

Woodford Neighbourhood Forum  
Woodford Community Centre  
Chester Road  
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**Our ref:** 41064/25/MW/NMi/16055825v3

**Your ref:**

By email [woodfordneighbourhood@gmail.com](mailto:woodfordneighbourhood@gmail.com) and post

Dear Sir/Madam

## **Woodford Neighbourhood Plan Regulation 14 Pre-Submission Draft (May 2018)**

Lichfields is instructed by Harrow Estates plc [Harrow] to make representations on the Woodford Neighbourhood Plan Pre-Submission Draft [NPPS] published for consultation by Woodford Neighbourhood Forum in May 2018.

These representations are made in the context of land at Woodford Aerodrome. They follow previous representations submitted on behalf of Harrow, in relation to the application submitted to Stockport Metropolitan Borough Council [SMBC] by the Woodford Community Council [WCC] under Section 61F of the Town and Country Planning Act 1990 and The Neighbourhood Planning (General) Regulations 2012. That application sought to establish the Woodford Neighbourhood Forum [WNF] and Woodford Neighbourhood Area [WNA].

Harrow requested at that time that should SMBC be minded to grant the WCC application, it should be on the basis that the Woodford Neighbourhood Area was redrawn to exclude the Woodford Aerodrome site.

On 17 October 2013, SMBC refused the application from Woodford Community Council for the designation of the Woodford Neighbourhood Area as proposed but formally designated a smaller area as the Woodford Neighbourhood Area, which excluded the Woodford Aerodrome site. The Woodford Aerodrome site is not therefore subject to the policies and provisions within the Neighbourhood Plan and it is essential that the content of the Neighbourhood Plan reflects this position. The comments in this response therefore need to be considered in this context.

However, Harrow recognise the importance of ensuring that the Aerodrome development integrates well with and helps serve the needs of the existing community, given its close proximity to the existing village. Whilst Harrow generally supports the concept of a Neighbourhood Plan for Woodford it has concerns with the content of some parts of the NPPS and these are set out in the representations below.

The Framework<sup>1</sup> states that:

*“Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan... Neighbourhood Plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood Plans should not promote less development than set out in the Local Plan or undermine its strategic policies”.*

The Practice Guidance<sup>2</sup> states that only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in Section 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:

- 1 Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- 2 Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- 3 Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- 4 The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- 5 The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- 6 The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- 7 Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

Harrow consider the NPPS does not meet these requirements in certain respects. Specifically, the submission provides representations in relation to the policies and parts of the Plan listed below:

- 1 General comments on the NPPS
- 2 Section 4.3 – Woodford Today
- 3 Section 6.3 - Aspirations
- 4 Section 7.2 – Environment Policies
- 5 Section 7.3 – Employment Policies
- 6 Policy DEV3 - Affordable Housing
- 7 Section 9 – Village Action Plan

## **General Comments**

As a general comment, Harrow note that there is a lack of clarity in the wording of a number of policies on the geographical area covered by the policies within the NPPS. For example, reference is made to *“the*

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<sup>1</sup> National Planning Policy Framework, §184

<sup>2</sup> Planning Practice Guidance Reference ID: 41-065-20140306

*village*” (Policy ENV2 and Policy EMP3), “*Woodford*” (Policy COM2, Policy COM3, Policy DEV1, Policy DEV3, Policy DEV4, Policy DEV6, and Policy DEV8), and “*Woodford Village*” (Policy DEV2). It is not clear whether these descriptions refer to more distinct geographical areas within the Neighbourhood Area and there are no individual plans within the NPPS to suggest such.

### **Recommended Change**

In the interests of clarity and for the avoidance of any doubt, it is considered that reference should be made to “*the Woodford Neighbourhood Area*” within the Neighbourhood Plan Policies and explanatory text unless there is a specific need to deviate from this definition (for example, where a distinct part of the Neighbourhood Area is specifically being referred to). If a distinct area is being referred to, rather than the whole Neighbourhood Area, this area should be clearly identified on a plan within the document.

### **Section 4.3 – Woodford Today**

Confirmation in the NPPS (page 11, second paragraph) that the Neighbourhood Area does not include the Aerodrome site and the identification of the Neighbourhood Area on page 6 of the NPPS is welcomed.

