – closes 22 December 2021
- Budget Engagement 2022 to 2026 – closes 4 January 2022
- Cheshire East active travel have a say on your town – ongoing consultation
- Join the digital influence panel

Planning applications

- Comment on a current planning application

[More consultations](#)

Cheshire East Council
Working together to **REDUCE CARBON**

livewell
Cheshire East

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

Contact **Social media**

Cheshire East Family

Cheshire East Council Consultations

Welcome to Cheshire East Council's Consultation portal - please browse our current consultations below.

- Read about [document accessibility](#)
- View [Equality Impact Assessments for the individual consultations](#)

Current consultations

Final Draft HousingSPD

Consultation took place between the 26 April 2021 and the 7 June 2021 on the initial draft Housing Supplementary Planning Document. The final draft has now been published to provide further guidance on the implementation of policies in the Local Plan, including policies SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exceptions housing for local needs' of the Local Plan Strategy. You can respond by:

- View or make representations on the [Final Draft Housing Supplementary Housing Document and Report of Consultation on the Initial Draft SPD](#)
- Respond by email to planningpolicy@cheshireeast.gov.uk
- Writing to Strategic Planning Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ.

Alternatively, you can download this [Final Draft Housing Comments Form \(PDF, 205 KB\)](#) and return it by email or by post to the relevant address above.

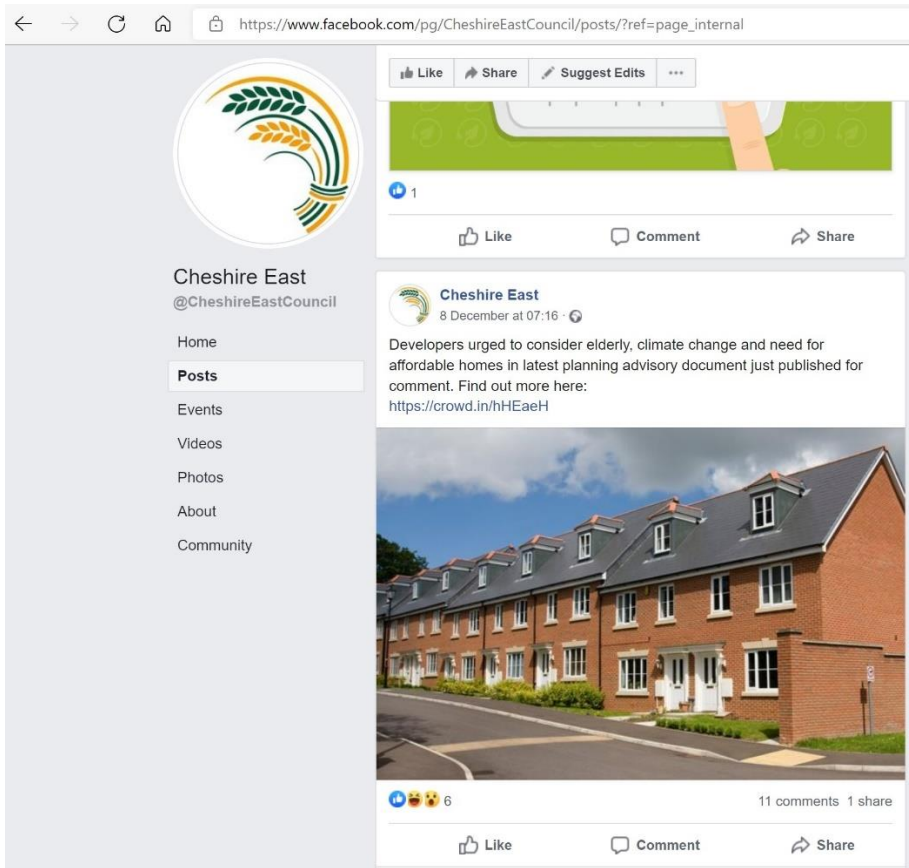
Representations are invited on the Final Draft Housing SPD until **22 December 2021**.

In this section

- Budget Engagement >
- Consultation into Faster Broadband Coverage >
- Consultations Results >
- Consultations in Cheshire East >
- Local Transport and Car Parking Engagement 2020 >
- Research and Consultation Team - privacy notice >
- The Digital Influence Panel >

Rate this page


We value your feedback. How do you rate this information?



Updates

Cheshire East Council
9,365 followers
3m

Please take the opportunity to comment on our latest housing planning document. Responses to be received by 22 December. For more details visit:
<https://crowd.in/ZUhoHs>





Search

Logout Who Said What? Help Print

Consultation Home > Planning > Supplementary Planning Documents > **Final Draft Housing SPD**

Final Draft Housing SPD

Consultation took place between the 26 April 2021 and the 7 June 2021 on the initial draft Housing Supplementary Planning Document ("SPD"). The final draft Housing SPD has now been published to provide further guidance on the implementation of policies in the Local Plan, including policies SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exceptions housing for local needs' of the Local Plan Strategy (LPS). The accompanying Report of Consultation sets out the responses received to the initial draft Housing SPD and how they have been considered in the final version.

The Final Draft Housing Supplementary Planning Document ("SPD") has been published for consultation, alongside the Report of Consultation, and provides further guidance on the implementation of policies in the Local Plan, including SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exceptions housing for local needs' of the Local Plan Strategy. This is the second stage of consultation on the SPD which, once adopted, will be a material consideration in decision taking.

Consultation Document

The Final Draft Housing SPD and Report of Consultation are available to download on this consultation portal:

- Final Draft Housing SPD (PDF file)
- Final Draft Housing SPD - Report of Consultation (PDF file)

A screening exercise has been carried out to determine whether the draft document gives rise to the need for further Strategic Environmental Appraisal or Appropriate Assessment (under the Habitats Regulations). This screening concludes that further such assessment is not necessary. The screening report is also available for consultation and this is included at Appendix 3 of the draft SPD.

An Equalities Impact Assessment ("EIA") has also been published and this concludes that the Final Draft Housing Supplementary Planning Document will not have a significant adverse impact on persons sharing any of the characteristics protected under the Equality Act 2010. Copies of published EIAs can be found on the Council's website.

For the duration of the consultation, the document can also be viewed at public libraries in Cheshire East. Opening hours may currently be restricted due to the coronavirus pandemic and you are advised to check the current libraries opening times on our website or telephone the 24-hour library information service on 0300 123 7739.

Submit your views

To comment online using this consultation portal, please log-in or register and then click the 'Read and comment on document' button below. This is our preferred method of submitting responses, but you can also respond by email (to planningpolicy@cheshireeast.gov.uk) or in writing (to Strategic Planning Westfields, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ).

Alternatively, you can download this [SPD Comments Form \(PDF file\)](#) and return it by email or by post to the relevant address above.

Whichever method used, please make sure that your comments reach us by **8pm on Wednesday the 22 December 2021**. We are not able to accept anonymous comments and you must provide us with your name and contact details. Your personal information will be processed in line with our [Strategic Planning Privacy Notice](#) and your name and comments will be published on this consultation portal.

Further information

We have also published a [formal notice of publication of the Final Draft Housing SPD \(PDF file\)](#)

For further information or for assistance in making comments, you can contact the Strategic Planning Team at planningpolicy@cheshireeast.gov.uk or by leaving a message on 01270 685893 and we will respond as soon as possible.



Event Information Supporting Documents All Comments

Access: Login required

Appendix 3: Press release

[Home](#) / [Council and Democracy](#) / [Council Information](#) / [Media Hub](#) / [Media releases](#) / 8/12/21 - New planning document urges developers to consider good housing mix in new schemes



New planning document urges developers to consider good housing mix in new schemes

8 December 2021

8 December 2021

Affordable housing, accommodation for the elderly and climate change are among the key features of the final draft of Cheshire East Council's housing supplementary planning document.

The draft is now available for comments from residents and all interested parties, prior to its adoption. It provides more guidance on three policies within the [Local Plan Strategy](#), which sets out the overall vision and planning framework for development in the borough.

The policies refer to the 'residential mix' of developments. These are intended to ensure that supported housing and accommodation for the elderly is available and that there continues to be the right provision for affordable homes, including in rural areas.

Climate change should also be considered when submitting a planning application, says the planning guide. Design, layout, low greenhouse gas emissions and strong energy ratings should all figure prominently in any new scheme.

Councillor Mick Warren, Cheshire East Council's chair of environment and communities, said: "While the supplementary planning document (SPD) is not part of our statutory development plan, it is a recognised way of introducing additional planning guidance, which should be taken into account when determining a planning application, or an appeal against a planning decision."

The final draft housing SPD is accompanied by a report summarising the responses received during an earlier consultation and explains how they have been taken into account in preparing the final document.

Cllr Warren added: "By providing clear guidance up front about our policy expectations, we wish to support developers and property owners when making relevant planning applications, as well as support the council in determining these applications."



[All comments should be received by the council by 22 December](#)

Comments can also be posted to **Strategic Planning (Westfields), c/o Municipal Buildings, Earle Street, Crewe CW1 2BJ.**

Appendix 4: Consultation response forms



Cheshire East Local Plan Final Draft Housing Supplementary Planning Document - Comments Form

Consultation took place between the 26 April 2021 and the 7 June 2021 on the initial draft Housing Supplementary Planning Document ("SPD"). The final draft Housing SPD has now been published to provide further guidance on the implementation of policies in the Local Plan, including policies SC4 'residential mix', SC5 'affordable homes' and SC6 'rural exceptions housing for local needs' of the Local Plan Strategy ('LPS'). The accompanying Report of Consultation sets out the responses received to the initial draft Housing SPD and how they have been considered in the final version.

Representations are invited to be made on the Final Draft Housing SPD and Report of Consultation between **12pm on Wednesday the 24 November 2021 and 8pm on Wednesday the 22 December 2021**. The SPD, once adopted, will be a material consideration in decision-taking.

Consultation documents

The consultation documents can be viewed online at <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/>

A screening exercise has been carried out to determine whether the draft document gives rise to the need for Strategic Environmental Appraisal or Appropriate Assessment (under the Habitats Regulations). This screening concludes that further such assessment is not necessary. The screening report is also available for consultation and this is included at Appendix 3 of the Final Draft Housing SPD.

For the duration of the consultation, the document can also be viewed at public libraries in Cheshire East during opening hours. Opening hours may be restricted due to Covid-19 and you are advised to check the current libraries opening times on the council's website or telephone the 24-hour library information service on 0300 123 7739. If you are unable to inspect copies of the documents during the representations period, please contact us using the details below to make alternative arrangements to inspect the documents.

Submit your views

The council's online consultation portal is our preferred method of submitting responses which can be accessed via <https://cheshireeast-consult.objective.co.uk/portal/planning/spd/> but you can also submit responses or return this form by email or post to:

By e-mail: planningpolicy@cheshireeast.gov.uk

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

Please make sure that your comments reach us by **8pm on Wednesday the 22 December 2021**. We are not able to accept anonymous comments and you must provide us with your name and contact details. Your personal data will be processed in line with our Spatial Planning Privacy Notice, which is available on the council's website.

