

Woodford Neighbourhood Plan

Representations to Regulation 14 Consultation and WNF Responses

This document presents all the representations received by Woodford Neighbourhood Forum to Regulation 14 Consultation on the Woodford Neighbourhood Plan during the consultation period 16th May to 30th June 2018.

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Responses to representations from How Planning are written within their text which is added at the bottom of this document (page 85).	

Summary

The Forum received and addressed 269 comments in total, in representations from:

- 99 residents who supported the draft Plan
 - 66 of these supported with no comments
 - 33 submitted a total of 81 comments, which included strong support, caveats and suggestions.
- 3 residents who objected and submitted a total of 9 comments.
- 13 businesses and organisations who submitted a total of 26 comments. These included suggestions for amendments from Historic England, the Environment Agency and United Utilities.
- 2 residents in neighbouring Handforth, who supported and made suggestions.
- 8 landowners and their agents, who made a large number of comments and objections. All these included reference to GMSF. Some points relating to the WNP policies were also made and have been addressed.

Notes relating to the tables below

Abbreviations: WNA = Woodford Neighbourhood Area; WNP = Woodford Neighbourhood Plan; NP = Neighbourhood Plan; VAP* = Village Action Plan; S = Support; O = Object; C = Comment

Yellow highlighting indicates objection.

Green highlighting indicates a suggestion.

Amendments to text in the WNP are marked as follows: deleted text in red font crossed out; added text highlighted in turquoise.

*VAP becomes a separate document entitled Woodford Village Aspirations for the Submission stage, in order to clearly differentiate the aspirations from planning policies.

Responses from residents who supported with no comments

Ref no.	Surname	First name/initial/title	S/O/C	Consultee Comments	WNF Comments	Action
1.	Auden	Carol	S	None	Noted	None
2.	Baker	Mrs J Y	S	None	Noted	None
3.	Berriman	Robin	S	None	Noted	None
4.	Berriman	Valerie	S	None	Noted	None
5.	Bindottii	Philip (Mr & Mrs)	S	None	Noted	None
6.	Boyd	Letitia	S	None	Noted	None
7.	Brown	Frank & Sylvia	S	None	Noted	None
8.	Burton	Roger	S	None	Noted	None
9.	Buszard	David	S	None	Noted	None
10.	Buszard	Helen	S	None	Noted	None
11.	Carroll	Lucy	S	None	Noted	None
12.	Carroll	Matthew	S	None	Noted	None
13.	Chadwick	Stephen	S	None	Noted	None
14.	Cooke	John A	S	None	Noted	None
15.	Cooke	John A	S	None	Noted	None
16.	Coppock	Azadeh	S	None	Noted	None
17.	Coppock	Chris	S	None	Noted	None
18.	Cox	Peter and Jan	S	None	Noted	None
19.	Craig	Judith	S	None	Noted	None
20.	Dawson	Teresa	S	None	Noted	None
21.	Dawson	Thomas	S	None	Noted	None
22.	Deauville	Neville	S	None	Noted	None
23.	Delaney	John	S	None	Noted	None
24.	Fitchett	Pat	S	None	Noted	None
25.	Foster	Kurt	S	None	Noted	None
26.	Frearson	Evelyn	S	None	Noted	None
27.	Furness	Avril	S	None	Noted	None
28.	Garden	George	S	None	Noted	None
29.	Greenwood	Valerie	S	None	Noted	None

30.	Hancock	Angela	S	None	Noted	None
31.	Hancock	Nigel	S	None	Noted	None
32.	Hayward	Adam	S	None	Noted	None
33.	Henderson	Mrs Joyce	S	None	Noted	None
34.	Hill	Barbara	S	None	Noted	None
35.	Hurst	Joyce (Mrs)	S	None	Noted	None
36.	Jones	David H	S	None	Noted	None
37.	Jones	Janet E	S	None	Noted	None
38.	Kennedy	John	S	None	Noted	None
39.	Law	Geoff & Mary	S	None	Noted	None
40.	Law	Mary	S	None	Noted	None
41.	Lawrenson	Geoff	S	None	Noted	None
42.	Lewis	Joan	S	None	Noted	None
43.	Lewis	Ray	S	None	Noted	None
44.	Maher	Andrew	S	None	Noted	None
45.	McLeod	David	S	None	Noted	None
46.	McWhirter	Peter (Mr & Mrs)	S	None	Noted	None
47.	Meakin	Bev	S	None	Noted	None
48.	Mercer	Brenda	S	None	Noted	None
49.	Mole	Steve	S	None	Noted	None
50.	Morgan	Sheena	S	None	Noted	None
51.	Morton	Edward	S	None	Noted	None
52.	Mott	David	S	None	Noted	None
53.	Mott	Paula	S	None	Noted	None
54.	Murray	Mrs A V	S	None	Noted	None
55.	Neil	Doreen	S	None	Noted	None
56.	Owen	Christopher	S	None	Noted	None
57.	Roberts	Sarah	S	None	Noted	None
58.	Robinson	Karen	S	None	Noted	None
59.	Robinson	Mike	S	None	Noted	None
60.	Sandover	Jane	S	None	Noted	None
61.	Schofield	J (Mr & Mrs)	S	None	Noted	None

62.	Shaw	Louise	S	None	Noted	None
63.	Skelton	Ruth	S	None	Noted	None
64.	Smith	Mike	S	None	Noted	None
65.	Starling	Anna	S	None	Noted	None
66.	Wood	Ann & Graham	S	None	Noted	None

Responses from residents who supported overall and made comments (some of which were objections)

Ref no.	Surname	First name/ initial/title	WNP page/ para/policy no	S/O/C	Consultee Comments	WNF Comments	Action agreed
67.	Auden	Dave	General	S	Excellent Plan for the future of Woodford which should keep Green Belt intact.	Noted	None
68.	Aynsley-Smith	Francis	General Comments	S	Seems Ok to me	Noted	None
69.	Bennett	Martyn	Environment	S	I agree with the Environment policies but this cannot be kept by building thousands of houses in a small area.	Noted	None
70.	Bennett	JR (Mrs)	Environment	S	I agree we need to preserve the greenbelt. We have a vast amount of wildlife – rabbits, hawks, owls etc that are being reported as becoming rare. Lots of people enjoy the freedom of walking over the fields and seeing the wildlife. Stockport is becoming more and more built up. There is no infrastructure for all this development. I support local employment.	Noted	None
71.	Bibby	Harry &Silvia	Environment	S	We have read recently that Councils are introducing policies that require any new building development to inc tree coverage equivalent to 25% of the site area. Perhaps we should include a similar requirement. Birch trees as noted in your report are good at absorbing pollutants.	This doesn't reflect current national policy	None
72.	Bibby	Harry & Sylvia	Community & Heritage	O	COM2 Any development etc.....will be refused. This seems too rigid. For instance what happens if the RBL decides to close its club because of poor support? The Plan should allow for Forum involvement in any replacement development	Any individual proposal for redevelopment would have to be considered against national and local policy	None
73.	Bibby	Harry & Sylvia	Development	O	DEV3 Affordable Housing – new sites with more than 5 dwellings, 50% to be affordable seems too	The aim was to potentially get more	

					high a percentage	smaller houses in Woodford	
74.	Bibby	Harry & Sylvia	Village Action Plan	C	The WNF should encourage the new residents on the airfield to set up a committee to interact with the WNF to “plan” the new village centre. Also, if the airfield is allowed to expand and build more houses then the Plan will become irrelevant. How can this be made forcefully to SMBC?	Not part of the neighbourhood planning process.	None
75.	Bibby	Harry & Sylvia	General Comments	S	Congratulations to the team that has worked on the Plan for their dedicated, detailed and excellent work. Well done.	Noted	None
76.	Boggett	Michael & Dorothy	Environment	S	We agree	Noted	None
77.	Boggett	Michael & Dorothy	General Comments	S	Very Good, well thought out	Noted	None
78.	Braddock	Malcolm & Heather	Village Action Plan	C	A bus service to Wilmslow and Poynton would be very useful.	Noted for Woodford Village Aspirations	None
79.	Braddock	Malcolm & Heather	General	S	I feel it is important not to lose the rural atmosphere/character of Woodford, of open fields and vistas to the hills.	Noted	None
80.	Chance	Donald	Environment	S	My main concern is that of air quality, given the increased traffic associated with the aerodrome development, and the new roads which will be opened in the coming months. I am disappointed that the proposed speed limit for some of these roads is 70mph, when reducing these to 50mph with speed cameras, would reduce pollution, reduce noise levels, and be less damaging to cyclists on the proposed cycle routes.	Not part of Neighbourhood Planning process	None
81.	Chance	Donald	Development	S	The openness of the green belt must be protected, although I support limited infilling as detailed in the plan	Noted	None

82.	Colburn	John	Environment	S	<p>My personal concerns environmentally speaking and: Increased noise, Woodford is already considerably noisier than when I moved in 15 years ago. Air quality, increased traffic due to increased population concerns me. Flood Risk, Woodford is a low lying wet environment, concreting over more and more of it with homes and supporting facilities run the risk of introducing a greater flood risk as already seen in many other areas.</p> <p>My comments about the employment policies: No comments</p> <p>My comments about the Development Policies: Agree with the objectives.</p> <p>My comments about the Community & Heritage Policies Agree with the objectives.</p> <p>My comments about the Village Action Plan: Agree with the objectives.</p> <p>General Comments about the proposed Neighbourhood Plan: Agree with the objectives.</p>	Noted	None
83.	Cowlard	Brian & Sheila		S	Thank you to all concerned with the Plan	Noted	None
84.	Coxey	KC & BE (Mr & Mrs)	Community & Heritage	S	We agree with the community and heritage policies as presented with the current range of facilities protecting the landscape and environmental benefits contributing to the	Noted	None

					quality of life.		
85.	Coxey	KC & BE (Mr & Mrs)	Development	S	We totally support the concept to remain predominantly green belt with an aim to strongly reject to infill by developers to merge local areas – typically as seen over the years between Bramhall & Cheadle Hulme. We totally support the assessments prepared by WNF that the housing needs for Woodford to 2026 is 20-25 net additional houses particularly to the extensive development on the aerodrome site	Noted	None
86.	Coxey	KC & BE (Mr & Mrs)	Village Action Plan	S	In addition care should be taken to extensions to existing developments to ensure they are in keeping with the neighbourhood.	Noted	None
87.	Coxey	KC & BE (Mr & Mrs)	General Comments	S	In general we support the general principles bearing in mind the real need to prevent valuable infill areas being lost to development. The neighbourhood Plan has been well thought out through all its processes giving an excellent presentation of the area and sets out practical, sensible and realistic policies within the comprehensive documentation. Many thanks to all those who have participated in the presentations.	Noted	None
88.	De Vecchis	Janet	General	S	A Great deal of work has been put into all parts of the Plan and I whole-heartedly support all parts of it.	Noted	None
89.	Evans	Malcom and Mandy Evans	Environment	S	We both agree these policies reflect our views	Noted	None
90.	Evans	Malcom and Mandy	Employment	S	We both agree these policies reflect our views. However we both feel that the long term decline in engineering in Stockport means that any development in housing will inevitably encourage long distance commuting (BAE Systems, Mirlees,	Noted	None

					Simons, Phillips have all closed down manufacturing in Stockport) which is bad for the environment.		
91.	Evans	Malcom and Mandy	Community & Heritage	S/C	We agree with these policies. In addition we think it worth referencing the evidence of stripfield systems- an earlier neighbourhood Plan (?) - adjacent to Moor Farm in the field behind 115 Moor Lane- Foden Lane. We have good pictures last winter. Not sure how rare this form of farming is in Cheshire? We are not sure of the age of this field system either?	Evidence of strip-farming in Cheshire is mentioned in the supporting study report "Landscape and Environment Study: Part 1 Add a sentence to this document "residents have reported possible evidence of strip farming in a field behind Moor Lane"	Amend supporting document
92.	Evans	Malcom and Mandy	Development	S	We agree that there could be helpful policies for Development which allow small scale innovation and improvements to the architecture and character of Woodford. The Council seems to have moved from a draconian Council "says no" position to laissez faire with Developers doing whatever they want.	Noted	None
93.	Evans	Malcom and Mandy	Village Action Plan	S	Thank you for the hard work and thoughtful progress that you have made over the last 4 years	Noted	None
94.	Evans	Malcom and Mandy	General	S	There seems to be a race between Councils to increase Community Tax by developing land indiscriminately. I very much hope that the Woodford Neighbourhood Plan will provide protection for this excellent Community and Neighbourhood	Noted	None
95.	Fielding	Reuben and	General	S	We support the Woodford Neighbourhood Plan	Noted	None

		Gwyneth	Comments		<p>because Woodford is a village of 600 houses. We already have the Aerodrome site used for nearly 1,000 houses and another site adjacent to Woodford allocated for 1,500 houses. Why develop the middle part of Woodford into another housing estate? The quota of houses needed for Woodford is already exceeded.</p> <p>If more homes are needed, the Aerodrome site is large enough for further extensive development. We do not need to use green field sites, when brownfield sites could be used instead.</p> <p>The roads cannot cope with any more traffic, which more houses would make in this area. We already have congestion, which even the new roads cannot cope with.</p> <p>Brexit will make farming difficult. Why make it harder by taking good farm land away?</p>		
96.	Gass	Paul	ENV1	C	<p>ENV1: Protecting Views and Vistas Views over fields and to distant hills (Kinder Scout, Lyme Park, Shining Tor, Macclesfield Forest, White Nancy) from field gate on east side of Old Hall Lane, next to Low Eaves & opposite Dellhaven, should be added to list of protected views on page 26, and to the map on page 27. Currently they have been omitted, although there is depicted on the map a view over the fields in a westerly direction from the gate on the opposite side of the lane which is far less impressive! As you come down Old Hall Lane, this is the first view that you get of the distant hills, and it should</p>	Add the view as suggested.	Amend

