



# Wilmslow Town Council

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## INDEPENDENT EXAMINATION OF THE WILMSLOW NEIGHBOURHOOD PLAN

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Dear Ms Burden

Thank you for your letter of 26 April 2019. Please find below and attached the response of the Qualifying Body to matters raised. Please do not hesitate to contact us for further clarification.

Question	Response	Evidence/key documents
1 In the submitted Basic Conditions Statement there appears to be some text missing from the second column in the table under 1a. Can that please be corrected by providing any missing text?	Please find amended document attached. Sentence has been completed.	Basic Conditions Statement RevA - attached
2 CEC has suggested, that the use of the term "strategic" in the WNP may cause confusion. To ensure that the distinction between the context for the Cheshire East Local Plan Strategy (CELPS) and that of the	The qualifying body (QB) is happy to change the name of the previously termed 'strategic policies' to 'local strategic policies' as per Cheshire East Council's (CEC) first suggestion.	

<p>Neighbourhood Plan is clear, which of the labels suggested by CEC would be preferred by the QB?</p>		
<p>3 Policy SP1: Can CEC and the QB please consider and provide their views on the following:</p> <p>3A - Is Policy SP1 intended to apply to all new development?</p>	<p>The policy applies to development of all types and sizes. The inclusion of 'where appropriate' through the policy is added to help the decision maker and applicant to decide when elements of the policy should be applied. However, if it is felt that amendments can be made to make this clearer, that would be welcomed by the QB.</p>	
<p>3B - In so far as the Policy would seek to require new development to exceed the national technical standards for housing, can the QB provide evidence to demonstrate that there is a need for this level of construction or performance in Wilmslow, and that the impact of such requirements on viability have been assessed?</p>	<p>The main evidence for this policy and its high standards comes from work undertaken by the UK Green Building Council and their document 'Driving sustainability in new homes: a resource for local authorities'. This document provides real world examples of how planning policy has considered the matters covered in this neighbourhood plan (NP) policy and looks at viability and deliverability of the tests. This is the document from which the NP has taken a lead.</p> <p>However, research has been published by the RTPI and TCPA, in addition to a recent article in the Planner which sets out specifically how neighbourhood plans can and should plan for climate change.</p> <p>Considerations of viability can only be made on a case by case basis and so it is the intention that the decision maker would factor in this element and request the appropriate evidence from the applicant.</p> <p>This is the group's intention and any recommendations from the Examiner on how this can be most effectively achieved are welcomed.</p>	<p>Rising to the Climate Crisis, TCPA, RTPI, 2018 – attached</p> <p>Why neighbourhood plans should tackle climate change, Daniel Stone MRTPI, The Planner, 7<sup>th</sup> May 2019 – attached</p> <p>More information is available from the Centre for Sustainable Energy on Neighbourhood Planning at: <a href="https://www.cse.org.uk/local-energy/neighbourhood-plans">https://www.cse.org.uk/local-energy/neighbourhood-plans</a></p>

<p>3C - To what extent does Policy SP1 repeat the provisions of policies in the CELPS?</p>	<p>It is considered that this policy complements but does not repeat the provisions within policies SD1, SE1, SE8 and SE9 of the Cheshire East Local Plan Strategy (CELPS), adding a level of detail specific to Wilmslow. The goals for carbon reduction are more ambitious than the CELPS, as encouraged by the publications referenced in the response above.</p>	<p>As above</p>
<p>4 Policy SP2: Can CEC and the QB please consider and provide their views on the following:</p> <p>4A - To what extent does Policy SP2 repeat the provisions of policies in the CELPS?</p>	<p>Relevant policies of the CELPS include SE5 (Trees, Hedgerows and Woodland) and SE6 (Green Infrastructure) but the policies are very broad and lack specificity. This is to be expected given that this covers the entirety of the Borough and at the time of publication very few studies beyond the strategic green corridors had been considered. The policies in the CELPS also are quite high-level in the way that they are written, allowing for a great deal of interpretation.</p> <p>The Wilmslow Neighbourhood Plan policy SP2 is much more targeted and direct. It takes on the aspirations for new development from these strategic policies and provide specific attributes that new developments should focus on. There is a very strong design component to SP2 which, does in part reflect the guidance in the Framework (2019) paragraphs 28 and 127.</p> <p>Policy SP2 links a number of policies together, offering a clear steer how environmental matters can be designed into new development. Paragraph 124 of the Framework supports this approach when it states “Being clear about the design expectations, and how these will be tested, is essential.”</p> <p>As a result it is considered that the policies to not repeat, but provide further guidance and detail as to how the strategic policies should be implemented. In many cases, the bullet points that make up the majority of the policy are reflective of design guidance within the Cheshire East Design Guide (2017).</p>	
<p>4B - Is there any reference in Government Policy or Guidance to “Green Biophilic Points”, and</p>	<p>The biophilic points were developed from work undertaken by the Town and County Planning Association which is referenced within the Neighbourhood Plan document under this policy. That document suggested a more rigour and robust series</p>	<p>DEFRA 25 Year Environment Plan (2018) available at: <a href="https://www.go">https://www.go</a></p>