For further assistance in making comments, you can contact the Strategic Planning Team at planningpolicy@cheshireeast.gov.uk or by leaving a message on 01270 685893 and we will respond as soon as possible.



Cheshire East Local Plan

Final Draft Housing Supplementary Planning Document - Comments Form

Please return to: Strategic Planning, C/O Municipal Buildings, Earle Street, Crewe CW1 2BJ or by email to planningpolicy@cheshireeast.gov.uk

Please return by: **Wednesday the 22 December 2021**

- This comment form has two parts:
- Part A – Personal details.
 - Part B – Your representation(s).

Comments Form Part A: Personal Details

	Personal Details*	Agent's Details (if applicable)
	<i>* If an agent is appointed, please complete only the Title, Name and Organisation in column 1 but complete the full contact details of the agent in column 2.</i>	
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address (where relevant)	<input type="text"/>	<input type="text"/>
Your Reference No. (if known)	<input type="text"/>	<input type="text"/>

Please complete a separate Part B form for each comment that you would like to make. This response form provides enough space for four comments but please copy and attach further part B forms if required.

OFFICIAL

Comment Form Part B: Final Draft Housing SPD Comment Form

Name and Organisation:

Office Use Only:	
PID:	RID:

Q1. Which section of the document are you commenting on?

Page / Chapter / Paragraph / Figure
(please delete as appropriate and state which): _____

Q2. What is your overall view on this section? (please tick one box)

Support Object Comment only

Q3. Please set out your comments or views on this section:

OFFICIAL

Appendix 5: Summary of key issues and response

Consultee Ref	Document Section	Summary of key issues	Response to issues raised including any changes proposed
FDHSPD 30 (John Flemming, Gladman)	General	SPDs cannot be used as a fast-track mechanism to set policies and should not be prepared with the aim of avoiding the need for examination or reinventing planning policy. It should only be prepared to provide additional guidance to those bringing forward development proposals in the borough.	The scope, purpose and focus of the SPD is on providing additional guidance on existing planning policies, including Local Plan Strategy policies SC4 'Residential Mix', SC6 'Affordable Homes' and SC7 'Rural Exception Housing for Local Needs'. Specific policy references to the SADPD, outside of the policy background section, have been significantly reduced in the SPD.
FDHSPD 29 (Harriet Worrell, Macclesfield Town Council)	General	Welcome the document, particularly the sections on affordable housing, biodiversity, and meeting national space standards.	Noted.
FDHSPD – 28 (T Bettany-Simmons, Canal and River Trust)	General	No comments to make.	Noted.
FDHSPD 53 (S Tibenham, Pegasus Planning Group Ltd)	General	The SPD's contents are premature. The SPD is still 'jumping the gun' on several topics covered by detailed policies in the SADPD currently at Local Plan examination. The content of this SPD will be further informed by detailed policies in the SADPD – which are still being examined. Until such time that the SADPD has been adopted, a consultation process on this SPD cannot be meaningful because the baseline statutory policy position is yet to be agreed and cannot therefore be fully understood by the	The scope, purpose and focus of the SPD is on providing additional guidance on adopted strategic policies in the Local Plan Strategy, policies SC4 'Residential Mix', SC6 'Affordable Homes' and SC7 'Rural Exception Housing for Local Needs'. Specific policy references to the SADPD, outside of the policy background

Consultee Ref	Document Section	Summary of key issues	Response to issues raised including any changes proposed
		public or any interested party wishing to make comment. As such, the current consultation process fails a basic legal test associated with the production of such documents. We therefore strongly urge the Council to carry out a further full consultation process on the SPD once the SADPD has been adopted and re-invite all interested parties to provide comments.	section, have been significantly reduced in the SPD.
FDHSPD 48 (Melanie Lindsley, Coal Authority)	General	The Coal Authority have no specific comments to make on this document.	Noted.
FDHSPD 14 (L Calvert, Historic England)	General	Encourage you to consider the historic environment in the production of your SPD. We recommend that you seek advice from the local authority conservation officer and from the appropriate archaeological staff. They are best placed to provide information on the historic environment. In the event that a proposal affects a heritage asset, planning applications will also be assessed against other policies in the development plan such as LPS policies SD1 'Sustainable Development in Cheshire East', SD2 'Sustainable Development Principles', SE 7 'The Historic Environment amongst others.	The SPD text has been amended at paragraph 2.6 (in the final version), as follows:- <u>There is a raft of other policies in the LPS that are also relevant to housing proposals. The list above is not exhaustive, and consideration will also be given to other relevant planning policies, where appropriate to the planning application proposal. This could include proposals that also affect Heritage Assets such as Conservation Areas or Listed Buildings.</u> The limited scope and purpose of the Housing SPD is to provide additional guidance focused on Local Plan Strategy policies SC4 'Residential Mix', SC5 'Affordable Homes' and SC6 'Rural Exceptions Housing for Local Needs'.
FDHSPD 13 (D Rogers,	General	Natural England has no additional comments to make on the SPD. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the	Noted.

Consultee Ref	Document Section	Summary of key issues	Response to issues raised including any changes proposed
Natural England)		natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	
FDHSPD 41 (Joe Hobbs, Homes England)	General	Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.	Noted.
FDHSPD 107 (Steve Sayce, The Environment Agency)	General	We note the content of the SPD and have no objection and no further comments to make.	Noted.
FDHSPD 43 (C Waldron, Defence Infrastructure Organisation)	General	The Ministry of Defence have no concerns or suggested amendments to the current draft of the SPD that forms the subject of the current consultation.	Noted.
FDHSPD 54 (Emery Planning on behalf of Bloor Homes)	General	As the draft SADPD is subject to outstanding objections, potentially subject to change and in examination, the SPD should not be adopted or used for development management purposes in advance of the adoption of the SADPD. SPDs and as set out within the NPPG, supplement the policies in an “adopted” local plan and not to introduce new planning policies into the development plan.	The scope, purpose and focus of the SPD is on providing additional guidance on existing planning policies in the Local Plan Strategy, particularly policies SC4 ‘Residential Mix”, SC6 ‘Affordable Homes’ and SC7 ‘Rural Exception Housing for Local Needs’. Specific policy references to the SADPD, outside of the policy background section, have been significantly reduced in the SPD.
FDHSPD 60 (Julie Mason, Bollington)	Introduction	Bollington Town Council (BTC) notes that housing policies in the SADPD will be dealt with through the examination process.	Noted.

Consultee Ref	Document Section	Summary of key issues	Response to issues raised including any changes proposed
Town Council)			
FDHSPD 60 (Julie Mason, Bollington Town Council)	Introduction and paragraph 2.4	<p>Bollington Town Council agrees with Historic England that it would have been very helpful to include detailed guidance on the historic environment in the SPD. Including on the following issues: -</p> <ul style="list-style-type: none"> -The construction of modern housing within or nearby Conservation Areas -Development of historic buildings for new uses and in particular the conversion of historically valuable industrial buildings to housing accommodation. -Support for sympathetic development of historic sites. <p>Currently the Bollington community is facing two very serious issues. The first is St. John's Church in the centre of the industrial Town. The church was made redundant in 2005 and scheduled for development 3 years later. That development has still not taken place. The second is the stalled development of 66 dwellings in Ingersley Vale. This development, which is in an idyllic rural setting, has been required since fire destroyed the Mill in 1999. Based on Planning application 08/791P.</p> <p>The Housing SPD would be improved if it gave clear guidance to developers and looked at its own policies in relation to creating dwellings in these circumstances to ensure progress.</p>	<p>The scope, purpose and focus of the Housing SPD is on providing additional guidance focused on Local Plan Strategy policies SC4 'Residential Mix', SC5 'Affordable Homes' and SC6 'Rural Exceptions Housing for Local Needs'. The SPD text has been amended at paragraph 2.6 (in the final version), as follows:- There is a raft of other policies in the LPS that are also relevant to housing proposals. The list above is not exhaustive, and consideration will also be given to other relevant planning policies, where appropriate to the planning application proposal. This could include proposals that also affect Heritage Assets such as Conservation Areas or Listed Buildings.</p>
FDHSPD 2 (J Meecham)	2 Introduction	The problem with the LPS is that the Strategic Planning Board (SPB) and its officers ignore it and most local and most affected by the proposed development - namely the local Borough	The scope, purpose and focus of this SPD is to provide additional guidance on the implementation of certain planning policies in

Consultee Ref	Document Section	Summary of key issues	Response to issues raised including any changes proposed
		Council and residents. They have no relationship with the communities affected. There needs to be something that forces those involved to care about local communities and about the standards set out in the LPS.	the Local Plan Strategy - policies SC4 'Residential Mix', SC5 'Affordable Homes' and SC6 'Rural Exceptions Housing for Local Needs' only.
FDHSPD 62 (J Mason, Bollington Town Council)	Paragraph 3.5	Bollington Town Council accepts that there are exceptions to the restrictions to development in the Green Belt and Open Countryside but would request an additional phrase added 'Where there is clear and demonstrable evidence of local community need there is an exception for 'affordable housing''	The purpose of paragraph 3.5 (now 2.5) is to provide a brief summary of existing policies in the Local Plan Strategy. The current wording for this paragraph is considered to be reflective of the policy position in the Local Plan Strategy.
FDHSPD 15 (J Bowden)	4 Applying for planning permission	The document currently does not mention social value contribution from developers. New skills provision and jobs is a key benefit of new development, so this should properly be utilised. Suggested wording provided with the representation.	The scope, purpose and focus of the SPD is limited to provide additional guidance on policy wording on residential mix and affordable housing in the Local Plan Strategy. There is no current planning policy that relates to the wording promoted through the representation.
FDHSPD 63 (J Mason, Bollington Town Council)	Paragraph 4.1	Bollington Town Council requests an amendment to the first sentence. After 'engage with the council, put 'the local town/parish council, the community, etc'. The democratically elected responsible body should have a specific mention, particularly as they are a statutory consultee. Then at the end of paragraph 4.1 please add the sentence: Pre-application documents will be shared with the local Town/Parish Council.	The response is noted. Additional text has been added to paragraph 4.1 (now 3.1 in the final document) as follows (additional text shown as underlined): - Applicants should engage with the council, the local community <u>including town/parish council</u> and relevant statutory consultees at the earliest opportunity in order to make sure that new development responds appropriately to the unique character and quality of place in the borough.
FDHSPD 55 (Emery Planning on behalf of Bloor Homes)	5 Housing Mix	Paragraph 62 of the NPPF requires that the size, type and tenure of housing need for different groups in the community should be assessed and reflected in planning policies. Emery Planning submitted representations to the consultation draft of the Housing SPD on behalf of Bloor Homes which summarised the objections to the Revised Publication Draft	Reference to market factors is made in paragraph 5.1 (now 4.1) of the SPD (amongst other relevant matters). There has been an amendment made to paragraph 5.2 (now 4.2), as follows (additional text shown as underlined and text struckthrough):-