					<p>be protected.</p> <p>Similar views are also to be had from Low Eaves, and I would like to see them protected in the same way as it is proposed to protect the view of the hills from the back of properties on Chester Road.</p> <p>Although there is no provision here to attach photos, I will email a couple demonstrating the views to woodfordneighbourhood@gmail.com</p> <p>It should not be permitted to take any land out of greenbelt.</p>		
97.	Gass	Paul	General Comments	S	I thoroughly support the vision laid out by the plan to keep Woodford as a rural community, accepting that development of the aerodrome site needs to happen to make best use of the brownfield site that has been vacated. However with such a large site available in such a small community, there should be no need to develop any other large areas, and certainly no need to take any land out of the greenbelt to cater for future housing needs.	Noted	None
98.	Hayward	Kris	General	S	I fully support the plan and the policies contained therein.	Noted	None
99.	Hayward	Kris	General	C/O	By way of comment: I should like to say that whilst I appreciate that a neighbourhood Plan is required to plan for housing development within the area, in the case of the Woodford Neighbourhood Area, any development during the plan period is	Some development (albeit limited) in the WNA, which is Green Belt, is permitted under national policy. The WNP complies	None

					<p>unnecessary.</p> <p>The development on the former BAE site will deliver around 1000 dwellings over the next 10 years, on land abutting the Neighbourhood Area to the South and East.</p> <p>The Cheshire East Council local plan will deliver more than 1500 dwellings over the next 15 years, in the form of the North Cheshire Growth Village, butting up against the Neighbourhood Area along its West and Northwest boundaries.</p> <p>These developments are planned to deliver a range of housing types, including onsite and offsite affordable housing.</p> <p>Over and above these large scale developments, what the GMSF eventually plans to deliver remains to be seen.</p> <p>What these developments will undoubtedly deliver to the area by the bucketful is even more traffic congestion, air, noise and light pollution and reduction in open spaces to the detriment of the health and wellbeing of the environment and many thousands of residents of the south Manchester.</p> <p>Woodford, currently around 600 dwellings, will be subsumed into the amorphous mass that is urban Greater Manchester in a pincer movement of development.</p>	with national policy.	
100.	Hayward	Kris	General	C	<p>Whilst the Neighbourhood Area is currently entirely within the Green Belt and therefore 'Local Green Spaces' should not need designating as they are already protected, the Open Spaces Society, suggests that: "...if land is already protected by Green Belt policy, consideration</p>	The option of designating Local Green Space was considered but it was thought to be inappropriate in the	

					should be given to whether any additional local benefit would be gained (by designation). This may be in a case where LGS designation could help to identify areas that are of particular importance to the local community.” Everyone will have their own favoured green spaces, but I would suggest that the area of fields bounded by Church Lane and Blossoms Lane is enjoyed by large numbers of people, from Woodford and surrounding areas, on foot, on horseback and by bicycle, as individuals, families and in groups. They are often to be seen enjoying the peace, openness and far reaching views. If LGS designation provided any extra consideration and/or protection to this area, I consider that it would be beneficial.	WNA.	
101.	Heath	Martin	General	S	The aims and policies set out in the Plan are all credible and realistic and would help to retain the feel and sense of community in the village. Necessarily, they lack specifics in many areas and the key will be in the sensible, pragmatic and considered application without any undue influence and a bias to NIMBYism.	Noted	None
102.	Heywood & Davidson	Christopher & Deborah	Environment	C	Please consider traffic calming at Chester Road/Woodford road roundabout. We live on a blind corner – very dangerous exiting and entering own property (390 Chester Road). Speed is excessive – my dog was runover by a tractor in May '18. Suffered broken pelvis – still alive miraculously!	This is covered by Woodford Village Aspirations	None
103.	Hobson	John & Diana	Environment	S & C	The environment policies are good concerning pollution from smoke. I would like to see as many trees as possible planted on the new airport relief	Noted	None

					road to deaden the noise.		
104.	Hobson	John & Diana	Community & heritage	S	Again I would like to see better maintenance of recreation facilities, especially paths and surrounding hedges but the policy is good	Noted for Woodford Village Aspirations.	None
105.	Hobson	John & Diana	Development	S/O	I am happy for the AVRO site to be developed. I do not want to see current green belt used for housing development	Some development (albeit limited) in the WNA, which is Green Belt, is permitted under national policy. The WNP complies with national policy.	None
106.	Hobson	John & Diana	Village Action Plan	S	The village aspirations are appropriate	Noted	None
107.	Hobson	John & Diana	Employment	S	I am happy about employment policies	Noted	None
108.	Hobson	John & Diana	General Comments	S	Clearly a vast amount of hard work has gone into the Plan. Thank you – a great effort.	Noted	None
109.	Hulme	Susan	General	C	We have lived in Woodford for 56 years and connections with the area since the war. I have asked my daughter to comment on the Plan. She lived in Woodford for 13 years and is currently a councillor in mid-Bedfordshire, so is conversant with these problems. Attached is her comment sheet. I hope this will be of some use.	Noted	None
110.	Hulme	Daughter on behalf of Susan Hulme	Environment Section 7, page 26 ENV1	C	States to protect and enhance views and vistas within and out of the Neighbourhood plan - subsection 12 -this states views on Wilmslow Road: These have just been lost with erection of two large Industrial cow/storage sheds which have a massive impact on the views. Presuming these have had planning permission – the statement in the plan does not make sense. You cannot protect a view.	A NP can legitimately include policies to protect views.	None
111.	Hulme	Daughter on	Environment	C	There should be tree preservation orders on trees	There are TPOs and	None

		behalf of Susan Hulme	ENV3		in Woodford	TPAs in Woodford (see supporting study "Landscape and Environment Study: Part 1")	
112.	Hulme	Daughter on behalf of Susan Hulme	Employment policies	C	There must be a post office for the residents of Woodford. It is rare to be able to stop a site used for a business use to not be turned into a residential site. The reason for business changes are the high business rates and overheads. Planning policies are constantly changing due to the huge demand of houses and infrastructure like health hubs and schools so planning policy documents must be robust against challenge from developers otherwise they are costly to the council tax payer.	Not part of the Neighbourhood Planning Process	None
113.	Hulme	Daughter on behalf of Susan Hulme	Community and heritage policies	C	Buildings only stay if there is money to keep them going and an army of volunteers to run them. It should be encouraged to have a heritage group in Woodford to help preserve the community facilities today. If Woodford were to have a village status it would be large village due its community buildings and retail services.	Not part of the Neighbourhood Planning Process	None
114.	Hulme	Daughter on behalf of Susan Hulme	Development policies	C	The rule in planning is to look at every planning application on its own merits. The aspirations in the visions stated are too high and open to judgement. Developers will always challenge policies. Planning inspectors appeal decision notices can be very varied too. There is no common sense in planning law and it open to various interpretations.	Noted	None
115.	Hulme	Daughter on behalf of	Village Action Plan	C	What the residents want and the local authority are to deliver can vary so much. It is essential	Noted	None

		Susan Hulme			that the local councillors fight for the right thing for Woodford to retain the old village and keep its identity. In support of village signs as it gives a sense of place. Action Plan should include village care schemes and neighbourhood watch and speed watch. Newly retired volunteers enjoy being involved in such schemes.		
116.	Hulme	Daughter on behalf of Susan Hulme	General; Plan	C	Not sure it will have any weight in planning decisions. The document needs to be constantly updated. Many neighbourhood plans have fallen as they take years to get some status. Even now I don't know of one that had made a significant impact to their community. Has the Local Plan been to the planning inspectorate yet and been adopted?	Noted	None
117.	Kirwin	A J (Mrs)	Employment	S	Unless within existing businesses I feel any employment prospects in Woodford are minimal and would in any case only increase traffic and add to congestion during rush hours. (see general comments) Dust and noise pollution for my home and those of my near neighbours is already severe and can only get worse.	Not part of the neighbourhood planning process.	None
118.	Kirwin	A J (Mrs)	Employment	S	As above, Notcutts must surely be the main employers. Living opposite, my neighbours and I get all the traffic from there too! Recent traffic calming measures on Moor Lane and beyond are a waste of tax payers' money and will do nothing to ease congestion or increase safety. You can still do 30mph!	Not part of the neighbourhood planning process.	None
119.	Kirwin	A J (Mrs)	General comments	S	Excellent in theory but Woodford is mainly a commuter village and 920 houses on the airfield with occupants all heading for the by-pass off Woodford Road and driving past my house is	Some development (albeit limited) in the WNA, which is Green Belt, is permitted	None

					more than enough development especially when the proposed new school is built.	under national policy. The WNP complies with national policy.	
120.	Lasseter	Family (4 people)	General	S	Thank you for all your efforts. We need to keep our community as close to how it is as possible.	Noted	None
121.	Leck	Bryan (Mr & Mrs)	General Comments	S	We fully support the Woodford Neighbourhood Forum Management Committee in this Plan	Noted	None
122.	McCall	Jayne	Development Policies	S	Speed bumps on Hall Moss / Jenny / Moor Lanes are awful. I voted in favour of traffic calming measures but these speed bumps are dreadful. They are not uniform in size, they're painful to drive over (no matter how slowly) for someone with a bad back & having a baby on board is a nightmare. Really disappointed.	Not part of the neighbourhood planning process	None
123.	Minanhan	Michael	Environment	S	Fully support	Noted	None
124.	Minanhan	Michael	Employment	S	Fully support	Noted	None
125.	Minanhan	Michael	Community & Heritage	S	Fully support	Noted	None
126.	Minanhan	Michael	Development	S	Fully support	Noted	None
127.	Minanhan	Michael	Village Action Plan	S	Fully support	Noted	None
128.	Minanhan	Michael	General	C	With regard to aspirations suggest: 1. The absence of any provisions to enable pedestrians to cross Chester Road safely be rectified. 2. Attention to be given to the state of flooding of the footpaths of significant sections of Moor Lane. Otherwise fully support.	These are covered by Woodford Village Aspirations.	None
129.	Pantling	Claire	Environment	S	I am in complete agreement with all of these policies - Woodford must be protected from	Noted	None

					further damaging development. Urban sprawl must not be allowed.		
130.	Pantling	Claire	Employment	S & C	For the village to thrive employment is very important but large companies must not be allowed to 'take over' at the cost of existing or new small businesses.	Planning cannot control company ownership.	None
131.	Pantling	Claire	Community & Heritage	S	This is extremely important - we must not allow our village to be destroyed. The reason most people choose to live in Woodford is due to its natural and beautiful surroundings. Once it has been taken it will never be returned. Our countryside is one of the few things left in this country of which to be proud of and it must be left for future generations to enjoy also.	Noted	None
132.	Pantling	Claire	Development	S & C	To protect the village no further house building should be allowed certainly not on the scale seen at the former Aerospace site. This development has only had a detrimental effect on the area i.e. increase in traffic and crime rates especially house burglary.	Noted	None
133.	Pantling	Claire	Village Action Plan	S & C	Living on Church Lane the increase in speeding traffic over the last couple of years is alarming. I hope the current calming measure have an impact. Everything must be done to ensure the safety of walkers, horse riders and cyclists. There is definitely a need for safer areas to cross and improved footpaths along Chester Road.	Noted	None
134.	Pantling	Claire	General	S	I totally support the WNP thank you for your hard work and commitment to the residents of Woodford.	Noted	None
135.	Rains	Sylvia (Mrs)	Environment Policies	S	This is very important to me. Preserving the ambience and nature of Woodford, especially the trees	Noted	None

136.	Rains	Sylvia (Mrs)	General Comments	S	Road safety & traffic control is important, congestion through Woodford must be considered. More public transport would be a benefit.	Not part of the neighbourhood planning process.	None
137.	Riley	David	Environment	S	I agree	Noted	None
138.	Riley	David	Employment	S	I agree	Noted	None
139.	Riley	David	Community & Heritage	S	I agree	Noted	None
140.	Riley	David	Aspirations	C/O?	<p>You cannot achieve your aspirations with the proposed mass housing developments with all its heavy construction pollution.</p> <p>The developments then add more vehicles to our roads and with the council's policy of speed humps –calming measure (I don't know who it is meant to calm) forcing motorists to slow down and accelerate every 150m adding more pollution to our air.</p> <p>Asp 1: More vehicles on the roads – less safe for walkers, cyclists and walkers.</p> <p>Asp2: Roads not wide enough for cycle lanes.</p> <p>Asp3: More buses, more frequent, more pollution</p> <p>Asp 4: Speed restriction schemes. Achievable but at what cost to the environment and air quality that we all breathe. Speed humps drivers serve to miss then and they are lethal for cyclists, who have enough trouble negotiating thoughtless drivers, humps, potholes and grids.</p> <p>Asp 6: More roadworks, more standing traffic, more pollution.</p> <p>Asp7: You can stop calling Woodford a village with plans already in place. You won't know where Woodford ends and Handforth begins.</p>	Not part of the Neighbourhood Planning process	None