what justification is there for requiring measures which exceed those which may be necessary to mitigate a development?

of scoring mechanisms, which, whilst laudable, did not fit comfortably within the rather larger agenda proposed by national guidance (see comments below). It should be noted that policy does not require these points to be delivered

Biophilia is defined as the inherent human inclination to affiliate with nature. As a result, the green biophilic points were designed to take this forward, but also to integrate the importance of humans connection with nature sought by the 25 year Environment Plan (DEFRA, 2018). This, at least in part, is reflected by the social and environmental objectives of the Framework (NPPF 2019) which are an intrinsic part of the delivery of sustainable development.

Whilst there is no specific reference to 'Biophilic points' in the NPPF (2019), there is a very clear statement on intent on biodiversity net gain as part of chapter 15, specifically paragraph 170d, which states not only that planning policies and decision should mitigate, but also 'provide opportunity for net gains in biodiversity'. This is reflective of a much earlier statement in paragraph 28 of the NPPF which specifically references that non-strategic policies have a role to play in "establishing design principles, conserving and enhancing the natural and historic environment..."

Paragraph 170f goes on to state that policies and decisions should "wherever possible, help to improve local environmental conditions such as air and water quality" which would also, to a lesser extent be assisted by the delivery of the biophilic points.

Paragraph 174 is also very clear on the role of a planning documents ability role to 'identify and pursue opportunities for securing measurable net gains for biodiversity'. Paragraph 175d also includes a similar reference.

Chapter 3 of the DEFRA 25 Year Environment Plan (2018) is also very clearly support the aspirations of this policy insofar as it encourages health and wellbeing through quality urban spaces, the planning of trees and the greening of urban areas. The role of new development in achieving this is mentioned on a

[v.uk/government/publications/25-year-environment-plan](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

The National Adaption Programme and the Third Strategy for Climate Adaption Reporting (DEFRA, July 2018) available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

	<p>number of occasions. The document actually states that there should be more guidance on what actually is considered good green infrastructure in our urban areas – this policy seeks to provide such guidance.</p> <p>It is also considered that the items listed in the biophilic points are also designed, in part, to help address the issues set out in The National Adaption Programme and the Third Strategy for Climate Adaption Reporting (DEFRA, July 2018) - specifically in chapter 2 on the role and function of the natural environment.</p> <p>Collectively, whilst not specifically mentioned, there is a clear statement as to their intent. Should the examiner wish to change their titles to reflect a more common term, that would be considered acceptable, however, the current term derives from the opportunity to integrate the often disparate matters of climate change, biodiversity, health and wellbeing into a series of identifiable points which the QB consider appropriate.</p>	
<p>5 For the QB: Paragraph 7.13 – is there an omission of “to” after “discharge”?</p>	<p>That is correct.</p>	
<p>6 Policy SP3: Can CEC and the QB please consider and provide their views on the following:</p> <ul style="list-style-type: none"> <li>To what extent are the provisions sought in Policy SP3 already covered in national policy and in the policies of the CELPS?</li> </ul>	<p>Whilst it is acknowledged that there is some overlap between this policy and Policy SD1 and 2 of the CELPS this is an important policy in providing a framework for delivering the vision for sustainable development in Wilmslow. As evidenced policies SP1 and SP2 of the WNP take the matters to which they relate much further than the strategic policies in the CELPS and this policy is included, both to add some limited additional detail, but more importantly to provide a balanced and complete view of how the Vision should be delivered in policy terms. The need for a comprehensive approach should not be underestimated.</p> <p>Notwithstanding the above point, there are additional matters which do differentiate this policy from the strategic policies specifically the links that are provided to the specific routes identified in appendix 5 and 8 of this WNP. Specific reference to these</p>	

