

BOLLINGTON NEIGHBOURHOOD PLAN UPDATE – DRAFT RESPONSES TO – INSPECTOR’S QUESTIONS FROM BOLLINGTON TOWN COUNCIL - November 2024

Inspector’s Comments / Queries. From my initial reading of the updated Bollington Neighbourhood Plan and the supporting evidence, I have the following 10 questions for CEC and BTC. I have requested the submission of responses by **Thursday 5 December 2024** although an earlier response would be much appreciated. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

1. Can CEC provide a modification statement confirming whether the proposed update Plan does/does not in its view include substantial modifications in which the nature of the plan has changed, together with the reasons for reaching this conclusion?
CEC to respond.
2. Section 38B(1)(a) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that a neighbourhood plan must specify the period for which it is to have effect. The only reference to the plan period I have found occurs in paragraph 1.4: “The update of the Plan extends this (*the period up to 2030*) to 2040”. Can BTC confirm the Plan period?
The update of the Plan is intended to cover the period up to 2040 as stated in section 1.4, paragraph 11. References to the period up to 2040 occur in Section 3 Housing paragraphs 22, 32, 34, 38 and 53. It is anticipated that it will be necessary to consider a further review in about 2030 when the new Cheshire East Local Plan may be available and the effect of any revised Government policies has been carried through into the Local Plan.
3. Could publication dates for the submitted documents be provided please?
**The dates when the submitted documents were finalised are as follows:
Final Submission Plan Document – 19/9/24
Basic Conditions Statement – 14/9/24
Consultation Statement – 14/9/24
Modification Statement – 14/9/24
SEA Screening Assessment – 23/8/24
The documents were submitted by Bollington Town Council to CEC on 19/9/24**
4. Policies H1 and H2 refer to the ‘settlement boundary’. This is not defined within the BNP, although Paragraph 10 refers to SADPD Policy PG9. Can BTC confirm that the references in the housing policies refer to the settlement boundary shown on the adopted Policies Map? Can it also confirm that the settlement boundary follows the town boundary for its whole extent?
The Settlement Boundary is shown at the end of the CEC Bollington Settlement Report ED 24, August 2020 (part of the SADPD). A copy of this is attached as Map 1. The Settlement Boundary is tightly drawn around the built-up areas. The Neighbourhood Plan Area is defined by the Parish Boundary as shown on the map inside the cover page of the Plan Document.
5. Paragraph 54: Has the Macclesfield Borough Council Supplementary Planning Document for Bollington been formally adopted by CEC as Council policy (albeit I appreciate that it does not form part of the statutory development)? It appears to refer to obsolete policies.
CEC to respond.
6. Policy GB2 introduces a requirement that consideration should be given to developing the two safeguarded sites as environmental nature reserves. This appears to be at odds with strategic policies in CELPS, policies PG3 and PG4, SADPD, Policy PG11, and contrary to national advice in the NPPF (paragraph 148). Could BTC respond please?
See the response to CEC Comments in Appendix 1, pages 9/10 and Appendix 2 page 17.
7. The Regulation 16 responses by CEC recommend a number of changes to Policy wording, and the removal of some policies altogether. Is BTC able to provide a justification for retaining the identified policies, and respond to the suggested textual changes?
See attached Appendix 1.
8. I recognise that BTC may wish to comment on specific/the principal issues raised in the Regulation 16 representations. Therefore, if the Town Council are minded to take this

opportunity, I would be grateful to receive a note addressing any consultation comments BTC wish to submit for my consideration in response to the Regulation 16 representations.

See attached Appendix 2.

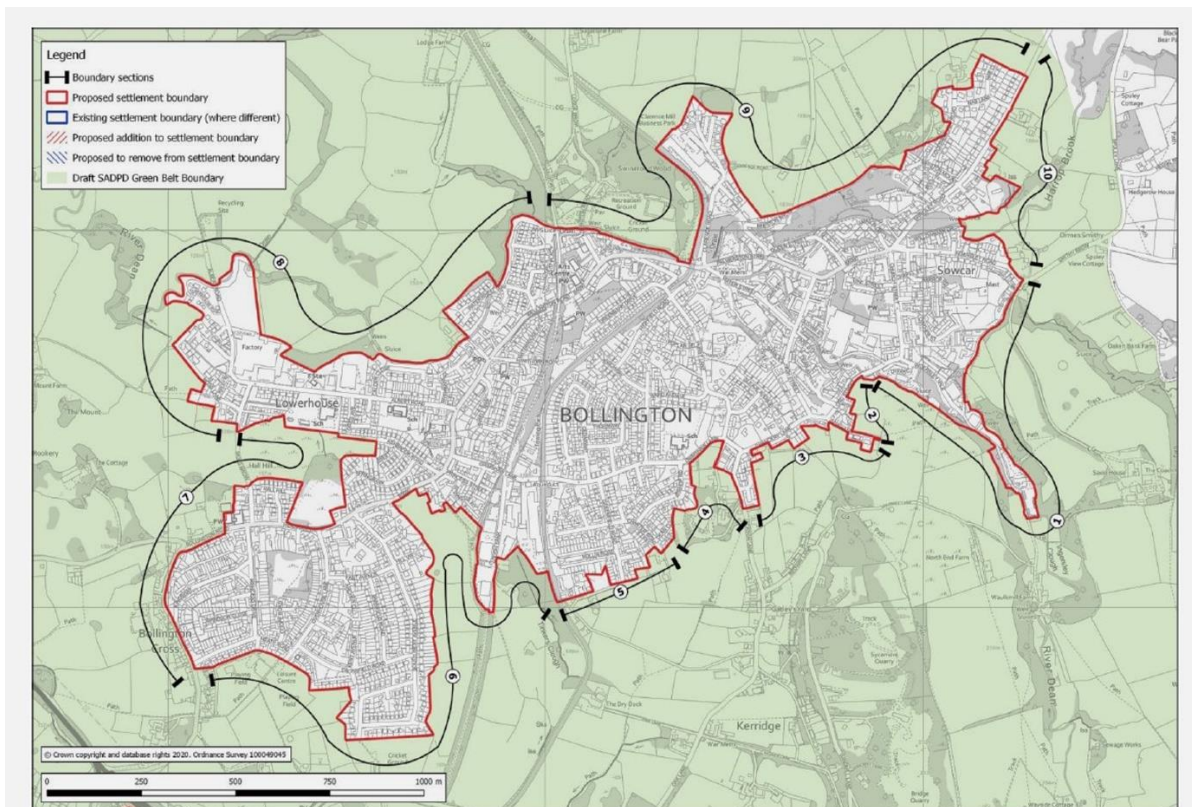
- Page 27, paragraph 85: It is stated that Bollington lies within the Mersey Forest boundary and the Mersey Forest Plan has relevant policies. Can BTC confirm this is, in fact, the case? The easternmost boundary of the Mersey Forest Plan appears to be in the region of Goostrey some 15 miles to the west of Bollington.