					You may as well drop the name and recall it Handford. ASP CLEAN AIR: YOU MUST BE CHOKING		
141.	Rodman	Paul	All policies	S		Noted	None
142.	Rodman	Paul	Village Action Plan	O	<p>Page 100, Section 4 Junction Improvements between Chester Road and Church Lane.</p> <p>I'm afraid that this is a bit too vague. I recall that it was proposed to put a roundabout on Chester Road at this point. The aspiration is not clear what form an "improvement" will take.</p> <p>With SMBC proposing "Quiet Lane" status on Church Lane (An Excellent Idea started by the local residents) and the possible building of traffic calming chicanes at each end of it. I am very concerned what form the "Improvement" will take.</p> <p>It is Proven that a Main Road roundabout is only effective when all traffic streams are of largely even magnitude. This plainly will never be the case with Church Lane / Chester Rd Junction.</p> <p>The 30mph aspiration speed limit on Woodford Rd / Chester Rd, although worthy is not I'm afraid, realistic.</p> <p>To reduce a speed limit the needs to be a history of severe accidents, narrow roads / poor sight lines etc. None of which apply in this case.</p> <p>However I do maintain that if the posted speed limits were more rigorously enforced by both an active police presence, speed cameras and the new speed indicating monitors fixed to lamp</p>	<p>Not part of NP process.</p> <p>See Woodford Village Aspirations.</p>	None

					posts that highway safety would greatly improved.		
143.	Rodman	Paul	General Comments	S	An Outstanding Achievement. All concerned should be congratulated on such a thorough, well researched, readable Document. This is no mean feat for a team of talented concerned residents. Well Done.	Noted	None
144.	Shields	Valerie	General	S	We fully agree and support the proposed Village Action Plan. Please do all that you can to help Woodford remain the beautiful rural community that it is. We totally oppose any further development in this area.	Noted	None
145.	Stott	RK	General	S	We fully support all items listed and thank you for the work undertaken to prepare these documents, a really professional effort.	Noted	None
146.	Taylor	Pat	General comments	S	I feel it is important to integrate the new Woodford Park Development into the community. I don't think Woodford can accommodate any further development.	Some development (albeit limited) in the WNA, which is Green Belt, is permitted under national policy. The WNP complies with national policy.	None
147.	Wardle-Davies	K (Mrs)	Development	C	The development of BAE has caused lots of problems for existing residents- pollution, dust, noise, loss of quiet enjoyment for many years. Stricter time limits should be in place for new developments, large or small. I hope when the new roads are finally finished it will reduce the traffic problems in our neighbourhood.	Not part of neighbourhood planning process	None

148.	Wardle-Davies	K (Mrs)	General	S	Very comprehensive, thank you for all your hard work on our behalf.	Noted	None
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Responses from residents who objected

Ref no.	Surname	First name/initial/title	WNP page/para/policy no	Support/Object S/O	Consultee Comments	WNF Comments	Action agreed
149.	Markland	Andrew	Development	O	I do not support any further development in the green belt. "Limited infilling" is the thin end of the wedge allows aggressive developers to build all over the greenbelt. There is far too much building on the green belt already in and around Woodford. The plan should be much more explicit about forbidding developers from building on the green belt.	Limited infilling is part of national policy and permitted in WNA	None
150.	Markland	Andrew	General Comments	O	This plan is too biased against the motorist. Whilst local transport infrastructure is not specific to this plan, any further increase in the local population should not be allowed until the surrounding road infrastructure can cope with it. SEMMS might make it easier to get to the airport, but it will do nothing about the nightmare that is the A34 into Manchester - which will only get worse with all the development that is already taking place in the local area, especially the airfield development. Nor will it improve transport and parking in Bramhall. More buses are not the answer. It must prevent development when the surrounding roads are unable to cope with the volume of traffic.	Not part of NP process	None
151.	Schulz	John	Gen / Development /	O	The second version of the Greater Manchester Spatial Framework is due to be published next month; and I believe it would be unwise to	GMSF has no planning status at present.	None

			Environment ENV 1, ENV 2, DEV 1, and DEV 2.		press on regardless with the Woodford Neighbourhood Plan until we see what version 2 contains. It is almost certain to lead to the removal of some land in Woodford from the Green Belt to allow for additional housing development over and above the former Aerodrome site; and I believe it makes little sense to produce a Neighbourhood Plan that ignores such a likelihood.		
152.	Schulz	John	Development Environment ENV 1, ENV 2, DEV 1, and DEV 2.	O	Much as I personally would like to see a minimum of further development in Woodford, I believe that the pressing need for further housing for current and future generations overrides my selfish interests, and that Woodford should acknowledge a moral duty to accommodate its share of such additional housing as set out in the final Greater Manchester Spatial Framework.	GMSF has no planning status at present.	None
153.	Schulz	John	ENV 1, ENV 2, DEV 1, and DEV 2.	O	The above two comments above translate into objections to parts of policies ENV 1, ENV 2, DEV 1, and DEV 2.	GMSF has no planning status at present.	None

154.	Schulz	John	Village Action Plan	O	In addition, I have one suggestion for an additional item, perhaps for the Village Action Plan. It relates to agricultural vehicles using Bridle Road. I accept that the current sole practicable access to the farmland to the south is from Bridle Road itself, and that access cannot therefore be denied through a Traffic Regulation Order. However, the use of such a narrow road (with many parked cars) by large tractors and other large farm machinery (and, in particular, the aggressive manner in which they are frequently driven) poses a real danger to pedestrians, especially to children and elderly people, and especially where there is no footway. I sought (unsuccessfully) to have an access into the farmland provided for in the plans for the Poynton Relief Road, and I have to admit that I'm not sure what the best way forward might now be. A 20 mph speed limit would probably not actually achieve much, as it not so much absolute speed as manner of driving that poses the greatest threat to safety. It may be that the most I could ask for is an additional numbered point in paragraph 9.2.4 of the Village Action Plan.	Not part of NP process	None
155.	Buck		Development	O	No new developments should be permitted. Woodford has already been ruined by the aerospace development and cannot take any additional properties.	Some new development is allowed even within Green Belt under national policy	None
156.	Buck	Steven	Community Heritage	O	Again should be development on existing sites, not new on greenbelt.	Some new development in	None

						WNA is allowed even within Green Belt under national policy.	
157.	Buck	Steven	Village Action Plan	O	The additional traffic created by the aerospace development and A6MARR should not be used as justification to reduce speed limits and increase separate cycle lanes. Existing residents who rely on motor vehicles to go about their daily lives have suffered enough and should not be further punished. Evidence of this further punishment is the road cushions currently being installed on Moor Lane and Jenny Lane.	Not part of NP process.	None

Responses from local businesses and organisations

Ref no.	Organisation name	WNP page/para/policy no	S/O/C	Consultee Comments	WNF Comments	Action
158.	Meadowside B&B	General	S	Meadowside B&B's guests favourable comments about Woodford are largely about how lovely the view from the back of the B&B is, how lovely the green spaces are (a lot of guests walk around Church La & Blossoms La and down Old Hall Lane). They love the pub and find Budgens very handy but they really don't like the traffic congestion and are nearly always shocked at the size of the Aerodrome development. This invariably leads to a concerned conversation about the loss of wildlife habitats and general destruction of green spaces. The other huge favourable comment is always about Avro Heritage Museum - guests love it.	Noted	None
159.	Woodford Community Centre	General	S	The WWMCC management committee applauds the work of the Neighbourhood Forum. We appreciate that the former aerodrome site is outwith the Neighbourhood Area but would hope that in the future the former aerodrome could become part of the Neighbourhood Area. Constitutionally WWMCC has to accept the membership of any resident on the new development over 18yrs so it seems to us to be somewhat silly that on one hand the aerodrome residents can be members of WWMCC but not the Neighbourhood Forum. Hopefully in the interests of integration within Woodford this situation will not prevail too far into the future.	Noted	None
160.	Highways England		S	Highways England wish to make no comment at this stage of the plan	Noted	None
161.	Historic England		O	http://woodfordnf.co.uk/wp-content/uploads/2018/07/Woodford-NP-Regulation-14-Response-Form-HISTORIC-ENGLAND.pdf http://woodfordnf.co.uk/wp-content/uploads/2018/07/WoodfordNP_SEAScreening_May18-Historic-England.pdf	Agreed	Amend. Replace text as shown below

			<p>In terms of our area of interest, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing policies which have already been subject to a Sustainability Appraisal. As a result, we would endorse the conclusions that it is not necessary to undertake a Strategic Environmental Assessment of the document. It is worth pointing out that the scoping report appears to use different terminology and should for consistency ensure that where it seeks to reference the historic environment that it uses one term. For example, heritage assets (Part 6; Bullet 2), built environment and not heritage (Part 6; Bullet 4) and listed buildings (Part 6; Bullet 9). Also, development affecting listed buildings are subject to the requirements of the NPPF and the 1990 Act. The proposed policy within the neighbourhood plan does not provide a criterion based policy as summarised in part 6 of the scoping report, the criteria provided is that to be used to decide what is for inclusion in a local list. Reference should be made to our response to the neighbourhood plan (see letter reference PL00405282) with regard to this matter.</p> <p>If you have any queries or would like to discuss anything further, please do not hesitate to contact me.</p>		
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Policy COM3: Woodford Heritage assets

(a) Promotion of Protection of Woodford Heritage assets

All heritage assets and their setting within Woodford will be promoted, protected and enhanced. The significance of Woodford heritage assets will be sustained and enhanced for the enjoyment of the local community and visitors alike.

Explanation/justification

Heritage assets are defined as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions due to its heritage. Heritage assets can include Designated Heritage assets such as Listed buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas and Local Heritage Assets such as buildings or structures of local historic interest or areas of potential archaeological interest.

(b) Support for designation of further heritage assets in Woodford

Support is given to the identification of heritage assets within Woodford to be put forward for designation or be put forward on a local list including those that may be promoted by Stockport Council as Local Planning Authority.

Explanation/justification

In addition to the Heritage assets that are currently designated within Woodford, Stockport Council is making additions to its existing Local List (currently comprising more than 450 assets elsewhere within the Borough) being compiled as part of a Borough-wide phased Local List review.

(c) Support for Council Local List Review

The Woodford Community will provide support for and contribute to Stockport Council’s review of Local List Buildings designated using the following criteria:

- architectural interest: buildings which are locally or regionally important for the interest of their architectural design, decoration and craftsmanship. They are also important examples of particular building types and techniques, and significant plan forms
- historic interest: buildings which illustrate important aspects of local or regional social, economic, cultural or military history
- close historical association with local or regional important people or events
- group value: especially where buildings comprise an important architectural or historic unity or are a fine example of planning (such as squares, terraces and model villages).

Explanation/justification

The Woodford community welcomes the intention of Stockport Borough Council to extend the coverage of local listing to include this historic part of the Borough. The community looks forward to working with the Council to bring forward an appropriate list of local heritage assets.

(d) Measures to minimise or mitigate harm to heritage assets and their setting

Any new development affecting a heritage asset (including its setting) within Woodford should be appropriately conserved and enhanced in a manner appropriate to the significance of the asset.

Explanation/justification

Where changes are being proposed, heritage assets should be conserved, and where appropriate enhanced, in a manner that is consistent with their significance and to achieve sustainable development in accordance with national heritage policy. The community supports local heritage assets as contributing to an understanding and interpreting Woodford in past years.

162.	Natural England			Natural England does not have any specific comments on this draft neighbourhood plan.	Noted	Add to SEA opinion
163.	Manchester Gospel Hall Trust	Vision and objectives	S	The Trust supports the Vision and Objectives of the draft Neighbourhood Plan.	Noted	None
164.	Manchester Gospel Hall Trust	Environment	C	The Trust welcomes the positive approach to the policy wording. However, having regard to the status of the ‘made’ Neighbourhood Plan as an integral part of the statutory development plan, it is considered that all policies should	Noted	None

				fully compatible with the high level polices of the Stockport Core Strategy DPD (March 2011) and the saved polices of the Stockport Unitary Development Plan (May 2006) and the NPPF in order to minimise any potential future conflict of interpretation. The Green Belt designation 'washes over' all of Woodford. Development policies in the draft Neighbourhood Plan deal with Green Belt constraints in greater detail.		
165.	Manchester Gospel Hall Trust	Policy ENV1:	O	<p>3.2 In the light of the above it is submitted that the positive stance of the policy is not compatible with saved UDP policy GBA1.2 and other local policies including NPPF paragraph 87 which seek to maintain a presumption against new buildings unless they fall within limited exceptions or 'very special circumstances' can be demonstrated.</p> <p>We suggest that the policy should be revised to read:</p> <p>a) New development shall be permitted, provided it is compliant with national policy and Development policies in this Neighbourhood Plan</p>	<p>A Neighbourhood Plan interprets national policy at a local level.</p> <p>All the criteria set out in all national, local and NP policies must be applied so they are not read as stand-alone policies.</p>	None
166.	Manchester Gospel Hall Trust	Policy ENV2: Protecting the countryside and green spaces	O	<p>3.3 As above, due to local and national policies for the protection of Green Belt the policy should be revised to read:</p> <p>a) Development compliant with national policy for the Green Belt and Neighbourhood Plan Development Policies will be permitted provided that</p>	<p>A Neighbourhood Plan interprets national policy at a local level.</p> <p>All the criteria set out in all national, local and NP policies must be applied so they are not read as stand-alone policies.</p>	None
167.	Manchester	Policy ENV4:	S	3.4 Agreed.	Noted	None

	Gospel Hall Trust	Supporting biodiversity				
168.	Manchester Gospel Hall Trust	Policy ENV5: Reducing light pollution	S	3.5 Agreed in principle. However, criteria (d) should be amended to read: d) when considering applications for lighting applicants should provide information on bat roosts in the area, recognising that certain forms of lighting ...	Wording adequately covers the point Wording adequately covers the point	None
169.	Manchester Gospel Hall Trust	Policy EMP1:	S/ O	New Businesses within the Area 4.1 Supported in principle. Local businesses are to be encouraged to support local employment and reduce unnecessary travel to work outside the area. However, criteria c) is now a national requirement in Building Regulations should be deleted as unnecessary in the Neighbourhood Plan.	Statements is incorrect	None
170.	Manchester Gospel Hall Trust	Policy EMP2: Loss of Employment Supported in principle.	S/ O	Policy EMP2: Loss of Employment Supported in principle. Submit that it is inappropriate for the policy to prescribe the 'professional advisors'. The words: 'Such as the Chamber of Commerce' should be omitted or relegated to supporting text.	Agreed.	Amend as shown below
a) Provides evidence that the employment use is no longer viable; and should provide evidence of efforts made to either save or sell the business as a going concern e.g.: marketing strategy and business plan and details of consultations with professional advisers, such as the company's bank manager, local Chamber of Commerce accountants, solicitors, HR consultants, FSB, made over a period of a minimum of six months.						
171.	Manchester Gospel Hall Trust	Policy EMP3: Use of Rural Buildings	S/ C	4.3 Supported in principle. Although not always an 'employment use', redundant buildings may also be appropriate for community uses. We recommend that paragraph 3 should include 'community use' after 'small business purposes'	Not relevant to EMP3.	None
172.	Manchester Gospel Hall Trust	Community and heritage policies	S	5.1 The Trust welcomes the recognition of the benefits of increased social cohesion, a greater sense of identity and improved wellbeing. These attributes have been described as the 'glue' necessary for sustainable communities.	Noted	None

