

**Alderley Edge NDP - Public Consultation on First Draft Plan**

**Consideration of Responses and Proposed Amendments to the Draft NDP**

**Table 1 - Comments from Cheshire East Council (CEC)**

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All	<p>1. Cheshire East Council welcomes the opportunity to provide comments on the draft Alderley Edge Neighbourhood Plan and is submitting comments in this format as the on-line survey does not offer a way to comment on the plan without indicating support (or otherwise) for a policy. There are many policies that the borough council would support but that would benefit from editing, and there is unfortunately no means to record this via the survey.</p>	Noted.	No change.
<p>AE2 AE3 AE11 AE12 AE10 AE18 AE19 AE21</p>	<p>2. Wherever possible, neighbourhood plans should seek to add value to the development plan by providing clear and specific guidance on important local matters that are not otherwise addressed by planning policy elsewhere. The neighbourhood plan successfully achieves this in a number of places with policies covering design guidance, the conservation area, local green space, the station gateway, community facilities, Chorley hall playing fields and additional parking at Festival Hall providing a policy direction that</p>	General support noted with thanks.	No change.

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	<p>cannot be found in other parts of the development plan.</p> <p>These policies say something locally specific about Alderley Edge. These policies particularly could add value to Cheshire East Councils Development Plan, giving direction to decision making where only a more general set of rules is currently available for guidance. It is recommended that these policies are retained and refined to fully develop the value they can add to future decision making in Alderley Edge.</p>		
All	<p>3.</p> <p>In creating a plan, it is desirable, and inevitable that all current issues, planning and otherwise, are brought to the table for consideration. The value of neighbourhood plans is in far more than the policies produced and the plan-making process itself plays an important local capacity building for the long term. However, as the plan develops it is important to discern between those issues that are worthy of pursuit as planning policies and those that are either covered by planning policy elsewhere, or should be pursued by other means (perhaps through development projects/community activities and such like).</p>	Noted.	No change.
All	<p>4.</p> <p>The first draft of the Alderley Edge neighbourhood plan has successfully articulated a</p>	Noted.	No change.

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	<p>wide range of issues that affect the community, however by seeking to cover such breadth of material, the plan inevitably includes policies that are fully addressed by other parts of the existing development plan, and some matters that fall outside of the remit of planning.</p> <p>At paragraph 16 the NPPF sets out a series of requirements for development plans, including that they should <b><i>'serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).'</i></b> Whilst there are many policies that do serve a clear purpose in the draft AENDP, there are examples where local plan policies are either repeated or recreated in a way similar to the approach already set out in the Cheshire East Local Plan Strategy or emerging Site Allocations and Development Strategy.</p> <p>Therefore the core recommendation here is to thoroughly review the AENDP against the existing development plan and identify where duplication may have occurred.</p>	<p>See proposed detailed responses and proposed revisions below.</p> <p>The NDP Policies will be further considered in relation to the adopted Local Plan Strategy.</p> <p>The emerging new SADPD remains at an early stage of preparation and although reference will be made to the draft policies and proposals it is noted that these may be subject to change before the Plan is adopted in the future.</p> <p>The level of locally appropriate detail in the NDP policies should compliment the broader strategic policies in the Local Plan Strategy.</p>	
All	<p>5. This aside, the plan is a very well structured document with a succinct set of objectives that underpin a narrative which is easy to read. Visually it is attractive and well laid out and the</p>	Noted with thanks.	No change.

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	<p>careful design of the document is an expression of the care and attention paid to the matters covered in the plan.</p> <p>Below I provide some key comments on a limited range of policies that would either benefit from further attention or potentially raise a conflict with strategic matters identified in the boroughs development plan.</p>		
AE2	<p>6. To ensure the matters in the design code are fully tested by consultation and given the policy status necessary for decision makers to use in full, It is recommended to bring elements of the design code directly into the policy itself.</p>	<p>Noted.</p> <p>A review was undertaken of the Design Codes in relation to the Policies in the NDP during the final stages of its preparation. The key elements of the Design Codes were incorporated into Policies such as AE1, AE3, AE9, AE11, AE12, AE14 and AE19. In fact in a number of areas the NDP policies are more prescriptive and detailed than the Design Codes. The NDP Policies have been considered in detail by the Housing Subgroup and have been prepared taking into account consultation responses, particularly from local residents.</p>	No change.
AE2 (4A)	Setting detailed prescriptive housing requirements is rarely successful at examination, if this approach is pursued it must be supported	Noted and partially accepted.	Consideration was given to the point regarding one bedroom properties not being popular and

