

Alderley Edge NDP - Public Consultation on First Draft Plan

Consideration of Responses and Proposed Amendments to the Draft NDP

Table 3 - Comments from Landowners and Developers

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
<p>Lichfields on behalf of Story Homes</p> <p>1.1</p>	<p>All</p>	<p>1.0 Introduction</p> <p>1.1 These representations have been prepared by Lichfields on behalf of Story Homes and their landowner client, in relation to the Alderley Edge Neighbourhood Plan: First Draft [NPDF]. They are made in the context of Story Homes land interests in Alderley Edge which extend to approximately 160 acres (65ha) of land to the north and south of Chelford Road. The Alderley Edge Neighbourhood Plan Group [NPG] will be aware that Story Homes is promoting land at Ryleys Farm for residential development and have sought to engage with the NPG regarding the site.</p> <p>1.2 Story Homes have previously submitted representations to the Neighbourhood Plan Group in response to the</p>	<p>Noted.</p>	<p>No change.</p>

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		Neighbourhood Plan Area Application in June 2016 and the Emerging Policies Document in December 2018.		
1.2	Map 1	1.3 Based on Planning Practice Guidance1 we consider that restricting the designated area to the Parish boundaries of Alderley Edge would not follow best practice, nor would it result in an optimal basis for creating a Plan which best serves the needs of Alderley Edge and its residents. We are disappointed not to see the boundary amended to reflect physical features such as Chelford Road for example, which would see the inclusion of land at Ryleys Farm within the Neighbourhood Plan Area optimising the Plans' ability to implement a considerable number of the policy objectives and visions included within the emerging policies document.	<p>Not accepted.</p> <p>It is normal practice for the designated area boundary to follow the boundary of the parish council.</p> <p>The boundary includes SADPD Site ALD2 in its entirety, together with areas to the south, west and north within the line of the A34. NDP Policies will apply to this site if it is retained in the adopted SADPD. The attached illustration, Sketch Layout 75 dwellings continues to indicate built form and public open space falling well within the designated neighbourhood area, even for a scheme for 75 new houses.</p> <p>There is no intention to amend the designated area boundary at this stage to accommodate a</p>	<p>No change.</p> <p>Map has been updated to provide higher resolution</p>

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			developer / landowners' aspirations for a more extensive development site.	
1.3	All	<p>1.4 Notwithstanding the above, we welcome the efforts made by the NPG in preparing the Neighbourhood Plan. Whilst we generally support the Neighbourhood Plan, we have concerns with the content of some parts of the NPFD which are set out in the representations below.</p> <p>1.5 In accordance with the transitional provisions of the Framework (February 2019) Annex 1, the policies within the February 2019 Framework apply for the purposes of examining the Neighbourhood Plan.</p> <p>1.6 The Framework [§29] states that: “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote</p>	<p>Noted.</p> <p>The NDP has been prepared having regard to national planning policy and advice and to be in general conformity with the adopted policies in the Cheshire East Local Plan Strategy 2010 - 2030.</p> <p>The NDP ha been prepared to meet the basic conditions and this will be tested at the examination. Further detailed information will be provided at Submission Stage in the published Basic Conditions Statement.</p>	No change.

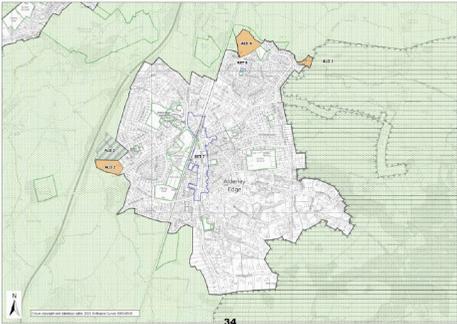
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		less development than set out in the strategic policies for the area, or undermine those strategic policies”.		
		<p>1.7 The Planning Practice Guidance² [Practice Guidance] states that only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:</p> <p>1 having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).</p> <p>2 having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.</p> <p>3 having special regard to the desirability of preserving or enhancing the character or</p>		

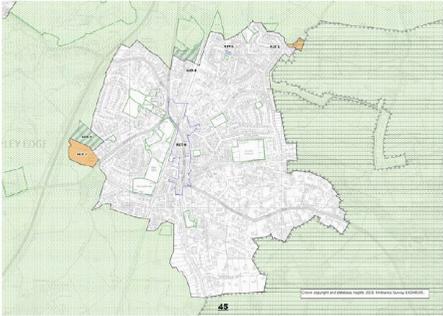
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		<p>appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.</p> <p>4 the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.</p> <p>5 the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>6 the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>7 prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).</p> <p>1.8 It is recognised that the NPFDC consultation is an informal consultation stage, with formal (Regulation 14) consultation anticipated to take place later this year. However, we have</p>		

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		considered the above basic conditions in our responses to the NPFDP where necessary in order to assist the NPG in the preparation of the Neighbourhood Plan going forward.		
1.4	References to SADPD	<p>1.9 As a general comment, we note that the Cheshire East Local Plan Publication Draft Site Allocations and Development Policies Document [SADPD] has recently been released for consultation. The content of the NPFDP suggests that the previous version of the SADPD (the First Draft) has been taken into consideration as it refers to SADPD allocations around Alderley Edge which have now been removed. When updating the Neighbourhood Plan for the next stage of consultation, the NPG will therefore need to ensure that the document is updated to align with the most up to date version of the SADPD.</p> <p>1.10 These representations seek to provide constructive advice and suggestions to the NPG in the formulation of their</p>	<p>Accepted.</p> <p>The emerging First Draft NDP was prepared and finalised for consultation before the updated version of the SADPD (Publication Draft) was published.</p> <p>All references to the SADPD will be updated to refer to the Publication Draft version and site allocations map.</p>	<p>AMEND NDP</p> <p>Update all references to the SADPD to refer to the Publication Draft version and site allocations map.</p> <p>Map 3 - delete and insert new Map from p34 of the Cheshire East Local Plan Draft Adopted Policies Map [PUB 02] (Publication Draft SADPD Version) August 2019.</p>

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		<p>Neighbourhood Plan. This report is structured to include a response to each of the relevant questions included in the online survey, these being Questions 1, 2, 3, 4, 5, 6, 11, 12, 13, 16, 17, 18, 19, 20, 21, 26, 27.</p> <p>1.11 Where deletions to policy wording are being suggested these are shown as strikethrough text. Where additions to policy wording are being proposed these are shown as underlined text.</p> <p>1.12 It should be noted that the online survey relating to this consultation has not been completed, and this report constitutes our representations to the NPFD.</p> <p>1.13 We firstly provide a summary of our proposals for the Ryleys Farm site for the benefit of the NPG and to demonstrate the wider benefits of the allocation of the site across all demographics and interest within the community.</p>		
1.5	SADPD ALD2 and ALD3	2.0 Background to the Ryleys Farm Site	Noted.	No change.

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		<p>2.1 Story Homes recognise that the NPG is not proposing to allocate any land for new homes in the Neighbourhood Plan and is relying upon the Cheshire East SADPD for the identification of allocations and Safeguarded Land in Alderley Edge.</p> <p>2.2 Our land interest in Alderley Edge (known as Ryleys Farm) extends to approximately 160 acres (65ha) of land to the north and south of Chelford Road.</p> <p>2.3 Part of the land is allocated as Site ALD2 – Ryleys Farm, north of Chelford Road in the Publication Draft SADPD for around 45 new homes. To the north of the allocation, part of the land (approximately 2.7ha) is identified as Safeguarded Land ALD3. Figure 2.1 shows the boundaries of these sites.</p>	<p>These are largely matters for CEC and will be addressed through the SADPD.</p>	

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		<p>Figure 2.1 Alderley Edge Draft Allocations – SADPD Publication Draft</p>  <p>Source: Cheshire East SADPD Publication Draft Policies Map</p>		
1.6	SADPD ALD2 and ALD3	2.4 With regard to this matter, the content of the NPF [§5.8] refers to the previous version of the SADPD (the First Draft) which proposed an allocation for 75 new homes on Site ALD2 and 2ha of safeguarded land. Figure 2.2 shows the boundaries of the sites as previously proposed in the First Draft	Noted. These are largely matters for CEC and will be addressed through the SADPD.	No change.

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		<p>Figure 2.2 Alderley Edge Draft Allocations - SADPD First Draft</p>  <p>Source: Cheshire East SADPD First Draft Policies Map</p>		
1.7	SADPD ALD2 and ALD3	<p>2.5 The Neighbourhood Plan will need to be updated to ensure that it aligns with the allocation boundaries in most up to date version of the SADPD.</p> <p>2.6 Story Homes support the allocation and safeguarding of the Ryleys Farm site in the Publication Draft SADPD (2019) as it will help deliver much needed market and affordable housing to Alderley Edge. However, we consider that:</p> <ul style="list-style-type: none"> • The housing requirement for Alderley Edge should be increased. • The Council has not identified enough land to meet the requirement for new homes in Alderley Edge. 	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

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		<ul style="list-style-type: none"> • The other allocations identified around Alderley Edge in the Publication Draft SADPD are not suitable for release from the Green Belt and allocation. • Additional land should be allocated at Ryleys Farm to address these matters. <p>2.7 There is an opportunity for the allocation boundary of Site ALD2 to be amended in order to provide more homes and we are making representations to the SADPD Publication Draft which seek to extend the size of the allocation to accommodate approximately 75 homes (as was proposed in the First Draft SADPD). We also consider that there is an opportunity for further Green Belt release at Ryleys Farm which would allow the provision of up to 100 new homes. We have provided further detail on these options below.</p>		
1.8	SADPD ALD2 and ALD3	<p>Alternative Allocation Boundary</p> <p>2.8 Story Homes have prepared a Sketch Layout (Appendix 1) based on a Technical Framework Plan (Appendix 2) to</p>	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

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		<p>demonstrate how 75 dwellings could be provided on an allocation at Ryleys Farm and how it would provide an attractive scheme which would assimilate with the existing landscape and complement the character of the existing urban area. Provision would be made for the future connection of the allocated site to Safeguarded Land ALD3 to the north.</p> <p>2.9 In accordance with the Framework, the impact of removing the allocated and Safeguarded Land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. This would include the provision of allotments and informal paths to provide access to the Green Belt to the north and south of Site ALD2 and to connect to the existing public footpath which runs to the south of the allocation enabling a footpath connection to Melrose Way/A34 Bypass (Footpath No. 072/FP1/1).</p>	<p>The Steering Group would like to thank the developers for attending a meeting and providing an overview and further detail about their proposals for the Sites at ALD3 and ASLD4, however the NDP will not be allocating sites and these matters should be addressed through the SADPD.</p>	

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		<p>2.10 We consider that the proposed approach adopted by the Council in defining the current allocation boundary for ALD2 is not entirely robust and the allocation of additional land may also be necessary to comply with the Framework3 when defining Green Belt boundaries. Green Belt land for release should be divided into parcels using strong physical boundaries such as main roads, railways and water courses. Boundaries should be physical and durable. There is an opportunity for the boundaries of Site ALD2 and Safeguarded Land ALD3 to be amended to fit more closely with the existing defensible boundaries present on site. These are easily identifiable on the Technical Framework Plan in Appendix 2.</p> <p>2.11 We consider that a stronger and more durable Green Belt boundary could be provided along the existing watercourse which runs through the site. This would provide a number of benefits and would not have an unacceptable impact upon the settlement or the character of the surrounding areas. It would provide a</p>		

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		<p>useful and logical offset to development, providing an attractive setting for the adjacent footpath and retain the green approach to the settlement.</p> <p>2.12 It is considered that the boundaries of the Safeguarded Land should be amended to allow the provision of a larger allocation on Site ALD2 and to ensure that a strong permanent defensible boundary defines the northern boundary of the Safeguarded Land. The suggested northern boundary would follow the line of a well established hedgerow which would provide a long term defensible boundary in this location.</p> <p>2.13 The Sketch Layout plan at Appendix 1 shows these proposed boundaries as part of a scheme for 75 homes.</p>		
1.9	SADPD ALD2 and ALD3	<p>Community Benefits</p> <p>2.14 In addition to providing much needed market and affordable housing in Alderley Edge, the development of the site for 75 homes as proposed above has the potential to deliver the following benefits for the local community:</p>	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

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		<p>1 A green buffer south of Haddon Close and along rear gardens of Wilton Crescent.</p> <p>2 Allotments and a car park within this green buffer with associated access road through the proposed Safeguarded Land.</p> <p>3 Upgrades and extension of the existing Public Right of Way to Melrose Way and up to the proposed allotments/Brook Lane.</p> <p>4 The provision of a visitor car park and designated drop-off and pick-up facility to service the Alderley Edge Community Primary School and Ryleys School. This will relieve on-street parking in the area, particularly along Ryleys Lane.</p> <p>5 The site is located on a distributor road (Ryleys Lane) and will not funnel traffic through existing residential areas.</p> <p>6 The site has the least impact on the Green Belt and is a logical site for further development.</p> <p>7 Linkages to the village centre will encourage travel by foot or cycle rather than private car.</p> <p>8 Improved pedestrian linkages to the cemetery on Chelford Road and a new car park for the cemetery.</p>		

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1.10	SADPD ALD2 and ALD3	<p>2.15 There is the potential to provide compensatory play/recreation space within the green buffer (guaranteeing the permanence of the buffer) to help facilitate the extension of the existing car park at Ryleys Lane.</p> <p>2.16 There is also potential for a contribution to improving upgrades to Chorley Hall playing fields as suggested in the Neighbourhood Plan (subject to this contribution meeting the relevant Community Infrastructure Levy (CIL) tests).</p> <p>2.17 The site is located within the designated Alderley Edge Neighbourhood Development Plan Area and Parish Boundary. The Parish Council will therefore receive 25% of the relevant Community Infrastructure Levy [CIL] receipts (uncapped) generated through the development of the site and which can be used to support the development of the area.</p>	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

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		<p>2.18 A primary reason for the appointment of Story Homes by our landowner clients was due to our ability and willingness to provide a bespoke and quality development reflective of the local vernacular and dependent upon the scale of the allocation, divided into distinct character areas.</p>		
1.11	SADPD ALD2 and ALD3	<p>Identification of Additional Land</p> <p>2.19 Story Homes consider that there is scope to extend the allocation boundary for Site ALD2 even further if it is required to meet any identified dwelling shortfall within Alderley Edge. In this instance, the Green Belt boundary could be extended further south with Chelford Road providing a logical, firm and defensible boundary for the allocation in accordance with the Framework4.</p> <p>2.20 It is possible to extend the boundary in this manner without causing harm to the settings of surrounding heritage assets. This could capture the area to the south and southwest of the proposed allocation</p>	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

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		<p>as far as the A34 subject to an adequate landscape buffer being provided along Chelford Road.</p> <p>2.21 This alternative option would ensure that:</p> <p>1 Up to 100 dwellings could be provided on the site (including 30% affordable dwellings) could be provided to meet acute affordable housing needs in Alderley Edge.</p> <p>2 A longer term defensible soft landscape edge can be provided to the south with additional off-set compensatory improvements to the environmental quality and accessibility of the remaining Green Belt.</p> <p>3 An adequate landscape buffer is provided to protect the settings of the heritage assets in the immediate vicinity.</p> <p>2.22 Story Homes therefore consider that there is scope to provide a stronger, more definitive Green Belt boundary by drawing the boundary along Chelford Road.</p>		
1.12	SADPD ALD1 and ALD4	Other allocations around Alderley Edge	Noted.	No change.