Mersey Forest Staff responded to the Regulation 14 consultation, stating that Bollington lies within their area of jurisdiction. See attached Appendix 3.

- The Appendix to the Modification Statement makes no reference to Section 10, policies IN1-1N3. Can BTC please confirm that Policy IN1 has been amended as shown on page 53 of the Plan, and that Policy IN3 is a new policy?

Page 4 of the Modification Statement includes Section 10 – Infrastructure. This describes the basis for Policies IN1 and IN2 and confirms that Policy IN3 is a new Policy.

MAP 1 – SETTLEMENT BOUNDARY FOR BOLLINGTON (Question 4).



Map Bollington 10: Settlement boundary map showing settlement boundary and areas of safeguarded land

APPENDIX 1 – BOLLINGTON NEIGHBOURHOOD PLAN - DRAFT RESPONSES TO CEC REG 16 FORMAL COMMENTS – November 2024

Policy	Current title	CEC comments:	Existing CEC policies	BNP Response
	<p>General Comments</p>	<p>Summary Response This statement sets out CEC’s views regarding the BNDP. In summary, it is CEC’s view that the NDP, overall, meets the Basic Conditions and other legal requirements, subject to recommendations. Engagement between the QB and CEC has meant that some issues raised at previous stages of consultation have been addressed, however the LPA would like to take the opportunity to provide additional comments on the Regulation 16 version of the BNDP and include such comments below. Should specific issues be raised during examination, the LPA would be happy to provide information and input to the examination process, as may be required.</p> <p>The response then considers the following headings: Process and Legal Compliance. Meeting the Basic Conditions. Compatibility with EU obligations. Prescribed conditions have been met. Consultation. NDP Content. Policy Comments – set out in detail below.</p>		<p>The modus operandi for preparing the update to the adopted Neighbourhood Plan was to start from the existing Objectives and Policies and decide which were still valid, which needed updating and whether new Policies were required. Existing valid policies have been retained. Paragraph 16(f) of the NPPF includes the statement: ‘Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.’ Many of the detailed responses from CEC claim that Policies in the BNDP are covered by existing Policies in higher level Plans but they then quote a large number of such Policies which do not focus on the specific Policies of the BNDP. We do not believe that our Plans represent unnecessary duplication of higher level Policies. We wish to emphasise that Bollington is unique in being the only Historic Town in Cheshire East partly in the Peak District National Park Fringe, with an industrial heritage and four significant conservation areas. In all cases the content and policies represent views expressed in responses to Questionnaires by the Bollington Community and they bring together a focus of concerns specific to</p>

				<p>Bollington which are otherwise distributed in a totally unfocused way in the higher level policies. Removal of the policies suggested by CEC would leave the NP totally unbalanced and devoid of the express wishes of the Community. Where there is a similarity in NPUpdate policies with CELP or SADPD policies, in many cases the policies are carried forward from the adopted version of the NP, are not in conflict with the higher level policies and were accepted previously. We have considered all our proposed policies alongside the CELP, SADPD and latest version of the NPPF from 2023 and prefer to retain them.</p>
<p>General Policy V1</p>	<p>Maintenance of Community Attributes</p>	<p>It is considered that the content and aspirations of this policy are covered sufficiently through the existing Development Plan, and within the various policies of the BNP. It is suggested that this policy is removed from the Plan. It is recommended that the wording be moved to the supporting text of the BNP vision or objectives sections.</p>	<p>LPS SD1, Sustainable development in Cheshire East. SD2 Sustainable development principles PG3, PG6, EG1, EG2, EG3, EG5, SC3, SE1, SE4, SE5, SE6, SE7, SE8, SE9, CO1 SADPD GEN1 Design principles ENV1, ENV2, ENV3, ENV6, ENV7, ENV15, HER1, HER3, HER4, HOU12, HOU13, RET1, RET2, RET3, RET6, RET7</p>	<p>LPS Policy SD1 refers specifically to Principal Towns and Key Service Centres and does not refer to Local Service Centres. NP Policy V1 summarises the important features of sustainability to Bollington as a unique Local Service Centre by requiring that the overall effect should be a positive contribution with no significantly unacceptable effect on any of the points listed and adds the specific requirement of the target of carbon neutrality by 2045 or sooner. This policy was included in the adopted version of the NP (apart from the addition of the carbon neutrality target) and is a Foundation Policy to support the overall Vision for the Plan.</p>