	<p>appendices were taken out of the policy as a result of feedback from the Regulation 14 consultation, allowing some greater flexibility, but it is important that the sustainable networks, and their aspirational links is not lost from the plan as this was well supported by the community.</p>	
<p>7 Policy NE1 and Proposals Map 3: In the CELPS, Policy PG3 identifies sites allocated for development and sites to be safeguarded for development which are located within the WNP area. Through the adoption of the CELPS these sites have been removed from the Green Belt. To what extent does the CEC and QB consider that:</p> <p>7A - The CELPS sites should be shown on Proposals Map 3 as part of the urban area with the Green Belt amended to accord with the CELPS.</p>	<p>The QB is happy for this map amendment to be made to show the allocated sites removed from the green belt. This includes the safeguarded sites which have been removed from the green belt. We agree that this map needs to be corrected.</p>	
<p>7B - It is appropriate for applications for the development of the CELPS sites to take into account the guidance for development which applies to the site where it lies within the area of the Wilmslow Landscape Character Assessment.</p>	<p>We very deliberately included the CELPS strategic development sites and safeguarded land in the Wilmslow LCA because they were undeveloped countryside at the time of survey. We consider that it is important to take account of their landscape character and special attributes in bringing forward development proposals. This will ensure that new development is harmonised with its surroundings, that special attributes are protected (e.g. the wetland identified as a relict mossland in the Heathfield Farm section of the Dean Row LCA) and opportunities are taken for providing/sustaining links for countryside access and biodiversity between town and country</p>	

	(e.g. in association with the Stanneylands site in the Lower Dean LCA)	
8 Policy NE3 and Appendix 4: Does the QB intend that the routes for the Green Links required in Policy NE3 and identified in Appendix 4 should be indicative rather than prescriptive?	They are intended to be indicative.	
9 Policy NE4: Can CEC and the QB please consider and provide their views as to whether the second paragraph of the policy accords with paragraph 56 of the National Planning Policy Framework (NPPF)?	<p>It is considered that major developments located in close proximity to the routes identified in Appendix 5 should contribute towards their improvement/provision in order to ensure suitable access to services and facilities in addition to leisure opportunities (in order to meet the requirements of CELPS and other NP policies). The QB have been concerned that given the edge of town location of many of the allocated sites in particular new occupants will not be encouraged to use sustainable modes of transport and may be isolated from the town's services and facilities.</p> <p>Following discussions with CEC, a higher threshold of 50units was removed in order to bring this, and other policies in line with CELPS.</p> <p>In terms of the scale of development and the scale of contribution, the QB would welcome any input which would make it clear that appropriate contributions would be sought depending on the scale of the proposed development. The policy enables developments of different scales to provide these routes in part, in kind or through financial contribution.</p>	
10 Policy NE5: Can CEC and the QB please consider and provide their views as to whether the third paragraph of the policy accords with national policy, which makes no	<p>It is our understanding that the government intends to make biodiversity net-gain a requirement of all new developments. The Chancellor's spring statement (13<sup>th</sup> March 2019) and paragraphs 170d and 174b of the NPPF.</p> <p>Please also see our response to questions regarding neighbourhood plan policy SP2 above.</p>	Government to mandate 'biodiversity net gain', DEFRA, available at: <a href="https://deframedia.blog.gov.uk/2019/03/13/gov">https://deframedia.blog.gov.uk/2019/03/13/gov</a>

<p>requirement for development to demonstrate a net gain in biodiversity?</p>		<p><u>ernment-to-mandate-biodiversity-net-gain/</u></p>
<p>11 Policy NE6: Can CEC and the QB please consider and provide their views as to whether the policy has due regard to national policy in particular NPPF paragraphs 53, 68, 118d, and 122-123.</p>	<p>The reference to hard surfacing could be changed to refer to non-permeable surfacing as the aim of this part of the policy is to avoid expanses of impermeable surfaces which exacerbate surface water run off.</p> <p>The QB recognises the contribution of small/medium sized sites but not at the expense of local character and amenity which can occur when gardens are developed – as stated in 122d of the NPPF.</p>	
<p>12 Policy TH1: Can the QB please consider and provide their views as to whether it would be appropriate to add to the list of bullet points: Lees Lane B5358?</p>	<p>We think not. The gateway referred to on the map is Adlington Road which starts at the roundabout after the petrol station hence excludes Lees Lane</p>	
<p>13 Policies TH2 and TH3: Can CEC and the QB please consider and provide their views as to whether the policies should make reference to the Historic Environment Record in order to meet the Basic Conditions test?</p>	<p>The QB considers reference to the HER to be appropriate, perhaps more appropriate for the explanatory rather than the policy itself.</p>	
<p>14 Appendix 6: Can the QB please consider and provide their views on the comments set out in the 20 March 2019 submission by Historic England as to the accuracy of the list in the appendix.</p>	<p>The Historic England list includes many items not within the Wilmslow boundary. The QB agrees that Hawthorn Hall and Pownall Hall, School previously shown as Grade II should be listed as Grade II*. The additional descriptive information suggested by Historic England to aid identification is now incorporated in to the amended Appendix 6 Heritage Asset List.</p>	