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	<p>by a level of detailed evidence that justifies why this particular mix is the best approach over other options.</p>	<p>Refer to Table 3, Comments from Developers and Landowners</p> <p>The proposed housing mix in the NDP is drawn from the Housing Needs Assessment which was commissioned through the Locality Technical Support programme and undertaken by consultants AECOM. It is considered that this report (which is available on the NDP website) should provide a robust and detailed evidence base for the proposed housing mix. However, following discussions with developers / landowners with interests in the NDP area, it is proposed to amend the housing mix requirement slightly to give a greater degree of flexibility.</p> <p>The developer / landowners recognised that there is a need for more smaller properties in the NDP area - up to 3 bedrooms - but 1 bedroom properties are not as popular as 2 bedroom properties as older people, single people and couples prefer to have a spare room, and first time buyers / small</p>	<p>not offering flexibility for residents. The Housing group agreed that it would be reasonable to make the suggested change to link the 1 and 2 bedroom percentages together so the policy reads "35% of 1-2 bedroom"</p>

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		households often try to stretch to 2-3 bedrooms to avoid expensive, frequent moves.	
AE2 (4D)	The approach to affordable housing contributions is established in the CELPS (policy SC5) which allows contributions to be made in lieu of affordable housing provision. As written, the current policy would not be considered to be in conformity with the strategic policies of the local plan, a key test of examination.	<p>Noted and partially accepted.</p> <p>The first part of the Policy referring to a minimum of 30% of all units to be affordable in Local Service Centres is in general conformity with Policy SC 5.</p> <p>However the part of the Policy requiring provision of the affordable housing to be made within the village boundary is an additional requirement. Policy Sc 5 8. Sets out that '<i>Affordable housing is required to be provided on-site, however, in exceptional circumstances, where it can be proven that on-site delivery is not possible, as a first alternative, off-site provision of affordable housing will be accepted; as a second alternative a financial contribution may be accepted, where justified, in lieu of on-site provision.</i>'</p>	<p>The Housing group discussed the wording of this policy and together with the Steering group agreed to amend Policy AE2 D last part of paragraph starting "This affordable housing" to:</p> <p><b>"This affordable housing provision of a minimum of 30% of all units should be provided on site or, as a first alternative where exceptional circumstances are demonstrated, built within the settlement boundary area of the village in order to maintain a balanced community within the area. Only if the policy requirement or first alternative are not possible, where exceptional circumstances are demonstrated,-commuted sum payments by developers in lieu of provision of affordable housing on site, or within the village, should contribute towards affordable housing schemes within Alderley</b></p>

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		<p>This NDP Policy is supported by local residents (see Survey Monkey report for residents comments and rates of support for NDP policies.)</p> <p>The Steering Group considers that there is a real need to provide suitable affordable housing provision for local residents of Alderley Edge within the village and would prefer to see this clause retained in the NDP up to examination. Schemes for new affordable housing in other parts of the wider CEC area are unlikely to benefit the families and individuals who have a personal connection to the village and would like to remain part of this vibrant and strong local community.</p> <p>The Policy was supported by residents in the public consultation on the emerging First Draft Plan with 81.13% of respondents agreeing that affordable housing should be within the village boundary.</p>	<p><b>Edge village as a first priority. Affordable Housing should be a mix of affordable to rent and affordable to buy (shared ownership being the preferred model).</b></p>

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AE3	<p>Planning policies should not address matters covered by other legislation including matters addressed by building regulations. Many of the considerations listed in this policy are covered by existing building regulations and it is therefore recommended that the policy is reviewed to understand whether there are related design issues that could be addressed here as an alternative approach.</p>	<p>Partially accepted.</p> <p>The majority of the criteria set out in Policy AE3 are not technical requirements but appropriately worded and detailed design criteria to promote sustainable development. This is in line with the NPPF paragraph 7 which sets out that the purpose of the planning system is to contribute to sustainable development, and indeed this is one of the basic conditions against which the NDP will be tested at examination.</p> <p>Many of the criteria are drawn from the Design Codes and all have been carefully considered and prepared by members of the Housing Subgroup.</p> <p>The Steering Group and Housing Subgroup recognise the urgency to address climate change at a time of global climate emergency. The Groups consider that Policy AE3 is fundamental to the NDP and ensuring that future development in the NDP area is climate resilient and</p>	<p>No change.</p>