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		<p>SADPD in respect of Policy HOU1 and the matter of housing mix. These are currently being considered through the examination of the SADPD. Within Cheshire East there will be significant differences between the demographic and demand behind housing mix in different locations and settlements. Within the draft SPD, there is a lack of reference to the matter of market demand, which is the ultimate driver of the housing market.</p> <p>The final draft SPD states that “development proposals are not likely to be supported when dominated by large dwellings (four or five bedrooms) which are unlikely to meet the borough’s housing needs”. Such a prescriptive approach does not provide sufficient flexibility to respond to changing demand. There has been a significant shift in demand arising from the COVID-19 pandemic and the way people live. As a result of the pandemic there is now increased demands on living space as a result of pressures such as home working and home-schooling children and access to a garden. It would be inappropriate for the SPD to view larger dwellings negatively, as this is not an accurate reflection of market conditions and the shift in pressures on demands for living space. Furthermore, the LPS is based on delivering jobs growth. Consequently, there is a need to deliver an attractive supply of housing which is sufficient to attract and retain households of working age.</p>	<p>Applicants should then provide information with their planning application on the approach to housing mix and how the proposal responds to the longer-term needs of residents in the borough. The council will require an appropriate range and mix of housing. Housing Mix will be considered on a case by case basis <u>and should maintain, provide or contribute to an appropriate mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities.</u> but development proposals are not likely to be supported when dominated by large dwellings (four or five bedrooms) which are unlikely to meet the borough’s housing needs.</p>
FDHSPD 31 (J Flemming, Gladman)	5 Housing Mix	<p>Gladman stress that any requirements relating to housing mix should support a flexible approach which recognises needs and demands will vary in different locations across the borough and may also change throughout the course of the plan period. It is imperative that development proposals can respond to local circumstances with regards to latest evidence. Further refinement of both the SPD are required to ensure policy requirements relating to housing mix can be applied in a</p>	<p>It is considered that the wording in the final version of the Housing SPD is sufficiently flexible on Housing Mix, noting that mix will be considered on a case by case basis.</p>

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		consistent manner through the development management process.	
FDHSPD 46 (P Welch, Peover Superior Parish Council)	5 Housing Mix	In our Parish we are experiencing several planning applications to either extensively modify or to demolish and rebuild family homes. In most cases these applications propose around a 30% increase in footprint when in the green belt. The 30% increase is often based on just a large replacement house compared to what exists as a house and outbuildings. The net effect is a replacement or enlarged dwelling that is up to twice the size of the original. This has the effect of seriously distorting the housing mix in the area as good-sized family homes are replaced one by one with large mansions that can only be afforded by the ultra-wealthy. This in turn distorts the social mix and the viability of local schools, shops, pubs, clubs and societies as the mansion residents do not participate in or support these activities. In the SPD we would like to see an extension of this section to include a policy of preserving a diverse housing mix that already exists in an area and avoiding the constant creep towards housing that is all of one type. Where applications of this type are approved then there needs to be appropriate CIL payments to offset the damage done to the local community.	There has been an amendment made to paragraph 5.2 (now 4.2), as follows (additional text shown as underlined and text struckthrough):- Applicants should then provide information with their planning application on the approach to housing mix and how the proposal responds to the longer-term needs of residents in the borough. The council will require an appropriate range and mix of housing. Housing Mix will be considered on a case-by-case basis <u>and should maintain, provide or contribute to an appropriate mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities.</u> but development proposals are not likely to be supported when dominated by large dwellings (four or five bedrooms) which are unlikely to meet the borough's housing needs.
FDHSPD 64 (J Mason, Bollington Town Council)	Paragraph 5.1	Bollington Town Council requests if legally allowable this should read 'Applicants are required to provide information on housing mix'. This is perfectly reasonable since applicants will not be aware of viability unless they have tested the market and decided on what 'mix' of housing types they will provide on site.	It is considered that the wording set out in paragraph 5.1 (now 4.1), to encourage information on housing mix at the pre-application stage is suitable and reflective of the applicants choice to seek advice on matters of their choosing, at that stage.
FDHSPD 65 (J Mason, Bollington)	Paragraph 5.2	Bollington Town Council asks for a further paragraph to be included which states; how housing need is determined, where the information concerning local housing need can be found and	There has been an amendment made to paragraph 5.2 (now 4.2), as follows (additional

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Town Council)		that it will be regarded as a material consideration in determining the application. If such a paragraph is included the rather negative paragraph 5.2 can be cut out. There may be a need for larger family accommodation to be required in some areas and such houses may be required if two family members are working from home and both require office space for different purposes.	text shown as underlined and text struckthrough):- “Applicants should then provide information with their planning application on the approach to housing mix and how the proposal responds to the longer-term needs of residents in the borough. The council will require an appropriate range and mix of housing. Housing Mix will be considered on a case by case basis and should maintain, provide or contribute to an appropriate mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. but development proposals are not likely to be supported when dominated by large dwellings (four or five bedrooms) which are unlikely to meet the borough’s housing needs”.
FDHSPD 5 (A Murdoch)	Paragraph 5.2	The policy on developments dominated by 4 and 5 bedroom houses is very welcome. It will be interesting to monitor this against future consents	As noted above, there has been an amendment made to paragraph 5.2 (now paragraph 4.2). The precise wording change is contained in the preceding row.
FDHSPD 66 (J Mason, Bollington Town Council)	Paragraph 5.3	Bollington Town Council welcomes the reference to ‘Key Worker’ housing and would request it has a separate paragraph.	Support for the reference to Key Worker housing is noted. The wording, reference and definition of a key worker is consistent with the Local Plan Strategy.
FDHSPD 56 (Emery Planning on behalf of	6 Environmental Impacts of Housing	Whilst our client acknowledges that there is a need to reduce carbon footprint where possible through the design of new homes, this section of the draft SPD covers issues in relation to draft policy ENV7 of the SADPD. This policy and the objections to it were considered at the examination hearing session on	It is considered that the section on the environmental impacts of housing in the SPD is reflective of the policy context included in the Local Plan Strategy.

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Bloor Homes)		Tuesday 2nd November 2021. The requirements of the policy are inconsistent with national planning policy and guidance, which makes clear that the only additional technical requirements exceeding the minimum standards required by Building Regulations, which LPAs can impose in respect of residential development can only be up to the equivalent of Level 4 of the Code for Sustainable Homes (Paragraph: 012 Reference ID: 6-012-20190315). The SADPD and SPD seek to introduce additional requirements at significant cost. It is fundamentally flawed to introduce additional standards which have a negative impact upon viability, but not revisit CIL.	The Housing SPD does not refer to technical standards on energy efficiency delivered through the building regulations. This is a matter appropriately reflected in the SADPD, which is subject to examination currently and / or through separate legislation supporting the establishment of the Future Homes standard.
FDHSPD 50 (A Leysens, United Utilities)	6 Environmental Impacts of Housing	Water Efficiency Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (l/p/day) for new residential development which can be implemented through local planning policy where there is a clear need based on evidence. In this regard we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following text in the emerging Housing SPD: 'All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.' We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reductions noting that water and energy efficiency are linked. We also wish to note the associated social benefits by helping to reduce customer bills.	Noted. There are no current adopted planning policy (in the Local Plan Strategy) that requires optional water efficiency standards for this SPD to provide additional guidance on. Paragraph 5.5 (in the final version of SPD) refers to development expecting to consider water efficiency, in more general terms, as part of a suite of other measures.
FDHSPD – 47 (P Welch,	6 Environment	Welcome the additions that have been made. However, the policy focusses on sustainability post construction and does not	Noted. There is currently no planning policy context in the Local Plan Strategy to require a

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Peover Superior Parish Council)	al Impacts of Housing	<p>give sufficient weight to the environmental impacts of the up-front construction. This is particularly relevant when existing viable dwellings are demolished and replaced as a very large percentage of a home's lifetime carbon footprint is embedded in the materials of the existing building. Given that rebuilds are often considerably larger than the original, this makes significant reduction in the annual CO2 emissions much less likely to be achieved and the break-even point even longer. Applications should be accompanied by a carbon calculation taking the existing annual carbon emissions, the annual emissions of the proposed project and the calculation of the embedded carbon in the replacement building. There are many such calculators available, and organisations certified to perform such a calculation. Planning applications for rebuilds that show a net carbon payback of greater than 20 years should be refused. Exceptions to this policy would apply only where existing housing has been identified for replacement in the Cheshire East SADPD. A more sustainable solution is the re-use of the existing structure enhanced where reasonably practical to improve the thermal performance and retrofitted with a low carbon technology heating system such as heat pumps and solar panels. Not only does this approach result in a lower lifetime carbon footprint but it also helps preserve the original character of buildings that make such an important contribution to the neighbourhood and results in less resource use and other forms of pollution.</p>	<p>carbon calculation in the terms described in the representation. An additional paragraph has been added in section 5.4 (in the final version of the SPD) to emphasise the policy requirements of policy SD1 'Sustainable Development Principles' as follows:- <u>"In line with policy SD 1 (sustainable development principles) development proposals, should, wherever possible, use appropriate technologies to reduce carbon emissions including using sustainable design and construction methods. The policy also encourages the re-use of existing buildings on site"</u></p>
FDHSPD 35 (M Wheelton, Prestbury Parish Council)	Paragraph 6.1	<p>Although CEC recognises the environmental impacts of housing and quotes the Climate Change Act, the UK government's commitments to reducing emissions and its own declaration of a climate emergency, its actual requirements of house builders in this SPD are not as strong as they should be. Paragraph 6.1 merely encourages applicants to reduce their carbon footprint</p>	<p>The SPD appropriately refers to the relevant policies in the adopted Local Plan Strategy in respect of climate change.</p>