<p>15 Policy TH4: Can CEC and the QB please consider and provide their views as to whether the policy as worded is justified in accordance with paragraphs 126 and 127 of the NPPF?</p>	<p>The policy accords with paragraph 126 and 127 as it is seeking to achieve the same end goal. Detail is given about the characteristics of each of the areas and how new development should take this into account. It also seeks to achieve the criteria set out in paragraph 127 of the NPPF by stating that schemes consider certain criteria to achieve appropriate design based on the context (i.e. taking consideration of density, landscape, surfacing, setbacks, scale and mass and materials).</p> <p>This policy stems from The Three Wilmslow Parks Supplementary Planning Document (SPD) produced by Macclesfield Borough Council. The SPD contained a good range of design guidance and character assessment which is still relevant and the QB wanted this to be considered where relevant in decision making. The document provides more detail than what is provided in policy TH4 and so more detail can be provided if it is considered this will improve the policy.</p> <p>Urban Imprint have analysed the SPD document and considered the points most relevant to the park areas today and in light of paragraph 127 of the NPPF. There were some elements which were not considered to be relevant which were not included in the policy.</p>	
<p>16 Policy TA1: Can CEC and the QB please consider and provide their views as to whether the reference to the 6 Cs Design Guide is necessary in the policy, and whether this policy repeats the provisions set out in the CELPS? Can the QB please provide their views on the revision to the policy suggested by CEC in their March 2019 representations?</p>	<p>The QB is happy to add the 6 C Design Guide wording within the policy.</p> <p>The revision suggested by CEC is in part considered appropriate by the QB, we suggest the following revision to the final paragraph of the policy:</p> <p><i>‘Within the town <u>core</u>, minimum parking requirements may be relaxed where the application can demonstrate predicted parking profiles, from a suitable data source, that would support the safe operation of the local highways network. Where this involves key Town Core sites (as identified on the Proposals Map and in policies KS1-7), parking should be delivered in accordance with these policies.’</i></p> <p>We suggest that the final part of the CEC wording (the bullet points explaining how the policy works) should be inserted into the explanatory after paragraph 10.7.</p>	

<p>17 Policy TA2: Can CEC and the QB please consider and provide their views on the following:</p> <p>17A - Do the provisions of this policy repeat those covered by policies in the CELPS including Policies CO1 and CO4?</p>	<p>The policy provides a Wilmslow specific level to the goals set out within CELPS policies CO1 and CO4, in particular by identifying specific junctions for improvement. This also enables policy TA5 (cycling) to be linked in, following community comments requesting that these junctions be made more cycle friendly.</p>	
<p>17B - If the policy is to be retained, would it be appropriate to include B5258 Lees Lane and Bedlells Lane/Hawthorn Street as areas of significant traffic flow and congestion?</p>	<p>The QB do not think that it is appropriate. The QB feel that the traffic arriving via Lees Lane is a contributing factor to the issues identified at the junction of Adlington Road and Dean Row Road but is not an issue in its own right. Beddalls Lane / Hawthorn Street are residential town centre roads used by residents to access homes in the South West of Wilmslow, these two roads are heavily used partly as a result of the congestion highlighted at the junction of Water Lane with Alderley Road which results in this road being used as a short cut.</p>	
<p>18 Policy TA4: This policy refers to Policy H4 which I understand to have been deleted from the WNP as submitted. Can CEC and the QB please consider and provide their views as to</p> <p>18 A - Whether the sentence which makes reference to Policy H4 should be deleted?</p>	<p>The reference to policy H4 is indeed a hangover from a previous draft of the document. The distances referred to within the old H4 policy are from CEC policy SD2 Sustainable Development Principles and table 9.1 'Access to services and amenities' which can be found on page 85 of the CELPS. The QB agree that reference to the deleted policy should be removed and replaced with reference to the above table associated with policy SD2 of the CELPS.</p> <p>Since policy H4 doesn't exist the sentence can be deleted.</p>	
<p>18B - Would the requirement in the second paragraph of the policy be in conflict with paragraph 56 of the NPPF?</p>	<p>The QB consider it acceptable to expect major developments to contribute to safe routes to schools. The QB considers the policy as a whole to be supported by paragraphs 91 and 92 of the NPPF.</p> <p>We are a little unsure which part of the policy you are referring to – the second paragraph deals with existing</p>	