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		<p>does not contribute towards unacceptable carbon emissions or wasteful use of resources.</p> <p>The Policy was well supported by local residents and stakeholders in the consultation on the emerging First Draft Plan.</p> <p>However it is recognised that Criteria 9 and possibly 10, make reference to technical standards. At this time it is proposed to retain these within the NDP to allow a future examiner to determine whether they should be deleted or retained. Informal discussions with one of the developers have indicated that targets set out in Criteria 9 are being achieved on other sites, (for instance at Grimsargh near Preston) and this approach will be encouraged in future development in Alderley Edge.</p>	
AE10	Local Green Space proposals must satisfy a series of tests in order to be adopted. LGS 3, 4 and 5 would benefit from additional description on how	<p>Noted.</p> <p>The justification for each of the proposed Local Green Spaces</p>	AMEND NDP:

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	they are considered to be 'demonstrably special' to inform an examiners view here.	according to the criteria in the NPPF is provided in Figure 3. The public consultation on the emerging First Draft Plan demonstrated that these were widely supported with 93.84% of respondents supporting the policy. This level of support contributes towards the "demonstrably special" criterion and should be added to the NDP.	Refer to recent consultation responses by adding to 8.22 (note missing full stop):  ". The public consultation on the emerging First Draft Plan demonstrated that these proposed Local Green Spaces were widely supported by residents with 93.84% of respondents supporting the policy. Clearly this level of support helps to show that each is "demonstrably special" to the local community and that the Local Green Spaces should be protected."  Add a photograph of each Local Green Space. Enhance the map to highlight the spaces more clearly
AE13	The national planning policy framework makes no allowance to protect 'views'. It is a term that describes a field of vision across an undefined distance, potentially incorporating many objects, buildings and features of the landscape and given the unbounded nature of the term, it is deliberately ambiguous requiring qualification to	Not accepted.  The Key Views referred to in the NDP are identified and evidenced in the Design Codes.  The Steering Group is aware that the views of the village townscape	AMEND NDP:  Amend Policy AE9 criterion 2:  Delete first and second sentences and replace with: "Development proposals must not significantly harm, individually or

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	<p>be made meaningful (a view of...the tree / a view of...the woods).</p> <p>It is therefore difficult to articulate the value of an entire view with out such qualification that would make the policy specific, and following from this difficulty, identifying where harm may arise to that view. However, the proposed policy is based in a recognition that the local landscape is of special significance and valued locally and therefore the policy may benefit from seeking to protect the valued features and characteristics of the local landscape which are more specifically identifiable, rather than a more ambiguous and wide ranging concept of a 'view'. The following words could be used to inform a review of the policy:</p> <p>'Development proposals must not significantly harm, individually or cumulatively, characteristic features within the local landscape. The characteristic features within the landscape are...(evidence should be provided to justify their status).'</p>	<p>and surrounding landscape make an important contribution to local character and it is essential that new development proposals consider how their siting and design are sensitive to these special qualities.</p> <p>The Policy was widely supported in the public consultation on the emerging First Draft Plan, with 97.30% of respondents agreeing that key views from the National Trust owned 'Edge', notably from Castle Rock should be protected, and 93.71% supporting the policy overall.</p> <p>The Lichfield response on behalf of Story Homes which have an interest in ALD2 supports the policy, advising that " <i>it is considered that any key views across the land at Ryleys Farm, including this long view, can be retained thorough the use of appropriate landscape buffers and plot orientation.</i>"</p>	<p>cumulatively, characteristic features within the local landscape. The characteristic features within the landscape include, but are not limited to the following:"</p>

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		<p>It is accepted that in practice planning officers will have to make a determination based on a subjective analysis of the impacts of proposed development on these views. However the policy requires landscape and visual impact assessments or similar studies to be carried out where a proposal would impact on an identified key view, and this should assist with the analysis.</p> <p>Protecting landscape character is addressed in Policy AE9. The wording of criterion 2 could be amended in line with the suggested wording for policy AE13. The justification for these features is provided in the supporting text with reference to local landscape types and Cheshire east Local Landscape Designation Review. Further information is also provided in the Design Codes.</p>	