H1	New dwellings	<p>The BNP vision outlines the overall aim for Bollington to continue to be a 'Working Town'. Including the sentence '...so that the Vision of Bollington as a 'Working Town' is retained' within the policy text is not considered necessary and should be moved to the supporting text.</p> <p>The existing Development Plan outlines the residential and employment needs of the Borough, as well as including policy provision regarding mixed use schemes. Policy PG 7 of the LPS outlines the spatial distribution of development for the 'LSC' tier of settlement that the BNP area falls within, as appose to disaggregating a figure to individual parish areas. PG 7 outlines that the 'LSC' tier is expected to accommodate 3,500 new homes over the LPS plan period. SADPD policy PG 8 outlines that it is expected that this will be addressed by windfall, in line with other policies in the Local Plan. Development is expected to come forward to meet this need, in accordance with adopted policy.</p> <p>The principle of development to bring forward residential development is not dependent on the delivery of employment opportunities and supporting infrastructure. It is inappropriate for the policy to tie these two matters together by seeking to impose a conditional requirement upon development sites of a size of greater than 50 dwellings, without justification.</p> <p>It is considered that the preference for mixed-use development can be expressed within the policy without this inclusion. It is recommended that the final sentence of the policy be removed.</p>	<p>LPS PG3 Green Belt PG4 Safeguarded PG6 Open Countryside PG7 Spatial distribut SD1 Sust develop in Cheshire East SD2 Sust dev principles IN1 Infrastructure EG3 Employment sites SE1 Design SE4 The Landscape SE15 PeakDistrictFringe SADPD PG8DevelopmentofLSCs PG9SettlementBoundary PG3 Green Belt PG11 GB & Safeguarded land boundaries ENV3Landscapecharacter INF1Cycleways etc INF6 ProtectionInfrastructure</p>	<p>We cannot emphasise too strongly the importance of Bollington continuing to be seen as a Working Town – see Figure EB2 in the Plan where this is supported by 87% of respondents to the Questionnaire. We wish to retain this emphasis in Policy H1.</p> <p>In the responses to Question 16 of the Questionnaire, 89% of respondents disagreed strongly with the addition of large residential developments greater than fifty dwellings (Figure H2). Such developments without accompanying employment opportunities and supporting infrastructure would tend to destroy the character of the Community. The preference for mixed-use development is conditioned by where possible and appropriate and would probably not apply to stand alone small developments.</p>
H2	Housing location	<p>The content within this policy is mostly covered by the existing policies within the Development Plan. It is considered that any repetition should be avoided.</p> <p>Point 1 of this policy is addressed by existing Development Plan policies, LPS: PG 3, PG 6, SD 1, SE 2, and SADPD: PG 8.</p> <p>Point 2a) of this policy is covered by BNP policy H1, points 2b)-e) are covered by existing Development Plan policies, LPS: PG 3, SC 1, SC 2, EG 3, SE 1, Appendix C, and SADPD: PG 9, GEN 1</p>	<p>LPS PG3 Green Belt PG6 OpenCountryside SD!SustainableDevelopment SD2SustainableDevelopment EG3 EmploymentSites SC1 Leisure and Recreation SC2 Sports Facilities SE1 Design SE2 EfficientLandUse SE13FloodRisk/Management AppC Parking standards</p>	<p>Point 1 expresses succinctly policy for Bollington which appears to require 5 LPS and 1 SADPD policy! Point 2(a) includes reference to the Housing Needs Assessment 2024 report for Bollington which is not covered by any higher level policies. Points 2(b) to 2(e) bring together succinctly points which appear to require 7 LPS and 2 SADPD policies. Flood risk is an</p>

		Point 3 of this policy is covered by LPS policy SE 13 and SADPD policy ENV 16. Overall, it is recommended this policy be removed from the Plan.	SADPD PG8 Development of LSCs PG9 Settle Boundary PG11 GB & Safeguarded land boundaries GEN1 Design Principles ENV16 SurfaceWater/Floods REC3 OpenSpace	important issue in Bollington because of the geographic nature of the valley and Point 3 includes additional wording emphasis suggested by United Utilities in their response to the Regulation14 consultation. We prefer to retain this policy.
H3	Parking provision for new dwellings	The standards contained within Appendix C of the LPS will apply to all development proposals where relevant. Reference to Appendix C is unnecessary and should be removed from the policy. The policy should seek to illustrate how parking provision could achieve better design, for example, by integrating landscaping and the efficient use of space for improving biodiversity, and drainage. Reference to BNP policy MA.P2 is incorrect, it should reference policy MA2.	LPS SD1 SustainableDevelopment SE1 Design SE3 Biodiversity Appendix C Parking Standards SADPD GEN1 DesignPrinciples ENV1 EcologicalNetwork ENV2 EcologicalImplement ENV5 Landscaping RUR14ReuseResidentialBdg HOU9SubdivisionDwellings HOU13Residential standards	Parking is a major problem in Bollington – we wish to emphasise this by leaving the policy in and stressing the effect of increasing vehicle sizes and the potential for underground parking provision in Bollington. Reference to integrating landscaping and incorporating biodiversity where practical in the site topography are already included. Correction to reference to policy MA2 accepted.
H4	Type of housing	The objective of this policy is covered within the policies of the existing Development Plan. Point 1 of this policy is covered by BNP policy H1. The inclusion of the term 'local connection' is not a land-use planning concern. It is suggested that point 1 be removed from the policy. Point 2 of the policy is addressed by the existing policies of the Local plan. It is considered that the policy inadvertently offers ranging support for development proposals that contribute to the housing needs of the ageing population. Consequently, introducing debate regarding the appropriateness of location, for example, whether such proposals would be supported within the settlement boundary or Green Belt, should be avoided. It is suggested that point 2 be removed from the policy. If retained, wording such as 'Proposals should demonstrably make a contribution to meeting the housing needs of an ageing	LPS SC4 Residential Mix SC5 Affordable homes SC6 Rural Exceptions SADPD HOU1Housing Mix HOU2 Specialist Housing HOU8 Space, Acc & wheelchair housing standards	Reference to the recommendations in the Housing Needs Assessment 2024HNA carried out as part of the NP consultations is not included in any higher level policies. See also the Justification. As far as the term 'local connection' is concerned we accept the comments made in the separate Regulation 16 submission from CEC Strategic Housing Section on this point and suggest adding to the wording of the policy: 'local connection, as defined in accordance with the CEC Housing Supplementary Planning Document and the CEC Common Allocations