173.	Manchester Gospel Hall Trust	Policy COM1: Provision of new community facilities	S	5.2 The Trust strongly supports and welcomes this policy.	Noted	None
174.	Manchester Gospel Hall Trust	Policy COM2: Development of Community Facilities	S	5.3 Again the Trust supports this policy.	Noted	None
175.	Manchester Gospel Hall Trust	Policy DEV2: limited infilling in Woodford village	S/C	6.1 This policy is supported in principle. However, in the light of recent caselaw it may be wise to retain the wording of national policy and replace 'compromise' with 'harm' the openness of the Green Belt. Similarly, in a) the words 'and not have an adverse impact on' should be omitted. The court held that 'preserve' does not mean leave entirely unchanged, but means avoid 'harm' to openness.	Agreed change "compromise" to harm Take out "and not have an adverse impact on"	Amend as shown below
a) Any proposed development should preserve and not have an adverse impact on the openness of the Green Belt; and						
176.	Manchester Gospel Hall Trust	Policy DEV3: Affordable Housing	O	6.2 This policy appears to conflict with National Policy in the Written Ministerial Statement and national planning practice guidance.	6.2 is incorrect	None
177.	Manchester Gospel Hall Trust	Policy DEV8: Design of new development	S	6.3 Support.	Noted	None
178.	Network Rail		S	Network Rail has no comments on the neighbourhood plan.	Noted	None
179.	Poynton	General	S	Poynton Town Council congratulate the Woodford Neighbourhood Forum on	Noted	None

	Town Council	Comments		reaching this stage of their Neighbourhood Plan. The Town Council supports the submission version of the Plan. In particular, it is considered that Woodford Neighbourhood Plan policies would be complementary to the emerging Poynton Neighbourhood Plan particularly in respect of Movement, Environment and Green Belt related policies. The future status of the former Woodford Aerodrome needs to be addressed in due course given the aspiration in the Woodford Plan to integrate the two communities.		
180.	The Coal Authority		S	The Coal Authority has no specific comments to make	Noted	None
181.	United Utilities		S	http://woodfordnf.co.uk/reg-14-responses/ United Utilities recommends additional wording with respect to Surface Water Management. We recommend the following is included in the plan, as a separate policy. “New development should be designed to maximise the retention of surface water on the development site and to minimise runoff. The approach to surface water drainage should be considered in liaison with the LLFA, the public sewerage undertaker and where appropriate the Environment Agency”. Surface water should be discharged in the following order of priority: <ul style="list-style-type: none"> • An adequate soakaway or some other form of infiltration system. • An attenuated discharge to watercourse or other water body. • An attenuated discharge to public surface water sewer. • An attenuated discharge to public combined sewer. 	Agreed	Amend Add policy as shown below
DEV8: f) New development should be designed to maximise the retention of surface water on the development site and to minimise runoff. The approach to surface water drainage should be considered in liaison with the LLFA, the public sewerage undertaker and where appropriate the Environment Agency”. Surface water should be discharged in the following order of priority: <ul style="list-style-type: none"> • An adequate soakaway or some other form of infiltration system. • An attenuated discharge to watercourse or other water body. • An attenuated discharge to public surface water sewer. • An attenuated discharge to public combined sewer 						
182.	Woodland Trust		S	http://woodfordnf.co.uk/wp-content/uploads/2018/07/Woodland-Trust-response-to-Woodford-Neighbourhood-Plan.pdf ...we would recommend that policy ENV2 should also include:	Covered by existing policy	None

			<p>“Substantial harm to or loss of irreplaceable habitats such as trees, should be wholly exceptional”.</p> <p>The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection.</p> <p>For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>We would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Woodford. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.</p> <p>Protecting natural features which are a key aesthetic component of the landscape</p> <p>Whilst protecting natural features is being take into account with Policy ENV3, it should also seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new housing proposals.</p>	<p>Covered by ENV4</p> <p>Covered by ENV4</p> <p>Covered by the Introduction, Environment section rationale and the introduction to the Landscape and Environment Study: Part 1</p> <p>Covered by ENV2</p>	
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183.	Sport England			http://woodfordnf.co.uk/wp-content/uploads/2018/07/Sport-England-Reg14-Response.pdf	Noted	None
184.	Environment Agency		O	<p>http://woodfordnf.co.uk/wp-content/uploads/2018/09/Environment-Agency-Reg-14-Representation-31-Jul-18.pdf</p> <p>Contaminated Land The plan has identified the environmental setting of the Woodford Neighbourhood however it does not identify the sensitivity of the environmental setting.</p> <p>The wider Woodford area is located above a Principal Aquifer which is known to support one public abstraction (groundwater) borehole and many private abstractions. The area is also serviced by a number of surface watercourses. Whilst policy EMP1 recognises the need to protect the environment from small scale development, it is important that the plan recognises the importance of protecting the environment from any scale of development.</p> <p>Due to potential former land use(s), soil and /or groundwater contamination may exist at any site where development is proposed so the site so the associated risks to controlled waters should be addressed by:</p> <ol style="list-style-type: none"> 1. Following the risk management framework provide in CLR11, Model procedures for the management of land contamination <ol style="list-style-type: none"> 1. https://www.gov.uk/government/publications/managing-land-contamination 2. Referring to the Environment Agency guiding principles for land contamination and the land contamination sections in the Environment Agency’s Groundwater Protection: Principles and Practice <ol style="list-style-type: none"> 1. https://www.gov.uk/government/publications/managing-and-reducing-land-contamination 3. https://www.gov.uk/government/collections/groundwater-protection 	Not a NP issue	Amend. Add text as shown below

			<p>Further information may be found on the land contamination technical guidance pages on the direct.gov website</p> <ol style="list-style-type: none"> 1. https://www.gov.uk/government/collections/land-contamination-technical-guidance <p>All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites. The competent person would normally be expected to be chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites. The Specialist in Land Condition (SiLC) qualification administered by the Institution of Environmental Management provides an accredited status for those responsible for signing off LCR's. For further information see - www.silc.org.uk.</p> <p>Biodiversity The main waterbody flowing through the Woodford area, is Dean Brook (Ref: Dean (Bollington to Bollin) (GB112069061360) - poor status). Dean Brook is currently failing its statutory ecological objectives as identified in the North West River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/500468/North West RBD Part 1 river basin management plan.pdf and we would welcome recognition of this in the neighbourhood plan; and potential ways of how through both well designed and sustainable land management and future development can play a role in improving ecological status of waterbody, a key wildlife corridor and green infrastructure asset in area.</p> <p>Flood Risk The Map provided on page 15 is associated with our National Flood Risk</p>	<p>Agreed. Add note to this effect in the rationale</p>	
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			<p>Assessment (NaFRA) showing the long term flood risk. We would recommend you download the GIS layer showing the Flood Map for Planning for this area, see link http://environment.data.gov.uk/ds/catalogue/#/catalogue</p> <p>For your information within Woodford Neighbourhood boundary there are three designated “main rivers”, Dean brook (south boundary), Handforth Brook and Grove end Brook.</p> <p>Informative Developments may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of a designated ‘main river’. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.</p> <p>We have discretionary powers to carry out maintenance works on the channels of "main river" watercourses to remove blockages and ensure the free flow of water. The responsibility for the repair and condition of the watercourse, its channel, banks and adjacent structures, lies ultimately with the riparian owner</p> <p>Please keep us updated on the plan progress.</p> <p>[in Woodford today] The Environment Agency has provided the following information:</p> <ul style="list-style-type: none"> • The wider Woodford area is located above a Principal Aquifer which is known to support one public abstraction (groundwater) borehole and many private abstractions. The area is also serviced by a number of surface watercourses. 	<p>Add this to Environment rationale</p>	
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			<ul style="list-style-type: none"> • Due to potential former land use(s), soil and /or groundwater contamination may exist at any site where development is proposed so the site so the associated risks to controlled waters should be addressed (see measures recommended in Section 7: Development rationale). • Within Woodford Neighbourhood boundary there are three designated “main rivers”, the River Dean, Handforth Brook and Grove End Brook. (These are shown on the Fluvial Flood Risk Map below, which also marks flood zones adjacent to the River Dean). • Developments may require a permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency for any proposed works or structures, in, under, over or within eight metres of the top of the bank of a designated ‘main river’ (see Section 7: Development rationale). • Dean Brook is failing its ecological status (see Section 7: Environment rationale). <p>[in Woodford today] Fluvial Flood Risk Map (downloaded from Environment Agency 11 August 2018: https://flood-map-for-planning.service.gov.uk/ using postcode SK7 1PS)</p> <p>[in Environment rationale] The Environment Agency notes the sensitivity of the environmental setting, including three designated “main rivers”, the River Dean, Handforth Brook and Grove End Brook within the Neighbourhood Area. These are listed for special protection in the table of Key Habitats for wildlife associated with ENV4: Supporting biodiversity.</p> <p>The Environment Agency also notes that he main waterbody flowing</p>		
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			<p>through the Woodford area is Dean Brook, which is currently failing its statutory ecological objectives as identified in the North West River Basin Management Plan. While it is beyond the power or remit of a Neighbourhood Plan to include specific policies to remedy this situation, Woodford Neighbourhood Forum will encourage and support any measures by the appropriate authorities aimed to improve the ecological status of Dean Brook. The River Dean is identified as a wildlife corridor by CWT and is hence covered by ENV4.</p> <p>[in Table for ENV4] Streams (Handforth Brook, Grove End Brook and Dean Brook) Rivers (River Dean)</p> <p>[in EMP1] *The Environment Agency noted the importance of protecting the environment from any scale of development.</p>		
			<p>Follow-up letter from Environment Agency: Further to an email sent from Stephen Johnson, (Planning Policy Officer) dated 28 August 2018, we would wish to make the following comments to the points raised.</p> <ol style="list-style-type: none"> 1. In relation to the flooding maps Yes this map is the correct GIS layer identifying flood zones as defined in NPPF. 2. In relation to the contaminated land comments made, they consider that in terms of the minimal level of development planned for and the policies proposed, they are doing as much as a neighbourhood plan can in relation to that and that it is the job of higher level plans to reflect the requirements you have referred to in your letter of 6th July. Would agree that the requirements set out in that letter are better addressed through an assessment of the relevant issues at either local plan other strategic plan level? 	Add to Section 4.1 Geology as shown below	

			<p>This is agreeable in general. However we would like to reiterate the sensitivity of the environmental setting in the area. Whilst Section 4.1 on Geology describes the underlying aquifer, the formal designation of the sandstone as a Principal Aquifer and the groundwater Source Protection Zone for a nearby public water supply abstraction could be acknowledged in this section, with reference to our groundwater protection position statements available at https://www.gov.uk/government/publications/groundwater-protection-position-statements.</p> <p>For information, groundwater source protection zones can be viewed at https://magic.defra.gov.uk/MagicMap.aspx under Designations>Land Based Designations>Non-statutory>source protection zones merged (England).</p> <p>3. In relation to the names of brooks, over which there seems to be some confusion, they are assuming that they have identified the same rivers/brooks as you refer to, but that the names are simply slightly different, e.g. River Dean/Dean Brook.</p> <p>On the flood map for planning the main rivers are shown as dark blue. 'River Dean' is indeed the correct river name.</p>		
<p>Addition to Section 4.1 Geology This is an area of high environmental sensitivity because the sandstone is formally designated as a Principal Aquifer and there is a groundwater Source Protection Zone for a nearby public water supply abstraction. It is subject to Environment Agency groundwater protection position statements (available at https://www.gov.uk/government/publications/groundwater-protection-position-statements).</p>					