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		"where possible" when in fact the document could detail of the sort of measures that are expected of developers.	
FDHSPD 67 (J Mason, Bollington Town Council)	Paragraph 6.1	<p>Bollington Town Council strongly supports this section of the SPD and endorses the general position of paragraph 6.1. Recommend a paragraph on ensuring that the developers have taken every aspect of fire risk into account and that a safety certificate in relation to fire safety is obtained and submitted by a reputable organisation before and after the development is completed. This is particularly important in any development involving the conversion of previously constructed buildings. A suggested paragraph on fire risk might be:</p> <p>6.2. Fire Risk. Developers will be expected to present a detailed report on the fire risks involved in any development during</p> <p>a) the preparation of the site</p> <p>b) the design and build of the dwellings in relation to facilities provided, the materials used and the method of construction.</p> <p>c) the use of the dwellings by the eventual residents. At the point of sale each dwelling should have a detailed fire risk report plus necessary advice to residents on how to avoid the risk of fire.</p>	<p>Fire safety is a matter primarily considered through the building regulations framework. Additional text has been proposed to be added to paragraph 6.9 (now para 5.10) as follows:-</p> <p>Development should avoid and, where necessary, mitigate against environmental impacts of development. Residential development will be expected to address the requirements of LPS policy SE12 (pollution, land contamination and land instability) in any development proposals. <u>Relevant buildings containing two or more dwellings (or educational accommodation) and those who meet the height condition of 18 metres or higher (or 7 or more storeys) should refer to the requirements of the Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 ("the 2021 Order") and 'planning gateway one' in respect of fire safety matters.</u></p>
FDHSPD 67 (J Mason, Bollington Town Council)	Paragraph 6.2	<p>Bollington Town Council strongly supports the reference to the 12 Questions, Developers and Planners should ask themselves contained in the Building for Life document produced and agreed jointly by architects, town planners and developers. Recommend attaching this document as an Appendix to the Housing SPD when published. Paragraph 6.2 makes the clear statement Red Ratings on the traffic light scheme of assessment should be avoided. BTC regards this as an important statement of principle and needs to be highlighted.</p>	<p>A footnote has been included to make an appropriate reference to the Building for a Healthy Life document. The wording in paragraph 6.2 (now 5.2) is considered to be reflective of the wording of the Local Plan Strategy. The SPD makes reference to the use of planning conditions to secure the delivery of matters arising from the Building for a Healthy Life Assessment (paragraph 5.2).</p>

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		BTC asks why 'should' and not 'must'? BTC notes that Building For Life has recommendations to Planning Authorities below; 'We also recommend that local authorities consider expecting developments to demonstrate they are targeting BfL 12 where applications for outline planning permission are granted. A useful way to express this expectation is through either a condition or 'note to applicant'.' BTC would suggest a statement to that effect should be included in the Housing SPD.	
FDHSPD 35 (M Wheelton, Prestbury Parish Council)	Paragraph 6.2	Paragraph 6.2 only requires developers to "seek to maximise the number of green ratings" they might achieve under a traffic light system, with no target number stipulated, and it goes on to say, "Red ratings should be avoided" rather than making a stronger statement such as "Red ratings are not acceptable".	It is considered that the wording is reflective of policy SE 1 'Design' in the Local Plan Strategy to ensure the Building for a Healthy Life criteria is considered by applicants and decision takers on a case by case basis.
FDHSPD 16 (J Bowden)	Paragraph 6.2	It is not clear who will judge compliance with Building for Life/Building for a Healthy Life principles, and it seems unrealistic for the planning dept. to assess each development for BHL compliance. External assurance would be too onerous on the applicant so I suggest the applicant must attempt to show it has made a reasonable attempt to meet the principles, or clearly explain why not. Suggested wording below: A robust and documented internal procedure for showing adherence to the Building for Life 12 (now Building for a Healthy Life) will be demonstrated for the development, or state reasons why meeting of any of the principles is impractical.	Additional text has been added to paragraph 6.2 (now 5.2), as follows:- Planning conditions may be attached to a scheme to ensure the delivery of matters arising from the Building for a Healthy Life Assessment. <u>Applicants are encouraged to provide evidence for how the development reasonably addresses the Building for a Healthy Life Standard criteria.</u>
FDHSPD 32 (J Flemming, Gladman)	Paragraph 6.2	Building for Life 12 – now been renamed to Building for a Healthy Life. The SPD should be updated.	Noted. The SPD has been updated to refer to 'Building for a Healthy Life'.
FDHSPD 39 (N Belford, Manchester)	Paragraph 6.3	We acknowledge that you have taken on board our previous comments. Some minor modifications to the text are just required now to strengthen the wording within paragraphs 6.3	Noted. The footnote citing the Aerodrome safeguarding direction and circular has been added to paragraph 6.3 (now 5.3). Text has

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Airports Group)		<p>as follows: • Insert [bracket] and delete () text at paragraph 6.3 as follows: The views of the Aerodrome Safeguarding Authority [for Manchester Airport (should) must] be sought in respect of wind turbine or solar photo-voltaic installations, where necessary. These amendments will strengthen the wording and make it clear who the Aerodrome Safeguarding Authority are.</p> <p>• Paragraph 6.3 needs to refer to the footnote citing the Aerodrome Safeguarding Direction and Circular. This is currently included in paragraph 6.10 (footnote no. 15) but would be better located in the paragraph that first refers to the aerodrome safeguarding requirement.</p>	<p>been added to paragraph 6.3 (now 5.3) as follows: The views of the Aerodrome Safeguarding Authority (<u>Manchester Airport and any other relevant safeguarded interests / bodies identified in regulations</u>) should be sought in respect of wind-turbine or solar photo-voltaic installations, where necessary.</p>
FDHSPD 17 (J Bowden)	Paragraph 6.3	<p>The SPD is currently less ambitious and less specific than the Future Homes Standard. If the SPD is to go align or go beyond proposed Building Regulation changes it should specify a carbon emission reduction percentage which is at least a 31% reduction in Part L and F 2013 being brought in as the first part part of the Future Homes Standard. Suggested wording below: Dwellings will achieve a 31% reduction on the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on the 2013 Edition of the 2010 Building Regulations (Part L). A fabric first approach shall be prioritised, ensuring that at a minimum the thermal performance of the whole envelope exceeds that of the notional specification by 5%. The energy use intensity for new homes should be reported on a kWh/m²/year gross internal area (GIA) basis.</p>	<p>The SPD cannot introduce new planning policy. The current wording of the SPD is considered to be consistent with the policy intentions set out in the Local Plan Strategy. The SADPD is seeking to introduce energy efficiency standards and is currently at examination. The Future Homes Standard is also likely to introduce energy efficiency standards through building regulations.</p>
FDHSPD 18, 19, 20 & 21 (J Bowden)	Paragraph 6.4	<p>The Residential Design Guide states that Nationally Described Space Standards should be used but this is not clear in the SPD, Suggested wording: Homes should be designed and built with space requirements that at least meet the Nationally Described Space Standards, as stated in The Cheshire East Residential Design Guide volume 2 ii/22.</p>	<p>There is no policy in the current development plan to require adherence to Nationally Described Space Standards. The second part of the Council's Local Plan, the Site Allocations and Development Policies, has included a policy reference to Nationally Described Space</p>

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			Standards. This emerging planning policy document is currently under examination.
FDHSPD 18, 19, 20 & 21 (J Bowden)	Paragraph 6.4	<p>There is not sufficient weight given to the issue of embodied carbon in the SPD (although the Residential Design Guide does cover it). Suggested wording: Materials selection should take account of embodied energy (method of manufacture, source, transportation and recycled content) as well as their thermal/engineering properties) as stated in the CEC Residential Design Guide Volume 2, Section V/42. The SPD is not specific enough on actions that can be taken to reduce construction waste. Waste is arguably construction's biggest environmental impact account – construction, excavation and demolition waste accounted for 62% of all UK waste in 2018 (UK Statistics on Waste, Defra 2021, p.12). Suggested wording below: All reasonable efforts must be taken to reduce above and below ground construction waste according to the waste hierarchy through active consideration of measures including:</p> <ul style="list-style-type: none"> • designing out waste / adequate protection of materials / effective waste segregation / materials management plans <p>Documentation should clearly show how these have been considered. The SPD is not specific enough on actions that can be taken to reduce carbon emissions on site given the importance of the issue. The measures suggested are not onerous on development costs given a sharp rise in construction diesel duty from April 2022 when red diesel tax</p>	<p>Paragraph 6.4 (now 5.5) makes appropriate references to the relevant section of the Residential Design Guide SPD on embodied carbon.</p> <p>A new paragraph (paragraph 5.4) of the Housing SPD has been added to make reference to sustainable design and construction methods and the re-use of existing buildings on site.</p>

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		<p>breaks are abolished for construction. Suggested wording below: All reasonable efforts must be taken to limit gas oil consumption in the construction phase due to carbon emissions and air quality impacts through though measures to be demonstrably considered:</p> <ul style="list-style-type: none"> • early grid connections / suitably sized generators for requirements / efficient mobile plant such e.g. meeting Euro Stage V Standards / efficient generators e.g. Hybrid battery, variable speed and solar assisted generators / low carbon alternative fuels such as HVO 	
FDHSPD 22 (J Bowden)	Paragraph 6.5	The SPD is not specific enough on active travel and public transport to reduce car use. Suggested wording: All major developments will produce a Travel Plan that includes at a minimum professionally designed and printed brochures for residents promoting local active travel and public transport routes. Cycle store vouchers and bus 'taster' schemes e.g free bus passes for a 3-month period for new residents will be considered in all travel plans.	A cross reference to policy CO4 'Travel Plans and Transport Assessments' has now been included in paragraph 6.5 (now 5.6).
FDHSPD 68 (J Mason, Bollington Town Council)	Paragraph 6.5	Bollington Town Council welcomes the expectation that developments should provide for 'appropriate' open space. Reference is made to the Concept of the 20 Minute Neighbourhood. This concept needs full explanation in an appendix for the guidance of developers and community stakeholders.	Reference to the 20 minute neighbourhood has been added to the Glossary of the SPD.
FDHSPD 35 (M Wheelton, Prestbury Parish Council)	Paragraph 6.7	Paragraph 6.7 needs to be updated in the light of the latest government announcement on charging points (November 23 rd) that the government will be legislating to compel charging points in all new homes, supermarkets and work places from next year (2022).	Paragraph 6.7 (now paragraph 5.8) has been amended to reflect updates to Building Regulations (approved document S), as follows:-

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FDHSPD 69 (J Mason, Bollington Town Council)	Paragraph 6.7	Bollington Town Council asks that all new homes built should automatically be provided with EVC's. Government policy is now to encourage the use of electric vehicles to reduce our overall carbon footprint and to reduce air pollution. The built environment must recognise this as a requirement at the same level as provision for kitchen appliances and digital equipment.	<p>'Major' housing schemes of 10 or more homes (or a site area of 0.5 hectares or more) should provide on-site electric vehicle charging infrastructure in safe, accessible and convenient locations across the site in line with LPS policy CO2 (enabling business growth through transport infrastructure). This should include the provision of in-curtilage plug-in points, subject to feasibility and viability.</p> <p><u>Applicants should be aware that Part S in Schedule 1 to the Building Regulations sets out requirements for electric vehicle charging points within new residential and non-residential development schemes. These requirements should be considered early in the design process.</u></p>
FDHSPD 34 (J Flemming, Gladman)	Paragraph 6.7	Paragraph 6.7 states that major housing schemes of 10 or more homes should provide on-site electric vehicle charging on-site, subject to feasibility and viability. Whilst Gladman support the reference to viability, Policy INF 3 of the emerging SADPD is currently subject to the rigours of independent examination and it is not clear whether this policy will be retained in its current form. As such, the SPD should set out a more flexible approach relating to vehicle charging measures on site.	
FDHSPD 23 (J Bowden)	Paragraph 6.7	The SPD doesn't go far enough on this question given that combustion engine cars will be banned from sale in just 9 years. Suggested wording: All new dwellings regardless of development size will have a type 2 EV charge point per unit where the unit has suitable off street parking attached. Otherwise communal charge points will be provided at 1 charge point for every two homes. Where space makes this unviable, designated EV car club parking provision may be considered as an alternative.	
FDHSPD 35 (M Wheelton, Prestbury Parish Council)	Paragraphs 6.7 & 6.10	There is a reference in paragraph 6.7 to ecological enhancements and in 6.10 to sustainable water management and avoiding flood risk, but there is no reference in the document to the Environment Act 2021 which became law in November. The Act sets clear statutory targets for biodiversity and water as well as for air quality and waste, but there is no 'cut across' from it to this document. The Act, of course, has introduced the duty on local authorities and others in relation to biodiversity reporting and the whole system for biodiversity net	<p>Reference has been added to the Environment Act in the SPD to paragraph 6.8 (now 5.9) (new text shown as underlined):-</p> <p>Further guidance is contained in the Council's Residential Design Guide SPD in section iv 16 & iv 17. Lighting schemes should take reasonable steps to avoid night-time light pollution. <u>Criterion 5 of LPS policy SE 3 (Biodiversity and Geodiversity) notes how all</u></p>