		<p>population, including homes for down-sizing, as well as residential or nursing care.’ is considered more appropriate. LPS policy SC 5 will apply to development proposals where relevant, reference to SC 5 in point 4 of this policy is not necessary. Also, point 4’s final sentence is not a land-use planning concern. It is suggested that point 4 be removed from the policy.</p> <p>Point 5 of this policy is addressed by existing LPS policies SC 5 and SC 6. It is suggested that point 5 be removed from the policy.</p>		<p>Policy’, with these two documents added to the list of references. We are happy to accept the alternative wording for point 2 suggested by CEC as follows: ‘Proposals should demonstrably make a contribution to meeting the housing needs of an ageing population, including homes for down-sizing, as well as residential or nursing care.’</p>
H5	Design of housing	<p>We are encouraged that this policy seeks to secure high quality design in Bollington. However, most of the content covered within this policy is addressed in the policies of the existing Development Plan. To avoid the repetition of adopted policy it is suggested point 1, points 2 a) to c) and all of e), and point 3, be removed from the policy.</p> <p>If point 2 a) is retained, it is suggested that focus be directed towards enhancing the visual character of Bollington, as appose to the referring to the urban form and settlement pattern, which as currently reads, implies that the enhancement of such could not be limited to within the settlement itself. Therefore, potentially supporting development outside of the settlement that meet point 2’s criteria</p>	<p>LPS SD 2 Sustainable Development Principles SE 1 Design SE 4 Landscape SE 8 Renewable Low Carb Energy SE 9 Energy Efficient CO 1 Sustainable Travel and Transport SADPD PG9 Settlement Boundaries GEN1 Design Principles ENV3 Landscape Character ENV5 Landscaping ENV7 Climate change ENV14 Light Pollution HOU14 House Den INF 3 Highway safety/access</p>	<p>This policy covers the overall requirements including Bollington specific requirements for meeting Policy V1, carbon neutrality by 2045 or sooner and for reducing carbon emissions. These are additional to the previous version of the NP, not covered by higher level policies and clarify Bollington’s position on climate emergency.</p> <p>In point 2(a) we accept replacing urban form by visual character. Point 3 is important in requiring views from a minimum of three mutually exclusive directions to ensure that the full visual impact of proposals is clearly evident.</p>
E1	Regeneration of existing employment land.	<p>Policy EG 3 of the LPS addresses the matters raised in point 3, duplication should be avoided, and it is recommended this point be removed from the policy.</p>	<p>LPS EG1 Economic prosperity EG3 Existing & All employment sites SADPD ENV15 New Development</p>	<p>We are anxious to preserve Bollington as a Working Town and this policy seeks to support that position.</p> <p>The reference to a two year marketing exercise in item 3 is not covered by the LPS and was</p>

			RUR10 Employment Development in open countryside	accepted for the adopted version of the NP.
E2	Establish Bollington as a centre for business in high-value specialisms	It is suggested point 2 be relocated to supporting text within the justification.	LPS EG1 Economic prosperity EG2 Rural Economy SADPD RUR10 Employment Development in open countryside	The reference in Point 2 to specific specialisms is important in highlighting an existing base on which to build.
E3	Encourage the growth of home-based businesses	Much office-based home working is addressed by permitted development rights. However, although more client based/manufacturing-based homeworking may invoke the need for this kind of policy, the matter of having unacceptable impact on local or residential amenity is sufficiently covered by existing policies in the Local Plan. It is suggested this policy be removed from the Plan.	LPS CO1 Sustainable Travel&Transport SADPD HOU1 Housing Mix HOU12 Amenity	Comparison of the 2021 and 2011 census figures shows a huge increase in the %ge of people working from home – we wish to support this as it contributes to reducing the pressures on traffic and road use. It encourages flexible working and more efficient use of working time.
R1	Retain and develop retail offerings	Bollington has a local retail centre boundary and neighbourhood parade under the SADPD; therefore, the relevant policies of the Local Plan apply to these areas. Although the policy does not explicitly state that a market exercise is required, this would be the only way to demonstrate that no alternative user could be found. Permitted development has changed since the original plan was made making change of use to retail etc far more permissive (under class 'E'). Therefore, the requirement for marketing exercises is seen as onerous. It is suggested that this point just seek to show support for the same or equivalent uses.	LPS PG3 Green Belt EG4 Tourism EG5 Promote Town Centre First SADPD RET3 Sequential & impact tests RET4 Shop fronts and security RET7 Supporting vitality of town centres	The retail centre boundary referred to in the SADPD does not represent the distribution of retail areas of Bollington without a defined centre. See Figure R1 in the BNP. The policy does not specify a marketing exercise. We are concerned to support and if possible expand the existing retail provision.
OS1	Designation of Open Spaces	This policy replicates the existing SADPD policy REC 1, and duplication of planning policy should be avoided where possible. Point (d) is also covered within the existing Local Plan. Therefore, it is recommended this policy be removed from the plan.	LPS SD1 Sustainable Dev in CE SD2 Sustainable Dev princ SC1 Leisure & Recreation SC2 Indoor/Outdoor facilities SC3 Health/Well Being SE6 Green Infrastructure	We prefer to retain this policy because of the specific importance to Bollington with its current under provision and known proposals to develop on existing Open Space. The addition concerning water and waste water infrastructure is at the

			SADPD REC1, REC2, REC3	request of United Utilities in their Reg 14 response.
OS2	Maintenance of Open Space allocations	The aspiration of this policy is mostly covered by the policies within the existing Development Plan. Duplication of planning policy should be avoided where possible. Therefore, it is recommended this policy be removed from the plan. Also, it is unclear what is meant by the 'Cheshire East Standards of Allocation'. The Developer Contributions Supplementary Planning Document outlines the standards for open space. If the policy is retained, it is suggested this document be referred to as appose to the 'Cheshire East Standards of Allocation'.	LPS SD1, SD2, SC3, SE6 SADPD INF1, REC2, REC3	This policy was accepted for the adopted version of the Neighbourhood Plan in 2018 when the Cheshire East Local Plan was already in place. We think that it is important for the people of Bollington to see the detailed importance of Open Space to the character of the Town.
GB1	Development of Green Belt in Principle	The National Planning Policy Framework and the existing Cheshire East Development Plan establish the relevant considerations for development proposals within the Green Belt. Neighbourhood Plan policies must align to strategic and national Green Belt policy. The identified concerns, such as conservation areas, access to amenities, materials, and landscape character are all planning considerations addressed in other parts of the Development Plan and do not directly relate to the Green Belt or its purposes. Permission in principle is an alternative consent route for housing-led development which separates the consideration of matters of principle for proposed development from the technical detail of the development. The first stage (or permission in principle stage) establishes whether a site is suitable in-principle and the second ('technical details consent') stage is when the detailed development proposals are assessed. Planning policy must focus on the development and use of land and has no scope to influence consent routes. Overall, it is suggested that this policy be removed from the plan.	LPS PG3 Green Belt PG6 Open Country SD2 Sustainable development SE1 Design SE4 The landscape SE7 The Historic Environment SADPD PG11 Green belt and Safeguarded Boundaries. GEN1 Design Principles ENV3 Landscape character	The Bollington Settlement Area is embedded in the Green Belt. We feel very strongly about the potential for misuse of the 'Development of Green Belt in Principle' and we consider that the specific issues which might well arise with such a proposal in Bollington need to be emphasised. We have accepted the comments from CEC in Regulation 14 comments concerning the planning status requirements and have therefore transferred our concerns about criteria that need to be considered to the Justification.
GB2 and IN3	Development of Safeguarded Land	Safeguarded land is land that may be required to meet longer-term development needs beyond the period of the Local Plan. This provides certainty for future development within the Green Belt. Policies within the existing	LPS PG3 Green Belt PG4 Safeguarded land SADPD	Paragraph 1 of the NPPF 2023 refers to plans as providing for sufficient housing and other development in a sustainable