Responses from residents in neighbouring communities

Ref no.	Surname	First name/initial/title/location	WNP page/para/policy no	S/O/C	Consultee Comments	WNF Comments	Action agreed
185.	O'Mahony	Carol Handforth		S	None	Noted	None
186.	Small	Roger (Dr) Handforth	General	S	As a resident of the neighbouring parish of Handforth I strongly support the development of the Woodford Neighbourhood Plan.	Noted	None
187.	Small	Roger (Dr) Handforth	History: page 10	A	I suggest adding a new para between para 3 and para 4 to describe the elements of the wartime RAF 61 Maintenance Unit that lay within the north western corner of the Woodford neighbourhood area. These include the large Site 1 (lying immediately east of Dairyhouse Lane and which included part of the 61MU railway system) and the smaller sites Camp C, Site C4 and Site C6. The smaller sites were located at various points just south of Hall Moss Lane. The majority of RAF 61MU was closed in 1959. In the 1980's Macclesfield Borough Council demolished most of the 61MU buildings using funding from a derelict land grant.	Amend	Amend. Add text as below
<p>Parts of a war-time RAF Maintenance Unit lay within the north western corner of the Woodford Neighbourhood Area. These included a site lying immediately east of Dairyhouse Lane, part of a railway system and smaller sites located at various points just south of Hall Moss Lane. The majority of the unit was closed in 1959.</p>							
188.	Small	Roger (Dr) Handforth	Woodford Today: page 12	C	I suggest inserting a new para between paras 1 and 2. The new para should describe the planned North Cheshire Growth Village (NCGV) of approximately 1500 homes that is to be built in Handforth parish immediately adjacent to the western border of the Woodford neighbourhood area. The NCGV will	Not part of NA	None

					influence life in Woodford in a variety of ways e.g. increased road traffic, reduction in air quality, increased light pollution, deleterious effect on local wildlife.		
189.	Small	Roger (Dr) Handforth	Community Engagement and Consultation: Pages 16 -17	O	It is laudable that a variety of techniques were used to engage and consult with the local community. I note that there is no school in Woodford but wonder if any attempt was made by the neighbourhood forum to seek the views of young (secondary school age) persons.	A school is proposed outside the NA on Aerodrome.	None
190.	Small	Roger (Dr) Handforth	Aspirations: page 18	C	Aspirations include a desire to integrate and link with the Aerodrome development, a development that lies in Woodford but outside the neighbourhood area. Might it be a good idea to have a similar aspiration with regard to the NCGV in Handforth?	NCGV not part of NA.	None
191.	Small	Roger (Dr) Handforth	Environment	C	<p>6.ENV1: Protecting views and vistas: pages 26 -29 I believe that the preservation of the listed views and vistas is well worthy of inclusion in the WNP.</p> <p>7.ENV2: Protecting the countryside and green spaces: pages 30 and 31</p> <p>The sites listed in the table on page 30 and in the map on page 31 seem to be something of a mixed bag. I would venture to suggest that WNF should advance areas 1, 3, 4, and 5 as Local Green Spaces and thereby achieve the protection that such designation endows. According to the NPPF, the designation Local Green Space should only be used:</p> <p>1.the green space is in reasonably close proximity to the community it serves; 2.where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance,</p>	Noted	None
						Designation of LGS was considered but decided against.	None

					<p>recreational value (including as a playing field), tranquillity or richness of its wildlife; and</p> <p>3.where the green area concerned is local in character and is not an extensive tract of land.</p> <p>If WNF proceed along these lines, then justification for each site having the designation Local Green Space (including area calculation) should be mounted on the WNP website.</p> <p>WNF should perhaps specify that Areas 2 and 6 be designated as Incidental Open Spaces.</p> <p>Areas 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16 should simply be described as open countryside.</p> <p>It would perhaps be a good idea to include photographs of a few of these sites e.g. the community centre field and the churchyard (both to include the buildings therein).</p> <p>8.ENV4: Supporting biodiversity: pages 33 – 37 This policy has a very laudable objective.</p>	<p>Photos included in illustrations in Submission version</p>	<p>Covered in submission version</p>
192.	Small	Roger (Dr) Handforth	Community and Heritage Policies: pages 42 -44	C	<p>In view of the extensive new housing to be built at the aerodrome site and the NCGV should you not have policies that support the building/extension of schools and medical centres - even if these are to be outside your neighbourhood area?</p> <p>Might it be a good idea to have a policy that recognises the value of public houses as community resources/meeting places and recommends their continued use for these purposes? Such a policy could endorse the LA regulation that change of use of A4 premises is not permitted without consent.</p>	<p>Covered by Redrow planning permission</p> <p>Covered by national policy.</p>	<p>None</p>

Responses from landowners and agents acting on behalf of landowners

Amendments are marked as follows: deleted text in red font crossed out; added text highlighted in turquoise.

Ref No.	Landowner	Agent	Policy	Consultee Comment	WNF Comments	Action
Mr and Mrs Petch http://woodfordnf.co.uk/wp-content/uploads/2018/06/Mr-Mrs-Petch-Representations-Woodford-Neighbourhood-Plan-Reg-14-Response.pdf						
193.	Mr and Mrs Petch, Wilmslow Road	Emery Planning Aylsia Davidson	ENV1	<p>5.1 There is no justification for applying an additional restrictive policy tier across much of the WNP area. An allocation for residential development is proposed for Woodford in the emerging GMSF. In seeking to protect an extensive range of views across the draft allocation, the WNP is inconsistent with the emerging strategic plan for the area.</p> <p>5.2 The policy requires that any new development “does not affect the openness of the Green Belt”. This wording is inconsistent with national planning policy, and therefore contrary to basic test (a). The Framework is permissive of certain types of development which are “not inappropriate” in the Green Belt, and does not limit those types of development to only those which do not affect openness. Furthermore, paragraphs 87 and 88 of the Framework allow for inappropriate development in the Green Belt, where there are very special circumstances which clearly outweigh the harm to the Green Belt.</p> <p>5.3 The policy requires new development to respect and enhance the local landscape quality. There is no justification for requiring all new development to enhance the local landscape quality.</p> <p>5.4 The policy also requires important views and vistas within and out from the Neighbourhood Area and the rural skylines to</p>	<p>5.1 GMSF is not an emerging plan at the moment.</p> <p>5.2 “provided that it does not affect the openness of the Green Belt” was added at the suggestion of SMBC.</p> <p>5.3 Agree that the reference to local landscape quality could be removed from the policy without weakening it.</p> <p>5.4 There is no national or local policy which requires</p>	Amend as shown below.

				be maintained. These are listed in the table on page 26 and the map on page 27. Firstly, it is not clear what evidential basis there is for seeking to protect such views. Secondly, the number of views identified is extremely extensive, such that most greenfield land across the WNP area is affected. The policy does not distinguish between a significant view in terms of landscape and visual impact, and one that is less significant.	us to distinguish between significant and less significant. A point of correction: As explained in the justification and evidence in section 8, this policy arose from residents' opinion. The views and vistas listed are those considered significant by residents.	
ENV1: Protecting views and vistas (1-13)						
a) New development shall be permitted, provided that it does not affect the openness of the Green Belt and that it respects and enhances the local landscape quality, and ensures that important local views and vistas within and out from the Neighbourhood Area and the rural skylines are maintained, as listed in the Views and Vistas table and shown on the Views and Vistas Maps.						
b) Any development that enhances access to the views and vistas from public rights of way shall be encouraged.						
194.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	ENV2	5.5 Firstly, the policy refers to the sites identified as countryside and 'green spaces'. It is not clear if the policy is seeking to designate land as 'Local Green Space' which is a very specific planning policy designation. The policy is not entitled 'Local Green Space', so we assume that it is not. Furthermore the land does not meet the tests of the Framework for designation as Local Green Space as set out at paragraph 77 of the Framework, and in particular: · There is no evidence that each site is demonstrably special; and, · Each parcel represents an extensive tract of land. 5.6 Secondly, and as we have set out in our response to ENV1, there is no justification for applying an additional restrictive policy tier across nearly all of the WNP area. An allocation for	5.5 We are not designating any sites as Local Green Space. 5.6: GMSF is not an emerging plan at the moment.	None

				<p>residential development is proposed for Woodford in the emerging GMSF. In seeking to protect virtually all greenfield land across the draft allocation through an additional blanket policy tier, the WNP is inconsistent with the emerging strategic plan for the area.</p> <p>5.7 Furthermore, the WNP must have due regard for the allocation of the North Cheshire Growth Village through the adopted Cheshire East Local Plan Strategy (July 2017). Although outside of the WNP area, this strategic allocation for 1,500 new homes and other uses will fundamentally change the character of the landscape across the WNP area, and views and vistas. There is no reference to this allocation through the WNP and this is a fundamental flaw in the drafting of the various policies, particularly with regard to landscape impact and views. See the plan below, which shows the close proximity of this strategic site allocation (the allocation is shown hatched red:</p>	<p>5.7 The NCGV is not in NA, so cannot be subject to WNP policies.</p> <p>A point of correction: NCGV will only impact on the landscape in a very small section at the periphery of the NA.</p>	
195.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	ENV3	<p>5.8 There is no justification for seeking to protect all of the features listed. For example, not all trees in public places and bordering roads will be of high value and/or worthy of retention.</p> <p>5.9 The table of Natural Features lists key aesthetic components of the Woodford Landscape including 'ponds visible along roads, tracks and public rights of way across farmland'. It would not be feasible, practical or necessary to protect views of all ponds and certainly not all ponds would be deemed to be a key aesthetic component. No definition or criteria is given as to how the ponds have been assessed to fall within this category in terms of</p>	<p>5.8 This policy responds to residents' wishes based on survey evidence. All trees in public places and bordering roads are of aesthetic value to residents and/or have environmental benefits, even if scruffy, so worthy of retention.</p> <p>5.9 This policy responds to residents' wishes based on survey evidence.</p> <p>Natural ponds are British</p>	None

				<p>quality, size etc.</p> <p>5.10 Furthermore where the loss of such features does occur, the policy should be permissive of this provided that adequate mitigation is provided.</p>	<p>Action Plan protected features which should be assessed and preserved wherever possible.</p> <p>5.10 This is a good point and is covered by ENV4</p>	
196.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	ENV4	<p>5.11 The Cheshire Wildlife Trust mapping only provides a very broad overview of current ecological conditions, and detailed survey work has not been undertaken for all sites identified in the maps on pages 36 and 37 of the plan. It is therefore wholly inappropriate for the policy to protect, enhance or retain sites identified on the maps (as per points i and iii of the draft policy), or to provide specified buffer zones (point v). As a minimum the plan should also recognise individual development proposals will need to be assessed on their own merits, having regard to appropriate site specific survey work.</p>	<p>5.11 Detailed site work has been carried out, as outlined in section 8 of the Plan document and supporting documents.</p> <p>The policy notes that individual development proposals will need to be assessed on their own merits, having regard to appropriate site specific survey work.</p>	None
197.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	EMP2	<p>5.12 The policy to only permit a change of use if the existing business is unviable is unduly restrictive. It has not been demonstrated that there is a strategic need for such a restrictive approach in terms of employment land supply, and the relative need for other land uses including residential. The proposed requirements in relation to efforts made to save or sell the business are unduly onerous, and furthermore provide an applicant with little guidance or certainty as to what would be an acceptable outcome from such efforts.</p>	<p>5.12 This is consistent with SMBC policy and has been discussed with SMBC officers.</p> <p>Residents' surveys demonstrated local need. Note: This is not a "strategic" policy</p>	

198.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	EMP3	<p>5.13 Whilst we are supportive of the reuse of redundant buildings, the proposed approach to ‘prioritise’ the reuse of redundant buildings is inconsistent with the Framework, which seeks to encourage (but not prioritise) the use of previously developed land. The issue has arisen in numerous Local Plan examinations, but is probably best summarised in the Secretary of State appeal decision for Burgess Farm, Salford, which was issued shortly following the publication of the Framework (PINS ref: APP/U4230/A/11/2157433). Paragraph 14 of the decision letter clarifies the Secretary of State’s position: “He gives less weight to the sequential approach to release of sites. National planning policy in the Framework encourages the use of previously developed land, but does not promote a sequential approach to land use. It stresses the importance of achieving sustainable development to meet identified needs.”</p> <p>5.14 The proposed policy approach is also inconsistent with the Framework’s requirement to maintain a 5 year supply of housing land, which cannot currently be demonstrated in Stockport and is unlikely to be demonstrated for some time moving forward.</p> <p>5.15 There is no justification for the requirement for reconstruction / improvement works to provide evidence for low carbon technologies, and such a policy is inconsistent with national policy. Furthermore the approach introduces an additional cost for developers, which has not been subject to viability testing.</p> <p>5.16 The part of the policy relating to applications for the change of use of agricultural buildings (including stables) is unduly</p>	<p>5.13 WNF believes that prioritisation is the best way of dealing with re-use in an area where all of the land is designated as Green Belt.</p> <p>5.14 The five year supply is not an issue for a NP.</p> <p>5.15 SMBC requested inclusion of this paragraph. Residents’ views expressed in local survey responses support energy efficiency measures.</p> <p>The examples are too specific and should be deleted.</p> <p>5.16 WNF believes this is</p>	Amend as shown below.
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				onerous, and inconsistent with the Government’s support for the re-use of buildings. It also ignores that many such buildings currently benefit from permitted development rights to change use to residential or commercial use without the need for planning permission.	the best way of dealing with re-use in an area where all of the land is designated as Green Belt.	
<p>EMP3: Use of Rural Buildings (1, 4-9)</p> <p>Wherever possible the reuse of redundant buildings should be a priority over new-build.</p> <p>Any reconstruction / improvement works should provide evidence for proposed low carbon technologies, in order that the building’s carbon footprint be reduced. Examples of this are double / triple glazing, increased insulation, the use of LED lights and lights that automatically time-out in corridors and toilets etc, new boilers for heating systems and up to date “white goods”; and</p> <p>Schemes that create employment by the re-use, conversion and adaptation of permanent, structurally sound, rural buildings of substantial construction for small business purposes, recreation or tourism shall be permitted; and</p> <p>Applications for the change of use for agricultural buildings, including stables, within 10 years of completion of the building will not be permitted unless accompanied by evidence that the building was used during that period for the intended agricultural use and that the proposed changes of use will not generate the need for a replacement structure; and</p> <p>Proposals will not generate heavy goods traffic on unsuitable, rural lanes and must demonstrate, with the assistance of a Transport Statement, that the proposal will not have an unacceptable traffic impact within the village; and</p> <p>Proposals must include, where applicable, adequate parking, loading / unloading, servicing and manoeuvring areas.</p>						
199.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	DEV1	<p>5.17 The proposed policy is inconsistent with national planning policy in relation to the Green Belt. The ‘rural exceptions to Policy DEV1’ do not fully or accurately reflect the development that is considered to be ‘not inappropriate’ in the Green Belt as set out at paragraphs 89 and 90 of the Framework. Report of Representations Woodford Neighbourhood Plan June 2018 17</p> <p>5.18 Specifically in relation to limited infilling, the definition</p>	<p>5.17: WNF believes this is consistent with the NPPF.</p> <p>5.18/5.19: The NP can make</p>	None