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		gain. The latter requires developers to ensure an increase in biodiversity through their projects. This is not referenced in the SPD and should be.	<u>development must aim to positively contribute to the conservation and enhancement of biodiversity and geodiversity and should not negatively affect these interests. Developers should also be aware of their responsibilities through the Environment Act and associated regulations, particularly in respect of Biodiversity Net Gain.</u>
FDHSPD 3 (R Harding, Cheshire Wildlife Trust)	Paragraph 6.8	We would like to offer comment on Section 6 – Environmental Impacts of Housing, and specifically where this section references ecological enhancement in paragraph 6.8. While we welcome the statement that “new development should also aim to secure ecological enhancements by providing nesting / roosting opportunities for bats and nesting birds”, we would like to see this amended to reference securing measurable net gains for biodiversity in line with current local and national policy requirements (highlighted by square brackets below). We suggest the following: “6.8 New development should [secure a measurable biodiversity net gain alongside other] ecological enhancements [for example] providing nesting / roosting opportunities for bats and nesting birds. This could take the form of integrated opportunities for bats and nesting birds (such as roosting / nesting within part of the roof space). Provision should be informed by a trained ecologist in discussion with the Councils Nature Conservation Officers. Further guidance is contained in the Council’s [Biodiversity Net Gain SPD and] Residential Design Guide SPD in section iv 16 & iv 17. Lighting schemes should take reasonable steps to avoid night-time light pollution.” A measurable biodiversity net gain of at least 10% is mandated for all development carried out under the Town and Country Planning Act 1990, as per Schedule 7a of the Environment Act. The provision of measurable net gains for biodiversity is set out in National Planning Policy Framework paragraphs 174d, 179b and 180d. An overall net gain for biodiversity is also required under Cheshire East forthcoming Local Policy ENV 2 (Draft Site Allocations and Development	

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		Policies Document) with additional guidance provided in the forthcoming Cheshire East Biodiversity Net Gain SPD	
FDHSPD 24 (J Bowden)	Paragraph 6.8	Support for suggestion from Cheshire Wildlife Trust above.	Noted.
FDHSPD 70 (J Mason, Bollington Town Council)	Paragraph 6.8	Bollington Town Council questions the requirement to adapt housing as opposed to the surrounding landscape and environment for nesting and roosting opportunities for birds and bats.	As noted in paragraph 6.8 (now 5.9) there are opportunities in housing developments to incorporate opportunities for bats and nesting birds.
FDHSPD 71 (J Mason, Bollington Town Council)	Paragraph 6.9	Bollington Town Council recommends the word 'must' instead of 'should'. There is no point in a development that produces or allows contamination, instability or pollution to be present.	The word 'should' is considered appropriate in this context as it refers to development avoiding and, where necessary, mitigating against environmental impacts of development. It then goes onto note the requirements of LPS policy SE 12 (pollution, and contamination and land instability).
FDHSPD 50 (A Leysens, United Utilities)	Paragraph 6.9	We welcome paragraph 6.9 and reference to the need for residential development to address the requirements of LPS policy SE12 (pollution, land contamination and land instability). This will be important to United Utilities where development is proposed near to our wastewater treatment works and wastewater pumping stations which are 24-hour waste management operations. These can result in emissions including noise, odour and vibration. It is also important where development is proposed on land within a groundwater source protection zone which is used for public water supply purposes as well as other land which is used for public water supply catchment purposes. It is important to outline to the LPA the need for our assets to be fully considered in development proposals. We will not normally permit residential development over or in close proximity to our assets. We strongly recommend	Noted.

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		that the LPA advises future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact United Utilities.	
FDHSPD 25 (J Bowden)	Paragraph 6.9	Impacts of building on carbon stores is currently not considered – to my knowledge – in the planning process but I believe it should be as a major climate issue. Measuring is a first step to managing and would help the council consider the full impacts. Suggested wording: Where the development is to take place on a natural environment which is a major carbon store (mainly peat bogs) the estimated carbon and climate impact of building on the land type will be professionally assessed and clearly communicated to planning authority. If carbon emission impacts are very substantial, planning permission will be refused.	The SPD scope, purpose and context is to provide additional guidance on planning policies, focused on policies SC4 ‘residential mix’, SC5 ‘affordable homes’ and SC6 ‘rural exception sites for local needs’ in the Local Plan Strategy.
FDHSPD 72 (J Mason, Bollington Town Council)	Paragraph 6.10	The creation and maintenance of Sustainable Drainage Systems for surface water is a vital element in development planning. This has relevance in Bollington where we have developments built and planned for our designated flood plain and riverbanks near the River Dean at both ends of our Settlement Area. Again, the word ‘must’ needs to replace the word ‘should’ in this context.	Noted. It is considered that the word ‘should’ is sufficiently robust and reflective of the policy context contained in the Local Plan Strategy.
FDHSPD 50 (A Leysens, United Utilities)	Paragraphs 6.10	Welcome the inclusion of paragraph 6.10 requiring development proposals to integrate measures for sustainable water management, reduce flood risk and avoid an adverse impact on water quality and quantity in the borough in accordance with LPS Policy SE13. We are supportive of the approaches presented in the Cheshire East Design Guide and Building for a Healthy Life which prioritise multi-functional surface water management and identify drainage as a key consideration that should be integrated early in the design process	Noted.

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FDHSPD 26 (J Bowden)	Paragraph 6.10	Wording on SUDS should be more specific. The below suggestion would be impractical on every development but this would clearly express the most environmentally friendly option as a preference. Currently a SUD can be taken to mean an underground storage solution which is not as environmentally friendly. Suggested wording: The preferred drainage solution is an above-ground landscape-led SUDS such as an attenuation pond or swale incorporating ecological planting.	The reference to SUDs is considered to be reflective of the policy context set out in LPS SE13 (flood risk and water management). A separate SPD is being prepared on the provision of SUDs in the borough.
FDHSPD 40 (N Belford, Manchester Airports Group)	Paragraph 6.10	Some minor modifications to the text are just required now to strengthen the wording within paragraph 6.10 as follows: The views of the Aerodrome Safeguarding Authority for Manchester Airport should must be sought if the SUDS provision is within the 13km bird-strike hazard consultation zone for Manchester Airport or other relevant safeguarded interests identified in regulations. These amendments will strengthen the wording, make it clear who the Aerodrome Safeguarding Authority are, and make it clear that this requirement is specific to Manchester Airport as a safeguarded aerodrome.	Noted. The wording has been amended as follows in paragraph 6.10 (now 5.11):- The views of the Aerodrome Safeguarding Authority (<u>Manchester Airport</u>) should be sought if the SUDS provision is within the 13km bird-strike hazard consultation zone for Manchester Airport or other relevant safeguarded interests identified in regulations (15).
FDHSPD 73 (J Mason, Bollington Town Council)	Paragraph 6.11	Bollington Town Council recommends the strengthening of this paragraph. Developments must be prepared to pay the full costs over time of their negative impact on the amenities of the current community and make arrangements for the proper provision of long-term management arrangements for the elements of the development where there are communal responsibilities. This is exactly what sustainability means and requires. An appendix is required with a detailed list of the expenses a development could be reasonable expected to bear in some detail and the mechanisms that would be expected to be in place before occupation commenced to provide those necessary resources.	Developer contributions are governed by Regulation 122 of the CIL regulations (2010), namely:- <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 <p>It is difficult, in this document, to include repeatable guidance as each case will be considered on its own merits. Particularly as</p>

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			the scope and purpose of the SPD is to provide additional guidance, primarily focused on policies relating to affordable homes and housing for older people.
FDHSPD 74 (J Mason, Bollington Town Council)	Section 7: Affordable Housing	Bollington Town Council notes from the Final Draft SPD that the NPPF defines affordable housing as ‘housing for sale or rent for those whose housing needs are not met by the market.’ Bollington Town Council notes that the whole of Cheshire is regarded by Government as an area of High Affordability Pressure. A high affordability pressure area is where the difference between the average social rents and private rents is £50 per week or more. The Cheshire East Local Plan identifies a need for a minimum of 7,100 affordable homes (an average of 365 homes per annum per year) delivered throughout the 20 year plan period. This is therefore a vital social service to ensure that Cheshire East residents including those in Bollington who require affordable housing are served effectively.	Noted. The intention of the SPD is to provide additional guidance to support the delivery of affordable housing in the borough.
FDHSPD 75 (J Mason, Bollington Town Council)	Paragraph 7.1	Bollington Town Council regards the definition as adequate given there is a fuller explanation (paragraphs 7.14 - 7.39). However, given Cheshire East is not a registered provider for affordable housing and yet controls allocations through the organisation of Homechoice some brief detail of the structure of provision and the distribution and rate of allocation would be helpful background for both developers and community groups and individuals who might reasonably use the Housing SPD.	Noted, the purpose of paragraph 7.1 (now 6.1) is to reflect the planning policy definition of affordable housing contained in the National Planning Policy Framework.
FDHSPD 27 (J Bowden)	Paragraph 7.2	Currently, there is no preference expressed between social and affordable housing – “affordable” some parts of Cheshire may in fact be challenging to afford in some locations. Suggested wording: The preference for affordable homes is for social rent rather than affordable rent.	The purpose of paragraph 7.2 (now 6.2) is to highlight the objectively assessed requirement for affordable housing, as set out in the Local Plan Strategy.