		<p>Development Plan identify safeguarded land for future housing development, and other policies also set out the general requirements that will apply to the sites, such as, housing mix policies (SC 4, LPS and HOU 1, SADPD), which will seek to ensure that local housing needs are considered.</p> <p>The Development Plan outlines that the safeguarded land sites within Bollington are preserved to meet future housing development needs. Point 2. of the proposed policy contradicts this by stating that the safeguarded land does not need to be for housing development. This conflicts with adopted Local Plan policy, which identifies the land for the purposes of eventual housing delivery. This paragraph should be removed from the plan.</p> <p>Since the allocations are for the delivery of housing, the establishment of a nature reserve is inappropriate, however, the impacts on the natural environment will need to be mitigated and it would therefore be appropriate to require that environmental mitigation is met on site wherever possible, in accordance with BNG requirements. It is advised this policy is reviewed to ensure no conflict arises between the policy and other national and Development Plan policies regarding this matter. It is recommended points 1 and 2 be removed from the policy, but the content of point 3 is considered useful to retain.</p>	<p>PG9 Settlement Boundaries PG11 Green Belt and Safeguarded land boundaries PG13 Local Green Gaps</p>	<p>manner. The term ‘development’ clearly does not refer only to housing but must include other requirements for use of land. Paragraph 148 of the NPPF refers to ‘meeting requirements for sustainable development’ with no restriction of the term ‘development’ to housing. Policy PG4 of the Local Plan does not state that safeguarded land is reserved specifically for the delivery of housing, it simply refers to it as being land that may be needed to meet longer term development needs. Similarly, Policy PG11 of the SADPD refers only to Policy PG4 of the Local Plan and to possible future development if required without specifying the type of development. In Bollington future development must include all aspects covered in the Neighbourhood Plan and environmental, climate change and biodiversity elements are essential to the future of the Town as well as housing and employment. In our view there are other sites which could be more suitable for delivery of housing if a need for such type of development in the Town was demonstrated. Safeguarded site BOL1 is much more suited for development as an environmental nature reserve to compensate for biodiversity improvement requirements from other developments and is identified in</p>
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				the independent environmental reports by Cheshire Wildlife Trust and NLG Ecology as having environmental habitats and corridors of medium importance which should be preserved.
NE1	Natural Environment Policy	It is considered that point 1 of the policy is sufficiently covered within the existing Development Plan. It is suggested that the first paragraph be removed from the policy.	LPS SE3 Biodiversity SADPD ENV1 Ecological network ENV2 Ecological implementation	We object strongly to this comment. We have had a detailed ecological survey of Bollington carried out by Cheshire Wildlife Trust in 2015 and a review of this carried out by NLG Ecology Ltd in 2024. The CELP and SADPD have not provided the level of details of habitats and corridors given in our own reports and these add value to the ecological information.
NE2	Maintenance of views	Point 1 of the policy focuses on the Peak Park Fringe, it is considered that policies SE 15 (LPS) and ENV 3 (SADPD) of the existing Development Plan achieve the aim of point 1 and consequently any duplication of planning policy should be avoided. Therefore, it is recommended that this paragraph be removed from the policy. Though, it is considered that the term 'industrial heritage' is too ambiguous. It is suggested that the feature(s) that would illustrate the 'industrial heritage' be explicitly noted within the policy itself, for example from the referenced figure (BE4) the 'viaduct', 'aqueduct' and 'Lowerhouse' mill are shown. If the term 'industrial heritage' is possibly in reference to the historic environment of Bollington such as its conservation areas, then it is considered that heritage matters are sufficiently covered within the existing Development Plan and the term 'industrial heritage' should be removed from the point 2. The reference to figure BE4 is not thought to be clear for the purpose of the policy. BE4 does not present a definitive list that reflect the features stated within the policy. For example, the figure presents 'noteworthy views', which are not relevant within the context of the policy. The figure	LPS PG6 Open Countryside SD2 Sustainable Development SE1 Design SE4 Landscape SE7 The Historic Environment SE15 The Peak Park Fringe SADPD ENV3 Landscape character HE Maintenance R3 Conservation Areas	Bollington is unique amongst the Local Service Centres in lying partly in the Peak Park Fringe and the importance of this on planning proposals cannot be overstressed. We have adopted the words suggested in the CEC Regulation 14 response of 'characteristic features or important landscape receptors, within the local landscape ...' and have drawn attention to some specific features of importance to Bollington such as White Nancy, Nab Head and the industrial heritage. We are happy to add examples of the industrial heritage such as the Adelphi and Clarence Mills, the Canal Aqueducts, the Middlewood Way Viaduct, the Lowerhouse area, and the Historic Triangle of Palmerston

