

Knutsford Town Council

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Andy Mead

Examiner

Thursday 13th December 2018

Your Ref: 02/AM/KNP

Dear Mr Mead,

RESPONSES TO QUESTIONS RAISED 07/12/2018

Please find below the Town Council's responses to the questions raised to us in your letter of the 7th instant.

Please could a plan be supplied demonstrating the possible conflict between CELPS housing allocation LPS 38 and the KNP Local Green Space (LGS) 32. A plan at an extremely useful scale was attached to the Regulation 16 response on behalf of Dewscope Ltd (CEC report of 5th October 2018). It would be helpful if the same base could be used, showing the boundaries of each of those two areas together with LGS 37. Is LPS 38 Green Belt, or did it cease to be Green Belt on adoption of the CELPS? Am I correct in assuming there is no conflict between the LPS 38 and LGS 37?

A plan is attached.

LPS 38 (development site) is no longer Green Belt but both LGS 32 (playing fields) and LGS 37 (booths mere woodland) are.

The conflict that Cheshire East Council proposes is that it plans to allow an access road to the development site through the playing fields. The Town Council is opposed to this but regardless considers that the LGS 32 should be designated as Local Green Space even if there is to be a road, to ensure the protection of the remainder of the site. There is no conflict at all with LGS 37.

Local Green Spaces 32, 37 and 29 constitute the vital green corridor from the open countryside to St John's Wood LWS (LGS 26). It is essential that, to maintain the integrity of the green corridor, all three of these sites are protected from development.

The Proposals Map shows Informal Open Space and Protected Open Space on either side of Mereheath Lane beyond LGS 1. There is no policy or other reference in the KNP to those open spaces and I could not see any distinguishing feature on the ground? What are they and what is the justification for including them in the Plan?

The designation of these two areas is taken from the Cheshire East Local Plan 2017 (pages 304-308)

The KNP Proposals Map Neighbourhood Plan Central Zone Inset includes a key in which four of the notations (Primary Shopping Frontage, Secondary Shopping Frontage, Primary Shopping Area, Town Centre Boundary) refer to Cheshire East. Are these categories each derived from the emerging SADPD and, if so, do they depend on the SADPD for the evidence base?

Yes, those four notations are as per the SADPD.

Assuming the adoption of the SADPD evidence base for the KNP, Appendix 2 of FD 34 shows Retail boundary maps (Map A: Existing and Proposed primary and secondary frontages; Map B: Existing and proposed primary shopping area; Map C Existing and proposed town centre boundary). Are all the changes from existing to proposed based on the Macclesfield Borough Local Plan and, if not, what is the source of the “existing” categories?

We understand that the existing is from the Macclesfield Local Plan 2004, but Cheshire East Council will be able to confirm.

Within the justification of the amendment of the primary and secondary frontages in Table 3 of FD 34, is Kings Street 43 – 124 (No. 4) and Kings Street 125 (No. 5), each “Mainly all A1 uses”, but the former defined as a primary frontage and the latter as secondary. Why should No.5 be defined as a secondary shopping frontage?

It would appear that this is an error in the SADPD, King Street 125 is a restaurant (A3 usage).

How will the Cheshire East Design Guide relate to the Knutsford Design Code when the KNP is made?

Context

The Cheshire East Residential Design Guide was developed alongside the Cheshire East Local Plan Strategy (CELPS) and launched prior to the formal adoption of the Local Plan Strategy in 2017. The Cheshire East Design Guide discusses in general terms the way that new residential developments should respond to local context and the core principles of urban design to deliver attractive and sustainable neighbourhoods. Discussions with the Council Officers / authors have suggested that in the main, much of this is targeted at larger residential development (the strategic allocations). The Cheshire East Residential Design Guide now operates as a supplementary planning document (SPD) and is a strong material consideration when making decisions about design matters for residential development across the Borough. Part 1 of this document (as it is spread over two volumes) does include some very broad comments about the design features within Knutsford town centre (density, character, built form), with part 2 offering the most specific 'guidance'.

Design Focus

The Knutsford Neighbourhood Plan has a very strong design focus to a number of its policies, ranging from shop frontages, guidance about design for various different uses and policies and

character and appearance at a number of different levels. These policies, of course were underpinned through developing a number of pieces of evidence - specifically the Knutsford Design Guide, the Knutsford Character Assessment and the green links study (all of which are within the core documents in support of the Neighbourhood Plan). Much of this takes the guidance contained in the Local Plan Strategy and national policy and provides a 'local flavour' or direction to the policy - the exact purpose of a neighbourhood plan. In much the same way as the Neighbourhood Plan has a relationship with the CELPS, the Knutsford Design Guide takes the broad principles set out in the Cheshire East Residential Design Guide and adds the local specific detail based on the other detailed studies undertaken for the town. This specific relationship is made in both the Neighbourhood Plan (under policy D1) and within the Knutsford Design Guide itself.

This is a direct reflection of much of the feedback from the community consultation undertaken as part of the Neighbourhood Plan, where design, character and the appearance of development was very high on the community's agenda. The Cheshire East Borough Design Guide was well supported by local groups and those drafting the plan, but it was felt to be lacking in two areas. Firstly, it gave very little guidance for design beyond larger residential schemes and secondly, that much of its guidance was strategic and simply reinforcing the overall principles of good design, which were lost from decision making when the government withdraw a suite of excellent urban design guidance documents - the Urban Design Compendium, Safer Places and By Design: Urban Design and the Planning System.

It was determined early in the neighbourhood planning process that some detailed design guidance would be necessary, but it was also felt that to simply do this by way of specific policies would be against the guidance from national policy and of course, best practice urban design. So, the design guide was developed as a flexible and comprehensive way of bringing all these ideas together into one place.