With regard to the mixed-use residential-led scheme on the Aerodrome site which benefits from planning permission and is currently under construction, the NPPS text (page 12, first paragraph) states the following:

*“The population in the parish of Woodford will triple as a result of this development, posing challenges for the community facilities and for integration of new and existing residents”.*

In the interests of fairness and balance, it is considered that the NPPS should recognise the significant benefits that the Aerodrome scheme is capable of delivering for the local community. For example, the planning permission includes a public house, retail floorspace (up to 5 shop units), use class D1 floorspace (which could potentially house a creche facility, doctor’s surgery etc. depending upon occupier interest) and a primary school. The significant amounts of open space provided in the site will also be available for use by the local community. All of these facilities will encourage integration between new and existing residents and should therefore be recognised in this section of the Neighbourhood Plan.

### **Recommended Change**

The following wording should be added to the end of the first paragraph on page 12:

*“However, it should also be noted that the permitted scheme on the Aerodrome site is capable of delivering significant benefits to the local community which will encourage integration between existing and new residents including a public house, local shops, a creche facility/doctor’s surgery (depending upon occupier interest) and a primary school. Public open space within the site will also be available for the use of the wider community”.*

### **Section 7.2 – Environment Policies**

The NPPS (page 23, final paragraph) refers to a Cheshire Wildlife Trust [CWT] Report for Woodford and makes the following statement:

*“The CWT report highlighted that the important wildlife habitats in Woodford are associated with the River Dean and its tributary south of Blossoms Lane, the grasslands, woodlands, hedgerows and wetlands found across the parish. The report notes the value of species-rich hedgerows, particularly in the vicinity of Blossoms Lane and to the west of the former aerodrome site. It also notes that recent development on the adjacent aerodrome site will disturb breeding curlews, which are a globally near threatened species, and brown hare which is a species of county importance”.*

As the Aerodrome site does not fall within the Neighbourhood Area it is not clear why the final sentence of this paragraph has been included and it is not considered to be relevant.

### **Recommended Change**

The final sentence of the paragraph quoted above should be deleted.

### **Section 7.3 – Employment Policies**

In the Rationale for the employment policies (page 39, third paragraph) the NPPS states:

*“It was evident from our residents’ survey that existing brownfield sites were the preferred option for any new employment sites and the former aerodrome site would be the most obvious place for any such sites. Evidence from the same source also confirmed that residents did not wish to see further loss of employment and that better broadband provision would be a positive asset to business. From our surveys there is clearly very limited appetite for further development in order to provide employment unless it was on brownfield land on the former aerodrome site but there was clearly support for the re-use and refurbishment of existing buildings. As far as future employment in Woodford was concerned residents principally favoured small shops, tourism and pubs and restaurants”.*

Given that the Aerodrome site does not lie within the Neighbourhood Area, Harrow consider that this element of the survey findings, which indicates a reliance upon the potential use of the site for employment purposes, is not of direct relevance to the Neighbourhood Plan. Notwithstanding this point, Harrow note that employment development forms part of the permitted scheme on the Aerodrome site (with the planning permission granting permission for the erection of up to 8.631 sq m [90,000 sq ft] of commercial floorspace).

### **Recommended Change**

The above paragraph should be reworded as follows:

*“It was evident from our residents’ survey that existing brownfield sites were the preferred option for any new employment sites and the former aerodrome site would be the most obvious place for any such sites. Evidence from the same source also confirmed that residents did not wish to see further loss of employment and that better broadband provision would be a positive asset to business. From our surveys there is clearly very limited appetite for further development in order to provide employment unless it was on brownfield land ~~on the former aerodrome site~~ but there was clearly support for the re-use and refurbishment of existing buildings. As far as future employment in Woodford was concerned residents principally favoured small shops, tourism and pubs and restaurants”.*

### **Policy DEV3 - Affordable Housing**

Harrow strongly object to Policy DEV3 as the policy would currently apply to development of Woodford Aerodrome, which lies outside the Neighbourhood Area boundary. The policy states (inter alia):