				<p>provided in the WNP is unduly restrictive, and not a reasonable interpretation of limited infilling. Numerous appeal decisions have found that more than one dwelling can comprise limited infilling. In particular we refer to a recent appeal decision in relation to a site in Church Lawton, Cheshire East, where a development of 5 dwellings was found to comprise limited infilling. Copies of the decision letter and site location plan are appended at EP3. Planning permission was granted for the demolition of a dwelling and the construction of 3 dwellings on land at 115 Coppice Road Poynton, Cheshire East. The Delegated Officer Report, local plan and approved proposed site plan are at Appendix EP4. Two further appeals allowed infill development for two dwellings on and land at 23 Sandbach Road, Church Lawton, Cheshire East and land at Hollands Lane, Kelsall, Cheshire West. The appeal decisions, location plans and approved site plans for both cases are at Appendices EP5 and EP6 respectively.</p> <p>5.19 These appeal decisions clearly demonstrate that Policy DEV1 is unduly restrictive and unjustified.</p>	<p>policy in this subject are – appeal decisions do not set policy precedents, each one is considered on local circumstances.</p>	
200.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	DEV2	<p>5.20 The policy adds further restrictions to those set out in Policy DEV1 in relation to limited infilling within the Green Belt. There is a degree of inconsistency between the policies; for example Policy DEV1(a) is only permissive of infilling for one dwelling, whereas Policy DEV2(c) refers to the filling of a narrow gap normally capable of taking one or two dwellings. The requirements in relation to infilling should be consistent, and preferably set out in one policy only.</p>	<p>5.20 It is necessary to restrict development in the Neighbourhood Area because of the important contribution it makes to the openness of the Green Belt. Therefore, DEV1 is consistent with the old and new NPPF in relation to limited infilling within the Green Belt.</p> <p>In DEV2 WNF believes that</p>	None

				<p>5.21 The policy states that any proposed development should preserve and not have an adverse impact upon the openness of the Green Belt. However the limited infilling exception in the Framework provides no such restriction. Notably the Framework draws a distinction between limited infilling within a village, which does not refer to openness in the penultimate bullet point of paragraph 89, and the redevelopment of previously developed land which does refer to the impact upon openness in the final bullet point. Consequently the references to preserving openness should be deleted.</p> <p>5.22 As with Policy DEV1, we do not consider that the proposed approach accords with the Framework. Again we refer to the</p>	<p>it is reasonable to allow up to two dwellings provided that the development is consistent with the adjacent homes. This goes beyond SMBC custom, which is for one only, but responds to the demand for smaller homes for starters or downsizers as identified in our survey. This could include two smaller dwellings in the form of a semi-detached home (or apartments) consistent in overall size and scale to adjacent large detached for such a gap.</p> <p>5.21: The clause regarding the openness of the Green Belt was included at the request of SMBC.</p>	
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				<p>Church Lawton appeal decision appended at EP3. The requirements in relation to the completion of a narrow gap in a road frontage, scale, building line and low density areas represent an unduly restrictive interpretation of limited infilling which Report of Representations Woodford Neighbourhood Plan June 2018 18 is not supported by national planning policy, appeal decisions or caselaw in particular those appeal decisions and planning approval listed at paragraphs 5.16 – 5.17 above and the appeal decision below. Appeal APP/A0665/W/14/3000557 - 115 Hilltop Road, Acton Bridge</p> <p>5.23 This appeal was made following planning refusal 14/03768/OUT for the erection of a single dwelling on an infill plot at 115, Hill Top Road, Acton Bridge. The appeal was allowed on 12 February 2015. The appeal decision and proposed site plan are appended to this statement at EP7. 5.24 This site is a relatively wide plot that fronts the western side of Hill Top Road. The site (115 metres) is comparable with the site at Hall Moss Lane but forms part of a much less defined and built up ribbon of development along Hill Top Road than the gap that exists between Green Hedges and Long Acre. Furthermore, built development lies opposite the site, on Church Lane, to the south west. The proposed scheme was a single dwelling and the case was made that it represented infill development in the Green Belt. 5.25 This further supports our case that the site Hall Moss Lane is suitable for infill development. 5.26 There are a number of other appeal decisions that can be drawn upon which clearly illustrate that an ‘infill’ development does not have to fit the restrictive description as set out in Policy DEV1.</p>		
201.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	DEV3	5.27 The draft policy requires 50% provision on sites of more than 5 dwellings. Policy H-3 of the Core Strategy only requires 40% affordable housing in Woodford. The draft policy is therefore inconsistent with the adopted development plan.	5.27 and 5.28: This policy is justified in aiming to get smaller houses in the NA.	None

			<p>Furthermore there is no justification, and in particular no viability evidence, to justify seeking a higher proportion of affordable housing than that set out in adopted policy.</p> <p>5.28 In relation to the site size threshold, this reflects the threshold in Policy H-3 of the Core Strategy. However, both the Core Strategy and the emerging WNP conflict with advice contained within the PPG and the Written Ministerial Statement in relation to planning obligations, which state that where sites fall under 10 units / 1,000m² floor area, they should be exempt from tariff style contributions. The threshold is lower for designated rural areas; however Woodford is not such an area. Consequently the minimum threshold should be raised to 10 units to reflect national planning policy.</p> <p>5.29 The residency qualification for affordable housing is too restrictive. There are very significant levels of unmet need in Stockport borough for affordable housing, including in neighbouring settlements such as Bramhall. If there are suitable sites available Woodford should not be viewed in isolation from Stockport borough.</p> <p>5.30 We refer to a recent appeal decision in High Peak, which is a rural authority. We were the agents for this appeal. The Inspector addressed the Written Ministerial Statement referred to above and clarified that it was unjustified to request affordable housing provision for fewer than 10 units; see the Inspector's comments at paragraphs 37-40 of the appeal decision letter at Appendix EP8: "Policy H4 of the Local Plan sets out the local approach to securing affordable housing contributions. For development proposals including between 5 and 24 units the policy requires a 20% provision of onsite affordable housing- which in the case of the appeal proposal</p>	<p>5.29 The community wish to have restrictions – this is not constrained by national and local policy.</p>	
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			<p>would equate to one dwelling. My attention has also been drawn to the Government’s Planning Practice Guidance (PPG), which, expands on the national policy expressed in the Written Ministerial Statement of 28 November 2014 (the WMS). This outlines the specific circumstances where contributions for affordable housing should not be sought, including from developments of 10 units or less or which have a maximum combined floorspace of no more than 1,000 SqM. Whilst a lower threshold of 5-units applies to designated rural areas, the Council confirmed that the appeal site is not within one of these. As the WMS and the related PPG constitute clear and unequivocal statements of national policy on this matter they are considerations to which I attach very considerable weight in the overall planning balance. Although I note that the adoption of the Local Plan post-dates the issue of the WMS, it was adopted at a point where a Declaration order of the High Court quashed the contents of the WMS. However, that order was overturned by the Court of Appeal on 13 May 2016, and from that date the national policy expressed in the WMS once again constitutes a material planning consideration. It is clear that the contents of the WMS and the PPG do not automatically displace the statutory primacy of the development plan in the assessment of the planning merits of a proposal. However, I have been supplied with no substantive evidence in this case to demonstrate the specific circumstances pertaining in the Borough that justify a departure from the unambiguous and most up to date expression of national policy on this matter expressed in the WMS. Consequently, in this instance I consider that the national policy expressed in the WMS and related advice in the PPG are matters that justify a departure from Policy H4 of the Local Plan, and therefore find that the necessity of an affordable housing contribution has not been established in this</p>	
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				instance.”		
202.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	DEV5	5.31 The Framework states that the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces, is not inappropriate within the Green Belt. The additional requirements and restrictions are inconsistent with national planning policy.	WNF believes that the policy is consistent with national policy. Amend to be more flexible.	Amend as shown below.
<p>DEV5: Replacement of existing dwellings (1-3, 5-11)</p> <p>The replacement of one permanent and substantially constructed house by one dwelling (or two semi-detached dwellings in one building) may be allowed provided the new building is not materially larger than the building it replaces. The following criteria are to be considered also required to be satisfied:</p> <ul style="list-style-type: none"> a) The new dwelling would be sited within the house and garden and its design would create a visual enhancement of the site; and b) The new dwelling by virtue of its siting, design, external appearance and any access arrangements would respect the traditional character and openness of the surrounding countryside; and c) Existing landscape features are retained and appropriate additional landscaping carried out which reflects the character and appearance of the surrounding countryside; and d) Any additional freestanding buildings shall not have an adverse impact upon the character and appearance of the surrounding countryside; and <p>The new dwellings shall respect the privacy and other existing amenities of any adjacent dwellings.</p>						
203.	Mr and Mrs Petch	Emery Planning Aylsia Davidson	DEV8	5.32 Part (d) of the policy sets out a number of requirements in relation to environmental and energy standards for construction, with reference to the SMBC Sustainability Checklist. However this document is no longer up-to-date, as it does not reflect the Government’s 2015 Written Ministerial Statement and subsequent guidance in relation to streamlining housing standards. Only specific optional technical standards can be set by a local planning authority, and furthermore this must be justified (including through viability evidence)	5.32 Amend to allow for changes in energy standards.	Amend as shown below
<p>DEV8: Design of new development (1-3, 5-9, 11, 13-15)</p> <p>Any new development in Woodford shall seek to achieve a high standard of design. The new development should be compatible with the rural nature of Woodford, the Landscape Character Assessment, the WNF Key Natural Features Map, CWT Habitat Distinctiveness Map and CWT Wildlife Corridor Map for Woodford and the emerging Landscape Character Assessment for Stockport.</p> <p>The layout and design of new housing should satisfy the following local design principles:</p> <ul style="list-style-type: none"> a) Reflect local rural character of the Woodford; and b) Respect the form, layout, materials, siting, height, scale and design of the adjoining and surrounding buildings, the setting and countryside; and 						

- c) Be sympathetic to the character of the local environment, the rural street scene, the linear and street frontage layout of development; and
d) Achieve **high** environmental and energy standards ~~with a view to achieving zero carbon buildings and a sustainability standard of Gold in accordance with the SMBC Sustainability Checklist; and~~
e) Retain or enhance existing landscape, wildlife features and coherent ecological network features.

Daylesford Trust <http://woodfordnf.co.uk/wp-content/uploads/2018/06/The-Daylesford-Trust-Representations-Woodford-Neighbourhood-Plan-Reg-14-Response.pdf>

204 - 214	Daylesford Trust	Emery Planning Aylsia Davidson		Identical to those for Mr and Mrs Petch	Same as for 192 -202	
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Garner Farms Ltd <http://woodfordnf.co.uk/wp-content/uploads/2018/06/William-Garners-Farms-Ltd-Representations-Woodford-Neighbourhood-Plan-Reg-14-Hill-Top-Farm-1.pdf>

215 - 225	Garner Farms Ltd	Emery Planning Aylsia Davidson		Identical to those for Mr and Mrs Petch	Same as for 192 -202	
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226.	Garner Farms Ltd	Emery Planning Aylsia Davidson	EMP1:	5.12 This policy takes a very general approach to new business within the area. There is no reference to support for rural diversification or rural businesses including the conversion of suitable existing buildings.	5.12 This is covered in EMP3	None
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227.	Garner Farms Ltd	Emery Planning Aylsia Davidson		5.13 Support for the rural economy is encouraged in paragraph 28 of the NPPF where it states that in rural areas, in order to create jobs and prosperity, a positive approach should be taken to sustainable new development and neighbourhood plans should: <ul style="list-style-type: none"> · “Support the sustainable growth and expansion of all types of business and enterprise in rural areas both through the conversion of existing buildings and well designed new buildings. · To promote the development and diversification of agricultural 	Noted	None
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				<p>and other land-based rural businesses;</p> <ul style="list-style-type: none"> · To support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and · Promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public house and places of worship.” 		
228.	Garner Farms Ltd	Emery Planning Aylsia Davidson	DEV4: redevelopment of farm buildings or farm complex	<p>5.34 This policy relates to the complete redevelopment of all related farm buildings within a farm complex into a new housing scheme. It is unclear as to whether this policy includes sites within the Green Belt? It is assumed so as only buildings outside of the defined settlement limits of Woodford are within the Green Belt. If it does, then the requirements would need to be compliant with the exceptions categories set out in para’s 89 & 90 of the NPPF.</p> <p>5.35 The requirement for a mix of housing within a new housing scheme is not consistent with the affordable housing policy whereby this should only be applied on sites of 10 units or more. No reference to the number of units is given in this policy.</p> <p>5.36 The policy needs to be consistent with National and adopted Local Planning Policy.</p>	<p>5.34 All of the NA is in the Green Belt.</p> <p>5.35 The aim is to achieve a mix of housing sizes, which includes smaller sizes.</p> <p>5.36 WNF believes that it is consistent with local and national policy</p>	Amend as shown below.