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		<p>2.23 The SADPD Publication Draft (2019) proposes three allocations around Alderley Edge (see Figure 2.1)</p> <p>2.24 In addition to Site ALD2 – Ryleys Farm the following sites are allocated:</p> <ul style="list-style-type: none"> • Site ALD1 - Land adjacent to Jenny Heyes (around 10 new homes) • Site ALD4 - Land North of Beech Road (around 35 new homes) <p>2.25 We consider that sites ALD1 and ALD4 are not suitable to be allocated for new homes for a number of reasons. Story considers that there are real sustainability merits in delivering one comprehensive allocation in Alderley Edge rather than splitting the requirement across three sites.</p>	<p>These are largely matters for CEC and will be addressed through the SADPD.</p>	
1.13	SADPD ALD1	<p>2.26 Turning firstly to the Jenny Heyes site (ALD1) the following issues are noted:</p> <p>1 The site extends to approximately 0.47ha. However, a large portion of the site is unsuitable for development due to flood risk constraints. In the absence of any detailed flood risk assessment, it is not possible to assess exactly how much of the site would fall outside of Flood Zones 2 and</p>	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p> <p>The site lies outside the NDP designated area and, if the site</p>	No change.

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		<p>3 (where residential development is not normally acceptable) and whether this could accommodate the 10 dwellings specified. It is estimated that the gross site area is reduced to 0.23ha. The net developable area is therefore estimated to be 0.17ha, equating to a net developable area for the delivery of 5-6 dwellings assuming 35 dwellings per hectare. We therefore question the deliverability of this site at the outset in meeting housing needs in Alderley Edge and have sought professional technical advice which is attached at Appendix 3. Lichfields have witnessed first-hand at other Local Plan examinations where Local Plan Inspectors have thrown out housing allocations with flood risk issues. Flooding issues in the Borough and across the UK have been well documented in the press and providing housing on sites with known flood risk issues and no supporting delivery evidence is not good practice.</p> <p>2 The site is not currently served by a highways access and is located along an 'S' bend in the road which limits visibility.</p>	<p>is retained in the adopted plan, AENDP policies will not apply.</p>	

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		<p>There is no certainty over whether a suitable access could be provided. The suitability of an access in this location is further questioned in the knowledge that Heyes Lane is culverted in this location over Whitehall Brook. In addition, this part of Heyes Lane is very narrow and there are existing residential access points opposite the site along its entire frontage. The opposite frontage also provides access to the commercial property occupied by Emerson Management Services. As a result, any new access would be directly opposite the existing points of access causing potential conflict.</p> <p>3 It is not clear whether a suitable and safe pedestrian access to the site could be provided to the site. There is no footpath on the eastern side of Heyes Lane in the vicinity of the site (the footpath terminates approximately 30m to the south). Given the narrow width of the highway in this location, the potential to provide a footpath on the eastern side of Heyes Lane appears to be limited, further exacerbated by the culvert over Whitehall Brook presenting technical and legal</p>		

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		<p>difficulties, and may require land outside of the site and public highway boundary. The Alderley Edge Settlement Report⁵ considers the ability to provide suitable pedestrian access to the site and concludes:</p> <p>“The footpath along Heyes Lane crosses Whitehall Brook but then ends immediately afterwards. Heyes Lane is relatively narrow from this point on and provision of an extended footpath as far as the site’s vehicular access point may prove difficult, in which case a pedestrian access point at the far western tip of the site would be required in order to connect with the existing footpath”.</p> <p>Story Homes note that the footpath referred to above runs along the western side of Heyes Lane. As visibility along the highway is limited given the bend in the road, it is not clear whether a safe crossing point could be provided from the site to this footway.</p> <p>4 Large parts of the site are covered by mature tree planting, much of which is likely to require removal in order to</p>		

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		<p>accommodate residential development and provide the appropriate visibility splays for access if this is feasible. Given the restricted developable area of the site, the opportunity to provide suitable replacement planting is likely to be limited. The small scale of the site also limits the opportunity to provide any complementary open space.</p> <p>5 The provision of 10 dwellings on the site would fall below the policy threshold for affordable housing provision set out in Policy SC5 of the Cheshire East Local Plan Strategy [CELPS]. The allocation of the site would therefore be a lost opportunity for the Council to secure affordable housing in a settlement where the lack of available brownfield sites and Green Belt restrictions outside of the settlement minimises the opportunity for affordable housing provision on non-allocated sites. This is contrary to the objectives of the NDP which seeks to create a more sustainable and balanced community.</p>		

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		<p>6 The distance of the site from public transport routes and town centre facilities means that it is significantly less well-suited to providing housing than Ryleys Farm and indeed the additional housing could be delivered at Ryleys Farm with considerably less impact. Whilst there are local shops, the site is greater distance from the village centre, increasing the likelihood of car use and thus increasing traffic impact.</p> <p>7 The site constitutes a disproportionate and illogical extension to the settlement boundary as it only adjoins the existing settlement on one side.</p> <p>8 The site is also located outside of the designated Alderley Edge Neighbourhood Development Plan Area and Parish Boundary. The Parish Council would not therefore qualify for 25% of the relevant Community Infrastructure Levy [CIL] receipts which will be generated through the development of the site.</p>		
1.14	SADPD ALD4	2.27 Turning secondly to the Beech Road site (ALD4) the following issues are noted:	Noted.	No change.

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		<p>1 This part of the Green Belt plays a significant role in separating the settlements of Alderley Edge and Wilmslow to the north. When assessed in the Council's Green Belt Assessment Update [GBAU] as part of Parcel AE04, the site was considered to make a 'Major' contribution to the Green Belt.</p> <p>2 The Alderley Edge Settlement Report⁶ re-assesses Green Belt contribution based on the removal of Site ALD4 only. In this assessment the overall contribution of the site has been downgraded to 'Significant' contribution. Whilst it is recognised that Site ALD4 does not occupy the whole of Parcel AE04, Story Homes considers that the removal of the site from the Green Belt will still have a 'Major' impact upon the Green Belt purposes. The Green Belt gap between these two settlements in this area has recently been significantly reduced following the removal of the Royal London site to the south of Wilmslow and the allocation of this land for residential and employment development in the CELPS.</p>	<p>These are largely matters for CEC and will be addressed through the SADPD.</p> <p>It is understood that flooding issues have been resolved by the landowners / developers to the satisfaction of EA and CEC.</p> <p>It is not accepted that the site would lead to erosion of the green gap between Wilmslow and Alderley Edge.</p>	

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		<p>The removal of Site ALD4 from the Green Belt would move the settlement boundary of Alderley Edge significantly further north (75-100m) further reducing the gap between the two settlements.</p> <p>The Settlement Report recognises that the removal of the allocated land will narrow the gap between Alderley Edge and Wilmslow further.</p> <p>3 The proposed allocation boundary does not follow any readily recognised boundary to the north. Given the role this land plays in separating Alderley Edge from Wilmslow, the need to identify an existing permanent, defensible boundary is of critical importance to ensure that the two settlements do not merge.</p> <p>4 The site is also subject to technical constraints which would severely limit its development potential. The Government's Flood Map for Planning indicates that significant parts of the site fall within Flood Zones 2 and 3 where residential development would not normally be permitted.</p>		

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		<p>5 Whilst the site promoter has indicated that that 35 dwellings could be accommodated outside of Flood Zones 2 and 3 and also outside of the areas at risk of surface water flooding, the Settlement report does not record any response from the Environment Agency to indicate the use of the site for residential development would be acceptable and we provide professional advice on this matter at Appendix 4. Given the constraints identified, there is no guarantee that the site can come forward to deliver the 35 dwellings currently envisaged. This would threaten the deliverability of both market and affordable housing for Alderley Edge and may not fully meet the development needs of the area. The allocation of the site in the SADPD is therefore considered to be flawed when sequentially preferable sites (such as land at Ryleys Farm) are available for development. 6 The Framework7 is clear that planning policies and decisions should support development that makes efficient use of land. The site is 2.9ha in size and the development of 35</p>		

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		<p>dwelling would result in a development density of 12 dwellings per hectare. We consider that this would result in the wasteful use of land and it is not possible to justify the removal of such a large site from the Green Belt when its development potential is so poor.</p> <p>7 The landscape impact of the site is also acknowledged by the Council as being of significant concern in the Alderley Edge Settlement Report⁸ as it only adjoins the settlement on one side. Whilst the Settlement Report suggests that appropriate design and landscaping could mitigate this impact, it is not clear how this would address the issue as its relationship with the existing settlement would remain the same.</p> <p>2.28 The provision of a larger allocation on the Ryleys Farm site would help meet any shortfall in homes if these two sites are not allocated in the SADPD or if they are reduced in size.</p>		

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1.15	SADPD ALD4	2.29 For the reasons set out above, we would encourage the NPG to support the allocation and safeguarding of the Ryleys Farm site, including the potential enlargement of the allocated Ryleys site southwards up to the watercourse as suggested above, as this would provide a significant number of benefits to the local community, including the provision of more affordable housing and the opportunity to provide a greater variety of dwelling types and potential other community benefits such as allotments and compensatory open space to help meet the needs of the community. It would also conform with the objectives of the NDP	Noted. These are largely matters for CEC and will be addressed through the SADPD.	No change.
1.16	N/A	3.0 Response to Survey Questions 3.1 The following section sets out our response to the relevant questions that the NPG has provided in the online survey.	Noted.	No change.
1.17	AE1	Draft Policy AE1: Alderley Edge Development Strategy 1. Do you support the plan's draft overarching approach to development policy as detailed in AE1?	Safeguarded land - not accepted: The Local Plan Strategy sets out in Policy PG 4 Safeguarded Land that <i>Safeguarded land is land between the existing urban area and the</i>	No change to text apart from replacing "Proposals Map" with "Policies Map" in AE1 1.

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		<p>3.2 We generally support with changes the wording of Policy AE1 and agree that growth should be targeted to the most appropriate locations, where the highest levels of integration, sustainability, connectivity and design quality can be achieved.</p> <p>3.3 The explanatory text to the policy [§5.13] notes that the NPG is not proposing to identify new housing sites in the Neighbourhood Plan and that allocations and changes to the Green Belt boundary will be determined through the emerging Site Allocations and Development Policies Document [SADPD]. Whilst this may be the case, the NPG needs to ensure that the neighbourhood plan does not prejudice or stifle the delivery of those sites subject of draft allocations / safeguarding within the emerging SADPD. Story Homes fully support the allocation of Ryleys Farm in the Publication Draft SADPD but are disappointed that the site has been reduced to allow for the allocation of a further site. The conflict between the</p>	<p><i>inner boundary of the Green Belt that may be required to meet longer-term development needs stretching well beyond the period of the Local Plan.</i></p> <p>The Policy goes on to say that: <i>4. Development of safeguarded land for uses other than those appropriate in the open countryside will not be permitted, unless a review of the Local Plan has taken place to allocate the land following an assessment of the need for development at that time, and the identification of the most appropriate locations for development to take place.</i></p> <p>The supporting text of the Local Plan Strategy sets out in para 1.38 that <i>The identification of safeguarded land between the urban area and the inner boundary of the Green Belt means that the permanence of the new Green Belt boundary will</i></p>	

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		<p>NDP and SADPD (2019) needs to be properly resolved.</p> <p>3.4 Part 1 of the Policy supports new residential development where proposals are located within the defined built up area (as shown on the most up to date Local Plan proposals map). This would exclude areas of Safeguarded Land around Alderley Edge, which are treated as open countryside given their Safeguarded status. It may be the case that areas of Safeguarded Land identified in the Cheshire East Local Plan, such as the proposed Safeguarded Land ALD3 at Ryleys Farm, could come forward for development within the Neighbourhood Plan period, should a shortfall in housing supply occur. In order to ensure that the policy aligns with the Local Plan, we consider that the wording of Part 1 should allow for the development of Safeguarded Land as well. The following additional wording is suggested:</p> <p>“Are located within the existing defined built up area of Alderley Edge or currently</p>	<p><i>be secured. The safeguarded land is not proposed for development in this plan but may be required post 2030 if a future review of the plan identifies further needs for development.</i></p> <p>The SADPD sets out in Safeguarded land para 12.10 that <i>Safeguarded land is identified in Green Belt areas and may be required to meet longer-term development needs. In line with LPS Policy PG 4 'Safeguarded land', it is not allocated for development at the present time and policies related to development in the open countryside will apply.</i></p> <p>Para 12.11 explains that <i>as with development sites, the LPS identifies safeguarded land around the principal towns and key service centres, leaving the identification of safeguarded land around local service centres to</i></p>	