		<p>does seek to illustrate 'local landmarks', however, this includes the 'viaduct' and 'aqueduct', which are not referenced in the policy.</p> <p>Finally, it is also suggested that it may be beneficial for the title of the policy to be amended to not include the term 'views', and more accurately describe the policy's purpose of aiming to protect the local landscape.</p>		<p>Street, High Street and Water Street.</p> <p>We are happy to agree to change the title of the Policy to Maintenance of the 'Local Landscape'.</p>
NE3	Provision of Landscape Plan	<p>These matters are sufficiently covered within the policies of the existing Development Plan; therefore, this policy should be removed from the plan.</p>	<p>LPS SE4 the Landscape SE5 Trees Hedgerows Wood SADPD ENV5 Landscaping ENV6 Trees Hedgerows Wood</p>	<p>The existing justification makes clear that these requirements are special to Bollington to preserve the landscape setting of the four communities and were accepted in the adopted version of the NP after adoption of the CELP.</p>
BE1	Historic Town	<p>The SADPD contains an extensive chapter of policies relating to the historic environment. It is considered that any repetition of existing planning policy should be avoided.</p> <p>Point 1 of the policy is covered by policies SE 7 (LPS) and HER 1 (SADPD). It is suggested point 1 be removed from the policy.</p> <p>Point 2 of the policy is address by policies SE 7 (LPS) and HER 1 and 7 (SADPD). Also, the NPPF does not outline that weighing the public benefits gained by a proposal against the level of harm is a part of the policy test for non-designated heritage assets. It is suggested point 2 be removed from the policy.</p> <p>Point 5 relates to the theme of landscape character, which is addressed within the policy NE2 of the Neighbourhood Plan. Policies SE 7 and ENV 3 (LPS), and HER 1 and 3 (SADPD) covers this matter. It is suggested point 5 be removed from the policy.</p> <p>Point 6 considers energy efficiency, the heritage focussed policies of the existing Development Plan respond to all types of development proposals, reflecting on whether they cause harm towards heritage assets and their conservation. It is recommended point 6 be removed from the policy. If retained, it is suggested the policy simply refer to supporting opportunities for energy efficiency for historic assets where appropriate, as appose to introducing a test of</p>	<p>LPS SE1 Design SE4 The Landscape SE7 TheHistoricEnvironment SE9 EnergyEfficientDevelopment SADPD ENV3 Landscape change ENV7 Climate change HER1 Heritage assets HER2 Heritage at risk HER3 Conservation areas HER4 Listed Buildings HER5 Registered Parks HER6 Historic Battlefields HER7 Non-designated Historic Assets HER8 Archaeology</p>	<p>This Policy gives a concise set of requirements which are specific to Bollington and supported fully by the Community in responses to the Questionnaire (Figures BE1 and BE2) and we prefer to retain all parts of the policy.</p>

		<i>significant</i> harm specifically relating to development proposals concerned with energy efficiency.		
TL1	Support for development of tourism	The term 'modest growth' is ambiguous. It should be made clear how the second paragraph of the policy relates to the support for development of tourism. The content of this policy and the theme of tourism is addressed within the LPS and extensively within the 'RUR' policies chapter of the SADPD. It is recommended that this policy be removed from the Plan.	LPS EG2 Rural tourism EG4 Tourism SC4 Residential Mix SE9 Energy Efficient Development Appendix C Parking Standards SADPD GEN 1 Design Principles ENV7 Climate Change RUR6 to RUR9 HOU1 Housing Mix HOU 12 Amenity	The particular importance of providing support for visitors to Bollington is covered in the Justification section. We believe the term modest growth does not require further definition at this stage. We agree that the second paragraph should be amended to say '....change of use from an existing use to one to support the visitor economy as part of a Brownfield site,....
MA1	Improve safety and efficiency of moving around	Planning obligations need to be considered individually having regard to the site-specific circumstances of a development proposal. Though, it is helpful that locally specific issues have been identified, and for which planning obligations may be required to address. However, it is considered that point 1 may be better placed within a community actions/aspirations section of the plan, as appose to policy. It is considered that points 2, 3, and 4 are covered by policies within the existing Development Plan. It is suggested that they be removed from the policy.	LPS SD2 Sustainable Development IN1 Infrastructure IN2 Developer Contributions SE1 Design CO1 Sustainable Travel and transport CO2 Enabling Business Growth CO4 Travel Plans / transport assessments SADPD GEN1 Design Principles ENV5 Landscaping INF1 Cycleways, Bridleways, INF3 Highway Safety/access	We do not agree. The existing higher level policies are ineffective in dealing with the problems of traffic, cycling and pedestrian moving around in Bollington. Most of the courtesy crossings in Bollington are ineffective and are ignored by motorists. The CEC Crossing Strategy consultation document states that drivers should allow pedestrians to cross at courtesy crossings. We prefer to retain this policy and relate to planning through use of s106 / CIL funds. E.g. on schemes of the following type: (a) Enhancement of the existing courtesy crossings on the B5090 to improve pedestrian safety by additional markings making them visible to drivers.

				<p>(b) Providing the infrastructure for the adoption of a 20 mph speed limit in Bollington.</p> <p>Please see the Justification.</p>
MA2	Parking provision	<p>Parking provision is sufficiently addressed within the existing Development Plan.</p> <p>It is considered that the imposition of a two-storey limit on multistorey car parks is inappropriate. Proposals for such development will be assessed against the relevant existing adopted policy that would consider the impacts of the scale and verticality of the proposed development on the design and character of Bollington. Matters regarding residential amenity and high-quality design are covered within the existing Development Plan. The final sentence of point 1 is ambiguous. It is suggested that point 1 be removed from the policy. Reference to appendix C of the LPS in the first sentence of criteria (a) of point 2 is not necessary. It is suggested it be removed from the policy.</p> <p>It is considered that 'visitor car parking' is encompassed within the broader policy provision relating to parking. It is suggested that criteria (b) be removed from the policy.</p> <p>Criteria (c) should reference policy H3, not H5, however, its repetition is not necessary. It is suggested it be removed from the policy.</p>	<p>LPS SD1, SD2, SC7, SE1, CO2, CO4, AppC ParkingStand</p> <p>SADPD GEN1, RUR2, RUR6 to RUR10, RUR14, HOU4, HOU9, HOU11 to HOU13 INF2, REC4</p>	<p>The existing Development Plan does not achieve a satisfactory resolution of the parking problems in Bollington.</p> <p>Parking is a major problem in Bollington – we wish to emphasise this by leaving the policy in and stressing the effect of increasing vehicle sizes and the potential for underground parking provision in Bollington.</p>
IN1	To improve safety for pedestrians and cyclists	<p>Our comments regarding planning obligations made on policy MA1 of the Neighbourhood Plan, are reiterated here. Criteria (iv) is not strictly a land-use planning concern, and it is recommended that this be removed from the policy.</p>	<p>LPS IN1, IN2, CO1, CO4,</p> <p>SADPD INF1</p>	<p>The provision of supporting infrastructure with new housing developments is woefully inadequate We wish to draw attention to this to by leaving this as Infrastructure policy.</p>
IN2	To provide improved infrastructure for the visitor economy in Bollington, in accordance with Policy TAL.P1	<p>It is considered that the content of this policy would be better suited within a 'community actions/aspirations' section of the plan, as this policy is not considered to strictly relate to a land-use planning concern.</p>	<p>LPS SE1 Design SE7 Historic Environment</p> <p>SADPD GEN1 Design principles HER3 Historic Environment</p>	<p>The need is covered in the Justification section in the Tourism section</p>

APPENDIX 2 – BOLLINGTON NEIGHBOURHOOD PLAN - DRAFT RESPONSES TO SOME REG 16 COMMENTS OTHER THAN CEC.