DEV4: Redevelopment of farm buildings or farm complex (1, 3)

The complete redevelopment of related farm buildings or within a farm complex into a new housing scheme within Woodford shall be supported where:

- a) The site is currently occupied by agricultural buildings which are not capable of re-use without extensive re-building, or has previously been occupied by agricultural buildings which have outlived their usefulness for agricultural purposes; and
- b) The location and proposed nature of the scheme are both sympathetic to the character of the open countryside and would have minimal visual and environmental impact; and
- c) The redevelopment does not extend beyond the site area previously or currently occupied by agricultural buildings; and
- d) The housing scheme **includes a mix of housing sizes** ~~reflects a mix of housing based on meeting the needs of different groups within the Woodford community and is based on a recent Housing Needs survey of the local area.~~

229.	Garner Farms Ltd	Emery Planning Aylsia Davidson	6. Summary and conclusions	6.1 We support the principle of the production of a WNP. However, we consider that a number of changes are needed to ensure that the plan meets the basic conditions.	6.1 Noted	None
230.	Garner Farms Ltd	Emery Planning Aylsia Davidson		6.2 In particular, we have concerns in relation to the WNP's interpretation of Green Belt policy through policies DEV1, DEV2 and DEV5.	6.2 See justification above.	None
231.	Garner Farms Ltd	Emery Planning Aylsia Davidson		6.3 We also have significant concerns in relation to the placing of unduly restrictive policies in relation to views and countryside / 'green space' in policies ENV1 and ENV2. The plan fails to acknowledge the significant unmet housing needs in the area, and the proposed allocation of 2,400 dwellings in Woodford through the emerging Greater Manchester Spatial Framework.	6.3 Responds to residents wishes. Other NPs do this. GMSF has no status in planning at present.	None
232.	Garner Farms Ltd	Emery Planning Aylsia Davidson		6.4 This concludes our representations. Our client wishes to be kept informed of the process moving forward.		None
Marques of Kingsley Estates http://woodfordnf.co.uk/wp-content/uploads/2018/07/M-Kingsley-Reg-14-Response.pdf						
233.	Marques of Kingsley	Mr Kingsley	ENV1	The Policy seeks to prevent all development where it might impact on views and vistas and by	The list of views is based on those noted as significant	None

	Estates			<p>setting out a list of almost every possible view or vista within the area, thereby effectively sterilises all possible future development within the area.</p> <p>Further, we object to the inclusion of the views set out within numbers 1. and 2. of the Table to the Policy, since none of these views are important local views for the public in general, being very limited views available to the backs of only about 7 or 8 houses fronting onto Chester Road and from a single house at Upper Swineseye farmyard. Bridle Way and end of Bridle Road where many folk walk their dogs. Views to the features as set out in 1. and 2. are more properly available from other vantage points.</p> <p>The Policy is accordingly overly restrictive and should be amended to only say that vistas and views should be maintained where possible and the views referred to at 1. and 2. should in any event be removed from the Table.</p>	<p>by residents. It does not include every vista in Woodford.</p> <p>All are visible from public roads and/or footpaths.</p>	
234.	Marques of Kingsley Estates	Mr Kingsley	ENV2	<p>The Policy seeks to prevent all development that might have a detrimental impact on defined areas, and then goes on to define what is effectively the whole of Woodford, including area 15, which makes no contribution to the rural character of the village, being an area of infill between the development at Woodford Aerodrome and the proposed Poynton Relief Road, and which has no sporting, recreational or other value.</p>	<p>Residents wanted to keep all the green spaces. That is evidence which supports the policy. It would not prevent limited infilling as described by our DEV2. The countryside in Area 15 is important to residents on Chester Road, Bridle Road, Bridle Way and users of footpath 101HGB.</p>	None

				The Policy is accordingly overly restrictive and should be amended to say that development that has a detrimental impact should not normally be allowed and area 15 should in any event be removed from the Policy.		
Richborough Estates Limited http://woodfordnf.co.uk/wp-content/uploads/2018/09/Richborough-Haslam-Savills-Reg14-Response.pdf						
235.	Richborough Estates	Rob Haslam	General	We write on behalf of our client, Richborough Estates Limited, who are promoting land at Moor Lane/Jenny Lane/A5102 in Woodford, Stockport for residential development through the Stockport Local Plan and Greater Manchester Spatial Framework (GMSF).	GMSF has no planning status at present.	None
236.	Richborough Estates	Rob Haslam	Environment policies	<p>The site is undeveloped open land, is bound to the east by the A5102 Woodford Road, and residential development; and to the north by Jenny Lane. Moor Lane and further residential development forms the western boundary. To the south, an access road separates the site from further residential development, open Green Belt and a large and well-established garden centre. It is located within the settlement of Woodford, and in close proximity to the neighbouring village of Bramhall.</p> <p>The site is being promoted for residential development to meet increasing local housing needs and forms part of draft allocation OA20 Woodford (Stockport) within the draft Greater Manchester Spatial Framework (GMSF). This allocation has an indicative target to deliver around 2,400 new homes across the Plan period.</p> <p>The site was submitted during the initial 'call for</p>	GMSF has no planning status at present.	None

				sites' exercise in January 2016 with an indicative masterplan of 135 dwellings. We are anticipating a revised draft GMSF, with amended housing allocations, to be published over summer 2018.		
237.	Richborough Estates	Rob Haslam	ENV2	<p>Policy ENV2 of the pre-submission draft Plan states that development will be permitted provided that it has no detrimental impact on countryside or green spaces that contribute to the rural character of the village or have sporting, recreational, amenity or aesthetic value. Countryside and Green Spaces in Woodford Neighbourhood Area 13, 'Fields between Jenny Lane, Woodford Road, Chester Road and Moor Lane' covers the entirety of the site.</p> <p>We consider that the above land should not be identified in Policy ENV2 as the site forms part of a large housing allocation in the emerging GMSF and residential development on the site as planned will impact upon the open nature of the countryside and green space. Policy ENV2 is therefore in direct conflict with the emerging sub-regional policy framework and we therefore request its removal from the Plan. The Neighbourhood Plan should seek to conform to and acknowledge the emerging GMSF, and be flexible enough to accept its findings.</p>	<p>Residents wish to retain Area 13 as green space/countryside.</p> <p>GMSF has no planning status at present.</p>	None
Wallace Land Investments http://woodfordnf.co.uk/wp-content/uploads/2018/07/Pegasus-Group-Reg14-Response.pdf						
238.	Wallace Land Investments	Pegasus (Graham Lamb)	General	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		None

				sustainable future for Woodford.		
239.	Wallace Land Investments	Pegasus (Graham Lamb)	Development	<p>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.</p> <p>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 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.</p> <p>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</p>	<p>GMSF has no status in planning at present.</p> <p>The WNP does not include allocations.</p> <p>The WNP complies with NPPF 2012 version, which is allowed under the new legislation.</p>	None

			<p>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.</p> <p>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.</p> <p>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:</p> <p><i>“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or</i></p>	<p>The WNP does not seek to amend Green Belt boundaries.</p>	
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			<p><i>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.”</i></p> <p>AECOM Neighbourhood Plan Housing Policy Advice</p> <p>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).</p> <p>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.</p>	<p>ONS figures are being revised downwards.</p>	
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				<p>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.</p>		
240.	Wallace Land Investments	Pegasus (Graham Lamb)	DEV 3	<p>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.</p> <p>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).</p> <p>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 Heatons are not and that</p>	This policy aims to get smaller houses in the NA. The aim is supported by residents wishes.	

				<p>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.</p> <p>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.</p>		
241.	Wallace Land Investments	Pegasus (Graham Lamb)	Employment and Community policies	<p>Employment Policies (Section 7.3 & 8.3) & Community Policies (Section 7.4 & 8.4)</p> <p>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</p>	Noted	None

			<p>COM1 and COM2).</p> <p>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.</p> <p>Below we set out the levels of local household expenditure that would be generated by different levels of housing development:</p> <ul style="list-style-type: none"> - 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 <p>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</p>		
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				investment.		
242.	Wallace Land Investments	Pegasus (Graham Lamb)	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.	EF: The environment policies arose from residents wishes. They are supported by a professional Landscape study by AECOM, a wildlife survey by CWT and a volunteer survey conducted by qualified biologists and an architect.	None
243.	Wallace Land Investments	Pegasus (Graham Lamb)	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	Noted	None

				<p>least the protection and support of local businesses and community facilities.</p> <p>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.</p>		
Harrow Estates http://woodfordnf.co.uk/wp-content/uploads/2018/06/Harrow-Lichfields-Reg14-response.pdf						
244.	Harrow Estates	Lichfields	General Comments	<p>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 “<i>the village</i>” (Policy ENV2 and Policy EMP3), “<i>Woodford</i>” (Policy COM2, Policy COM3, Policy DEV1, Policy DEV3, Policy DEV4, Policy DEV6, and Policy DEV8), and “<i>Woodford Village</i>” (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.</p> <p>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</p>	Woodford Village is defined as the Woodford Neighbourhood Area. Change all references to the “Village” or “Woodford Village” to the “Neighbourhood Area”.	Amend as shown below.

				Neighbourhood Area, this area should be clearly identified on a plan within the document.		
[in Introduction] Note: for the purposes of the policies in this Plan document, the terms “Woodford” and “Woodford Village” refer to the Woodford.						
[in Woodford today] Woodford has twenty public rights of way, which provide a network of pleasant short walks connecting one side of the village Neighbourhood Area to the other, some passing through green fields and woodland and some with views of the Pennines.						
[in aims of policies] Policy ENV1: To protect and enhance views and vistas within and out from the Woodford Neighbourhood Area. COM2: To prevent loss of, or harm to, existing village-features in the Woodford Neighbourhood Area that are valued by the community. To allow improvement, relocation, or addition of new village-features of value to the community in the Woodford Neighbourhood Area, provided no harm to existing features of value is caused. COM3: To conserve and enhance the heritage value of heritage structures or buildings and their setting. To recognise the community value of heritage to the Woodford Neighbourhood Area and the contribution this makes to local quality of life. DEV2: To provide the criteria for small-scale infilling in the Plan area Woodford Neighbourhood Area, consistent with Green Belt policy.						
Where appropriate, amend “Woodford”, “the Plan area”, and “the Neighbourhood Area” to read “Woodford Neighbourhood Area”. This applies to ENV1, EMP1, EMP3, COM3, DEV1, DEV2, DEV3, DEV4, DEV6 and DEV8						
245.	Harrow Estates	Lichfields	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: <i>“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”.</i>	Suggested inclusions concerning the potential benefits of facilities on the site to the wider community will not be included. The first part of the sentence is fact. The second part (highlighted) is our hypothesis, so delete.	Amend

				<p>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.</p> <p>The following wording should be added to the end of the first paragraph on page 12:</p> <p>“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”.</p>		
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.						
246.	Harrow	Lichfields	Section 7.2 –	The NPPS (page 23, final paragraph) refers to	Agree. Delete this section	Amend

	Estates		Environment Policies	<p>a Cheshire Wildlife Trust [CWT] Report for Woodford and makes the following statement:</p> <p><i>“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”.</i></p> <p>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.</p> <p>The final sentence of the paragraph quoted above should be deleted.</p>	of the quote.	
<p>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.</p>						
247.	Harrow Estates	Lichfields	Section 7.3 – Employment Policies	<p>In the Rationale for the employment policies (page 39, third paragraph) the NPPS states:</p> <p><i>“It was evident from our residents’ survey that existing brownfield sites were the preferred option</i></p>	We cannot change the results of the residents’ survey.	None

			<p><i>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”.</i></p> <p>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).</p> <p>The above paragraph should be reworded as follows:</p> <p>“It was evident from our residents’ survey that</p>		
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				<p>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”.</p>		
248.	Harrow Estates	Lichfields	<p>Policy DEV3 - Affordable Housing</p>	<p>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):</p> <p><i>“Affordable housing should be provided within the Plan Area and or/within the former aerodrome to meet Woodford’s Housing needs as follows...”</i></p> <p>With regard to the drafting of policies in Neighbourhood Plans the Practice Guidance states3:</p> <p><i>“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted</i></p>	<p>Misquoted. Planning permission, which has been already granted for the aerodrome site, includes provision of affordable housing which may contribute satisfying to the Woodford Neighbourhood Area’s needs.</p> <p>Agree to delete “within former</p>	<p>Amend as below</p>

				<p><i>with sufficient 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”.</i></p> <p>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.</p> <p>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:</p>	Aerodrome site” as suggested.	
<p>DEV3: Amend second paragraph Affordable housing shall be provided within the Plan area and/or within the former aerodrome area to meet Woodford’s its housing needs as follows:</p>						
249.	Harrow Estates	Lichfields	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	The Village Action Plan does not include strategic policies, but rather the	Amend *Village

			<p>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.</p> <p>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.</p> <p>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</p>	<p>aspirations of the community that will require it to influence local authorities to undertake the actions suggested.</p> <p>Therefore, it will be presented as a separate document from the Neighbourhood Plan.</p>	<p>Action Plan becomes Woodford Village Aspirations, which is presented as a separate document for Submission.</p>
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			<p>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.</p> <p>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.</p> <p>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</p>		
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				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.		
250.	Harrow Estates	Lichfields	Village Action Plan Detailed Wording of Aspirations	<p>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:</p> <p>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</p>	<p>Agree, delete all reference to Redrow.</p> <p>No need to refer to potential future developments on the Aerodrome site.</p> <p>Note: The Village Action Plan does not include strategic policies, but rather the aspirations of the community that will require it to influence local authorities to undertake the actions suggested.</p> <p>Therefore, it will be presented as a separate document from the Neighbourhood Plan.</p>	Amend as shown below.*

				<p> dwellings already granted planning permission).</p> <p>The first sentence of Aspiration 1 should be amended as follows:</p> <p>“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.</p> <p>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”.</p>		
<p>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.</p>						
251.	Harrow Estates	Lichfields	Village Action Plan	The aspiration also specifically mentions Redrow Homes and suggests that developers will be	Agree, delete all reference to Redrow.	Amend as shown

			<p>Aspiration 2: Cycling Provision</p>	<p>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 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).</p> <p>The first sentence of Aspiration 2 should be amended as follows:</p> <p><i><u>“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</u></i></p>	<p>No need to refer to potential future developments on the Aerodrome site.</p>	<p>below.*</p>
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				<i>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”.</i>		
The Community will work with SMBC, Redrow Homes , Cheshire East and other developers (who will be expected to contribute financially to effect <u>enable</u> this provision) to create a safe and secure cycling network <u>within the Neighbourhood Area</u> .						
252.	Harrow Estates	Lichfields	Village Action Plan Aspiration 3: Public Transport Provision	<p>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).</p> <p>Aspiration 3 should be amended as follows:</p> <p>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</p>	<p>Agree, delete all reference to Redrow.</p> <p>No need to refer to potential future developments on the Aerodrome site.</p> <p>Note: The Village Action Plan does not include strategic policies, but rather the aspirations of the community that will require it to influence local authorities to undertake the actions suggested.</p> <p>Therefore, it will be presented as a separate document from the Neighbourhood Plan.</p>	Amend as shown below.*

				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”.		
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 with a greater range of destinations.						
253.	Harrow Estates	Lichfields	Village Action Plan Aspiration 4: Traffic Calming First sentence Page 99			Amend as shown below.*
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.						
254.	Harrow Estates	Lichfields	Village Action Plan Aspiration 5:			Amend as shown below.