	<p>routes. Or is the question related to the second part of the first paragraph which refers to contributions?</p>	
<p>19 Policy TA5: Can CEC and the QB please consider and provide their views as to whether the fourth bullet point of the policy is consistent with paragraph 56 of the NPPF?</p>	<p>As the bullet point states 'where appropriate', it is considered that contributions will be sought when the proposed development impacts the specified areas/routes listed thus complying with paragraph 56 of the NPPF and the CELPS requirement for all allocated sites to have pedestrian and cycle links. This policy provides a local specificity to this goal and is linked to a cycle improvement strategy.</p>	
<p>20 Policy CR3, Proposals Map 1 and Appendix 9: Can the QB please add the following information to an amended Appendix 9 for each of the sites proposed to be Local Green Space (LGS):</p> <ul style="list-style-type: none"> <li>• The current use of the site (eg playing fields, allotments, park).</li> <li>• Any existing designation (eg Green Belt, Conservation Area, Nature Reserve).</li> <li>• The area of the site in hectares.</li> <li>• Whether the landowner was informed prior to the proposed designation and whether any comment was received in response.</li> </ul> <p>In addition, is there a document which sets out in more detail how</p>	<p>The current use of each site is shown on the appendix</p> <p>The existing designation of each site has been added to the amended table.</p> <p>The area of each site has been added to the amended table.</p> <p>Nearly all of these sites are in Local Authority ownership. The landowners were not informed prior to the designation being allocated.</p> <p>An amended more detailed appendix 9 has been supplied detailing the assessments made.</p>	

<p>the judgement was made on each of the criteria identified in Appendix 9?</p> <p>(Please note that I may have further questions relating to the LGS once the additional information is provided)</p>		
<p>21 Policy CR4: Can CEC and the QB please consider and provide their views as to whether the provisions set out in the third paragraph relating to playing fields, together with the 3 bullet points, are covered by CELPS Policy SC3 and NPPF paragraph 97?</p>	<p>There is some crossover between paragraph 97 of the NPPF and this policy however, the QB wished to ensure that new facilities were appropriately located and accessible, something which is not mentioned by the Framework. It is not considered that CR4 replicates or crosses over with the content of SC3 as no specific mention is made to the loss of playing fields.</p>	
<p>22 Policy H1: Can CEC and the QB please consider and provide their views on the following:</p> <p>22A - Are the first two paragraphs necessary since these matters are covered in national and local plan policy?</p>	<p>The first two paragraphs are in part covered by local and national policy, however, it is important, for the context and operation of the policy that this matter is repeated especially with regard to references to the green belt – the examiner will note that despite many comments from the community consultation this is the only policy that sets out this approach. It is important for the community that this point was reflected and thus it should remain.</p> <p>The replication of national policy is of course important given that the NPPF (2019) is not formally part of the development plan – the CELPS takes the same approach in the wording of its policies.</p>	
<p>22B - With regard to paragraph 3 and the listed criteria, to what extent are these covered in CELPS Policy</p>	<p>The reference to paragraph 3 we think is meant to relate to policy SE1 of the CELPS (Design). In that regard it is acknowledged that there is some cross-over between the policies, but that there is no conflict. The points about reflecting landscape as well</p>	