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		<p>identified as Safeguarded Land on the edge of the settlement as shown on the most up to date adopted Local Plan proposals map)”</p> <p>3.5 Part 2 of the policy supports development which is on brownfield sites or re-uses existing buildings wherever possible. Story Homes recognise that an approach to development which considers the effective use of previously developed land is a requirement of national policy. However, the policy should also be appropriately worded to ensure that sites allocated and identified as Safeguarded Land in the Local Plan can also be delivered as and when required. In order to ensure that the policy is in general conformity with the strategic policies contained in the development plan and contributes to the achievement of sustainable development, we suggest that the following wording is added after Part 2 of the policy: “Are allocated for residential development or currently identified as Safeguarded Land</p>	<p><i>the SADPD. 12.12 The SADPD identifies safeguarded land around Alderley Edge, Chelford, Disley, Mobberley and Prestbury.</i></p> <p>The NPPF sets out in para 139. <i>When defining Green Belt boundaries, plans should:</i> <i>c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;</i> <i>d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;</i></p> <p>Therefore the proposed wording change to AE1 is incorrect.</p>	

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		for future development in the Cheshire East Local Plan”.	<p>Safeguarded land can only come forward through a review of the Local Plan and until such a review takes place and areas of former Safeguarded land are identified for development to meet updated housing need, policies related to the development of land in the open countryside will apply.</p> <p>The existing wording refers to "the existing defined built up area of Alderley Edge (as shown on the most up to date adopted Local Plan Policies Map" and this should be retained apart from replacing "Proposals Map" with "Policies map" in line with the latest wording in the NPPF.</p>	
1.18	AE2	<p>Draft Policy AE2: Location, Design, Scale and Type of New Housing</p> <p>2. Do you agree that the NDP should require new housing to reflect the needs of the people of Alderley Edge, in particular by providing smaller</p>	<p>Noted and partially accepted.</p> <p>Following an informal meeting with a representative from Story Homes the Steering Group agreed to amend the split in AE1 4A to provide a greater degree of</p>	No further change.

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		<p>houses and suitable accommodation for local young people, families and the 65+ age range?</p> <p>3.6 Part 4A of the policy states that schemes should make provision for the recommended split of dwellings by bedroom number as follows:</p> <ul style="list-style-type: none"> • 15% 1 bedroom • 20% 2 bedroom • 60% 3 bedroom • 5% 4 or more bedrooms <p>3.7 Part 4B of the Policy states that proposals for further provision of houses of 5 or more bedrooms will be resisted.</p> <p>3.8 Part 4C states that the mix of housing should include a range of accommodation suitable for the increasing 65+ age range including bungalows.</p> <p>3.9 Story Homes recognise the contribution that an appropriate housing mix can make to meeting the needs and always seek to deliver a range of home sizes when delivering new development. However, we</p>	<p>flexibility - see Table 1. It is proposed to combine 15% 1 bedroom and 20% 2 bedroom to provide 35% 1-2 bedroom.</p> <p>The Steering Group are committed to retaining AE1 4 B as the Housing Needs Assessment demonstrates that there is no need for more larger properties in Alderley Edge as existing stock including recent developments have tended to focus on larger 4+ bedroom properties which are frequently unaffordable for local households. At the meeting with the developers' representative the existing provision of larger properties in the area was acknowledged and accepted.</p>	

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		<p>consider that the Neighbourhood Plan should not be overly prescriptive when it comes to housing mix, as strict guidance may not adequately reflect likely market demand, resulting in it being overly restrictive in terms of market choice. This may ultimately undermine housing delivery contrary to the aims of the Framework9 which is seeking to boost housing supply. It would not therefore have regard to national planning guidance and may not contribute to the achievement of sustainable development.</p> <p>3.10 The provision to meet an appropriate mix should not impact on the quantity of the general properties needed within the market, and any policy must be worded in a way that avoids this. Story Homes therefore considers that the second sentence of Part 4A and the recommend dwelling splits proposed should be deleted from the policy text. Part 4B and Part 4C of the Policy should also be deleted.</p> <p>3.11 We note that the provision of a larger housing allocation at Ryleys Farm would</p>		

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		allow for a more diverse housing mix to be provided. Story Homes have previously communicated this and has submitted several masterplans that provide for up to 100 units with a mix of housing tenures including bungalows.		
1.19	AE2	<p>3. Do you agree that the 30% of all new housing of 10 units and over that the Cheshire East Local Plan requires to be built as affordable in Alderley Edge should be provided within the village boundary (rather than elsewhere in Cheshire East), in order to maintain a balanced community in Alderley Edge?</p> <p>3.12 Whilst we generally support the provision of affordable housing within the village boundary, we consider that Policy AE2 should also recognise that affordable housing may also come forward on Safeguarded Land over the life of the Neighbourhood Plan. The wording of the policy should therefore make provision for the development of affordable housing on Safeguarded Land to ensure that it does not stifle the delivery of much needed affordable homes in the settlement.</p>	Noted - see 1.20 below.	No change.

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		<p>On this basis, it is recommended that the wording of Part 4D of the policy is amended as follows</p> <p><i>"...This affordable housing provision of a minimum of 30% of all units must be built within the village boundary or on land currently identified as Safeguarded Land in order to maintain a balanced community within the area..."</i></p>		
1.20	AE2	<p>3.13 Part 4E of the policy requires that any agreement regarding affordable housing shall specify that the developer shall build the affordable housing element and it should be available for occupation generally before 50% of the market housing is occupied. Story Homes object to this 50% occupation requirement as it may not be possible to implement this requirement on some sites. For example, it is normal practice for affordable housing to be 'pepper potted' on a development site (i.e. spread throughout the site to assimilate and integrate with the market housing). It may therefore be the case that not all of the affordable units can be completed and made available for</p>	<p>Noted and partially accepted.</p> <p>The developer makes a reasonable point. Note that 4D will be amended following comments from CEC.</p> <p>The Steering Group and Housing Subgroup accept that "pepper potted" affordable housing across schemes so that the affordable element is fully integrated with market housing is good practice and this is in line with Local Plan Strategy Policy SC 5 which sets out that affordable housing is required to be</p>	<p>This point was debated and "pepper potted" in line with SC5 is desirable and so it was agreed to delete AE2 4 E and replace with:</p> <p>"Affordable housing should be fully integrated with market housing, and should be prioritised for occupancy prior to, or at least at the same time as, the majority of market housing in the development scheme."</p>

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		<p>occupation in accordance with this threshold if they are being brought forward in the later stages of development.</p> <p>3.14 We therefore consider that the wording <i>“and it should be available for occupation generally before 50% of the market housing is occupied”</i> should be deleted from part 4E.</p>	<p>provided on-site unless exceptional circumstances apply.</p> <p>However there remains a concern that developers may phase the development to provide affordable units towards the end of the development process and as affordable housing is a local priority there is a need to address this in the policy. Therefore an amendment to the policy wording is proposed.</p>	
1.21	AE2	<p>3.15 Story Homes note that the provision of a larger allocation at the Ryleys Farm site would allow for a greater number of affordable homes to be provided on the site (and within the village boundary), applying the 30% requirement in CELPS Policy SC5. As noted above, the allocation of the Jenny Heyes site (Site ALD1) for 10 dwellings would fall below the policy threshold for affordable housing provision set out in Policy SC5 of the Cheshire East Local Plan Strategy [CELPS]. This would be a lost opportunity for the Council to secure affordable housing in a settlement where</p>	<p>Noted.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

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		<p>the lack of available brownfield sites and Green Belt restrictions outside of the settlement minimises the opportunity for affordable housing provision on non-allocated sites.</p> <p>This is contrary to the objectives of the NDP which seeks to create a more sustainable and balanced community.</p>		
1.22	AE2	<p>4. Does draft policy AE2 cover all the important key principles for new housing development in Alderley Edge?</p> <p>Part 2 - Design</p> <p>3.16 Part 2 of the policy indicates that development will be supported where it adheres to the Cheshire East Borough Design Guide and the Village Wide Design Principles as set out in the Alderley Edge Design Codes. The Design Codes are provided in a separate Design Code document. Story questions whether the Design Codes referred to in Part 2 are necessary.</p> <p>Design matters are covered in significant detail in the Cheshire East Council Borough</p>	<p>Not accepted.</p> <p>The Design Codes were commissioned to provide a high level of detail and have been prepared following a character appraisal of different identified character areas within Alderley Edge.</p> <p>The Design Codes form part of the technical evidence base for the NDP and are published as a supporting document. The NDP is already a lengthy and complex document and the Steering Group would prefer not to add a further lengthy appendix.</p>	No change.

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		<p>Design Guide SPD. This SPD considers the settlement character of Alderley Edge and provides significant detail of working with the grain of a place, urban design, street design, green infrastructure and landscape design and sustainable design principles in different parts of Cheshire East, including Alderley Edge. It is not therefore clear why an additional Design Code document is required to accompany the Neighbourhood Plan given the comprehensive nature of this document.</p> <p>3.17 If the NPG opts to retain the Design Code document going forwards, it is considered that the document should form an Appendix to the Neighbourhood Plan document as it forms a component against which accordance with Policy AE12 will be assessed.</p>		
1.23	AE2	<p>Part 3 – Scale</p> <p>3.18 Part 3 requires that “plot density, height and massing should relate to adjoining residential areas and protect and enhance the amenity of neighbouring residents”. We consider that a</p>	<p>Partially accepted.</p> <p>Ensuring new development is sympathetic and relates well to the distinctive character of the surrounding area is a priority for the NDP.</p>	<p>In order to resolve the issues raised it was agreed to delete wording for AE2 3. Scale and replace with:</p> <p>"Schemes are appropriate to their site in scale and character</p>

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		<p>requirement for these design aspects to “relate to” adjoining residential areas is overly prescriptive and could result in development which does not make the most efficient use of land as sought by the Framework [§122], if for example neighbouring development is of a particularly low density. On this basis, we consider that the wording “relate to” should be replaced with “respect”.</p>	<p>However it is noted that the term "relate" is repeated AE2 3 and therefore a slight amendment to the wording is suggested.</p> <p>Also, new development is unlikely to enhance local residential amenity and this should be deleted.</p>	<p>and relate well to their context; plot density, height and massing should <u>respond</u> to adjoining residential areas and protect the amenity of neighbouring residents."</p>
1.24	AE3	<p>Draft Policy AE3: Sustainable Housing Design</p> <p>5. Do you agree that where land is released from the Green Belt around Alderley Edge for housing, the new housing built on it should be constructed to a higher eco standard (to deliver a reduction in energy usage) compared to standard new build construction?</p> <p>3.19 Story Homes object to Part 9 of Policy AE3. There is no justification in national planning policy or the Local Plan for the application of higher eco standards on Green Belt sites. In addition, this</p>	<p>Not accepted.</p> <p>The Steering group and Housing subgroup are committed to retaining AE3 criterion 9 in recognition that land can only be removed from the Green Belt in very special circumstances. NPPF paragraph 135 sets out that <i>once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans</i>. The exceptional circumstances should be noted and in partial</p>	<p>No change.</p>

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		<p>requirement is not supported by any viability evidence in the Neighbourhood Plan. We therefore consider that Part 9 of Policy AE3 should be deleted.</p>	<p>compensation for the removal of land from the Green Belt the NDP aspires to ensuring a high quality of development should be provided.</p> <p>This clause was supported by 86.16% of respondents in the consultation on the emerging First Draft Plan and should be retained for the examiner to determine.</p>	
1.25	AE3	<p>6. Does draft policy AE3 cover all the important key principles for sustainable new housing?</p> <p>3.20 Part 3 of the policy requires schemes to provide a high quality public realm in accordance with the Design Codes. Story Homes question whether the Design Codes referred to in Part 3 are necessary. Design matters are covered in significant detail in the Cheshire East Council Borough Design Guide SPD. This SPD provides significant detail on the provision of high quality public realm and road hierarchy. It is not therefore clear why an additional Design</p>	<p>Not accepted.</p> <p>See above - the Design Codes were commissioned to provide a higher level of detail to ensure development responds positively to the distinctive local characteristics of Alderley Edge.</p>	No change.