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FDHSPD 76 (J Mason, Bollington Town Council)	Paragraph 7.3	Bollington Town Council welcomes the statement that in larger developments at least 30% of homes provided will be affordable and notes this allows for as large % as possible. Bollington Town Council also welcomes, as Bollington is a Local Service Centre, the stipulation that all developments are expected to provide at least 30% affordable housing.	Noted. Paragraph 7.3 (now 6.3) includes the thresholds for affordable housing as set out in the Local Plan Strategy.
FDHSPD 6 (A Murdoch)	Paragraph 7.3	In earlier comments, I asked why there was a higher threshold for principal towns and key service centres than all other areas - the response simply repeated the policy without answering the question. With no rationale for the difference, please reconsider and have a consistent policy throughout the Council area.	SPDs set out further guidance on adopted planning policies. Paragraph 7.3 (now 6.3) is reflective of the affordable housing thresholds already established in policy SC5 'affordable homes' of the adopted Local Plan Strategy.
FDHSPD 77 (J Mason, Bollington Town Council)	Paragraph 7.4	Support	Noted. Paragraph 7.4 (now 6.4) has been amended to better reflect the wording of the NPPF, as follows:- The NPPF (2021), in paragraph 64, states that the provision of affordable homes should only be sought for residential developments that are major developments . However, as the LPS is a recently adopted Plan, Planning decisions should be made in accordance with the thresholds included in policy SC5 (affordable homes) <u>unless material considerations indicate otherwise. The NPPF is a material consideration in decision taking.</u>
FDHSPD 78 (J Mason, Bollington Town Council)	Paragraph 7.6	Support	Noted.

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FDHSPD 79 (J Mason, Bollington Town Council)	Paragraph 7.7	Bollington Town Council notes that affordable homes can be of a variety of tenures, rented, leasehold, freehold with restrictive covenants and equity shared. In every case it is expected the element of affordability will be retained during the use lifetime of the property.	Noted.
FDHSPD 80 (J Mason, Bollington Town Council)	Paragraph 7.9	Bollington Town Council is concerned that this paragraph is not sufficiently explicit with regard to the information base for determining housing needs. We would wish to see a more detailed description of who determines housing need and on what basis those needs are determined to ensure there can be no dispute about the level and type of provision for affordable housing required.	The objectively assessed need for affordable housing is set out in paragraph 7.2 (now paragraph 6.2) and is reflective of the Local Plan Strategy. On housing tenure, paragraph 7.10 (now 6.10) sets out the council's initial preference and paragraph 7.11 (now 6.11) sets out that applicants are to provide justification for an alternative tenure mix. The wording contained in paragraph 7.9 (now 6.9) is also reflective of point 3 of LPS policy SC5 'affordable homes' and policy SC4 'residential mix'.
FDHSPD 81 (J Mason, Bollington Town Council)	Paragraph 7.10	Bollington Town Council notes the desired 65/35% split between affordable houses for rent and intermediate provision but requires justification why 'needs of the site' should be prioritised over 'needs of the community' for affordable housing.	Paragraph 7.10 (now 6.10) notes how a balance of housing will be sought that best meets local needs and the characteristics of the site.
FDHSPD 82 (J Mason, Bollington Town Council)	Paragraph 7.13	Support.	Noted.
FDHSPD 83 (J Mason,	Paragraph 7.15	Further paragraphs are required setting out in detail the current position of Cheshire East with regard to Affordable Housing -	The Council's Authority Monitoring Report reports on indicators on the performance of the

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Bollington Town Council)		Registered Providers, Other providers, Current level of supply of various types of tenure, Current funding sources Plan provision to date (365 per annum required; how many so far?) How many to do? What is in the pipeline?	provision of affordable housing in the borough. If the SPD included this data, it could become dated in the short / medium term. Additional text has been added to paragraph 7.15 (now 6.15), as follows:- Cheshire East does not currently maintain any social council housing of its own. There are several Registered Providers (RP), who operate in the borough including a number of housing associations. Registered Providers support the provision of affordable housing, are independent companies and are controlled by the Regulator of Social Housing. <u>The council has partnered with several Registered Providers, through Cheshire Homechoice to host opportunities to apply for social housing in the borough. Information on Cheshire Homechoice and how each application is assessed through the housing allocations policy can be viewed on the Cheshire East website. Information on registered providers who are not a partner through Cheshire Homechoice, and use their own eligibility criteria, can also be found on the Cheshire East website.</u>
FDHSPD 36 (C Draper, Peaks and Plains Housing Trust)	Paragraph 7.15	Consider a reference to “social housing” as opposed to “council housing” is more appropriate.	Noted, the reference in paragraph 7.15 (now 6.15) has been changed from council housing to social housing.

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FDHSPD 84 (J Mason, Bollington Town Council)	Paragraph 7.16	<p>Bollington Town Council strongly supports the emphasis on affordable housing for rent as for many households this is the most supportive form of housing and makes financial planning and home security relatively straightforward.</p> <p>Bollington Town Council also strongly supports the aspiration in para 7.18, 'there is a clear need to ensure that rented affordable dwellings can be let at rent levels that are truly affordable.'</p> <p>This means there must be some sensible link established between average weekly/monthly remuneration in Cheshire East and monthly rents. Therefore BTC strongly supports Cheshire East Councils aspirations 'to ensure rent levels which do not exceed either the Local Housing allowance for the area or the Regulator for Social Housing target rent allowance whichever is the lowest.' We welcome other subsidised routes to home occupation and in some cases to home ownership.</p>	Noted.
FDHSPD 33 (J Flemming, Gladman)	Section 7: Affordable Housing	<p>Gladman maintain that any requirements relating to affordable housing tenure mix should be sufficiently flexible and be able to respond to the latest evidence on affordable housing tenure.</p> <p>Gladman also welcome the Council's decision to provide further guidance on proposals relating to First Homes. The SPD suggests that if an application which includes First Homes is submitted to the Council prior to a Local Plan Review, then the Council will consider the inclusion of First Homes as a material consideration in decision taking. In the absence of an adopted Local Plan policy relating to First Homes, it is important that the SPD sets out a positive stance to the delivery of First Homes in order to align with Government aspirations and national planning policy and planning practice guidance and to provide a significant opportunity which the Council should support in order to boost affordable home ownership within the borough.</p>	Noted. Planning practice guidance asks local authorities to make the development requirements for First Homes clear in their area. It is considered that the SPD makes clear the Councils position on First Homes, that schemes will be considered as a material consideration in decision taking until such time that an update is made to the relevant Local Plan / Neighbourhood Plan.

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FDHSPD 57 (Emery Planning on behalf of Bloor Homes)	Section 7: Affordable Housing (para 7.24)	<p>On 24th May 2021 a Written Ministerial Statement (WMS) was published on First Homes. The draft SPD has been updated to make comment on the WMS published on 24th May 2021 and the guidance provided within the NPPG. However, whilst the SPD states that the Council will consider the inclusion of First Homes as a material consideration in decision taking, it does not include the requirement for 25% of affordable homes to be First Homes or provide developers with guidance on making a policy compliant planning application for First Homes. The SPD does not provide guidance on how the remainder of the 75% of affordable housing can be secured.</p> <p>The draft SPD states that under transitional arrangements the Council does not need to require First Homes as part of the affordable housing mix until the requirement is included within an updated and adopted Local Plan/ made neighbourhood plan. However, the WMS is clear that where local plans do not benefit from specific transitional arrangements, LPAs should make clear how existing policies should be interpreted in the light of the First Homes requirements and this should therefore form part of the SPD.</p>	Noted. Planning practice guidance asks local authorities to make the development requirements for First Homes clear in their area. It is considered that the SPD makes clear the Councils position on First Homes, that schemes will be considered as a material consideration in decision taking until such time that an update is made to the relevant Local Plan / Neighbourhood Plan. The SPD is clear that the position of the emerging SADPD is such that the Council falls within transitional arrangements for First Homes.
FDHSPD 85 (J Mason, Bollington Town Council)	Paragraph 7.24	Bollington Town Council notes that following a Ministerial Statement this is the preferred Government method of providing permanently Discounted Market Housing for Sale.	Noted.
FDHSPD 86 (J Mason, Bollington Town Council)	Paragraph 7.27	Bollington Town Council TC notes the dates and arrangements CE is setting out for the introduction of First Homes into planning applications.	Noted.

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FDHSPD 87 (J Mason, Bollington Town Council)	Paragraph 7.35	Bollington Town Council notes the reduction in equity share from 25% to 10% and the ability to increase equity share for shared owners of 1%.	Noted.
FDHSPD 88 (J Mason, Bollington Town Council)	Paragraph 7.36	Bollington Town Council notes that parts of the Parish of Bollington are now Designated Protected Areas.	Noted.
FDHSPD 89 (J Mason, Bollington Town Council)	Paragraph 7.41	Support	Noted.
FDHSPD 57 (Emery Planning on behalf of Bloor Homes)	Section 7: Affordable Housing (para 7.43)	<p>In terms of the layout of schemes providing affordable homes, paragraph 7.43 suggests that clusters of affordable housing “should consist of a maximum of between 6 and 10 dwellings”. We consider this to be far too prescriptive, as larger clusters can be successfully integrated within a scheme, particularly where affordable housing is to be delivered via smaller units such as apartments. The document needs to be clear that it will be applied flexibly on a case by case basis.</p> <p>In terms of phasing, the draft SPD correctly confirms that on larger schemes the actual percentage of affordable homes for each phase will be decided on a site by site basis. This flexibility</p>	<p>Noted, paragraph 7.43 (now paragraph 6.43) has been amended as follows:- It is acknowledged that Registered Providers favour clusters of units to assist in housing management and repair issues. Clusters should <u>normally</u> consist of between 6 and 10 dwellings; <u>however, there may be limited circumstances where clusters are a different size. In all cases, this it</u> should not be to the detriment of ensuring the scheme has a wide mix of tenures throughout the site.</p>

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		is important and whilst the draft SPD sets out the norm, the SPD should not prescribe the phasing of affordable housing. This should be left to the development management process.	
FDHSPD 90 (J Mason, Bollington Town Council)	Paragraph 7.43	Support	Noted.
FDHSPD 91 (J Mason, Bollington Town Council)	Paragraph 7.44	Bollington Town Council would welcome an insistence on information on the housing mix in the Affordable Housing Statement. Must rather than should on bullet point 5.	The reference to should is considered to be reflective of the policy context in SC4 'residential mix'.
FDHSPD 92 (J Mason, Bollington Town Council)	Paragraph 7.46	Bollington Town Council strongly supports the role set out for Registered Providers.	Noted.
FDHSPD 93 (J Mason, Bollington Town Council)	Paragraph 7.47	Bollington Town Council supports the CE's approach to these issues.	Noted.
FDHSPD 51 (Cllr R Bailey, Cheshire East Councillor)	Paragraph 7.48	Whilst I agree that all monies should be used, I don't agree that rural funding should automatically be channelled to improve affordable housing in Crewe it should be local first in terms of any monies garnered.	Noted. Paragraph 7.48 (now 6.8) of the SPD is reflective of paragraph 12.51 of the LPS. Every case would be considered on a case by case basis. The word 'limited' as been added to the paragraph to note that this is not expected in every case.