<p>SE2 and the CEC Design Guide?</p>	<p>as landscape character is an important one that is not mentioned in SE1.</p> <p>Another point worthy of note is that the tone and nature of the guidance in SE1 appears to focus on larger, more strategic developments, which are also covered by the Residential Design Guide (note this is not development plan – but a cross reference to it could be useful), however, all of that seems to lack specificity on smaller sites that are not strategic in nature.</p> <p>CEC guidance (either in policies or in the Design Guide) is very focused on larger schemes, and the bullets in H1 are really focused on schemes of any size, reflecting and responding to a smaller context. It is also considered that both the NPPF (2019) and the CELPS are quite limited in their references to amenity and privacy (the final bullet point), and whilst these are part of old saved policies of the Macclesfield Borough Local Plan, they do not form a large part of the adopted CELPS.</p> <p>Whilst it is appreciated that more guidance will come forward as part of the Site Allocations and Development Management Document, this is still some way off, and this policy allows a short term reinforcement of these issues that are specifically absent from national policy.</p>	
<p>23 Policy H2: Can CEC and the QB please consider and provide their views on the following:</p> <p>23A - To what extent are the criteria listed in the policy adequately covered in CELPS Policies SE1, SD2, and SE13?</p>	<p>In answer to 23A of the question, much of this reflects the answer given in response to H1, however, H2 has a clear landscape dimension that is not effectively dealt with in policy SE 1 of the CELPS and has been developed following the findings of the Wilmslow Landscape Character Assessment that has been undertaken in support of and feeds into the WNP.</p> <p>The other element that is not effectively covered by SE 1 is the matter of gateways. Gateways are dealt with a little in the Cheshire East Design guide but not at all in the CELPS and as such this element is added to reflect specific issues highlighted by the communities in that regard – gateways to Wilmslow being a topic that is highlighted on a number of occasions.</p> <p>It is accepted that there is some overlap with SE13 on matters of water management but the inclusion of the</p>	

	<p>reference here was in response to the Environment Agency who asked for more information related to relevant policies on this matter. It does not detract from the message of the policy and it is useful to consider water management with wider landscape design processes.</p> <p>The policy also allows the new allocations that form part of the WNP (KS2-7) to be effectively integrated into the requirements for design guidance and coding which is otherwise not possible as SE1 only refers to major development – some of these may not be considered as such.</p> <p>However, it is accepted that policies H1 and H2 do have some similarities, and could be amalgamated to form one policy which would simplify the plan.</p>	
<p>23B - Is the second paragraph of the policy adequately covered in CELPS Policy SE1?</p>	<p>See above.</p>	
<p>23C - Is there any national policy advice or locally based evidence to support the requirement in paragraph 3 for the subdivision of larger properties to retain their scale, mass and appearance?</p>	<p>On the last part of the question, 23C, the NPPF (2019) provides some guidance on this matter, specifically in chapter 11. Whilst making efficient use of land is important it is very clear that this should not be at the expense of local character (paragraph 122d). It is also considered to reflect guidance in paragraph 127 on delivering good design.</p> <p>Whilst not directly relevant, the Three Wilmslow Parks SPD (see comments on that policy separately) is based on a 2004 document, which has been submitted as evidence with this plan. It already notes the impact on the overall quality of the townscape of the loss of the larger properties and their ample grounds. It should be noted that the policy allows for an element of balance to be achieved with the inclusions of the phrases ‘where possible’ and ‘demonstrate consideration’ - this of course leaves the matter to the individual decision maker on the merits of each scheme – a planning balance.</p> <p>In addition, there have been a number of recent cases where CEC Development Management have refused this type of development (subdivision or over development of a large site). One such recent case</p>	

	<p>considered the redevelopment of a site for a large nursing type development by the McGoff Group on Handforth Road (April 2019) Another case in March 2018 saw a similar sized scheme for 14 apartments on Adlington Road refused. CEC will be able to provide you with further details of these cases, however, if required please do not hesitate to revert to the QB who will be able to find these if required.</p>	
<p>24 Policy H3: Can CEC and the QB please consider and provide their views on the following:</p> <p>24A - To what extent is the matter of housing mix as listed in the policy covered in the CELPS and in national policy?</p>	<p>One the first bullet point reference is specifically made to paragraph 12.37 which is part of Policy SC 4 of the CELPS which states that <i>“Neighbourhood Plans can play an important role in securing an appropriate housing mix. Their policies can reflect more local evidence regarding the need for particular types of housing”</i>. This policy also provides the evidence that is available to underpin the parent policy.</p> <p>The types and nature of the mix identified in policy H3 reflect the broad strategic targets of the CELPS policy. The NPPF (2019) paragraph 61 states that policies should provide the size, type and tenure of housing needed for different groups should be included in policies. In this regard it is considered that this policy is appropriate and justified.</p>	
<p>24B - Is it appropriate to rely on the latest Cheshire East Housing Need Audit, and is it clear where the document can be accessed?</p>	<p>The rationale for the latest housing needs audit is as a result of the fact that a new Audit is expected imminently to support the CEC SADPD but this has yet to be published despite being subject to internal review for some months now. It would be inappropriate for the policy to rely on the older audit only. The intention of the policy should be to ensure that the mix is based on the most up to date evidence of mix and need. Response from developers have asked for some flexibility in this regard, hence the ability to meet changing circumstances.</p>	
<p>24C - Is it intended that all the housing types as listed should be included in a residential development or are they intended as</p>	<p>The policy refers to a range of possible appropriate types of development that should form part of any mix. The exact proportions and the nature of these (alongside other types of housing where this is justified) would form an appropriate mix. The uses in the list identify the communities aspirations from the consultation and therefore are worthy of specific note</p>	