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		Code document is required to accompany the Neighbourhood Plan given the comprehensive nature of the SPD.		
1.26	AE3	3.21 Story Homes object to Part 6 of Policy AE3 which requires external charging points to be provided at a rate of one charging point per house within the garage or on the driveway in order to support the use of electric vehicles. There is no stated requirement in the adopted CELPS for such level of provision or in the emerging SADPD either. In addition, there is no national requirement for this level of provision. No viability evidence has been provided with the Neighbourhood plan to demonstrate that this level of provision can be delivered. We therefore consider that Part 6 of Policy AE3 should be deleted.	Not accepted. EV charging points should be provided in new development schemes to help the UK move towards a lower carbon future as part of climate change objectives. The NDP seeks to contribute towards sustainable development in line with the NPPF and in accordance with one of the basic conditions and supporting lower carbon technologies is an important part of this. Provision of just one charging point per house should not be considered an onerous requirement.	No change.
1.27	AE3	3.22 The need to protect biodiversity and other ecosystem services provided by the natural environment is recognised. However, Story Homes object to Part 11 of the policy as currently worded. There is no requirement in the Framework for all development proposals to deliver net	Accepted. Amend AE3 12 as suggested but also move original wording to supporting text and if possible, partially retain in policy.	It was agreed to delete AE3 11 and replace with: "Developments should conserve protect and enhance wildlife, biodiversity, and other ecosystem services provided by the natural environment and demonstrate

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		<p>gains for biodiversity. With regard to this matter, the Framework¹⁰ states that plans should: "Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity"</p> <p>3.23 Whilst pursuing opportunities for securing net gains in biodiversity is encouraged, the Framework does not set a blanket requirement for all developments to achieve this aim. Our position is supported by information produced by the Government¹¹ on this matter which makes clear that biodiversity offsetting is an option available to developers to fulfil their obligations under the planning system's mitigation hierarchy, rather than a requirement.</p> <p>3.24 For the above reasons, it is considered that the first sentence of Policy AE2, Part 11 should be amended as follows:</p>	<p>Housing group had discussions with LK : Green Infrastructure approach is in the Local Plan Policy SC6, therefore condensing AE3.11 and 3.12 into one point and moving some wording into para 6.25 does not weaken the policy.</p>	<p>how schemes contribute to biodiversity net gain. Opportunities to incorporate biodiversity improvements in and around developments are encouraged, especially where this can secure measurable net gains for biodiversity. Where development sites include culverted water courses these should be naturalised wherever possible, and features such as field ponds and wet marshy grasslands should be protected and enhanced using appropriate local species in planting and landscaping schemes."</p> <p>Take relevant text from the existing criterion 12 and add to the end of 6.25:</p> <p>"Developments may provide opportunities for improving wildlife habitats as part of measures to enhance local biodiversity. Any areas of priority</p>

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		<p>“Developments should conserve protect and enhance wildlife, biodiversity, and other ecosystem services provided by the natural environment and demonstrate how schemes contribute to biodiversity net gain. Opportunities to incorporate biodiversity improvements in and around developments are encouraged, especially where this can secure measurable net gains for biodiversity”.</p>		<p>habitats should be retained and naturalised. Such habitats may include existing water courses, field ponds and areas of wet marshy grasslands, as well as hedgerows and woodland.”</p>
1.28	AE8	<p>Draft Policy AE8: Supporting a Vibrant Village Centre</p> <p>11. Do you agree that a mix of uses and maintaining an attractive, safe environment for all users will ensure the village’s long-term sustainability and competitive edge?</p> <p>3.25 Story Homes support Policy AE8. Ensuring the vitality and viability of Alderley Edge is of vital importance to the long-term economic success of the area. The Framework sets out that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a</p>	Noted.	No change.

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		<p>positive approach to their growth, management and adaptation [§85].</p> <p>3.26 As outlined in the Framework [§85(f)], it is important that the Neighbourhood Plan recognises that residential development often plays an important role in ensuring the vitality of centres, and residential development should be encouraged on appropriate sites. This is of particular importance in regard to the site at Ryleys Farm, which is identified as a draft allocation (Site ALD 2 – Ryleys Farm, north of Chelford Road) with land to the north safeguarded for future development needs (ALD 3 Ryleys Farm) in the emerging SADPD.</p>		
1.29	AE9	<p>Draft Policy AE9: Landscape Character and Access</p> <p>12. Do you agree that it is important to maintain the existing green gap between Alderley Edge and Wilmslow to the north and north west?</p> <p>3.27 Story Homes strongly support the maintenance of a green gap between</p>	<p>Noted.</p> <p>The Steering group does not accept that the proposed site at Beech Road (ALD4) contributes to the erosion of the green gap between Alderley Edge and Wilmslow.</p>	No change.

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		<p>Alderley Edge and Wilmslow to the north and north west. This land comprises Green Belt which provides a visual and physical separation between the two settlements and serves an important function in preventing the two settlements from merging into one another and checking the unrestricted sprawl of the built up area.</p> <p>3.28 With regard to this matter, the SADPD Publication Draft (2019) proposes the allocation of land North of Beech Road (Site ALD4) for residential development of around 35 new homes. We note that the allocation of this site does not appear to align with the aspirations of Policy AE9 as it would contribute to the erosion of the green gap between the built up areas of each settlement.</p> <p>We have provided further comments on the impact of the Beech Road allocation upon this gap in earlier sections of this representation.</p>	<p>The site allocation process will continue to be determined through the SADPD.</p>	
1.30	AE9	13. Do you support the landscape character draft policy AE9?	Noted.	No change.

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		3.29 We have no further comments to make on this matter.		
1.31	AE12	<p>Draft Policy AE12: Local and Historic Character</p> <p>16. Do you support the local and historic character draft policy AE12?</p> <p>3.30 Story Homes generally support Policy AE12 but question whether the Design Codes referred to in Part 1A are necessary. As noted in our response to other policies in these representations, design matters are covered in significant detail in the Cheshire East Council Borough Design Guide SPD. This SPD considers the settlement character of Alderley Edge and provides significant detail of working with the grain of a place, urban design, street design, green infrastructure and landscape design and sustainable design principles in different parts of Cheshire East, including Alderley Edge. It is not therefore clear why an additional Design Code document is required to accompany the Neighbourhood Plan given the comprehensive nature of</p>	<p>Support noted.</p> <p>Deletion of design codes not accepted - see above.</p>	No change.

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		this document.		
1.32	AE13	<p>Draft Policy AE13: Key Views and Townscape</p> <p>17. Do you agree that key views from the National Trust owned 'Edge', notably from Castle Rock should be protected?</p> <p>3.31 We have no comments to make on this matter.</p>	Noted.	No change.
1.33	AE13	<p>18. Do you support the key views and townscape draft policy AE13?</p> <p>3.32 Story Homes recognise the importance of minimising impact upon key views that make an important contribution towards local visual amenity on Alderley Edge's townscape, setting and character. As noted in the policy, any impact on key views can be assessed through an appropriate landscape and visual assessment to ensure that schemes are designed and sited sensitively and appropriately.</p>	Noted.	No change.

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		<p>3.33 Key View No.4 shown on Map 9 which accompanies Policy AE13 shows a 'long view' across the eastern part of the Ryleys Farm site onto St Philip and St James Church. As noted in these representations, 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.</p>		
1.34	AE14	<p>Draft Policy AE14: Sustainable Transport Routes</p> <p>19. Do you support the sustainable transport draft policy AE14?</p> <p>3.34 We support Draft Policy AE14 which encourages development proposals to include linkages to existing footpaths and cycle routes. As part of the development of the Ryleys Farm site, connections would be provided to the existing public footpath which runs to the south of the allocation enabling a footpath connection to Melrose Way/A34 Bypass (Footpath No. 072/FP1/1). This existing public right of way would be retained were any future</p>	Support noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		development to take place in this part of the site. It is also proposed to extend the public right of way northwards through the site's western boundary providing accessibility to Brook Lane.		
1.35	AE15	<p>Draft Policy AE15: Promoting Accessibility to Public Transport</p> <p>20. Do you support draft policy AE15 promoting accessibility to public transport?</p> <p>3.35 Story Homes support Policy AE15 in relation to transport in new development, which requires that proposals for new residential development in Alderley Edge should demonstrate that they are located in sustainable locations with good access to services and public transport facilities. In this respect, it is considered that the Ryleys Farm site performs well as it is located within 800m of such facilities including the village centre, bus stops and Alderley Edge railway station.</p>	Support noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>3.36 The proposed development of the site at Ryleys Farm would ensure integration of the development with existing sustainable transport routes. Any development will seek to enhance connectivity with surrounding areas including footpath connectivity to Chelford Road and onto Melrose Way.</p>		
1.36	AE16	<p>Draft Policy AE16: Supporting the provision of additional parking at the Park at Ryleys Lane to improve parking facilities in Alderley Edge village</p> <p>21. Do you agree with the draft policy AE16 which proposes extending the car park at Ryleys Lane to provide improved car parking in Alderley Edge?</p> <p>3.37 The principle of providing additional parking in Alderley Edge is supported and Story Homes recognise that a shortage of public car parking spaces in and around the village centre is one of the most important issues for the local community and the local economy.</p>	Support noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>3.38 We support the provision of additional parking at the Park at Ryleys Lane to improve parking facilities in Alderley Edge village. Policy AE16 notes that this would be subject to the relocation of the existing recreation facilities to a suitable and accessible new location within or adjoining the boundary of Alderley Edge. As noted in these representations, there is the potential to provide compensatory play/recreation space within the green buffer to the north of the proposed SADPD allocation and Safeguarded Land at Ryleys Farm to help facilitate the extension of the existing car park at Ryleys Lane. Story Homes also control 160 acres of land to the South West of Alderley Edge which has previously been subject to detailed masterplanning on community benefits (including a new primary school) as well as recreational and leisure open space. We welcome feedback and suggestions on how this land can provide compensatory open space.</p>		
1.37	AE21	26. Draft Policy AE21: Additional Car Parking for the Medical	Noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>Centre and Festival Hall at Heyes Lane Allotments with retention of the remaining space either for allotments or creation of new Public Open Space / Wildlife Area Subject to the availability of new allotment space in development in the current Green Belt, the plan sets out 3 options for the Heyes Lane Allotments:</p> <ol style="list-style-type: none"> 1) Maintain whole Heyes Lane site for allotment use only 2) Convert approx. 25% of the allotment area to provide an additional 40-50 parking spaces to support the Medical Centre and Festival Hall. Retain the remaining 75% as allotments 3) Convert approx. 25% of allotment area to provide an additional 40-50 parking spaces to support the Medical Centre and Festival Hall. Repurpose the remaining 75% as a public open space/wildlife area (subject the agreement of the existing allotment holders and suitable relocation of the affected allotments). <p>Note: options 2 & 3 are subject to evaluation of costs, legal consideration and identification of suitable sites.</p>	<p>This Policy will be deleted from the NDP following consideration of the large number of objections from residents and allotment holders.</p>	

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		<p>Which of the above options would you favour?</p> <p>3.39 Story Homes are concerned that the Heyes Lane site may not be suitable for the provision of additional parking facilities. It is not clear whether it would be possible to deliver a car park on the Allotments at Heyes Lane as it is understood that there is a restrictive covenant on the land against non-recreation use of the existing allotments. It may therefore be the case that the Heyes Lane allotments are only suitable for allotment use and cannot be used for car parking purposes.</p>		
1.38	All / General	<p>27. Do you support the Neighbourhood Development Plan overall?</p> <p>3.40 Story Homes generally support the emerging Neighbourhood Plan, but for the reasons set out in these representations we have some concerns with the current content and policy within the document.</p> <p>3.41 We would encourage the NPG to support the allocation and safeguarding of the Ryleys Farm site in the SADPD,</p>	<p>Noted.</p> <p>The Steering Group / Parish Council will be responding to the SADPD consultations as the Plan moves through the process. The NDP will be amended to reflect the proposals in the most up to date version at all stages of the Plan's preparation.</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		including the potential enlargement of the allocated site as suggested in these representations, as this would provide a significant number of benefits to the local community, including the provision of more affordable housing and the opportunity to provide a greater variety of dwelling types to help meet the needs of the community. There is also the wider opportunity to deliver a more comprehensive and sustainable development that could provide some of the benefits that the NPG is seeking in Alderley Edge.		
		Appendices - see pdfs of developer responses.		
Turley on behalf of David Wilson Homes North West 2.1	All	ALDERLEY EDGE NEIGHBOURHOOD DEVELOPMENT PLAN - FIRST DRAFT FOR CONSULTATION Introduction We are pleased to provide comments on behalf of David Wilson Homes North West (hereafter referred to as 'DWH') in relation to the First Draft Alderley Edge Neighbourhood Development Plan ('AENDP') which has been published for a	Noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>period of public consultation until 12 September 2019.</p> <p>This follows previous representations which were made to the AENDP Emerging Policies Document in October 2018.</p> <p>DWH is part of Barratt Developments PLC, the UK's largest housebuilder, and has a track record of working with local communities to deliver high quality developments which benefit those living and working in the area in which they are provided. In 2017 DWH delivered 572 new homes in the North West, meeting local and general housing needs, providing around 1,600 direct and indirect jobs and almost £100m increase in Gross Value Added (GVA) throughout the region.</p> <p>An infographic summarising the north-west socio-economic footprint of DWH is enclosed at Enclosure 1.</p>		
2.2	N/A	DWH is currently building houses at a number of sites in the borough including	Noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>Bollin Park and Stanneylands in Wilmslow. Both of those sites comprise a range of attractive and spacious new family homes, including affordable dwellings, but also provide additional facilities which address a range of outstanding issues in the local community.</p> <p>At Stanneylands, the development includes the construction of a new bridge over the Rive Dean for use by cyclists and pedestrians, as well as a large area of public open space, well in excess of policy requirements. The development at Bollin Park has contributed over £500,000 to improve the local park and play facilities at Browns Lane. The masterplan for improvements to the park was unveiled last year and includes the introduction of a multiuse games area, play equipment for all ages, a shared cycle and foot path, enhanced pond and drainage system, timber seating, new fencing and landscape planting.</p>		
2.3	SADPD - Non allocated site at	In Alderley Edge, the BDW proposals include the construction of a car park to be gifted to the Parish Council and	Noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
	Whitehall Meadow	<p>which is aimed at addressing a major local shortfall. Further detail is provided within these representations.</p> <p>DWH is the promoter of 'Whitehall Meadow', a high quality residential development opportunity at Wilmslow Road, Alderley Edge ('the Site'). A Vision document is provided at Enclosure 2 which identifies how sustainable development can be achieved on the site, making an important contribution towards meeting the specific housing needs for Alderley Edge and the Borough's overall housing requirement.</p> <p>DWH welcome the opportunity to comment on the draft policies within the emerging AENDP, as follows.</p>	<p>The Whitehall Meadow site has not been included in the most up to version of the SADPD. The NDP will not be identifying site allocations and the PC intends to leave such matters to CEC.</p> <p>Whilst parking is a significant issue in Alderley Edge, the NDP proposes a range of measures to help improve provision and to support travel by means other than the private car. The provision of a car park would not in itself be a sufficient reason for a site allocation for new housing.</p> <p>These are largely matters for CEC and will be addressed through the SADPD.</p>	
2.4	Vision and Objectives	<p>Vision and Objectives</p> <p>DWH broadly support the AENP vision: "To promote the evolution and growth of Alderley Edge, whilst preserving our unique village culture, identity and character and</p>	Support noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>protecting the quality of life and well-being of the residents, employers, employees, and other stakeholders.”</p> <p>It is positive that there are several objectives which seek to address the specific elements of the overarching vision; two of which are particularly supported by DWH which seek to support new housing development that will meet local needs and support a balanced community (Housing Objective), as well as aspiring to address local parking constraints (Access and Infrastructure Objective).</p> <p>DWH is able to contribute towards Alderley Edge achieving its overall vision, through the promotion of land at Whitehall Meadow which will be able to provide new homes immediately, and delivery of an area of public parking at the southern end of the site, accessed from Wilmslow Road.</p>		
2.5	AE1	<p>Section 5: Overarching Approach to Development</p> <p>Draft Policy AE1: Alderley Edge Development Strategy</p>	<p>Noted.</p> <p>The PC has made the decision that site allocations will be made through the SADPD and the NDP</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>In order to meet the specific development needs and to support sustainable growth of Alderley Edge, additional land is required around the settlement and as such Green Belt release is needed, as has been identified within the emerging Cheshire East Council ('CEC') Publication Draft Site Allocations and Development Policies Document ('SADPD') (2019).</p> <p>The emerging neighbourhood plan presents an opportunity to the local community to shape the development and growth of their local area. The Planning Practice Guidance (PPG) seeks to establish the benefits of the neighbourhood planning and states</p> <p>1: "Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that</p>	<p>will provide a supportive and more detailed planning policy framework to guide decision making. The policies have been prepared through a thorough and extensive approach to community consultation and engagement and reflect local peoples' concerns and priorities. The recent responses to the informal public consultation demonstrate a high level of public support for almost all policies.</p> <p>It is accepted that the emerging First Draft NDP refers to the previous version of the SADPD and amendments will be made to the Draft NDP to refer to the most up to date version. As the NDP moves through the process, it will be kept up to date where possible, referring to the most up to date version of DPDs.</p>	

