

29<sup>th</sup> June 2018

Woodford Community Centre  
Chester Road  
Woodford  
Stockport  
Cheshire  
SK7 1PS

Dear Sir/ Madam,

**Representations to Woodford Neighbourhood Plan Pre-Submission Consultation  
On behalf of Wallace Land Investments**

On behalf of our client, Wallace Land Investments, we set out representations to the Woodford Neighbourhood Plan Pre-Submission (Regulation 14) consultation.

Wallace Land Investments ("Wallace") specialise in the promotion and subsequent delivery of strategic land for residential and mixed-use development across England and Scotland. These schemes range from 50 to 2,500 new homes and involve a mixture of uses such as employment land and community facilities and infrastructure. From this experience Wallace understands the need for local and neighbourhood plans to deliver the right amount of homes and jobs in the right locations in aid of facilitating thriving and sustainable local places the country needs. To do this, every effort should be made to objectively identify and meet the full housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.

Wallace have land interests in the Woodford Neighbourhood Plan area and would welcome a continued and positive dialogue with the Neighbourhood Plan Group in order to deliver a sustainable future for Woodford.

At the outset, it must be noted that we support the Woodford Community Council's decision to pursue a Neighbourhood Plan and that our comments are intended to be constructive and highlight those aspects of the plan that may require revision to meet the basic conditions tests and see the plan 'made'.

***Development Policies (Section 7.5 & 8.5)***

It is clear from the rationale and justification that this plan seeks to meet a localised housing need for Woodford (of 20-25 units from 2011-2026), based on a 2015 AECOM Housing Need Assessment, through limited infilling and redevelopment of previously developed sites in line with national green belt policy.

However, this does not take account of the wider housing needs of Stockport, which are being addressed through the Greater Manchester Spatial Framework and emerging Stockport Local Plan. The draft GMSF, which was published in October 2016, set an overall

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housing requirement for 19,300 dwellings in Stockport from 2016-2036, equating to 965 dwellings per annum (dpa) and included an allocation within the Woodford Neighbourhood Plan Area (Ref: OA20) for up to 2,400 dwellings.

A further draft of the GMSF is due later this year and whilst the Council's recent SHLAA has identified increased brownfield capacity within the borough, which may reduce the numbers required from strategic allocations, this is off-set by the fact that the Government's Standard Housing Need Methodology shows an increased need for Stockport of 1,078 dpa (an increase of 12%). As such it is likely that the revised GMSF will still need to identify significant strategic allocations in Stockport, and as has already been demonstrated, Woodford is a sustainable location for future housing growth.

Whilst we appreciate that current national policy does not allow Neighbourhood Plans to amend Green Belt boundaries to allocate sites for development; we would expect the Neighbourhood Plan to at least refer to or acknowledge where allocations are proposed as part of an emerging plan, as to not do so, would clearly conflict with paragraph 184 of the NPPF (or paragraph 31 in the revised draft NPPF), which requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan. Accordingly, the plan as drafted does not meet the basic condition of compliance with national policy.

Furthermore, the revised Draft NPPF which was subject to consultation from March to May 2018 and is due to be adopted this Summer, actually does allow Neighbourhood Plans to amend Green Belt boundaries, with paragraph 135 noting:

*"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans."*

#### AECOM Neighbourhood Plan Housing Policy Advice

Notwithstanding the wider housing need implications, we also have concerns with the localised housing need assessment produced by AECOM. Firstly, this is based on the 2012 SNPP population projections, which are now very dated as they have been superseded by both the 2014 version and more recently, the 2016 version (which came out in May 2018).

The NPPG (para 2a-016-20150227) confirms that local needs assessments should be informed by the latest available information where possible; but notes that assessments based on older projections are only rendered out of date if there has been a meaningful change in the housing situation.

In the case of Stockport, there has been a meaningful change as population growth has increased significantly across the Neighbourhood Plan period between the 2012 and 2016 SNPP (from 992 to 1,409 per annum, an increase of 42%). This assessment also refers to data from the 2008 SHMA and 2010 SHLAA which have both been superseded.



As such, the assessment is out of date and will need to be updated before this plan is submitted for Examination.