<p>examples of the types of property which could be included in a housing scheme?</p>	<p>in a policy. It is accepted that this approach could be made clearer.</p>	
<p>24D - Is it necessary to refer in the last two paragraphs to affordable housing when this is dealt with in CELPS Policy SC5?</p>	<p>The reference to affordable housing and the CELPS policy SC5 is simply a reflection of comments received from the community who wished for the guidance to be integrated with their plan. For completeness this make sense and ensures that policies are read in the round and are not 'played off' against each other. The final paragraph could be moved to the explanatory if this is considered sensible.</p>	
<p>25 Policy TC3: Can CEC and the QB please consider and provide their views on the following:</p> <ul style="list-style-type: none"> <li>• To what extent would the types of development listed in the policy fall within the provisions for prior approval of the change of use from Use Class B1(a) to Use Class C3?</li> </ul>	<p>An article 4 direction would be needed to restrict office to residential prior approval within the Town Core. However, many schemes would require planning permission, for example if operational development needed to take place e.g. replacement windows, new accesses etc.</p> <p>This NP needs to be future proof, the current prior approval regulations are considered by many to be resulting in substandard dwellings. We therefore consider that these PD rights may be removed within the lifetime of the NP. In that instance this policy would be even more crucial in protecting the critical mass of ground floor retail in the town core.</p>	
<p>26 Policy TC4: Can the QB please consider and provide their views on the following:</p> <ul style="list-style-type: none"> <li>• In the second paragraph of the policy, should the reference to non-retail uses be A2-A5?</li> </ul>	<p>The intention of this part of the policy is to allow A1-A4 within the Main and Secondary Shopping Frontages and to restrict non-A uses and A5 uses.</p> <p>The following rewording of the first two paragraphs of the policy is suggested. This should add clarity by defining what the policy means by non-retail uses and being more specific about restrictions applying to A5 uses.</p> <p><i>Within Wilmslow's Shopping Core (as identified on the Proposals Map), new retail development of the following Use Classes will be permitted, where planning permission is required;</i></p> <ul style="list-style-type: none"> <li>• <i>A1 Shops</i></li> <li>• <i>A2 Financial and Professional Services</i></li> <li>• <i>A3 Restaurants</i></li> <li>• <i>A4 Drinking Establishments</i></li> </ul>	

	<p><i>Clustering of hot food takeaway (A5) uses will not be supported within the Main Shopping Frontage.</i></p> <p><i>Within the Main and Secondary Town Centre Shopping Frontages (as identified on the Proposals Map), non-retail uses (B, C, D and sui generis) will not be supported in ground level units, unless a proposed alternative can be demonstrated which will enhance the vitality of the Town Core and provide an active frontage.</i></p>	
<p>27 Policy TC6: Can CEC and the QB please consider and provide their views on the following:</p> <p>27A - Is the restriction on change of use of ground floor retail use to residential use too restrictive and contrary to paragraph 85a) and f) in the NPPF?</p>	<p>Ground floor residential use is only considered a problem within the town core. Elsewhere ground floor residential uses will be permitted. The intention of the policy is to retain a clustering/critical mass of retail uses to avoid fragmentation. Perhaps the policy should be amended to state that this restriction only applies within the main and secondary shopping frontages? The NP as a whole complies with paragraphs 85a and f of the NPPF – in particular the allocated key town centre sites in conjunction with protecting the town core’s retail function. This approach provides a comprehensive long term strategy and strong vision for the town core.</p>	
<p>27B - To what extent are the listed criteria in the policy covered by the policies of the CELPS?</p>	<p>These design criteria are predominantly present within the Macclesfield Borough Local Plan saved policies, if at all, and are not set out within the emerging SADPD. Most of the design focused policy at the borough level is focused on strategic sites and suburban housing. There is no guidance on town centre living other than a small amount in the CEC Design Guide. However, the Design Guide is not development plan.</p>	
<p>28 Policy PR1: Can CEC and the QB please consider and provide their views as to whether the management of traffic speeds and the introduction of weight limitations as identified in the last paragraph of</p>	<p>These are not land use matters and could be added into an aspiration (A6 Public realm strategy).</p>	