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FDHSPD 37 (C Draper, Peaks and Plains Housing Trust)	Paragraph 7.48	Text: "In exceptional circumstances, where suitable sites aren't available, and where it can be justified, as a second alternative, a financial contribution will be accepted." Comment: The proceeding para (7.47) states that "in expectational circumstances... affordable housing will be accepted off-site". It therefore follows that the second solution, described as "a last resort", set out a para 7.48, should be caveated by the words "In extremely exceptional circumstances..."	Noted paragraph 7.48 (now 6.48) has been amended as follows:- In exceptional the circumstances, where suitable sites aren't available, and where it can be justified, as a second alternative, a financial contribution will be accepted. This provision is viewed by the council as a last resort option, as opposed to an alternative method of affordable housing. The council's desire to have all affordable provision on-site is in line with government guidance to encourage the development of mixed and balanced communities. However, there may be physical or other circumstances where an on-site provision would not be practical or deliverable.
FDHSPD 38 (C Draper, Peaks and Plains Housing Trust)	Paragraph 7.49	Whilst paragraph 12.51 in the LPS supports diverting funding for affordable housing into the improvement of existing stock in Crewe, this SPD document provides the opportunity to extend this further so as to not just apply to Crewe but to other urban areas throughout the whole of Cheshire East.	Noted. Paragraph 7.48 (now 6.48) of the SPD is reflective of paragraph 12.51 of the LPS. Every case would be considered on a case by case basis. The word 'limited' as been added to the paragraph to note that this is not expected in every case.
FDHSPD 52 (Cllr R Bailey, Cheshire East Councillor)	Paragraph 7.49	Whilst I agree that all monies should be used, I don't agree that rural funding should automatically be channelled to improve affordable housing in Crewe it should be local first in terms of any monies garnered.	Noted. Paragraph 7.48 (now 6.49) of the SPD is reflective of paragraph 12.51 of the LPS. Every case would be considered on a case by case basis. The word 'limited' as been added to the paragraph to note that this is not expected in every case.
FDHSPD 42 (D Lunch, Churchill Retirement Living)	Paragraph 7.51	A generic tariff approach is often inequitable in respect of specialised housing proposals. The SPD methodology must therefore be updated to include reference to specialist housing where the proposed methodology should not apply. It is commonly agreed that planning obligations are payable as a	Minor amendments have been made to paragraph 7.51 (now 6.51), as follows:- <u>One way of calculating t</u> The basis for calculating the cost to the developer for off-site provision will <u>may</u> be the difference between

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		<p>result of the increase in land value generated through the award of planning approval and intensification of land uses. Indeed, the viability of affordable housing targets, CIL and other S106 is measured against its impact on land value. Were affordable housing capable of being delivered on site, the subsidy required to enable this provision would be reflected within the land value. National policy requires that where cash in lieu payments are acceptable, they must be appropriate, viable (established through testing) as well as meet the requirements elsewhere set out within the NPPF/NPPG i.e. they must be:</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. <p>In terms of viability, the plan wide viability testing does not seek to test the viability of proposals apply this commuted sum methodology. Instead, it quite rightfully looks at the impact of policy and infrastructure requirements on land value. The methodology suggested within the SPD has not therefore been shown to be a viable approach through viability testing of the local plan.</p> <p>The correct and consistent way of establishing commuted sums is to look at the difference between a residual appraisal with 0% affordable housing and a separate appraisal with the policy requirement for affordable housing included. This is consistent with policy relating to planning obligations which requires that planning obligations run with the land, are directly related to the development and fairly related in scale and kind.</p> <p>Obligations for affordable housing are therefore fairly assessed against land value and not just a disproportionate assessment of sales values which will unfairly impact on specialist housing</p>	<p>the open market value of the units that would have otherwise been affordable and the average amount a Registered Provider would offer for those units. <u>In this example, we</u> would require the applicant to submit an affordable housing mix outlining the type, size and tenure of units which meet the housing requirements of the LPS, including constructed to national building regulations requirements and provided at 65% rented and 35% intermediate tenure mix. This should include the open market values of the units and details of offers from a Registered Provider to take the affordable units. In order to establish open market values, a valuation will need to be completed by a RICs qualified valuer, then verified by the Council.</p> <p><u>Worked example for C3 dwelling houses</u></p>

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		proposals. The SPD must therefore be updated to apply a commuted sum methodology which is consistent with the local plan viability testing and is calculated on the basis of the difference between the land value of a scheme with 0% affordable housing and a separate appraisal with the policy requirement for affordable housing included.	
:FDHSPD 94 (J Mason, Bollington Town Council)	Paragraph 7.53	There will be a need for Professional Staff in adequate numbers and of a high professional standard.	Noted.
FDHSPD 95 (J Mason, Bollington Town Council)	Paragraph 7.54	Bollington Town Council notes the detailed provisions set out and is in broad agreement that they are all necessary but we note that to carry out the level of legal work required as well as the professional financial negotiations requires Cheshire East Council to train and maintain an adequate level of staffing if the planning system is not to either: grind to a halt at this stage of planning permission preparation or allow the possibility of serious mistakes to be made in the allowances given through the negotiation process. We would expect the overall management of the Planning Authority to fully recognise and provide for the needs of the system proposed.	Noted.
FDHSPD 7 (A Murdoch)	Paragraph 7.57	The requirement to include an overage provision in any S106 regarding reduced affordable housing contributions is very welcome - and in particular the provision in para 7.66 they these “will” not “may” be included in the S106 - hopefully this will be brought to the attention of those responsible for drafting and negotiation these agreements and monitoring as the development progresses.	Noted.

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FDHSPD 8 (A Murdoch)	Paragraph 7.63	I agree that the developer should be responsible for the costs of the Council's independent viability assessment - will they also be responsible for the assessment of any overage payment required on reassessment (para 7.56 and 7.66 ?).	Noted. Overage payments and the process of securing it will be considered through Section 106 on a case by case basis.
FDHSPD 1 (Cllr A Farrall)	Paragraph 7.64	As per PPG Paragraph: 018 Reference ID: 10-018-20190509, It should be prepended for clarity with the paragraph - "The cost of fully complying with policy requirements should be accounted for in benchmark land value. Under no circumstances will the price paid for land be relevant justification for failing to accord with relevant policies in the plan."	Noted, additional text has been added to paragraph 7.64 (now 6.64) :- The PPG notes that a lower level of expected profit may be appropriately applied in circumstances where this guarantees an end sale at a known value and reduces risk. <u>The cost of fully complying with policy requirements should be accounted for in benchmark land value. Under no circumstances will the price paid for land be relevant justification for failing to accord with relevant policies in the Plan.</u>
FDHSPD 57 (Emery Planning on behalf of Bloor Homes)	Section 7: Affordable Housing (para 7.64)	Section 7 provides guidance on viability assessments, with specific mention of what level of developer profit is considered to be acceptable (paragraph 7.64). The SPD comprises guidance and not planning policy, and therefore it should not set out policy or guidance on how various inputs within a viability appraisal should be calculated.	Noted, wording has been amended in 7.64 (now 6.64) as follows:- Viability assessments should consider an appropriate level of profit. be undertaken on the basis of an The PPG makes reference to expected profit of between 15-20% as specified in PPG with profit levels relevant to the scale, complexity and risk of the development.
FDHSPD 9 (A Murdoch)	Paragraph 7.67	Will both the developer's viability and that if the Council's independent assessment be publicly available on the application pages of the website - or will they need to be requested separately? Will any reassessment of the viability for overage assessment also be publicly available?	As noted in paragraph 7.64 (now 6.64) there may be circumstances where commercial sensitivity means that viability studies cannot be published and this would need to be justified on a case by case basis.
FDHSPD 96 (J Mason,	Paragraph 7.70	Bollington Town Council notes the Credit available and would ask Cheshire East Planning authority to consider heritage	Noted.

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Bollington Town Council)		issues when significant heritage buildings are being considered for change of use to dwellings as per proposals set out already.	
FDHSPD 10 (A Murdoch)	Paragraph 7.72	I will look to see how robustly this is applied	Noted.
FDHSPD 4 (C Hutton, Strategic Housing, CEC)	Paragraph 7.74	<p>The calculation proposed to determine VBC needs some slight amending so that it reflects the number of policy-compliant affordable homes, as opposed to the percentage that the AH policy requires. An amended calculation is listed below which would result in the correct level of AH provision, after VBC has been considered.</p> <ul style="list-style-type: none"> • Proposed development of 2,000 sqm (with a floor space of 100 sqm each) results in 20 homes • Policy SC5 (affordable homes) requires 30% affordable homes • 30% of 20 homes =6 dwellings • There is an existing vacant building on site with a floorspace of 750 sqm • The difference between the gross floorspace of the existing vacant building and the proposed new build floorspace is 1,250 sqm • Therefore, the affordable housing requirement for this site is $(1250/2000) \times 6 = 3.75$ (or 4 dwellings (rounded)) 	<p>Noted. The changes outlined have been made to paragraph 7.74 (now 6.74):-</p> <p>One way of calculating vacant building credit, could be to use the following formula – (net change in floorspace / proposed floorspace) x affordable housing policy requirement. As an illustrative example; -</p> <p>Proposed development of 2,000 sqm (with a floor space of 100sqm each) results in 20 homes.</p> <p>Policy SC5 (affordable homes) requires 30% affordable homes</p> <p>30% of 20 homes = 6 homes</p> <p>There is an existing vacant building on site with a floorspace of 750 sqm</p> <p>The difference between the gross floorspace of the existing vacant building and the proposed new build floorspace is 1,250 sqm</p> <p>Therefore, the affordable housing requirement for this site is $(1250/2000) \times 30\% = 18.75$ <u>3.75</u> (or <u>4</u> 19 dwellings (rounded)).</p>
FDHSPD 97 (J Mason, Bollington Town Council)	Paragraph 7.75	Bollington Town Council notes the importance to the issue of housing in rural areas including green belt and open countryside of rural housing policies which should according to NPPF Para 78 'Be responsive to local circumstances and support housing developments that reflect local needs. Local	Noted.