*“Affordable housing should be provided within the Plan Area and or/within the former aerodrome to meet Woodford’s Housing needs as follows...”*

With regard to the drafting of policies in Neighbourhood Plans the Practice Guidance states<sup>3</sup>:

*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient*

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<sup>3</sup> Planning Practice Guidance Reference ID: 41-041-20140306

*clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared”.*

The policy as currently worded is unclear and ambiguous given that it seeks to apply itself to land outside of the Neighbourhood Area boundary. There is no justification for applying the policy requirements to the Aerodrome site. It would not be possible to apply Policy DEV3 as currently worded as it would not be distinct to the planning context of the specific Neighbourhood Area for which it has been prepared.

### **Recommended Change**

Reference to Woodford Aerodrome within Policy DEV3 should be removed. Harrow suggest that the following alternative policy wording would be appropriate to demonstrate that the Aerodrome site is not subject to the policy and that it covers the Neighbourhood Area only:

*“Affordable housing should be provided within the Neighbourhood Plan Area and/or within the former aerodrome to meet Woodford’s Housing needs as follows...”*

### **Section 9 – Village Action Plan**

Whilst it is noted that they do not constitute policy requirements, Harrow note that the focus of a number of the aspirations in the Village Action Plan appears to be the Woodford Aerodrome site despite the fact that the site lies outwith the Neighbourhood Area. Whilst it may be the case that benefits from the Aerodrome Scheme are delivered within the Neighbourhood Area (for example through improved traffic calming measures or improved bus services) the wording of the aspirations must be considered in the context of the area which the Neighbourhood Plan covers and the development which will take place within the Neighbourhood Area itself.

There is a clear statutory planning policy framework in place for the Aerodrome Site (Stockport Core Strategy and Woodford Aerodrome Opportunity Site Supplementary Planning Document). Importantly, the purpose of the SPD, which was adopted in January 2013, is to provide guidance for the future development of the site and in particular contains objectives to inform the way in which the site is developed and used. Substantial consultation has been carried out in relation to the Woodford Aerodrome site and this consultation helped to shape the content of the adopted SPD and provided important input into the preparation of the planning applications.

Planning permission has now been granted for the residential-led mixed-use development of the site and a number of the aspirations identified in the Village Action Plan are addressed through this permission and the associated s106 agreement. In particular, a number of benefits are delivered by the permission and will be provided by the developer including cycleways, public transport improvements and traffic calming measures. As the Aerodrome site lies outside of the Neighbourhood Area, and the benefits of its development are delivered through the provisions identified above, the aspirations of the Village Action Plan which directly relate to the Aerodrome site are not considered to be justified or necessary and should be removed.

### **Recommended Change**

- 1 The Aerodrome site does not lie within the Neighbourhood Area and its development is guided by statutory planning policy in any event. In addition, the aspirations identified in the Village Action Plan are addressed through the planning permission and the associated s106 agreement. Therefore, any reference to the Aerodrome site, in terms of requirements for its development and associated benefits sought, and any reference to the developers (i.e. Redrow Homes) should be removed from the Village

Action Plan.

- 2 If the Neighbourhood Forum does not delete the aspirations, then the wording of the Village Action Plan must reflect the fact that planning permission has been granted on the Aerodrome site and is subject to a s106 Agreement and contributes to addressing the aspirations identified in the Village Action Plan. As a consequence, the aspirations will only be relevant if Stockport MBC decides to allocate future additional development on the Aerodrome site (i.e. more than the 920 dwellings which currently benefit from planning permission). In these circumstances, additional requirements will be placed on that development through GMSF policy and any subsequent planning permission/s106 Agreement.

## Detailed Wording of Aspirations

Any aspirations for the aerodrome site should therefore be worded in the context of that additional development on the site and the opportunities this may bring in terms of benefits. In particular:

- 1 **Aspiration 1: Walking Provision** – The aspiration specifically mentions Redrow Homes and suggests that developers will be expected to contribute financially to effect this provision. Harrow wishes to note that there can be no expectation to make any financial contribution in relation to development on the Aerodrome site given that the site is located outside of the Neighbourhood Area and, on this basis, it is not clear why Redrow Homes is specifically identified. However, they recognise the need to create a safe and secure network of walking routes around and within Woodford and wish to note that they have contributed to this aim through the permitted scheme on the Aerodrome site in any event. The recommended change below also suggests wording to account for additional development opportunities which may arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission).