<p>the policy are land use matters?</p>		
<p>29 Key sites KS2 – 7: Can CEC and the QB please consider and provide their views on the following:</p> <p>29A - To what extent is there a reasonable prospect that the identified sites will come forward for development in the period of the WNP?</p>	<p>The WNP team has an appropriate level of design and development experience to identify the potential of the key sites and the drafting of the subsequent outline site briefs that support Policies KS2 to KS7.</p> <p>The WNP feasibility assessment of the Key Sites has identified the potential for up to 250 - 300 additional parking spaces plus up to 250 new dwellings with supporting parking within the Town Core</p> <p>KS2 - Fire Station</p> <p>The WNP plan team met with Stephen McGlade, Estates Manager for Cheshire Police and Fire Station sites. He acknowledged that the police and fire services in Wilmslow were looking to share a suitable site and that the police station, which was virtually vacated, could become available for redevelopment.</p> <p>Demand has been identified for new dwellings within the town core</p> <p>There is an identified demand for additional public parking to the western end of Water Lane</p> <p>The brief is developed in such a way as to allow a phased development of the site(s) in the eventuality of the services being relocated within the town</p> <p>KS3 - Legion</p> <p>Demand has been identified for new dwellings within the town core</p> <p>Two meetings have taken place between the WNP team and senior representatives from the British Legion. it is understood that the BL site could be released for redevelopment in the eventuality of an alternative appropriate new BL site being identified.</p> <p>KS4 - Tesco block</p>	

Demand has been identified for new dwellings within the town core. There is local pressure to improve this significant TC site.

Discussions have taken place between the WNP team and local agents to identify redevelopment demand. The brief that has been put forward has the potential for added value on the site with the addition of 2 to 3 levels of apartments over the ground floor retail

Residential parking criteria has been adjusted to reflect the importance of the site

Wilmslow residents identified this block as the most disliked in the town

KS5 - Library

The site is owned by CE

Strong demand has been identified for additional community uses within the Town Core. The policy recognises and supports the current CE initiative to generate vibrant community hubs within town centres

KS6 - Meadows car park

The site is owned by CE

Demand has been identified for new dwellings within the town core

Significant demand has been identified for additional long term office and commuter parking. This is supported by local businesses.

The WNP initial assessment of the site has identified the potential to successfully combine residential accommodation with additional parking

KS7 - Station

Significant demand has been identified for additional long term office and commuter parking.

No meetings have taken place as yet with Network Rail

The policy supports residential development to the rear of the site

29B - Would the key sites proposals meet the Basic Conditions if there is no prospect of their delivery within the period of the WNP?

There is no test of deliverability for neighbourhood plan groups when allocating sites. All reasonable effort has been made to contact land owners and choose sites which are likely to come forward within the plan period. By allocating these sites the QB seek to encourage these sites to come forward. The NP and these policies have been subject to a substantial amount of consultation and have been prepared with the input of qualified architects, planners and designers. CEC have not objected to these sites throughout the process of production of the NP.

The KS policies meet the basic conditions, particularly in terms of conformity with strategic development plan policies:

- vision for key service centres (CELPS)
- contributes towards the settlement hierarchy (PG2 CELPS)
- helps support objectives for green belt (PG3 CELPS)
- would not undermine the spatial distribution set out (PG7 CELPS)
- contributes towards sustainable development principles (SD1, SD2 CELPS)
- employment and tourism benefits - town centre first approach retail and commerce and diversifying uses (EG1, EG5 CELPS)

and the NPPF:

- small/medium sized sites (paragraph 69 NPPF)
- promote long term viability, respond to change, suitable mix of uses in town centres (paragraph 85a NPPF)
- focus on sustainable locations for growth (paragraph 103 NPPF)

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|  | <ul style="list-style-type: none"><li>- efficient use of land (chapter 11, paragraph 118d NPPF)</li><li>- use of suitable brownfield land within settlements (paragraph 118c NPPF)</li><li>- achieving well designed places (paragraph 127 a-f NPPF)</li><li>- proactive role in identifying and bringing forward land that may be suitable for meeting development needs (paragraph 119 NPPF)</li><li>- to assist in urban regeneration by encouraging the recycling of derelict and other urban land (134e NPPF) (a purpose of green belt)</li></ul> |  |
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**Matthew Jackson**

**Town Clerk  
Wilmslow Town Council**