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		<p>Planning Authorities (CE) should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would facilitate this.’</p> <p>We recognise the deep sensitivity and concern that these words may cause to present dwellers in the rural countryside and we strongly agree with Paragraph 7.76. Bollington Town Council covers a Settlement Area and Designated Protected Areas where exceptions to protection policies might be considered. And note eligibility requirements as set out in para 7.80. The underlying criteria for eligibility for affordable housing is that households must be in unsuitable housing and unable to afford to rent or buy on the open market.</p>	
FDHSPD 98 (J Mason, Bollington Town Council)	Paragraph 7.79	<p>Bollington Town Council strongly supports this paragraph and in particular the statement, ‘That a scheme for a ‘small number of market units will only be permitted where a clear reason demonstrates that this is the only way that affordable housing to meet local needs can be delivered on the site.’ BTC would strongly advise that some indication of what a ‘small number’ is, is given.</p>	<p>The indication of ‘small scale’ will be dependent on each case only justified through viability assessments or some other clear reason demonstrates that this is the only way that affordable housing to meet local needs can be delivered on the site.</p>
FDHSPD 58 (Emery Planning on behalf of Bloor Homes)	Section 8 (Self Build and Custom Build)	<p>This section of the draft SPD refers to self and custom build dwellings, which are addressed in policy HOU3 of the draft SADPD. This policy is subject to outstanding objections and was considered at the examination hearing session on Tuesday 19th October 2021. As with our representations on other sections of the draft SPD, the outcome of the examination of the SADPD will determine the final version of policy HOU3 and then if required, the SPD could provide supplementary guidance on this issue rather than being adopted before the SADPD is finalized.</p>	<p>Local Plan Strategy policy SC4 (residential mix) refers to people wishing to build or commission their own home. The guidance included in the SPD builds reflects guidance included in the Self-Build and Custom Build Housebuilding Act 2015.</p>
FDHSPD 45 (T Dowse,	Section 9 (Specialist,	<p>It is noted from reviewing the associated Report of Consultation that this issue was raised by a number of respondents and the</p>	<p>Comment re the removal of references to the SADPD is noted.</p>

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Cognatum Development s Ltd)	Supported Living and Older Person Housing)	Council has accordingly removed specific policy references to the emerging SADPD from the SPD as a result. This change is supported and we have no further comments in this respect. However, there is a potential important implication of this change. If the document is not going to refer to the proposed SADPD Policy HOU6 ‘accessibility and wheelchair standards’, then it is our view that the Council’s proposed ‘homes first’ approach to retirement provision, which appears to rely heavily on keeping elderly residents in existing housing (as opposed to focusing more on the provision of specialist accommodation), is then put under further pressure. If there is a reduced provision of wheelchair accessible housing, then the Council cannot rely on this for its provision of suitable ‘homes first’ retirement accommodation.	The SPD is seeking to provide additional guidance on LPS policy SC4 ‘residential mix’ alongside other policies. LPS policy SC4 ‘residential mix’ already makes reference to developers having to demonstrate how proposals will be capable of meeting, and adapting to, the long term needs of the borough’s older residents.
FDHSPD 45 (T Dowse, Cognatum Development s Ltd)	Section 9 (Specialist, Supported Living and Older Person Housing)	The requirement for affordable housing provision from C2/C3 retirement schemes would not support the Council’s stated objective of encouraging and supporting the provision of older persons accommodation. Instead, it would likely result in the delivery of less accommodation overall. In this respect, I would refer the Council to the 3 no. recent appeal decisions that we mentioned in our SADPD Hearing Examination statement: <ul style="list-style-type: none"> • APP/K3605/W/20/3263347 / APP/Q3115/W/20/3265861 / • APP/F0114/W/21/3268794 In each of these appeals, the respective Council’s had failed to positively plan for the provision of retirement accommodation and, in light of the identified market shortfall, the Inspectors gave the provision of specialist accommodation significant weight, which was deemed sufficient to outweigh substantial planning constraints. If the Council is to insist on on-site affordable housing provision as part of retirement schemes, then any affordable housing requirement should be consistent in design and tenure with the balance of the scheme – i.e. the	Guidance contained in the SPD is reflective of the affordable housing thresholds contained in LPS policy SC5 ‘affordable homes’. LPS policy SC5 ‘affordable homes’ and the SPD makes clear that consideration will be given to any viability issues that arise from this matter (point 7 of policy SC5 ‘affordable homes’). LPS policy SC4 ‘residential mix’ includes policy criteria for the consideration of older persons housing in the borough.

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		<p>provision of social rent accommodation would necessitate another 'layer' of management within the scheme, as the involvement of a RSL would be required. As an aside, Cognatum Developments has recently delivered a high-quality scheme with no affordable housing in Dover District Council (Orchard Yard), including the provision of a clubhouse and guest suite. Furthermore, the existing Abbey Mill site in Prestbury has no affordable housing – Cognatum's proposal being an extension of the existing scheme. We therefore maintain our objection to the Final Draft Housing SPD reasons set out above.</p>	
FDHSPD 59 (Emery Planning on behalf of Bloor Homes)	Section 9 (Specialist, Supported Living and Older Person Housing)	<p>This section of the draft SPD relates to the delivery of specialist, supported living and older person housing. Our client understands that there is a need to provide a choice of accommodation to suit changing needs as people get older and as the Council is aware has delivered homes to support this. However, the SPD should not prescribe a proportion of homes to be bungalows. This should be considered on a case by case basis for the reasons set out above in relation to housing mix.</p>	Noted, references to Bungalows in the SPD are often provided as a an example approach and are not mandated in the SPD.
FDHSPD 99 (J Mason, Bollington Town Council)	Paragraph 9.1	<p>Bollington Town Council strongly supports the three main strategic objectives set out in paragraph 9.1 and welcomes the strategies set out in the documents listed in paragraph 9.2.</p>	Noted.
FDHSPD 100 (J Mason, Bollington Town Council)	Paragraph 9.17	<p>Bollington Town Council welcomes CE's policy of 'homes first' 9.17 which supports residents to maintain their independence and remain in their own home or supported housing offering independent accommodation as long as possible.</p>	Noted.
FDHSPD 44 (T Dowse,	Paragraph 9.17	<p>The revised wording on page 31 is now considered to be acceptable, in that it refers to care agencies being registered</p>	Noted

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Cognatum Developments Limited)		with the CQC, as opposed to the developments themselves. On this basis, we have no further comments to raise on this point.	
FDHSPD 101 (J Mason, Bollington Town Council)	Paragraph 9.18	Bollington Town Council welcomes the clear distinctions provided on definitions of different types of housing for older people on pg 31 para.9.18. NB Given the very special nature of residential care homes for people with advanced dementia a more detailed description of the support the planning system would offer to providers of such facilities would be very welcome. The SPD points out the aging nature of our population but fails to note the concomitant increase in older people with severe dementia which requires particular specialist housing provision.	Noted. Reference to inclusive design, including Dementia Friendly communities is included in paragraphs 9.31 (now paragraph 8.31) onwards.
FDHSPD 12 (A Murdoch)	Paragraph 9.19	A blanket age limit of 55 regardless of physical circumstances simply allows developers to circumvent standard parking standards whilst still selling to a market of able-bodied residents who have the same use of cars as people living in developments where there are no age restrictions, but a higher ratio of parking is required. I note the response to my previous comment that the policy reflects the content of the PPG but in that case, there is a case to call for the PPG to reflect that in cases where the developer is seeking to provide a reduced amount of parking on account of expected ages of residents (e.g. over 80) the S106/age limit should reflect their expectations- i.e. there should be consistency between the expected ages and the parking standard.	Noted. Guidance included in the SPD is reflective of the wording in the Planning Practice Guidance. Decisions on car parking standards are taken on a case by case basis in line with the car parking standards included in the Local Plan Strategy.
FDHSPD 102 (J Mason, Bollington Town Council)	Paragraph 9.25	Support	Noted.

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FDHSPD 103 (J Mason, Bollington Town Council)	Paragraph 9.26	Bollington Town Council supports these paragraphs in particular the acknowledgement of Dementia Friendly Communities. BTC would have appreciated more detail on specialist adaptation of housing for people with dementia.	Noted.
FDHSPD 104 (J Mason, Bollington Town Council)	Paragraph 9.30	Bollington Town Council welcomes this paragraph but would ask for the addition of a strong statement on fire proofing specialist buildings for residential accommodation. Given the appalling situations revealed in the Grenfell Inquiry and emphasis on fire safety must be included as it appears cost cutting pressures can result in compromising safety.	Noted. Building fire safety is a matter primarily addressed through building regulations.
FDHSPD 11 (A Murdoch)	Paragraph 10.1	Monitoring will be important - will the public have any participation in this process?	Monitoring on the indicators included in the Local Plan Strategy are monitored through the Council's Authority Monitoring Report.
FDHSPD 105 (J Mason, Bollington Town Council)	Paragraph 10.1	Bollington Town Council regards this section as seriously inadequate. This SPD is a vital aid in producing excellent housing in Cheshire East both 'market' and affordable, We need to know what aspects of the review will be monitored, what is the situation when it is adopted in terms of housing stock, affordable housing stock, its distribution and tenure types. How much has been built since the SPD publication? What residential accommodation is available for what purposes and what has been built since the SPD was published? What has happened in relation to rural exception areas? How many market homes have been built to support how many affordable dwellings and where they are? How often monitoring will take place, who is doing it? How is the first Homes policy progressing, what use has been made of the	The Authority Monitoring Report is referenced in the SPD. This is a report, published annually, which includes a number of indicators in relation to housing matters, including:- <ul style="list-style-type: none"> • Housing completions • Five year housing land supply • Percentage of empty homes in the borough • Location of completed and committed dwellings

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		<p>Building for Life Standard and what were the results of any traffic light assessments made.</p> <p>We need the requirements for that monitoring to take place set out in detail in Section 10.</p>	<ul style="list-style-type: none"> • Gross number of affordable housing units • Type of dwellings completed • Size of dwellings completed
FDHSPD 106 (J Mason, Bollington Town Council)	Glossary	Bollington Town Council found this a very useful summary of the technical concepts used in the SPD.	Noted.
FDHSPD 57 (Emery Planning on behalf of Bloor Homes)	Section 7: Affordable Housing	The Glossary should also be updated in respect of the definition of affordable housing to include First Homes.	The glossary definition, included in the SPD, for affordable homes is reflective of the wording contained in the NPPF. A separate entry in the glossary is made for First Homes.
FDHSPD 49 (Dr K Mullan MP)	Appendix 2: Example of Rural Housing Needs Survey 2021	As I understand it, the intention of this document is to collate the results of the consultation of residents wishes and concerns and to be balanced within the provisions of National Planning Policies, Local and Neighbourhood Plans. The first line in appendix 2 of the document states:- “Whether you consider yourself to have a housing need or not, the information you provide in this survey is important in helping us understand the housing need within your community”. The residents answers and opinions must be given priority over the wishes of developers who have their own ideas of the properties they consider appropriate to be built. Starter homes, shared ownership and affordable rented properties all play their part in getting people into suitable accommodation, but this must not	<p>Appendix 2 is presented as an example survey that can be utilised by local rural communities to determine the need (or not) for affordable homes in their area.</p> <p>The more general comments are noted. The scope and purpose of the SPD is limited to provide additional guidance on local plan policies SC4 (residential mix), SC5 (affordable homes), and SC6 (rural exceptions housing for local needs).</p>

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		<p>be given as justification for building in protected or unsuitable areas. We need to look at brownfield sites within the our towns and suburbs before looking to green gap, to accommodate these developments.</p> <p>What is of concern, from letters I receive, is the provision of retirement provision or for those who are struggling to get on the ladder. Older residents want to stay in the area, but want to downsize. There is little or no provision on new developments meaning Bungalows sell quickly and at a premium. The same can be said for retirement provision for social housing residents. I would also emphasise that housing developments should not take place when there is not the necessary infrastructure and public services to support them for example NHS provision, policing and schools.</p>	