Policy	Respondent	Respondent comments:	BNP Response
H1 / H2 / H5	Asteer Planning/ Brinkley Building Pp1-5	Brinkley own a site at Ingersley Vale which has previously had planning permission for 66 houses. They are currently negotiating a revised planning permission. They state that not all larger residential schemes will be able to include employment and propose removal of the last sentence of Policy H1 We propose the following change to H2 Criteria 3 (<i>unless it can be demonstrated through hydraulic modelling that the EA Flood Zone Map is incorrect and the Site can be taken out of the higher risk Flood Zone</i>). For Policy H5 we propose adding to criteria (b): (<i>and the findings of the Housing Needs Assessment 2024 report for Bollington</i>)	We are sympathetic to development of this historic but difficult site provided it can be delivered with reasonable access. We would be prepared to add 'except in exceptional circumstances' to the last sentence of Policy H1. We think that viability is adequately covered in Policies H1 and H2. Flood risk is a very serious issue in Bollington and the developer will have to demonstrate that his design removes the site from a high flood zone category. We believe it is clear that consideration must be given to the Housing Needs Assessment recommendations for any development in Bollington.
NPPF H1 / H2 / H4 / H5 / V1	Avalon Property/ Emery Pp39 - 61	.Avalon are developers for a site at Lowerhouse which has planning permission for 34 dwellings, The proposed revisions to the Neighbourhood Plan do not take into account the anticipated changes to the NPPF or the CEC consultation on its proposed Local Plan Review. Fundamentally, we consider that the review of the Neighbourhood Plan at this time is premature given the anticipated changes at a National Level and that it would at least be out of date at adoption. The respondents then criticise the Housing Needs Assessment on the grounds that it does not consider the wider needs of the Borough and make detailed comments on Policies H1, H2, H4, H5 and V1 which are basically that the policies are too restrictive and do not represent the needs of the Borough.	We are sympathetic to development of the site at Lowerhouse provided it can be delivered with a high level of safety against flooding from the adjacent river. The work on developing an update to the Neighbourhood Plan started in September 2023 and the Regulation 14 consultation stage with a draft version of the Plan was reached in June 2023. It is not reasonable to expect the Plan to take account of matters raised in subsequent consultations but not implemented into legal requirements. The Neighbourhood Plan does take account of the needs of the wider Borough through its meeting the Basic Conditions of compliance with the CELP and SADPD. It is a basic requirement that the Neighbourhood Plan should reflect the wishes of the Community.
NPPF V1 / GB1 / GB2	Emery Planning pn behalf of JJJHeathcote Pp62 - 141	JJJHeathcote's own a site on Shrigley Rd which has previously been put forward for development but rejected. The present submission includes a copy of the previous submissions. The proposed revisions to the Neighbourhood Plan do not take into account the anticipated changes to the NPPF or the CEC consultation on its proposed Local Plan Review. Fundamentally, we consider that the review of the Neighbourhood Plan at this time is premature given the anticipated changes at a National Level and that it would at least be out of date at adoption.	The work on developing an update to the Neighbourhood Plan started in September 2023 and the Regulation 14 consultation stage with a draft version of the Plan was reached in June 2023. It is not reasonable to expect the Plan to take account of matters raised in consultations but not implemented into legal requirements. The Neighbourhood Plan does take account of the needs of the wider Borough through its meeting the Basic Conditions of compliance with the CELP and SADPD. It is a basic requirement that the Neighbourhood Plan should reflect the wishes of the Community.

		The final sentence of the Vision is too negatively worded and does not reflect the role of Bollington as a Local Service Centre through the Cheshire East LPS. Overall the Plan is too restrictive for the development Bollington needs. Emery repeat concerns which they expressed at the time of the Regulation 16 stage of the version of the Plan adopted in 2018	Comments made at the Regulation 16 stage of the original Plan were not accepted then and should not carry any weight now.
NPPF E1	Polytech Liquid Polymers / Emery Planning Pp142-165	Polytech Liquid Polymers are based at Nab Works, a quarry at the extreme North end of the Parish Boundary. The proposed revisions to the Neighbourhood Plan do not take into account the anticipated changes to the NPPF or the CEC consultation on its proposed Local Plan Review. Fundamentally, we consider that the review of the Neighbourhood Plan at this time is premature given the anticipated changes at a National Level and that it would at least be out of date at adoption. the BNP should ensure that the policies in The Green Environment section provide a positive basis to support the objectives of Policy E1. The policies relating to the Green Belt do not refer to the introduction of 'grey belt' land which (based upon the WMS) is introduced into the draft National Planning Policy Framework (expected to be adopted in the New Year). The wider Nab Works site, identified as a current employment area under BNP Policy E1 would constitute 'grey belt' and in line with draft NPPF Paragraph 152, which covers commercial as well as housing and other development, it would benefit from a less restrictive policy basis.	It is not reasonable to expect the Plan to take account of matters raised in consultations but not implemented into legal requirements. The Neighbourhood Plan does take account of the needs of the wider Borough through its meeting the Basic Conditions of compliance with the CELP and SADPD. It is a basic requirement that the Neighbourhood Plan should reflect the wishes of the Community. The Neighbourhood Plan would be sympathetic to employment proposals that increase employment within existing sites.
NPPF H1 / H2	Gladman Developments Ltd Pp167-172	Reference is made to the emerging NPPF consultation being carried out by the Government. It is considered that some policies do not reflect the requirements of national policy and guidance and therefore fails to support the delivery of growth within and around the Local Service Centre. Gladman's main concern with policies H1 and H2 lies with the wording, 'large residential developments greater than fifty dwellings, without accompanying employment opportunities and supporting infrastructure will not be supported.' And the relation to the settlement boundary Gladman encourages the re-phrasing to 'within or adjacent to the settlement boundary where consistent with national policy' to be consistent throughout the Neighbourhood Plan when considering locations for future development.	It is not reasonable to expect the Plan to take account of matters raised in consultations but not implemented into legal requirements. The policies concerning developments of greater than 50 dwellings are based on the results of the Questionnaire and it is a basic requirement that the Neighbourhood Plan should reflect the wishes of the Community.