### Recommended Change

The first sentence of Aspiration 1 should be amended as follows:

*“The Community will work with SMBC, ~~Redrow Homes~~, Cheshire East and developers (who will be expected to contribute financially to effect this provision) to create a safe and secure network of walking routes around and within ~~Woodford~~ the Neighbourhood Area and improve links with surrounding areas. In relation to the Aerodrome site (which lies outside of the Neighbourhood Area) this aspiration has been addressed through the planning permission and Section 106 Agreement relating to the residential-led mixed-use scheme that is currently under construction. If additional development opportunities arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission), there may be further benefits to the Neighbourhood Area in the context of this aspiration and these benefits will be secured through future planning permissions and associated Section 106 Agreements”.*

- 2 **Aspiration 2: Cycling Provision** - The aspiration also specifically mentions Redrow Homes and suggests that developers will be expected to contribute financially to effect this provision. Harrow wish to note that there can be no expectation to make any financial contribution in relation to development on the Aerodrome site given that the site given that the site is located outside of the Neighbourhood Area and, on this basis, it is not clear why Redrow Homes is specifically identified. However, they recognise the need to create a safe and secure cycling network and wish to note that they have contributed to this aim through the permitted scheme on the Aerodrome site in any event. The recommended change below also suggests wording to account for additional development opportunities which may arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission).



## Recommended Change

The first sentence of Aspiration 2 should be amended as follows:

*“The Community will work with SMBC, ~~Redrow Homes~~, Cheshire East and ~~other~~ developers (who will be expected to contribute financially to effect this provision) to create a safe and secure cycling network within the Neighbourhood Area. In relation to the Aerodrome site (which lies outside of the Neighbourhood Area) this aspiration has been partly addressed through the planning permission and Section 106 Agreement relating to the residential-led mixed-use scheme that is currently under construction. If additional development opportunities arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission), there may be further benefits to the Neighbourhood Area in the context of this aspiration and these benefits will be secured through future planning permissions and associated Section 106 Agreements”.*

- 3 **Aspiration 3: Public Transport Provision** – The aspiration to achieve better quality and more frequent bus services is generally supported. However, Aspiration 3 as worded appears to assume that Redrow Homes will be the developer facilitating the provision of improved public transport provision as the developer is specifically referred to (despite the Woodford site being located outwith the Neighbourhood Area). The aspiration should be re-worded to make clear that such provision may be facilitated by other developers within the Neighbourhood Area. The recommended change below also suggests wording to account for additional development opportunities which may arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission).

## Recommended Change

Aspiration 3 should be amended as follows:

*The Community will work with SMBC, ~~Redrow Homes~~, the LHA, Transport for Greater Manchester [TfGM], Cheshire East and others to achieve better quality and more frequent bus services for ~~Woodford~~ the Neighbourhood Area with a greater range of destinations. We will support the extended provision of services in the evenings and at weekends to encourage the use of public transport for access to leisure opportunities. In relation to the Aerodrome site (which lies outside of the Neighbourhood Area) this aspiration has been partly addressed through the planning permission and Section 106 Agreement relating to the residential-led mixed-use scheme that is currently under construction. If additional development opportunities arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission), there may be further benefits to the Neighbourhood Area in the context of this aspiration and these benefits will be secured through future planning permissions and associated Section 106 Agreements”.*

- 4 **Aspiration 4: Traffic Calming** – The aspiration also specifically refers to Redrow Homes. There is no justification for this reference given that the Aerodrome site is not within the Neighbourhood Area.