Moving on to the content of the AECOM assessment, we note that it confirms an aging population in Woodford, which is well above the national average in both the 45-64 and 65+ cohorts. It also notes a predominance of larger properties in the existing stock, and conversely a lack of smaller houses, apartments and specialist disability accommodation; whilst affordability and affordable need are clearly major issues.

The allocation and delivery of larger scale market housing developments will help to address these issues and provide more balance in the local housing market, as they will attract a younger economically active demographic, can provide a range of different house sizes in line with local need, will reduce affordability pressures, and can provide on-site affordable housing provision in line with policy requirements (subject to viability).

#### Policy DEV3 Affordable Housing

This policy states that on new housing sites of 5 or more dwellings, 50% affordable housing should be provided on site. This aligns with Policy H-3 of the adopted Stockport Core Strategy (2011), which sets a 5-dwelling affordable threshold and 50% target for areas with above average property prices.

However, this does not align with the NPPG (para 23b-031-20161116) which only allows local authorities to apply the lower threshold in 'designated rural areas' in line with section 157(1) of the Housing Act 1985 (which requires them to be designated by the Secretary of State).

It is unclear whether any of the areas listed in policy H-3 are designated rural areas, although it is clear that places like Gatley and the Heaton are not and that this is not the purpose of the policy (which clearly identifies areas with above average house prices). As such it is arguable that this policy is rendered out of date by the NPPG and should be removed, or changed to apply the standard 10 dwelling affordable threshold.

In addition, it is unclear whether the 50% affordable requirement is still viable in these areas, as the housing market and development economics have changed considerably since the Core Strategy was adopted in 2011. As such, if the Neighbourhood Plan does wish to include such a high affordable requirement on small sites, it is suggested that a local viability exercise is undertaken to support the plan; as otherwise the Plan could actually hinder and prevent development, conflicting with the NPPF requirement to boost housing supply, and therefore failing the basic condition of satisfying national policy.

#### ***Employment Policies (Section 7.3 & 8.3) & Community Polices (Section 7.4 & 8.4)***

We fully support the overall aim to protect and support the 110 businesses within the Neighbourhood Plan area, and to encourage new small business and rural tourism ventures (EMP1 and EMP2). We also support the aim to protect and support existing and new community facilities (as per policies COM1 and COM2).



However, we are concerned that the level of housing growth (20-25 units over 15 years) proposed in the plan will not support these aspirations and mean that new business and community facilities are unlikely to be delivered; as simply supporting such facilities within Neighbourhood Plan policies is not enough, there needs to be sufficient footfall and spending capacity in the local area to make these businesses viable and to maintain the vitality of the village in line with paragraph 55 of the NPPF.

Below we set out the levels of local household expenditure that would be generated by different levels of housing development:

- 20 dwellings (lower range of AECOM local need assessment) = £512,000 per annum
- 25 dwellings (upper range of AECOM local need assessment) = £640,000 per annum
- 100 unit (modest sized market housing development) = £2.56m
- 2,400 dwellings (as proposed in the draft GMSF) = £61.5m per annum

As demonstrated above, the delivery of 100 + units in Woodford could generate significant household spending which would make a massive contribution to existing businesses and increase the chances of additional investment.

### ***Supporting Documents***

We have already made comments on the local housing needs assessment, which has been prepared by AECOM, as has the Heritage and Character Assessment; however it is unclear whether the Woodford Landscape and Environment Study has been prepared or reviewed by a suitably qualified Landscape Architect. Whilst we do not raise any issues with the content of this report, this has clearly informed the environmental policies within the plan and therefore this is something an examiner would likely seek clarification on.

### **Conclusions**

Overall Wallace Land Investments fully support the Woodford Neighbourhood Plan, and have sought to offer constructive comments where possible to ensure that it meets the basic conditions required for it to go to referendum and be made.

It is our strong view that, to meet the basic conditions, the plan will need to take account of the GMSF and wider strategic needs in Stockport, rather than relying on a localised need assessment, which is out of date in any event.

The letter has also demonstrated how more larger scale housing development (beyond the 20-25 dwellings supported in the plan) will deliver a series of economic and other benefits which will help to support the wider aspirations of the Neighbourhood Plan, not least the protection and support of local businesses and community facilities.

We trust the above representations are clear but should you have any questions, please do not hesitate to contact me. Otherwise, please keep us informed of any further consultations on the Neighbourhood Plan and associated documents, using the contact details below.



Yours faithfully



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