<p>NPPF GB2</p>	<p>Knights on behalf of Mr H Cumberbirch Pp174-179</p>	<p>Mr Cumberbirch is the owner of one of the safeguarded sites in Bollington, BOL1. It is submitted that Policy GB2 does not comply with the Basic Conditions and should be amended or deleted from the Plan. Reference is made to the Government’s consultation on planning policy and the much increased requirement for housing numbers that will have to be met</p>	<p>It is not reasonable to expect the Plan to take account of matters raised in consultations but not implemented into legal requirements. Paragraph 1 of the NPPF 2023 refers to plans as providing for sufficient housing and other development in a sustainable manner. The term ‘development’ clearly does not refer only to housing but must include other requirements for use of land. Site BOL1 is classed as having medium habitat distinctiveness and being a stepping stone of a wildlife corridor in the independent report by Cheshire Wildlife Trust. The land immediately adjacent to the North of site BOL1 is classed as high habitat distinctiveness. The NLG Ecology report identifies both BOL1 and BOL2 as having medium habitat distinctiveness and being stepping stones in wildlife corridors and recommends that the sites should be protected from development and considered for habitat enhancement to help provide a site for biodiversity gain now required for all building developments. Site BOL1 is heavily contaminated by industrial disposal of chemicals from the printing industry, but has become a reserve for badgers, foxes, bats and owls amongst other species. With the requirement for biodiversity gain with all housing developments it makes eminent sense to concentrate this requirement from development on other sites onto this one.</p>
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APPENDIX 3 – SUBMISSION BY MERSEY FOREST TO REG. 14 CONSULTATION

Response to the Bollington Neighbourhood Plan

The Mersey Forest Team welcomes the opportunity to comment on the Bollington Neighbourhood Plan update.

Cheshire East is a core Partner in the Mersey Forest. The Mersey Forest is one of England's Community Forests established in 1991 with the vision to "get more from trees" to help make Merseyside and Cheshire one of the best places in the country to live.

The Forest works with partners, communities and landowners across rural and urban areas, to plant trees and woodlands, improve their management and complement other habitats. This will increase woodland cover to 20% of the area. It will revitalise a woodland culture and bring economic and social benefits through the transformed environment.

The Mersey Forest Plan is a long term and strategic guide to the work of the Forest and its partners. It is recognised in the National Planning Policy Framework as a material consideration in preparing development plans and deciding planning applications.

[The Mersey Forest Plan web version single new.pdf \(merseyforest.org.uk\)](https://www.merseyforest.org.uk/mersey-forest-plan-web-version-single-new.pdf)

Bollington sits within the Mersey Forest boundary, therefore it is recommended that Bollington Neighbourhood Plan makes reference to the Mersey Forest Plan, drawing particular attention to policies related to objectives of the Neighbourhood Plan:

Policy 2 Empowering communities: We will encourage all to participate in the planning, enhancement and enjoyment of The Mersey Forest and, through their commitment to it, to play a part in its long-term stewardship and ownership.

Policy 13 Wildlife, biodiversity, and ecosystems: We will ensure that the natural regeneration, planting and management of trees, woodlands and associated habitats has a positive impact on biodiversity, complementing other important habitats. Ecological networks will be maintained, enhanced, repaired and created to allow species to move. In some instances, for example where a site has a statutory designation or is a Local Wildlife Site for a different habitat, planting is likely to be inappropriate.

Policy 14 Climate change: We will safeguard, plant and manage trees and woodlands for their role in climate change mitigation, adaptation, and resilience – such as providing urban cooling, carbon storage, flood alleviation and water management, helping wildlife adapt, low carbon fuels and products, sustainable travel routes, and outdoor recreation opportunities. We will design, plant and manage them to increase their resilience to potential climate change impacts, such as changing pests and diseases.

Policy 17 Health and wellbeing: We will promote the health and wellbeing benefits of trees and woodlands, for individual health as well as the wider wellbeing of our communities. We will make use of the maturing woodland resource to support the five ways to wellbeing. We will work with health professionals to maximise the use of woodlands, from increased day to day use, through to General Practitioner referrals.

Policy 20 Culture, heritage, and landscape: We will work towards a new culture around trees and woodlands, and their usefulness to society. This will include engaging communities by integrating landscape, heritage, and the arts into the design, planting and management of trees and woodlands.

The Mersey Forest Plan is currently being refreshed with input from partners, including Cheshire East Council, with the aim to update policies to facilitate the continued support for tree planting and nature recovery across the Mersey Forest area. Increasing canopy cover to mitigate effects of climate change through tree and woodland planting is crucial for future-proofing urban settlements. We are currently working to produce an updated policies map that will set refreshed tree cover targets across the Mersey Forest area.

The Mersey Forest Team can assist with advising on tree planting scheme designs and delivery. The Mersey Forest has a number of delivery programmes to facilitate tree planting and habitat establishment, such as Trees for Climate and Northern Forest. The Forest can also support delivery through Section 106 agreements or Community Infrastructure Levies where it can be shown that our funds provide additionality in terms of the delivery of The Mersey Forest Plan. This will support Bollington's objective to preserve Open Spaces, retain the extent of the Green Belt and enhance valued wildlife habitats with native species.

We would welcome a meeting with those working on the Bollington Neighbourhood Plan for further discussions.

If you have any queries, please do not hesitate to contact me.

On behalf of The Mersey Forest

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Katie Wilson', written in a cursive style.

Katie Wilson MPlan

Planning Officer