Moving beyond the Cheshire East Residential Design Guide

The other important aspect of the Knutsford Design Guide is to offer a specific design guidance for the strategic developments that were coming forward in and around the town. These are all on the edge of the settlement and will have an impact on the character and appearance of the local area - many of these forming the new gateways to the town. As a result, and as you will see from the consultation responses, it was deemed important to get these developments 'right', and to the community design, character and landscape treatment was central to this. When the Cheshire East Design Guide was developed, it was done so being 'blind' to the possible strategic development sites that may come forward. At the point of its development (when the CELPS was not adopted) that was sensible and appropriate.

Since the adoption of the CELPS in 2017, this now allows for the allocated strategic sites to be fixed, and as such, the Knutsford Design Guide is able to offer a local interpretation of the guidance in the Cheshire East Borough Design Guide. As you will see from its preamble the Knutsford Design Guide was developed by a working group, including developers and members of the community over a period of 18 months, and was the subject of consultation as part of the

regulation 14 plan consultation. Cheshire East's Design and Conservation team have also commented on the plan and changes have been made to ensure consistency.

Guidance documents working in concert

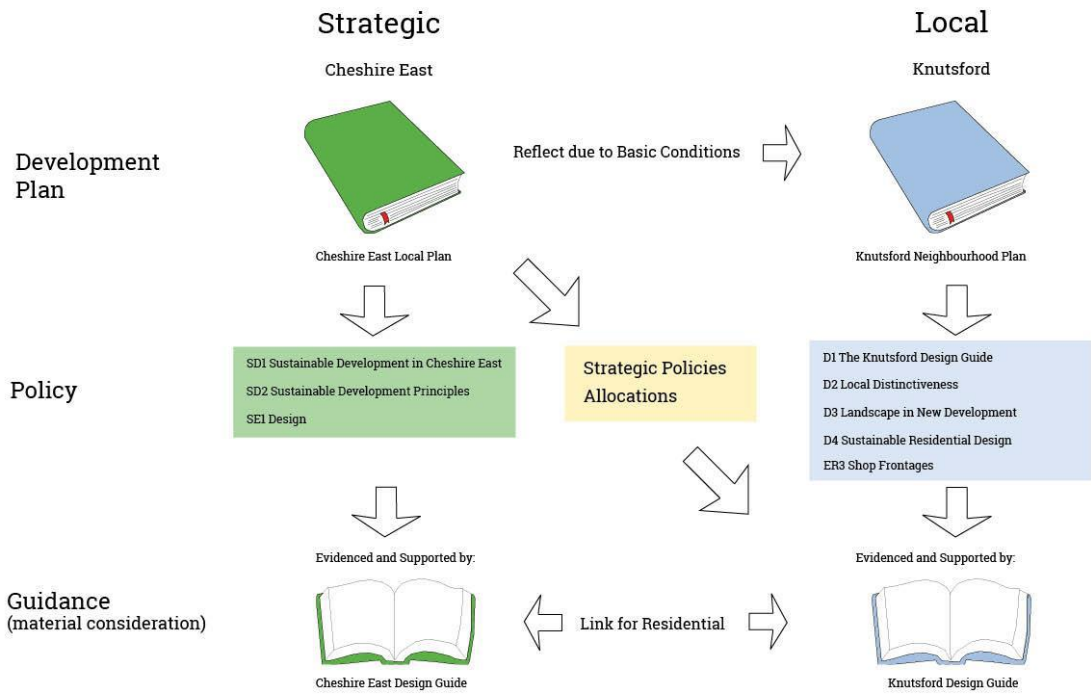
As a result, both design guides should work in concert to ensure high quality design is delivered, since they are tied to their respective parent policies (D1 – D4 of the Neighbourhood Plan and SP1, SP2 and SE1 of the CELPS). The relationship of both will be similarly supportive to the delivery of the development plan policies. Whilst the Cheshire East Residential Design Guide sets out the broad urban design principles that all developments should follow, the Knutsford Design Guide links to these and offers the local focus. In fact, on certain aspects it provides the preferred contextual approach based on the work undertaken in support of the Neighbourhood Plan. This approach being entirely in line with paragraph 125 and 126 of the Framework (2018).

In that respect, the Knutsford Design Guide fulfils the role of “identifying the special qualities of each area and explaining how this should be reflected in development.” (NPPF Paragraph 125) This is something that the Cheshire East Residential Design Guide is unable to achieve given that it should provide guidance for a multitude of towns and settlements of various sizes and context. In addition, since it focuses on residential elements, the wider employment, mixed use and retail /shop front design elements are also provided through the design guide. However, the Knutsford design guide is integrated into this wider design agenda at the Borough level. Where links to the Cheshire East Residential Design Guide are possible the Knutsford Design Guide makes these clear and where links to the specific local strategic allocations this is also clearly signposted.

Knutsford Design Guide is guidance

As a final point, it should be acknowledged that the Knutsford Design guide is only guidance, and should be treated as such. Whilst some elements are perspective, the whole approach taken has been to ‘comply or justify’ – demonstrate how you meet the guidance or can demonstrate why there are other reasons to follow an alternative design approach. This is based not only on the work undertaken in the preparation of the Design Guide itself but also with the partner evidence documents of the Knutsford Character Assessment and the Green Links study. This entire integrate approach to contextually responsive design is embedded within the Knutsford Design Guide and its parent Neighbourhood Plan policy D1.

The diagram below, is designed to summarise the relationships between the development plan documents and the two design guides:



Yours sincerely,

Adam Keppel-Green

Town Clerk

cc. Tom Evans, Cheshire East Council



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