Acton, Edlestone and Henhull, Edlestone and Henhull Neighbourhood Plan: CEC Regulation 14 Comments

This plan is clearly the result of much hard work and dedicated effort by the Parish Council, steering group and local residents who have contributed to its production and should be applauded for embracing the concept of local plan making. The ideas presented have the real potential to help shape sustainable development in Acton, Edlestone and Henhull, Edlestone and Henhull parish over the coming years ahead.

The purpose of this representation by the Borough Council is to comment on the Regulation 14 Pre-Submission consultation on the Acton, Edlestone and Henhull, Edlestone and Henhull Neighbourhood Plan and provide constructive advice to refine policies and identify any issues that may be problematic to the neighbourhood plans successful progress through an examination.

The Council is always happy to engage in more detailed discussion on representations it makes to neighbourhood plans and the advice provided is done so in the spirit of collaboration to achieve a positive outcome for our communities.

Neighbourhood plan polices must apply to the development and use of land and be in general conformity with the strategic policies of the adopted local plan; they should be clear and unambiguous and be supported by robust, yet proportional evidence; they should demonstrate that proposals are deliverable, are shaped by effective engagement; and they should not duplicate policies that are already being applied in the local area.

All development plans should:

> ***a) be prepared with the objective of contributing to the achievement of sustainable development;***
>
> ***b) be prepared positively, in a way that is aspirational but deliverable;***
>
> ***c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;***
>
> ***d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;***
>
> ***e) be accessible through the use of digital tools to assist public involvement and policy presentation; and***
>
> ***f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).***

(paragraph 16, NPPF 2018)

Cheshire East Council

Comments here specifically consider the policy approach taken by the Parish Council with these factors in mind, provide guidance on proposed policies and whether conflict is likely to arise between the neighbourhood plan and the Cheshire East Local Plan Strategy. More general comments are also included for consideration.

General Recommendations:

Generally, the Plan is well laid out, clear to understand and follows a logical progression

The vision and objectives of the plan are clear and provide a natural link between the overall objectives of the plan and the policies chosen.

It should be noted that the Borough Council has recently published its draft Site Allocations and Development Policies Document (part two of the local plan) which does cover some similar detailed issues covered by the Acton, Edlestone and Henhull, Edlestone and Henhull Neighbourhood Plan. The full SADPD document can be accessed here and to ensure policies are not unnecessarily duplicated, it is advised to review the approach in the Council's plan ahead of the final submission of the neighbourhood plan.

Vision:

The vision for Acton, Edlestone and Henhull, Edlestone and Henhull sets a positive set of objectives covering many issues related to sustainable planning.

Detailed Policy Comments:

Comments below are intended to assist the Parish Council and Neighbourhood Plan Steering Group in finalising its preferred plan prior to submission to the Local Authority. It should be noted that should the neighbourhood plan substantially and materially change in response to these and other representations, then it may be necessary to hold a second Regulation 14 consultation.

Acton, Edlestone and Henhull, Neighbourhood Plan Policy	Comment
ENV1 (B) / ENV2	The national planning policy framework makes no allowance to protect 'views' however the policy is based in a recognition that the local landscape is of special significance. Therefore the policy may benefit from seeking to protect the valued features and characteristics of the local landscape which are specifically identifiable. The following alteration is recommended: 'Development proposals must not significantly harm, individually or cumulatively, characteristic features within the local landscape.'
ENV4	The Councils emerging part 2 local plan – the Site Allocations and Development Policies Document – supports the retention of gaps between settlements and the identification of local green gaps in appropriate circumstances. Appendix 4 of the AENDP explains the choices made in the proposal here and demonstrates consideration of alternative boundaries.
ENV6	The policy could be expanded to require, where viable, that hedgerows are integrated into new development as boundary treatments, particularly on the main highway. Given the rural nature of the area, and that hedges are identified as a key characteristic of the area in the Character Assessment, such an approach could be mandated by condition where viability does not prevent delivery.