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>vision or grant planning permission for the development they want to see.”</p> <p>The PPG also seeks to define the role of neighbourhood planning and states2: “Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community’s needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.” (emphasis added) However, Paragraph 5.13 of the AENDP establishes that the neighbourhood plan will not identify new housing sites</p>	<p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p>	

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>and that the SADPD process will determine the strategic sites, and any changes to the Green Belt boundary.</p> <p>DWH are of the view that this represents a missed opportunity for the AENDP Steering Group to take control of development within the parish and shape development in the way envisaged by the PPG.</p> <p>The current development strategy is also appears flawed given that the CEC SADPD has not yet been adopted and as such is susceptible to change. Consequently, the First Draft AENDP refers to a version of the SADPD that has been superseded and there are discrepancies between the considerations of land.</p> <p>Later sections of this letter will consider the inconsistencies between the AENDP and the Publication Draft SADPD (2019) (specifically in relation to housing and key views) and the following subsection will set out DWH's recommendation to the AENDP Steering Group for an alternative development strategy.</p>		

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>In accordance with national guidance, the allocation of land within the AENDP should reflect the community's preferred locations for growth within the local area, one of which is Whitehall Meadow, as identified following the Questionnaire in 2017.</p>		
2.6	SADPD / Site Allocations	<p>Alternative Development Strategy</p> <p>As set out within DWH's response to the First Draft SADPD (October 2018) (Enclosure 3) DWH disagree with the proposed spatial distribution of housing across the Local Service Centres (LSCs) within the borough, as proposed by CEC within the SADPD.</p> <p>Despite assessing various options for the spatial distribution of housing, CEC concluded that preferred Option 7, which is for a Hybrid approach that combines a blend of the other options, is to be selected. For Alderley Edge this results in a requirement to accommodate 250 dwellings.</p>	<p>Not accepted.</p> <p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p> <p>The development strategy in AE1 should not be amended to include site allocations and a site not even included in the Publication Draft SADPD.</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>DWH has previously set out that Option 7 would result in a highly unbalanced distribution between the northern and southern settlements of the Borough.</p> <p>This is clearly articulated within the Council's own evidence base which states that the option encourages the majority of development to be accommodated within the south of the Borough (63.4%), with just 36.6% of the overall dwelling requirement being apportioned to the north of the Borough (including Alderley Edge)⁵. The development strategy of the AENDP should therefore seek to re-balance the significant imbalance that already exists within the LSCs and aspire to achieve sustainable patterns of growth, supporting the vitality and vibrancy of the northern communities. This would be best achieved through the allocation of additional land within the AENDP, recognising the sustainability of the settlement, as summarised within Enclosure 4.</p>		

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		Draft Policy AE1 should therefore be amended so that it allocates the most sustainable and suitable sites for development, including Whitehall Meadow. This approach would reflect one of the community's preferred locations for growth within the local area, and provide a balanced mix of new homes to respond to local needs, including the provision of affordable homes.		
2.7		<p>Section 6: Housing</p> <p>As set out above, DWH do not support the proposed development strategy within the AENDP given that it currently relates to a superseded version of the CEC SADPD. As such, paragraph 6.13 and Map 3 'Proposed Housing Sites, SADPD August 2018' of the AENDP do not reflect the current site allocations within Alderley Edge. In particular, the AENDP does not consider the Land north of Beech Road which is the subject of a draft allocation for around 35 new homes within the Publication Draft of the SADPD.</p>	<p>Noted.</p> <p>Refer to 1.4 above.</p> <p>This was a timing issue. The First Draft NDP was prepared and published prior to the publication of the Publication Draft SADPD. It will be amended to refer to the most up to date draft prior to the Reg 14 consultation.</p> <p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p>	No further changes.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>DWH will provide a separate response to the Publication Draft SADPD, which has been published for consultation until 30 September 2019. However, the Steering Group for the AENDP should be aware that the assumptions used by CEC in applying the site selection methodology for allocating sites within the SADPD is currently unsound and as such this should not form the development strategy for the AENDP.</p> <p>For instance, DWH is able to demonstrate that the Alderley Edge Settlement Report⁶ details how the Green Belt contribution that certain sites make to the Green Belt have been re-assessed and re-evaluated in an inconsistent manner. This has directly impacted on the sifting of sites in stage 1 of the site selection methodology and the removal of sites from further assessment. This has resulted in potential development sites such as the land at Whitehall Meadow not being fully assessed for allocation within the SADPD.</p>		

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		Based on a review of the evidence base for the SADPD, it is clear that the AENDP should undertake its own assessment of sites for allocations, acknowledging the preferred sites that were identified by the local community, including the land at Whitehall Meadow.		
2.8	AE2	<p>Draft Policy AE2: Location, Design, Scale and Type of New Housing</p> <p>DWH is generally supportive of providing a range and choice of homes to meet the needs of the local area given there is a recognised need for smaller houses, bungalows, and opportunities for existing residents to downsize.</p> <p>Specifically, the availability of affordable housing is extremely limited within Alderley Edge which presents a severe barrier to the aim of retaining and attracting young people and families to the settlement to support the local economy, facilities and services.</p>	<p>General support noted.</p> <p>Policy AE2 4A is supported by an up to date Housing Needs Assessment but will be amended to provide a greater degree of flexibility - see Table 1.</p>	No further change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>DWH also recognise that the population in Alderley Edge is ageing and without suitable new housing stock to retain and attract young new families, the average age of the population will consequently continue to rise and the proportion of working age people will decline further.</p> <p>The Draft Policy could be improved to ensure it provides a more flexible approach, specifically, Point 4 of the Draft Policy should acknowledge that local needs will vary across each site within Alderley Edge and as such prescriptive requirements should not be provided which may stall the delivery of development. It is therefore suggested that Point 4 of Draft Policy AE2 is reworded as follows: "4. Type A. Development must contribute towards a mix of house types, sizes and tenures and meets local housing needs as identified in the most up to date local housing needs assessment. Schemes should make provision for consider the recommended split of dwellings by bedroom number as follows..."</p>		

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>In accordance with the general principles of Draft Policy AE2, the proposed development at Whitehall Meadow will seek to accommodate a broad housing mix, to meet the local needs, providing affordable homes and in particular an increased proportion of bungalows and smaller properties which will provide opportunities for existing residents to downsize.</p>		
2.9	AE3	<p>Draft Policy AE3: Sustainable Housing Design</p> <p>DWH generally support the principle of Draft Policy AE3 which will ensure that new housing developments will demonstrate best practice in terms of sustainable design.</p> <p>However, DWH is concerned that Point 9 within Draft Policy AE3 does not accord with any guidance established within the National Planning Policy Framework (2019). It is therefore suggested that Point 9 is removed from Draft Policy AE3 which currently requires major housing</p>	<p>General support noted.</p> <p>Refer to 1.24 above.</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>developments on land that was formerly Green Belt to achieve a reduction in energy use compared to standard new build construction.</p> <p>The requirement for developments on land that was formerly Green Belt to incorporate additional eco-design measures is unjustified, contrary to national policies and as such the current draft of the AENDP would not meet the basic conditions which are required to be satisfied in order for the neighbourhood plan to proceed to referendum.</p>		
2.10	AE9	<p>Section 8: Character and Landscape Draft Policy AE9: Landscape Character and Access</p> <p>DWH acknowledge the importance of protecting landscape character and access within Alderley Edge. As such, supporting evidence has been collated to demonstrate that the landscape and visual effects of residential development at Whitehall Meadow would be limited and acceptable.</p>	<p>Noted.</p> <p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>Specifically, the enclosed Vision Document identifies how the site is contiguous with the existing urban area and is enclosed by mature landscaping and existing roads. The development of Whitehall Meadow would 'round off' the settlement and not result in any coalescence between Alderley Edge and Wilmslow to the north. As such, the scale of the development represents a logical and controlled expansion of the existing settlement that will not harm its character or urban form. Specifically, through the adoption of suitable landscaping, new development can create a 'softer edge' to the north of Alderley Edge, providing an appropriate transition from the wider rural area to the built form of the settlement.</p>		
2.11	AE13	<p>Draft Policy AE13: Key Views and Townscape</p> <p>There are a number of key views within and surrounding Alderley Edge, all of which DWH acknowledge will need to be</p>	<p>Noted.</p> <p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>considered when identifying future development opportunities.</p> <p>As identified in Section 8.38 and Map 9 'Key Views', the AENDP considers there to be 13 Key Views within the neighbourhood plan boundary area, one of which (Key View 1) relates to the land allocated by CEC for development within the Publication Draft of the SADPD (2019) (Site Ref. CFS130b 'Land north of Beech Road).</p> <p>Draft Policy AE13 considers that the identified Key Views make an important contribution towards local visual amenity and Alderley Edge's townscape, setting and character. As such, DWH recommend that the AENDP seeks to allocate its own development sites, and not to rely on allocations within the Cheshire East SADPD, given that it seeks to allocate land within an area that the local community recognise as 'an open view onto the rural landscape'.</p>		

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>Notwithstanding, Whitehall Meadow is considered to be 'the village 'edge' seen when approaching Alderley Edge' (Key View 7). However the Vision Document successfully demonstrates how this characteristic of the site can be retained to the north of the proposed development, following the provision of additional planting to create a soft edge to the north of the settlement.</p>		
2.12	AE16 AE17	<p>Section 9: Access and Infrastructure</p> <p>Draft Policy AE16: Supporting the Provision of Additional Parking at the Park on Ryleys Lane to Improve Car Parking Facilities in Alderley Edge</p> <p>Draft Policy AE17: Car Parking Paragraph 9.27 of the AENDP states that public consultation responses have shown that a shortage of public car parking spaces in and around the village centre, and specifically at the station, are one of the most important, if not the most important, issue for local residents and local businesses.</p>	<p>Noted.</p> <p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p> <p>The NDP addresses accessibility, travel and car parking through a range of policy measures and proposals. The Steering Group notes the proposed provision of a car park as part of a housing site allocation as part of measures to ease parking pressure in the village centre but this would not be sufficient a reason to support</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>DWH is able to contribute towards the village’s aspiration for an overarching strategy to alleviate the issue of parking within Alderley Edge, through the allocation of land at Whitehall Meadow. The provision of a 50-space public car park at the southern end of the Site would help meet the village’s current and future all day parking requirements, and provide a long term economic benefit to the community, as has previously been supported by the Parish Council.</p> <p>The social and economic benefits of additional parking within Alderley Edge are also of particular importance to CEC, whereby it is acknowledged: “...that the availability of car parking in the village can be an issue with competing needs of residents, workers and shoppers. Alderley Edge Parish Council has carried out a car parking review and is seeking to provide additional capacity and to manage existing provision through a car parking strategy.”</p>	<p>a site allocation for new housing in the Green Belt.</p>	

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>Despite the AENDP seeking to allocate land for additional parking at the Park on Ryleys Lane and part of the Heyes Lane allotment site, DWH encourage the AENDP Steering Group to acknowledge the significance of the car parking issue within the village and seek to identify additional suitable land. A suitable site has been identified at Whitehall Meadow, for the provision of a 50-space publically accessible car park, to be managed by the Parish Council. The adoption of such a Policy would address existing issues within the village, in accordance with what the local community has identified as something that needs to change for the future. Ultimately, the proposed parking spaces at Whitehall Meadow will complement the operation of car parking in both the town centre and the Railway Station, alleviating any impact upon local businesses and the village centre, as in accordance with Draft Policy AE17.</p>		
2.13	All	Summary	<p>Noted. See detailed responses above.</p>	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>This letter has been prepared on behalf of David Wilson Homes North West and has set out DWH's general support and concerns in relation to the Draft Policies of the emerging Alderley Edge Neighbourhood Development Plan. Several recommendations have been identified for where the document could be amended to ensure that the AENDP is in accordance with national planning policy and responds to the local issues for Alderley Edge appropriately. Acting on the following key recommendations would present major benefits for the AENDP, and the village as a whole:</p> <ul style="list-style-type: none"> • The AENDP Steering Group (including the local community) must take back control of the proposed housing allocations for the local area, as Government guidance in the PPG allows for, and which was the original intention; and • The AENDP Steering Group should accept the opportunity to deliver much needed additional car parking provision, for which 		

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>there is an identified need, by allocating the site at Whitehall Meadow.</p> <p>We trust you find these representations useful and DWH welcome the opportunity to liaise further with the neighbourhood plan Steering Group to further discuss the contents of this letter and the forward strategy for the land at Wilmslow Road, Alderley Edge.</p> <p>In the meantime, please do not hesitate to contact either X or myself should you have any further queries. Yours sincerely</p>		
		Appendices - see pdfs of developer responses.		
The Emerson Group 3.1	All / General	RE: ALDERLEY EDGE DEVELOPMENT PLAN - 2019-2030- FIRST DRAFT PLAN I write on behalf of Orbit, the commercial arm of the Emerson Group, in response to the to the current consultation exercise	Noted.	No change.