## Recommended Change

The first paragraph of Aspiration 4 should be amended as follows:

*“The Community will work with SMBC, the LHA, TfGM, ~~Redrow Homes~~, Cheshire East and others to produce a programme of schemes designed to improve safety for all road users, and to encourage increased levels of walking and cycling. This will include speed reduction schemes where appropriate. In relation to the Aerodrome site (which lies outside of the Neighbourhood Area) this aspiration has been partly addressed through the planning permission and Section 106 Agreement relating to the residential-led mixed-use scheme that*

*is currently under construction. If additional development opportunities arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission), there may be further benefits to the Neighbourhood Area in the context of this aspiration and these benefits will be secured through future planning permissions and associated Section 106 Agreements”.*

- 5 **Aspiration 6: Connecting** - The aspiration states that the integration of the footpath network, with the restoration of historic routes which link beyond the Aerodrome site, and the creation and extension of pedestrian and cycling routes through the new development will be encouraged. Harrow note that the permitted scheme on the Aerodrome site contributes to achieving these aims but again wish to emphasise that as the Aerodrome site falls outwith the Neighbourhood Area and Aspiration 6 needs to be worded accordingly. The recommended change below also suggests wording to account for additional development opportunities which may arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission).

### **Recommended Change**

The first paragraph of Aspiration 6 should be amended as follows:

*“The development of physical infrastructure, which facilitates linkages throughout the extended village, will be encouraged and supported. Creating and making linkages between new and existing parts of the village and their facilities will be advocated and consistent with the Forum’ aspirations for safe movement around the village. The integration of the footpath network, with the restoration of historic routes which link beyond the aerodrome site, ~~and the creation and extension of pedestrian and cycling routes through the new development~~ will be encouraged. In relation to the Aerodrome site (which lies outside of the Neighbourhood Area) this aspiration has been partly addressed through the planning permission and Section 106 Agreement relating to the residential-led mixed-use scheme that is currently under construction. If additional development opportunities arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission), there may be further benefits to the Neighbourhood Area in the context of this aspiration and these benefits will be secured through future planning permissions and associated Section 106 Agreements”.*

- 6 **Aspiration 7: Interfacing** - Harrow are willing to work with the community when preparing proposals for the redevelopment of the former Bodycote site (which falls within the Neighbourhood Plan Area) and will consider how to integrate any scheme with the existing village. However, it is not considered that the creation of a masterplan for development at the interface of the village and the Aerodrome site is necessary as access arrangements and treatment of the Chester Road frontage have already agreed with Stockport MBC as part of the planning permission for the Aerodrome site. The recommended change below also suggests wording to account for additional development opportunities which may arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission)

### **Recommended Change**

The wording of Aspiration 7 should be amended as follows:

*“Establishing and maintaining a dialogue with the land owner, developer and local authority and with the community ~~to promote the creation of a masterplan for development at the interface of the old and new villages~~ to support effective integration of the old and new villages two parts will be encouraged. In relation to the Aerodrome site (which lies outside of the Neighbourhood Area) this aspiration has been partly addressed through the planning permission and Section 106 Agreement relating to the residential-led mixed-use*



scheme that is currently under construction. If additional development opportunities arise on the Aerodrome site (beyond the 920 dwellings already granted planning permission), there may be further benefits to the Neighbourhood Area in the context of this aspiration and these benefits will be secured through future planning permissions and associated Section 106 Agreements.

*The Forum believes that there is an opportunity to provide an enhanced 'centre' of the village at this interface with the new development. This might build on the commercial content of the Approved scheme for the Aerodrome site which includes retail and commercial space, a public house and a care home. The development area might also embrace the former Bodycote site which has a direct frontage to Chester Road and falls within the Neighbourhood Plan Area. ~~The Forum recommends that this area is considered in its context at the interface between the new development and the existing village and effectively master planned to create a distinct 'centre' to the village.~~*

*Considerations will include improved connections across Chester Road, a reduced speed limit, the proximity to existing bus stops and clear signposting to the Avro Museum [an important local cultural asset]".*

We trust that the above representations will be given full consideration by the Neighbourhood Forum and that the Neighbourhood Plan will be amended accordingly prior to submission to Stockport Council.

Please can you confirm receipt of these representations by return.

Yours faithfully



**Nicholas Mills**  
Senior Planner

Copy

Mr T Noden – Harrow Estates plc