Organisation Name and reference No.	NDP Page / Paragraph / Vision / Objective / Policy Reference	Comments	Steering group and Subgroup Consideration	Agreed Changes to the NDP
		<p>being undertaken in relation to the above draft of the Neighbourhood Plan.</p> <p>Orbit (and The Emerson Group) have their Head office located on Heyes Lane in Alderley Edge and have either built, concerted or own buildings throughout the village ,examples being Festival Hall, the Library, Bridgford House, Queens Court and Cottage Lawns to name but a few.</p> <p>We have the following comments to make:</p>		
3.2	Vision and Objectives	<p>1. In terms of the vision and objectives, we support the Local Economy Objective to deliver a strong, competitive in the village and that maximises the strength and existing assets of the village and supports start-ups, small and independent businesses, providing the right conditions to grow. However, it should also support the existing larger businesses who play an important role in the village and very much help sustain local services / facilities.</p>	<p>Support noted.</p> <p>The local economy objective should clarify the important role and support for existing larger as well as small businesses. The NDP would like to ensure that, whilst recognising the role of larger businesses in supporting the local economy, inappropriate growth of larger businesses is restricted within the constraints of what is a local service centre. This would also acknowledge residents' comments on</p>	<p>AMEND NDP</p> <p>Review Local Economy Objective.</p> <p>Amend wording to read: " To deliver a strong, competitive economy that maximises the strength and role of existing larger businesses in the village and especially supports start-ups, small and independent businesses, providing the right conditions to grow.</p>

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			encouraging smaller, independent and specialist businesses.	
3.3	AE6	<p>2. Draft Policy AE6 —</p> <p>We very much support the notion of a policy which seeks to support existing businesses. However, the draft policy proposed appears too restrictive. For a policy entitled 'supporting existing businesses' it actually appears to restrict them by listed criteria that needs to be met to meet support. Some of these elements are far too wide ranging. For example prioritising expansion in a village centre location is not necessary (many parts of the village constitute sustainable locations), resolving access issues presumes there are some to resolve, and it may not be possible to meet parking and access standards - which should be flexible based on specific circumstances and locations (numerous buildings being within easy walking distance of the train station and London Road).</p>	<p>Noted.</p> <p>This point is referring to NPP guidelines on a town centre first approach to development and prioritising the village centre as the most sustainable location.</p> <p>The NDP does not want to weaken what are clearly issues for many residents when businesses expand or develop.</p> <p>Parking standards will be required in line with CEC adopted standards.</p>	<p>AMEND NDP</p> <p>Amend AE6 Criterion 2: "2. Proposals prioritise a village centre location for those businesses occupying dedicated business premises, to help ensure long term sustainability. and to protect the amenity of residents in surrounding existing residential areas</p> <p>Insert new 3. And renumber others: <u>"Suitable measures are taken to protect the amenity of residents in surrounding areas."</u></p> <p>Amend AE6 former Criterion 3 / new 4 to: "Proposals deliver high quality design, resolve any access issues, and provide suitable adequate</p>

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				service management plans (including screening of commercial waste contained within business curtilages, deliveries and parking)."
3.4	AE13	3. Draft Policy AE 13 — There is a lack of detail in relation to this draft policy and views of this nature are not protected in national policy. The policy should be deleted.	Not accepted. See Table 1 CEC comments. The Key Views referred to in the NDP are identified and evidenced in the Design Codes.	No change.
3.5	AE15	4. Draft Policy AE15 800m is far too limiting. A more sensible distance would be 1,600m.	Not accepted. The 800m / 10 minutes' walk standard is good practice and taken from Manual for Streets as explained in para 9.24. Most areas within Alderley Edge are within 10 minutes' walk of the station, bus stops and local facilities and the NDP aims to maintain a sustainable development pattern.	No change.

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3.6	AE16	5. Draft Policy AE 16 — We support the provision of additional parking at the existing park at Ryley's Lane, but question whether any replacement land needs to be provided elsewhere, as we do not believe the land required is currently utilised and its re-use as car parking would not undermine the recreational value of the park or materially compromise its facilities.	<p>Not accepted.</p> <p>Re-provision of recreational facilities and open space generally would be required by CEC planning policies - See Policy SC 2 in the Local Plan Strategy. This sets out that the Council will <i>" the council will:</i></p> <p><i>1. Protect existing indoor and outdoor sports facilities, unless:</i></p> <p><i>Either:</i></p> <p><i>i. They are proven to be surplus to need(47); or</i></p> <p><i>ii. Improved alternative provision(48) will be created in a location well related to the functional requirements of the relocated use and its existing and future users.</i></p> <p><i>And in all cases:</i></p> <p><i>iii. The proposal would not result in the loss of an area important for its amenity or contribution to the character of the area in general."</i></p>	No change.

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3.7	AE17	6. Draft Policy AE17 — It may not be possible for new commercial proposals to provide additional parking / parking to the general Cheshire East standard - it will vary from site to site depending on the sustainability of the location and site characteristics. It doesn't seem appropriate to require payments towards electric vehicle charging points elsewhere in the village when new development will no doubt need to also provide such facilities on site as a planning requirement. It is not always appropriate to allow access to private car parks to the general public outside of office hours — this brings security and insurance risks.	Not accepted. Parking and supporting sustainable transport alternatives are a priority for the NDP and it is appropriate to propose a range of measures in planning policies including encouraging developers to support EVC points and provide more flexible use of car parks when appropriate.	No change.
3.8	AE18	7. Draft Policy AE 18 — Whilst improvements to the Station Gateway are welcomed, any changes made should be entirely respectful of Bridgford House, which immediately abuts the existing car park.	Noted. Detailed matters such as impacts on neighbouring occupiers would be considered as part of the development management process as and when schemes come forward.	No change.
3.9	AE21	8. Draft Policy AE21 — We support additional parking proposals at the Heyes Lane allotments.	Noted.	No change.

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			Objections were submitted to this policy from allotment holders and nearby residents and it is proposed to delete AE21 from the Draft Plan.	
3.10	All / general	I trust these comments are helpful, and will be taken into account in the preparation of the next version of the Neighbourhood Plan. Yours faithfully	Noted.	No change.
Avison Young	All / general	Dear Sir / Madam,	Noted.	No change.

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<p>On behalf of Sims Family</p> <p>4.1</p>		<p>Alderley Edge Neighbourhood Plan – Response to the Statutory Consultation Regulation 14 of the Neighbourhood Planning (General) Regulations 2012</p> <p>We act on behalf of Mr and Mrs Sims (the family) and are responding to the opportunity to submit representations to the emerging policies of the Alderley Edge Neighbourhood Plan as set out within the Regulation 14 Consultation Draft.</p> <p>These comments are submitted in relation to Mr and Mrs Sims land holding ‘Land to the North of Beech Road’ and supplement our comments which were submitted in March 2019 as part of the previous round of consultation (attached for your reference) which was undertaken in November 2018.</p> <p>We thank you for this opportunity to provide comments on this next stage of the plan and complement the Neighbourhood Group on the clear presentation of this version of the Neighbourhood Plan.</p>		
4.2	SADPD	Background to the Site	Noted.	No change.

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	Site Allocation ALD4	<p>The family are the owners of land to the north of Alderley Edge and have been promoting 'Land to the North of Beech Road' for a number of years through both the Cheshire East Local Plan Strategy (CELPS) and the emerging Site Allocations and Development Policies Document (SADPD).</p> <p>The site is located immediately adjacent to the settlement boundary of Alderley Edge and extends to approximately 2.9 hectares. The land, which is currently identified as Green Belt, is in agricultural use, lying immediately to the north of Beech Close, Beech Road and Fairbourne Avenue. It is relatively devoid of features aside from a belt of trees.</p> <p>The site is extremely well related to established residential development and is bound to the west by the mainline railway. It is in a very sustainable location, within walking distance of Alderley Edge Town Centre which offers a variety of facilities and services. A parade of shops is located within 100 metres of the site which</p>	Site allocations are largely matters for CEC and will be addressed through the SADPD.	

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		<p>includes a general store, takeaway, laundrette and a news agent.</p> <p>The following sets out Mr and Mrs Sims' position in respect of this version of the Neighbourhood Plan and provides commentary on the policies and allocations within the Plan. We would note that there are a number of policies which are not applicable to the family's land holding and therefore this letter remains silent to these matters.</p>		
4.3	Vision and objectives	<p>Vision and Objectives</p> <p>It is noted that the Visions for Alderley Edge remain the same from the previous round of consultation. As set out in the previous representations, the family firmly support the Visions for Alderley Edge, believing it to be of utmost importance that whilst growth and evolution is required, it should not be at the expense of all that is good about the village.</p>	Support noted.	No change.
4.4	AE1	Overarching Approach to Development	Noted.	No change.

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		<p>The most recent version of the National Planning Policy Framework (NPPF) was published in February 2019 and states that neighbourhood Plans are required to be tested through an independent examination before proceeding to referendum. Paragraph 29 of the NPPF states:</p> <p>“Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies1”.</p> <p>The current allocations proposed by the Neighbourhood Plan show ‘Land to the North of Beech Road’ as being located within the Green Belt. It should be noted that as part of the emerging Cheshire East Local Plan Strategy: Site Allocations and Development Management Policies (SADMPD), the site is proposed to be removed from the Green Belt and allocated for around 35 new homes as site ALD4: Land North of Beech Road. Green Belt release has been justified by the Council in the Local Plan Strategy as there</p>	<p>Site allocations are largely matters for CEC and will be addressed through the SADPD.</p>	

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		<p>is insufficient land within the urban area of Cheshire East, particularly in the north of the borough, to meet future housing requirements.</p> <p>The Sims' family believe that there are no better alternative sites that exist in Alderley Edge which would make a positive contribution to the market and affordable housing requirements. A review of the site's performance and suitability for Green Belt release is summarised below in relation to the five purposes as set out in the NPPF.</p> <p>To Check Unrestricted Sprawl</p> <p>The land is extremely well related to the existing development to the south and is bounded to the west by allotments and the West Coast Main line. The eastern and northern boundaries are defined by vegetation and Whitehall Brook.</p> <p>The development of the site would not bring development any closer to Wilmslow than existing development. Furthermore, the railway line and A34 are extremely</p>		

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		<p>prevalent man-made boundaries which will maintain a strong sense of separation.</p> <p>No aspect of the proposed development could be described as sprawl, rather it is contained and entirely logical.</p> <p>To Prevent Neighbourhood Towns Merging</p> <p>There are no immediately adjacent neighbouring towns lying to any boundary of the site. The closest town is Wilmslow to the north of the site however, significant additional land lies between the proposed site and Wilmslow, as well as strong, defensible boundaries.</p> <p>To Safeguard the Countryside</p> <p>The site is very well related to the existing residential development and other built form such as the railway to the west. The land is adjacent to extensive areas of countryside and it is considered there is no need to safeguard this land as countryside, given the benefits of developing this site</p>		

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		<p>will outweigh any impacts of retaining it in its current form.</p> <p>To Preserve the Setting and Special Character of a Historic Town</p> <p>There are no statutory or non-statutory designated heritage assets within the boundary of the site and the surrounding urban area of Alderley Edge is not considered an historic town. The removal of the site from the Green Belt would therefore not contravene the purpose of preserving the setting and character of Alderley Edge.</p> <p>To Assist in Urban Regeneration</p> <p>There are very few brownfield sites available for redevelopment to accommodate the future housing requirements of this borough. It is clear from the Local Plan Part Two that changes to the Green Belt boundaries will be necessary to accommodate development over the next two decades. As such, the removal of the site from the Green Belt</p>		

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		<p>would not conflict with this purpose of assisting in urban regeneration. Given that the two documents are progressing concurrently, we would request that the sites allocation is amended in the Neighbourhood Plan to accord with the emerging SADMPD to reflect the Council's proposed allocation.</p>		
4.5	AE2	<p>Draft Policy AE2: Location, Design, Scale and Type of New Housing</p> <p>The family acknowledges the importance of delivering high quality development that protects the existing quality of the village and therefore supports this policy. The policy also recommends a split of dwellings and whilst the principle of this is welcomed, the policy should be flexible enough to allow developers to adequately respond to market signals and local need which are likely to change over the Plan period.</p>	<p>Noted.</p> <p>The Policy will be amended to provide a greater degree of flexibility - see 1.18 above.</p> <p>Following an informal meeting with a representative from Story Homes the Steering Group agreed to amend the split in AE1 4A to provide a greater degree of flexibility - see Table 1. It is proposed to combine 15% 1 bedroom and 20% 2 bedroom to provide 35% 1-2 bedroom.</p>	No further change.
4.6	AE3	Draft Policy AE3: Sustainable Housing Design	Support noted.	No change.

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		<p>This policy is supported as the family consider it important that new development should be as sustainable as possible.</p>		
4.7	AE4	<p>Draft Policy AE7: Encouraging Visitor Support for Local Businesses</p> <p>The policy proposes that better links should be provided between visitor attractions. The family believes this is an important policy and believes that there is significant scope for Alderley Edge to draw additional footfall through the provision of sustainable links to, and through the village.</p>	Support noted.	No change.
4.8	AE9	<p>Draft Policy AE9: Landscape Character and Access</p> <p>This policy seeks to ensure that proposals do not erode the green gap between the built-up area of Alderley Edge and Wilmslow. Developments on the edge of settlements will be required to provide landscaping scheme to provide an appropriate transition between the wider rural area and the built form.</p>	Support noted.	No change.

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		<p>As stated in the previous representations, the family fully support this policy. The allocation of this land would not bring development closer to Wilmslow than existing and that a very significant buffer, owned by the family, would remain.</p> <p>The site can also satisfy this requirement of the policy to not only maintain but actually improve public access to the countryside. One of the unique benefits of this site is its ability, courtesy of the extensive land to the north in the family's ownership, to provide sustainable, safe pedestrian and cycle links between Wilmslow and Alderley Edge. Extensive discussions have taken place with officers at the Council and these benefits are considered to be considerable, as there are currently no genuinely comparable links between the two settlements.</p> <p>The site is extremely well placed to meet the requirements of this policy.</p>		
4.9	AE13	Draft Policy AE13: Key Views and Townscape	Support noted.	No change.

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		<p>This policy seeks to preserve key views that make a contribution towards local visual amenity and Alderley Edge's townscape. The family supports this policy and believes that the allocation can be delivered in a way that the scale, height and layout of the development protects the key views.</p>		
4.10	AE14	<p>Draft Policy AE14: Sustainable Transport Routes</p> <p>The family supports the principle of the policy to establish a route of networks which extend beyond the boundary. As set out draft policy AE9, there is great scope to make significant improvements to achieve this policy on land owned by the family, which we consider cannot be matched by any alternative allocation.</p>	Support noted.	No change.
4.11	AE19	<p>Draft Policy AE19: Protecting and Enhancing Local Community Facilities</p> <p>The family supports the intention of the policy to resist the redevelopment of such facilities for non-community use unless they are no longer needed but suggests it should be expanded to allow for</p>	Support noted.	No change.

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		<p>redevelopment where suitable alternatives can be delivered. The family has promoted for some time the ability to provide allotments adjacent to the existing allotments on Land North of Beech Close. In the event that there was local consensus for existing allotments to need to relocate, then the family's land could accommodate this.</p>		
4.12	All	<p>Concluding Remarks</p> <p>Mr and Mrs Sims are grateful for the opportunity to make further comments on the emerging Alderley Edge Neighbourhood Plan. As you will see from this letter, there is broad support for the Plan's proposals, with the main suggested change the inclusion of Land to the North of Beech Road as a housing allocation to match that shown in the latest Site Allocations and Development Plan Document prepared by Cheshire East Council.</p> <p>We would be grateful if you would confirm receipt of these representations. Mr and Mrs Sims wish to maintain an ongoing</p>	Noted.	No change.

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		<p>dialogue with the group preparing the Plan, and is committed to an open dialogue to ensure its proposals for this site are of high quality.</p> <p>Yours sincerely</p>		
<p>Gladman Developments Ltd</p> <p>5.1</p>	<p>All / general</p>	<p>Re: Alderley Edge Neighbourhood Plan Submission (Reg 14) Consultation</p> <p>Dear Sir/Madam,</p> <p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Alderley Edge Neighbourhood Development Plan (AENP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation and examination of numerous plans across the country, it is from this experience that these representations are prepared.</p>	<p>Noted.</p>	<p>No change.</p>

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5.2	All	<p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in §8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the AENP must meet are as follows:</p> <p>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</p> <p>(d) The making of the order contributes to the achievement of sustainable development.</p> <p>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</p> <p>(g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the</p>	<p>Noted.</p> <p>The basic conditions statement will set out how the NDP meets the required basic conditions.</p> <p>The NDP has been prepared with the support of an independent planning consultant and with the involvement of planning officers from CEC.</p>	No change.

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		Conservation of Habitats and Species Regulations 2017.		
5.3	All / general	<p>Revised National Planning Policy Framework</p> <p>On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.</p> <p>§214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Clearly, submission of the AENP will occur after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National</p>	<p>Noted.</p> <p>The NDP has been prepared to be have regard to nation planning policies and guidance, including the most up to date version of the NPPF and PPG.</p>	No change.

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		Planning Policy Framework adopted in 2018 and corrected in February 2019.		
5.4	All / general	<p>National Planning Policy Framework and Planning Practice Guidance</p> <p>On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.</p> <p>The Revised Framework sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of</p>	<p>Noted.</p> <p>The NDP has been prepared to be have regard to nation planning policies and guidance, including the most up to date version of the NPPF and PPG.</p>	No change.

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		<p>neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that: "The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."</p> <p>Paragraph 14 further states that: "In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan</p>		

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		<p>is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:</p> <ul style="list-style-type: none"> a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made; b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement; c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five year supply requirement, including the appropriate buffer as set out in paragraph 73); and d. The local planning authority's housing delivery was at least 45% of that required over the previous three years." <p>The Revised Framework also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans</p> 		

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		<p>should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.</p> <p>In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can</p>		

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		come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.		
5.5	All / general	<p>Planning Practice Guidance</p> <p>Following the publication of the NPPF2018, the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.</p> <p>Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the</p>	<p>Noted.</p> <p>The NDP has been prepared to have regard to national planning policies and guidance, including the most up to date version of the NPPF and PPG.</p> <p>The NDP has been prepared to be in general conformity with the strategic policies set out in the Local Plan Strategy and also has regard to the reasoning and evidence supporting the SADPD.</p> <p>The NDP refers to the housing requirement in the SADPD and will be updated to refer to the recently published Publication Draft SADPD prior to the Reg 14 formal consultation.</p>	No change.

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		<p>neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan¹. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan. It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need</p>		

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		figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that; "A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlements will need to be supported by robust evidence of their appropriateness" ²		
5.6	SADPD / Site allocations	<p>Relationship to Local Plan</p> <p>To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.</p> <p>The Cheshire East Local Plan Strategy (CELPS) was adopted 27th July 2017 and sets out the strategic planning policy</p>	<p>Accepted.</p> <p>Refer to 1.4 above.</p> <p>The First Draft NDP was prepared and published prior to the publication of the Publication Draft SADPD. The NDP will be amended to refer to the most recent draft of the SADPD including any proposed site allocations.</p>	No further change.

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		<p>framework for the district until 2030. The CELPS is the first part of the new Local Plan to be adopted.</p> <p>The Council is currently consulting on the Publication Draft of its Site Allocations and Development Policies Document (SADPD) which will sit alongside the CELPS to which Gladman will submit detailed representations. The SADPD will allocate additional sites for development to ensure that the overall development requirements set out in the adopted CELPS are delivered in full.</p> <p>This version supersedes that used to inform the current consultation version of the AENP and, given that the SADPD has reached a more advanced stage detailing where new growth will be accommodated, the allocations noted on Map 3, page 26 in the AENP are already out-of-date. In that regard, Beech Road and Ryley's Farm have been added as allocations, whilst Horseshoe Lane has been removed as safeguarded land. This demonstrates why it is important that</p>		

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		<p>policies contained in the AENP allow for flexibility so that they are able to respond positively to changes in circumstance that may arise over the course of the plan period. This degree of flexibility is required to ensure that the AENP is capable of being effective over the duration of its plan period, so it is not ultimately superseded by the emerging SADPD as s38(5) of the Planning and Compulsory Purchase Act 2004 states that:</p> <p>“if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).”</p> <p>Gladman is concerned therefore that, given the changes required to the Green Belt, should the AENP proceed in its current form, the plan would not comply with basic condition (e) in its conformity with the strategic policies contained in the development plan, upon its adoption.</p>		

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5.7	All / General	<p>Alderley Edge Neighbourhood Development Plan</p> <p>This section highlights the key issue that Gladman would like to raise with regards to the content of the AENP as currently proposed. It is considered the requirements of national policy and guidance are not always reflected in the plan. Gladman have sought to recommend a modification to ensure compliance with basic conditions.</p>	Noted.	No change.
5.8	AE13	<p>Policy AE13 – Key Views and Townscape</p> <p>This policy identifies 13 short and long range views which the plan makers consider are important for the setting and character of Alderley Edge and goes onto state that development should consider and safeguard these views.</p> <p>Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. The evidence base to support the policy does</p>	<p>Not accepted.</p> <p>The views are identified and evidenced in the Design Codes document which is published as part of the evidence base for the NDP.</p> <p>The Policy was widely supported by local residents in the recent informal consultation on the First Draft Plan.</p>	No change.

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		<p>little to indicate why these views are important and why they should be protected, other than providing a view of the surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG3. Gladman consider that to be an important view that should be protected, it must have some form of additional quality that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.</p>		
5.9	All / general	<p>Conclusions Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy</p>	<p>Noted. See detailed responses above.</p>	<p>No change.</p>

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		<p>and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the AENP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic condition (d) the making of the order contributes to the achievement of sustainable development and is contrary to basic condition (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the reasons set out above. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team. Yours faithfully,</p>		
Jones Homes 6.1		RE: ALDERLEY EDGE NEIGHBOURHOOD PLAN - INFORMAL CONSULTATION (PREREGULATION 14).	Noted. It is likely that the examiner will also recommend changes to the	No change.

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		<p>Thank you for providing Jones Homes (North West) Limited with the opportunity to comment on the informal Alderley Edge Neighbourhood Plan.</p> <p>From its Head Office in Alderley Edge, Jones Homes, the residential arm of the Emerson Group, has become one of the largest privately-owned housebuilders in the country and has a longstanding history of housebuilding in the village. The Group employees over 200 staff from its Head Office which directly benefits the village, particularly, in terms of local expenditure in the village's shops and services.</p> <p>These representations are intended to assist the Neighbourhood Plan Steering Group in the preparation of the next stages of the plan process. Jones Homes has been involved in a number of Neighbourhood Plans in Cheshire East and the comments are based on our experience of the modifications made by examiners on other Neighbourhood Plans in the Borough. In this regard, the comments have been made to support the work of the</p>	<p>Alderley Edge NDP, including where he or she considers policies are repetitious. However on the whole the NDP does not seek to duplicate national or local planning policies but to provide a greater level of detail which can be applied to the Alderley Edge context.</p>	

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		<p>Neighbourhood Plan Steering Group and assist with making sure the basic conditions are met.</p> <p>The Draft Plan is very comprehensive and sets out in great detail how it has evolved through consultation with the local community, research and other work undertaken for the Steering Group.</p> <p>However, as a general point, there is some repetition with both national guidance and Cheshire East Local Plan Strategy (CELPS) policies. Whilst this is sometimes necessary to provide some context, there are instances where the repetition could be removed to help streamline the document and make it more user friendly. Indeed, the recent examiners reports on the Wilmslow and Poynton Neighbourhood Plans deleted policies that repeated those contained within the CELPS.</p> <p>Whilst we appreciate that the Steering Group's preference is for participants to respond via the online survey, we have chosen to respond individually to certain</p>		

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		<p>policies below. This is because we felt agreeing with some questions in the survey didn't necessarily translate to the wording of the draft policy.</p> <p>The National Planning Policy Framework makes it clear that Neighbourhood planning gives communities the power to develop a shared vision for their area. This is reiterated in the National Planning Practice Guidance which states that neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area.</p>		
6.2	AE1	<p>Draft Policy AE1 : Alderley Edge Development Strategy</p> <p>Jones Homes does not currently support the plan's draft overarching approach to development and is concerned that the proposed development strategy will not deliver the level of growth required in Alderley Edge as too much emphasis is placed on brownfield sites. The Urban Potential Assessment demonstrated that</p>	<p>Partially accepted.</p> <p>The NDP will not be including site allocations. These will be delivered through the SADPD. However the NDP does provide a supportive and more detailed planning policy framework to support any proposals coming forward through the SADPD and</p>	<p>It was agreed to amend AE1 criterion 1: Delete "existing defined built up area" and replace with "<u>settlement boundary</u>".</p>

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		<p>there were no brownfield sites in Alderley Edge that could be considered as potential sites for allocation in the emerging Site Allocations and Development Policies Document (SADPD). As a result, it was acknowledged that Green Belt sites would be required to meet the housing requirement for Alderley Edge. This needs to be factored into Draft Policy AE 1 to ensure that it meets the basic condition test of being in general conformity with the strategic policies contained within the development plan.</p> <p>For clarity and ease of use, point 1 should be amended to refer to the settlement boundary rather than the existing defined built up area.</p>	<p>to guide decisions about windfall development.</p> <p>Delete "existing defined built up area" and replace with "settlement boundary" to ensure greater consistency with the Local Plan Strategy.</p>	
6.3	AE1	Point 2 refers to brownfield sites or reuse of existing buildings. Jones Homes is concerned that the policy is seeking to introduce a sequential test of prioritising previously developed land for	<p>Not accepted.</p> <p>The Steering Group do not accept that criterion 2 should be deleted as a brownfield first approach is</p>	<p>AMEND NDP.</p> <p>Insert additional wording to paragraph 2 to refer to SADPD:</p>

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		<p>development before other land. This approach is not provided for in national guidance or in the strategic policies of the Local Plan and, therefore, this criterion should be deleted. Similar policies were deleted during the examination of the Wilmslow and Poynton Neighbourhood Plans.</p>	<p>in line with the need to promote efficient use of land as part of sustainable patterns of development. NPPF para 117 sets out that "<i>planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.</i></p> <p>Paragraph 118 goes on to say: "<i>planning policies and decisions should:</i> <i>c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities</i></p>	<p>Insert at the beginning of the paragraph: "In addition to any site allocations identified in the Cheshire East Council Site Allocations and Development Policies Document,...."</p>

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			<p><i>to remediate despoiled, degraded, derelict, contaminated or unstable land;</i></p> <p><i>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).</i></p> <p>The examiner will consider the wording for each NDP policy and is likely to recommend any modifications to improve clarity or to ensure the policy meets the basic conditions.</p> <p>Most of the new development in Alderley Edge will be provided through site allocations in the SADPD. This Policy seeks to compliment the SADPD by</p>	

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			<p>providing a policy framework for other development proposals that may come forward on windfall sites.</p> <p>It may be appropriate to refer to the proposed site allocations in the SADPD in the policy in order to align it more closely with the emerging new SADPD.</p> <p>Jones Homes appear to be concerned that the policy is seeking to introduce a sequential test of prioritising previously developed land for development before other land. This is not the intention of policy AE1, and after discussion with LK it was agreed to amend the wording to clarify that we regard the SADPD sites as a 'given' (imposed on the village from above, but not something the NDP can prevent, so not implying approval to them but acknowledging them)</p>	

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6.4	AE1	Point 3 refers to small to medium sized developments. There is no definition of what is meant by this and further guidance/clarity should be provided.	Accepted. The Glossary includes the NPPF definition of major development and a footnote should be inserted to improve clarity in relation to "small to medium sized developments".	It was agreed in response to this point to insert a footnote after "small to medium sized developments" to state: "Small to medium sized developments will be considered to comprise schemes which do not constitute major development in line with the NPPF definition, as provided in the NDP Glossary" .
6.5	AE2	Draft Policy AE2: Location, Design, Scale and Type of New Housing The Neighbourhood Plan should support a range of development to support the creation of mixed and balanced communities and not overly concentrate on any particular group. Jones Homes suggests that the policy is amended to delete 'Location' and refer instead to Design, Scale and Type of New Housing. This is because point I.A of Draft Policy AE2 is covered by Draft Policy AE 13	Accepted. Criterion 1 Location and sub criteria A and B are duplicated in other NDP Policies and could be deleted. Location is also covered more appropriately in AE1.	The point made is valid and so it was agreed to delete " Location " from the title of the policy. Also agreed to delete 1. A and B and renumber other criteria.

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		and point 1 .B is covered by Draft Policies AE 1 , AE3 and AE 14.		
6.6	AE3	<p>Criterion 2 refers to design and references the Cheshire East Borough Design Guide.</p> <p>This is a document intended for developments of 150 dwellings or more and is, therefore, unlikely to be applicable to any of the emerging CELPS allocations for Alderley Edge.</p>	<p>Not accepted.</p> <p>The Design Guide refers to neighbourhood plans in the Policy Backdrop section. It sets out: " Neighbourhood Plans <i>i 34 A number of communities have already, or are preparing Neighbourhood Plans. Some have already or intend to include specific design guidance for their village or town.</i> <i>i 35 Those design supplements should be read in conjunction with the Guidance presented here in the Cheshire East Design Guide to inform and shape new development proposals that respond positively and add to those places."</i></p> <p>The Design Guide does not set out that it is intended for schemes of at least 150 dwellings, however in paragraph iii 32 (p71)</p>	<p>No change.</p> <p>But check with CEC.</p>

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			<p>the document sets out that "<i>as a rule of thumb Cheshire East would require outline schemes of more than 150 dwellings to automatically require a supporting Design Code and also where a site forms part of a larger strategic allocation of more than 150 units.</i>"</p>	
6.7	AE2	<p>Criteria 3 and 4 lack the clarity necessary for effective development management and do not complement one another. Criterion 3 sets out a range of requirements including for plot density, height and massing to relate to adjoining residential areas and to protect and enhance the amenity of neighbouring residents.</p> <p>Criterion 4 requires development to contribute towards a mix of house types, sizes and tenures and meet local housing needs. It then sets out a highly prescriptive development mix with the vast majority forming 1, 2 and 3 bedroomed properties. However, if a scheme adjoins 4 and 5 bedroomed properties set in spacious</p>	<p>Criterion 3 - not accepted.</p> <p>This part of the policy is clearly worded and provides the flexibility often sought by examiners. It should be retained. The policy has been slightly amended - refer to 1.23 above.</p> <p>Criterion 4</p> <p>A - Partially accepted. See Table 1 and 1.18 above.</p> <p>B - Accepted - insert "new" before houses.</p>	<p>It was agreed that policy AE2 4B should have the insertion of "new" before houses</p>

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		<p>grounds, it will not be able to meet the requirements of 3 without contravening the requirements of 4 and vice versa.</p> <p>Furthermore, criterion 3 requires developments to enhance the amenity of neighbouring residents. It is unclear how new development will be expected to enhance the amenity of neighbouring residents or even if it can. Development management policies are in place to protect existing residential amenity. However, offering enhancement too introduces an overly onerous requirement and should therefore be deleted.</p> <p>With regards to the mix, Jones Homes considers that this is overly prescriptive and lacks flexibility to deal with changing market conditions. It is suggested the wording is amended to include ranges rather than being so precise. It should be noted that similar policies have been deleted from other local Neighbourhood Plans.</p> <p>Criterion 4.B seeks to resist the further provision of houses of 5 or more</p>		

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		bedrooms. Presumably this does not apply to proposals for replacement dwellings as there would be no further provision, however, this should be clarified in the policy. In addition, the Steering Group should consider how this policy sits alongside other policies. For example, Draft Policy AE 1 1 includes details about plot density and smaller dwellings could look out of place.		
6.8	AE2	In terms of affordable housing, the policy does not appreciate that CELPS Policy SC 6 allows for affordable housing to be permitted as an exception to other policies concerning the countryside, providing it is to meet locally identified affordable housing need. Therefore, affordable housing does not necessarily need to be provided for within the settlement boundary to comply with planning policy. Criterion 4.D relates to affordable housing and sets out that schemes of 10 houses or more will be required to provide a suitable proportion of affordable housing in line with CELPS Policy SC 5. CELPS Policy SC 5	Affordable housing - partially accepted - refer to Table 1 and 1.20 above.	No change.

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		<p>states that in developments of 11 or more dwellings in Local Service Centres at least 30% of all units are to be affordable.</p> <p>Therefore, this policy needs amending or deleting, as it repeats CELPS policy SC 5, to ensure that it meets the basic condition of being in general conformity with the strategic policies contained within the development plan for the area.</p> <p>In addition, Draft Policy AE2 seeks to remove the potential for a commuted sum to be paid by developers in lieu of the provision of affordable housing within the village. Whilst the preference should always be to provide affordable housing as part of a balanced scheme, Local Plan Policy SC 5 recognises that there may be exceptional circumstances where onsite delivery is not possible and allows for off-site provision or a financial contribution. Furthermore, national policy guidance does not seek to prevent financial contributions and, therefore, Draft Policy AE2 should be amended accordingly to reflect this and ensure that it is consistent with the development plan.</p>		

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6.9	AE3	<p>Draft Policy AE3: Sustainable Housing Design</p> <p>Whilst building to higher standards should be welcomed and encouraged, this policy could be introducing an overly onerous burden upon development. Other than a previous questionnaire highlighting that "eco-housing" was desired, there does not appear to be any justification or viability testing to ensure that the requirements of Draft Policy AE3 can be achieved.</p> <p>Criterion 1 sets out that developments on any future allocated green field site should include measures for building at lower densities. This is not sustainable as it is not using land efficiently. Paragraph 123 of the NPPF sets out that where there is a shortage of land for meeting identified housing needs, it is especially important that planning policies and decision makers avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. As well as wasting land, when combined with Draft Policy AE2, this could result in some</p>	<p>Not accepted.</p> <p>Refer to 1.24 above.</p>	No change.

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		<p>unintended consequences, such as small properties set in very large gardens. Criteria 4 to 7 are generally covered by existing Local Plan policy. The requirement to provide electric charging points at the rate of one per house may not always be feasible so sufficient flexibility should be built into this policy.</p> <p>Criterion 8 is very prescriptive and covers a number of matters that would usually be addressed through planning condition. Criterion 9 is considered to be overly onerous and should be deleted to avoid preventing development from coming forward.</p>		
6.10	AE4	<p>Draft Policy AE4: Rear Garden and Backland Development</p> <p>The wording of this policy seeks to restrict development opportunities when this type of site could provide a valuable source of housing land, particularly, when there is precious little brownfield land available in the village. This policy has the opportunity to make a valuable contribution to housing in Alderley Edge and the Steering Group</p>	<p>Not accepted.</p> <p>Back garden development is a significant issue in Alderley Edge and the number and scale of schemes have already had an adverse impact on the conservation area and contributed to the erosion of local character.</p>	No change.

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		<p>needs to make sure that it does not limit development opportunities. Without maximising the efficiency of these important, inherently sustainable windfall sites, it is likely that further Green Belt loss will be required in order to meet the housing needs of the village.</p> <p>It is considered that the policy is overly restrictive and too detailed to provide sufficient flexibility. Reference to openness in the policy should be removed as this is a green belt planning term and could lead to some confusion. There is no national planning guidance or local justification to maintain openness outside of the green belt.</p>	<p>The policy was supported by 87.10% of respondents and should be retained in the NDP.</p>	
6.11	AE9	<p>Draft Policy AE9: Landscape Character and Access</p> <p>With regards to the objective of protecting the green gap between the built-up area of Alderley Edge and the neighbouring town of Wilmslow, for clarity, it may be useful to identify the extend of the gap that the Steering Group wants to protect on one of the maps.</p>	<p>Partially accepted.</p> <p>It is not considered necessary to identify the "green gap" between Wilmslow and Alderley Edge as this is a Green Belt matter.</p> <p>Perhaps a better form of words would be "where feasible" for the final paragraph.</p>	<p>AMEND NDP</p> <p>Amend AE9:</p> <p>Insert "where feasible" after "public rights of way" in final paragraph.</p>

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		<p>The final paragraph should include the words 'where possible and necessary' as it may not always be feasible to link to a Public Right of Way or necessary to do so.</p>		
6.12	AE11	<p>Draft Policy AE11: Protecting and Enhancing the Conservation Area and adjacent areas</p> <p>The policy text appears to relate to development in the Conservation Area and therefore Jones Homes considers that 'and adjacent areas' should be deleted from the policy title.</p> <p>Draft Policy AE 12 deals with Local and Historic character and will provide a suitable means of controlling development in the adjacent areas.</p> <p>The policy is reasonably prescriptive about external materials, doors and windows which may conflict with Draft Policy AE3 which aims to encourage eco housing and Draft Policy AE 12 which supports contemporary designs of exceptional quality.</p>	<p>Not accepted.</p> <p>The policy seeks to protect adjacent areas, recognising that they contribute to the setting of the conservation area.</p> <p>The design policies have been drawn from the conservation area appraisal, and, here relevant Design Codes and are appropriately prescriptive.</p> <p>The policy was supported by 89.12% of respondents in the consultation on the First Draft Plan and should be retained.</p>	No change.

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		<p>The policy also deals with extensions and requires them to be secondary in character to the existing and for the materials and external joinery detailing to match those used in the original building. Providing a contrast between old and new can be a method of ensuring any extension is secondary in character and can often be a more desirable way of responding to heritage interests. It is recommended that the material requirement is deleted to provide flexibility and allow for innovative design.</p>		
6.13	AE12	<p>Draft Policy AE12: Local and Historic Character</p> <p>Draft Policy AE 12 seeks to safeguard the local and historic character and sets out a range of design considerations. Criterion 2.E sets out that only the highest level of design quality, which is in keeping with the overall traditional character of the village will be acceptable. Jones Homes considers that this is overly onerous and prescriptive and should be deleted to ensure that the policy meets the basic conditions.</p>	<p>Not accepted.</p> <p>Alderley Edge is characterised by many high quality buildings and has a distinctive local character. Developers should respond to the existing attractive context and seek to provide a high quality product in new housing schemes wherever possible.</p> <p>The policy was supported by 98.64% respondents in the recent consultation.</p>	No change.

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6.14	AE13	<p>Draft Policy AE13: Key Views and Townscape</p> <p>This policy aims to protect certain views deemed important to the local community. Whilst Jones Homes does not doubt the importance of some of these views, it is considered that the policy and accompanying map lack the detail necessary for effective development management. Furthermore, national guidance makes no provision for the protection of views of such widespread nature and, therefore, it is considered that the policy should be deleted.</p>	<p>Not accepted.</p> <p>Refer to Table 1 and 5.8 above.</p>	No change.
6.15	All	<p>Summary</p> <p>The Neighbourhood Plan Steering Group and volunteers should be commended for their efforts in producing a comprehensive document for the village. We trust that our comments will assist with the next stages and we look forward to our continuing involvement as the plan progresses.</p> <p>Yours sincerely,</p>	Noted.	No change.