			Informing Second sentence Page 105			
The existing village Neighbourhood Area supports a range of activities, not least those offered by the Community Centre.						
255.	Harrow Estates	Lichfields	Village Action Plan Aspiration 7: Interfacing First sentence Page 106			Amend as shown below.*
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 two parts will be encouraged. support effective integration of the Neighbourhood Area and the new development on the Aerodrome site will be encouraged.						

*Note: VAP becomes a separate document entitled Woodford Village Aspirations for the Submission stage, in order to clearly differentiate the aspirations from planning policies.



HOW

Representations to Woodford Neighbourhood Plan

**Residential Allocation
Land at Hilltop Farm, Woodford**

**Park Land and Securities Ltd
June 2018**

HOW Planning LLP, 40 Peter Street Manchester, M2 5GP

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APPENDICES APPENDIX 1: Land at Hilltop Farm Development Framework

[WNF: Appendix deleted to reduce file size]

The full representation from How Planning can be found here: <http://woodfordnf.co.uk/wp-content/uploads/2018/09/HOW-Representations-to-Woodford-Neighbourhood-Plan.pdf>

1 INTRODUCTION

- 1.1 These representations to the Pre-submission Consultation Regulation 14 Woodford Neighbourhood Plan (NP) are submitted by HOW Planning on behalf of Park Land and Securities Ltd (PLSL) in relation to land at Hill Top Farm, Chester Road, Woodford, Stockport. The site is circa 50 ha and shown at Appendix 1.
- 1.2 The land is proposed as part of the Woodford Opportunity Area (WOA) allocation within Draft Greater Manchester Strategic Framework (GMSF) Policy OA20. Policy OA20 indicates that the WOA should be allocated to deliver up to 2,400 new homes to build upon the success of the Woodford Garden Village through the delivery of further high quality sensitive residential led development and local facilities.
- 1.3 PLSL recognises the need for Green Belt release in Woodford and strongly welcomed the GMSF proposed allocation of the land within the WOA. Previous representations have been submitted to both the GMSF consultation and the Stockport Local Plan Issues and Options consultation setting out the case for the development of this site and a more detailed Development Framework (Appendix 1) was submitted to Stockport Council in February 2018.
- 1.4 PLSL has a number of fundamental concerns with the NP as currently drafted as it fails to recognise the draft GMSF Woodford allocation and the strategic potential of this location to provide the significant levels of new housing required in the Stockport district.
- 1.5 Furthermore, PLSL consider that the NP as drafted does not meet the Basic Conditions of Neighbourhood Plan preparation, in particular strategic policy contained in National policy and is premature in relation to the emerging Draft GMSF and Stockport Local Plan (SLP). The NP should not be a document that is ambiguous, prescriptive and overly restrictive; and should provide a level of clarity on how it will be applied and implemented. A NP provides an opportunity for the local community to guide development in their area and should not be restrictive in assisting the development of key sites in the area.
- 1.6 PLSL is willing to work with the Woodford Neighbourhood Forum and Stockport Council to deliver high quality, residential led development in this sustainable location, and to participate actively and positively in the formulation of appropriate Plans and policies at both the neighbourhood and District levels which can contribute effectively to the sustainable development needs of this area.

256. WNF Comment
GMSF has no status in planning at present.
Action: no change

2 BACKGROUND TO THE PROPOSED ALLOCATION

GMSF ALLOCATION

- 2.1 The draft GMSF, consulted upon in October 2016, proposed to release sufficient Green Belt and brownfield sites in Stockport to accommodate around 19,300 new homes between 2015 and 2035.
- 2.2 The Land at Hill Top Farm formed part of the proposed draft GMSF Policy OA20 allocation for the Woodford Opportunity Area (WOA) for development to deliver up to 2,400 new homes.
- 2.3 Further to this consultation, the Greater Manchester Council's agreed that a revised version of the draft GMSF will be published for consultation in 2018. The brief from the Greater Manchester Mayor, Andy Burnham, was to review Green Belt release and all authorities have revisited their evidence base in order to maximise brownfield opportunities, including revisiting previously developed land within the urban area and increasing densities to minimise need to release open land. As such, it remains uncertain which strategic allocations will be carried forward in the next version of the GMSF later in 2018.
- 2.4 Whilst a brownfield evidence base was published on the 20th March 2018 on a Greater Manchester map, it is clear that significant funding and work will be required to deliver the sites identified and it is not yet clear what the implications for Green Belt release will be.

NEED FOR GREEN BELT RELEASE IN WOODFORD

- 2.5 Paragraph 157 of the National Planning Policy Framework (NPPF) sets out that local plans should plan positively for the development and infrastructure required in the area and ensure that they are drafted to cover an appropriate time scale "preferably a 15-year time horizon". A key aim of local plans is to promote development and flexible use of land, bringing forward new land where necessary.
- 2.6 Whilst NPPF places an emphasis on maximising the potential of brownfield land, there is an identified shortfall in housing land within the existing Greater Manchester urban area, including in Stockport, to meet the objectively assessed housing need (OAHN) set out in the Greater Manchester: Strategic Housing Market Assessment, October 2016 (GM SHMA)¹.
- 2.7 The evidence that was prepared in support of the GMSF strategy makes it clear that exceptional circumstances exist that justify the need to review the Green Belt across the Greater Manchester Combined Authority (GMCA) area. These include:

¹ Greater Manchester Strategic Housing Market Assessment October 2016

- The GM SHLAA found that objectively assessed needs for housing cannot be met within the existing built-up area, where two thirds of the overall housing supply has been identified.
- It is more than 30 years since the Greater Manchester Structure Plan and subsequent Green Belt Local Plan last fully assessed Green Belt areas and defined Green Belt boundaries at the sub-regional level and review is timely and appropriate now.
- The tightly drawn urban boundaries in some locations.
- The opportunity to provide new sustainable neighbourhoods in locations at a scale, which can be linked to existing and/or potential transport networks; respond to market demand and have the necessary transformational potential.
- The opportunity to boost and maximise the city-region's economic potential by facilitating high quality housing and attracting high quality inward investment.
- The opportunity to ensure that Greater Manchester drives growth within the North of England and provides a suitable counterbalance to the strength of London and the South East.

2.8 The GM SHMA identifies that market signals indicate affordability within Stockport is the second most acute in the GMCA. The GM SHMA finds that Trafford and Stockport have the highest values or rates on several measures such as house prices, private rents, increases in house prices and private rents, affordability ratios and dwelling completions.

2.9 The 2016 draft GMSF proposed to redistribute the housing need throughout Greater Manchester. However, providing fewer homes in Stockport than the OAHN will have the likely effect of worsening affordability in the Borough because demand for housing in Stockport is already extremely high.

2.10 The Government's consultation on a standardised methodology² for assessing local housing need requires local authorities to increase the number of homes that are needed in the less affordable areas i.e. areas where the average house prices are more than 4 times average earnings. The data published alongside the consultation shows that the proposed methodology produces a baseline figure of 1,078 dpa for Stockport. It is notable that this is higher than the GM SHMA figure of 1,011 dpa, which Stockport was unable to meet.

² Planning for the right homes in the right places: consultation proposals, DCLG, 14th September 2017

- 2.11 Based upon analysis of the available evidence base PLSL consider that there remains compelling evidence to justify the need for release of Green Belt land and that the Stockport Local Plan needs to carry forward the Draft GMSF Policy 0A20 Woodford Opportunity Area (WOA) allocation.
- 2.12 Given that, even before taking into account the emerging Government requirement to take into account market signals, the Draft GMSF proposed to distribute a proportion of Stockport's OAHN elsewhere, even with newly identified urban capacity within Stockport Town Centre which will require significant public funding to prime delivery, clearly, the allocation of Green Belt land including this site remain an essential part of the strategy to meeting the future needs of the area.
- 2.13 The urban area cannot meet the future requirements of the Stockport area and this identified shortfall amongst other reasons amounts to exceptional circumstances for Green Belt release within Greater Manchester and Stockport. Thus, there is a requirement for release sites within the Green Belt that can provide sustainable communities.
- 2.14 Strategic sites are required to meet the significant housing needs of the area identified in the GMSF evidence base.

DEVELOPMENT FRAMEWORK

- 2.15 The Development Framework prepared by PLSL (included at Appendix 1) demonstrates how the proposed development will introduce new residential buildings, infrastructure and new landscaping within the boundaries of Woodford comprising a series of agricultural fields that border Chester Road, Church Lane and Moor Lane.
- 2.16 The allocation of strategic scale sites such as Land at Hilltop Farm in Woodford provides the opportunity for a range of housing types and tenures to be accommodated on site at a density and character that can respond to specific the needs of the area.
- 2.17 There are acute affordability issues in Stockport, meaning that many residents are not able to access housing in the area. Locating new market and affordable housing supply in the area will be crucial to addressing the issue and the site presents a logical sustainable extension to the village of Woodford.
- 2.18 The allocation of the site would provide a scale of development that can support the opportunity to provide a range of new facilities and services to augment provision at Woodford Garden Village and meet the needs of planned new residents to the benefit of those already existing in the area. It is anticipated that the exact type and mix of uses would be determined through discussions with Stockport Council, the local community and other interested parties.

- 2.19 The site is well contained by the existing roads and adjoining settlement along these roads, providing the opportunity to extend the village of Woodford without breaching the extent of the existing development limits and maintaining the gap with Handforth to the west.
- 2.20 The development could also significantly enhance the public transport provision through a range of measures to be agreed but could indicate an extended bus service, a rapid bus service and improvements to bus stops and cycle facilities in nearby stations.
- 2.21 The supporting technical documents demonstrate that the site has no constraints that prevent its delivery and have identified the defining factors and principles that have been incorporated into an illustrative masterplan. The illustrative masterplan shows how the site can deliver a well planned, rich and quality development that sensitively integrates with the existing character and landscape of Woodford. This exercise has robustly demonstrated that the site is capable of providing minimum of 1000 houses set around a new community hub.

257. WNF Comment
GMSF has no status in planning at present.
Action: no change

3 NEIGHBOURHOOD PLAN POLICY

THE BASIC CONDITIONS

- 3.1 The basic conditions are set out in paragraph 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:
- a. *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).*
 - b. *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.*
 - c. *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.*
 - d. *the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*
 - e. *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).*
 - f. *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
 - g. *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).*

NATIONAL POLICY

- 3.2 The Government's national planning guidance in the form of the NPPF and Planning Practice Guidance (PPG) are material considerations in plan making and decision taking. A presumption in favour of sustainable development is at the heart of the NPPF. Paragraph 14 states:

“For Plan making this means:

local planning authorities should positively seek opportunities to meet the development needs of their area;

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.”*

3.3 Paragraph 16 of the NPPF provides guidance on the application of the presumption in favour of sustainable development in terms of Neighbourhood Plans. It states:

“The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and*
- *identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.”*

3.4 The NPPF also provides specific guidance to Qualifying Bodies (“QBs”), in this case Woodford Neighbourhood Forum, on the preparation of Neighbourhood Plans. Paragraph 183 states:

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:

set planning policies through neighbourhood plans to determine decisions on planning applications; and

grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.”

3.5 Paragraph 184 of the NPPF continues:

“Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local

planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”

- 3.6 It is clear in the Basic Conditions, the policy contained in the NPPF and in national Planning Practice Guidance (“PPG”) that a Neighbourhood Plan must be aligned with national policy in the NPPF and the strategic policies of the GMSF and the SLP. For the reasons set out in detail in the following sections, PLSL consider that elements of the NP, as currently drafted, should be reviewed in the context of national and emerging local policy and ensure that the NP is underpinned by a robust evidence base.

258. WNF Comment

**WNP complies with the Basic Conditions and is underpinned by robust evidence as presented in Section 8 of the Pre-submission Consultation document GMSF and the updated Stockport Local Plan have no status in planning at present.
Action: no change**

4 DETAILED REPRESENTATIONS TO THE WOODFORD NEIGHBOURHOOD PLAN

- 4.1 This section sets out PLSL's detailed representations to the NP and includes general overall comments on the plan and evidence base as well as detailed comments on the specific policies proposed.

GENERAL COMMENTS ON THE NP

Structure and Content

- 4.2 PLSL considers that the structure, length and nature of the NP makes it largely unclear and difficult to digest. This results in often important policies or principles becoming 'lost' in the extensive volume of text. This means that some policies have become imprecise, overly prescriptive, inconsistent and would be difficult to implement and interpret when material planning decisions are made. PPG in paragraph 40 states that:

*"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient 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"*³.

- 4.3 Comments on the specific policies in the NP are included later in this representation; however, our broad comments on the plan as a whole include:
- i. Policies are often unclear and ambiguous in the plan. It should be clear how policies are applied, particularly in the context of future planning applications.
 - ii. There are a number of policies that cover the same issue. For clarity and consistency, the number of policies could be reduced and they should be made more precise in line with PPG.
 - iii. A number of policies refer to development being 'permitted' where it meets certain criteria, yet it is not within the remit of a Neighbourhood Plan Council to determine planning applications and as such we recommend that the word 'permitted' is replaced with 'supported'.

259. WNF Comment

WNF considers that the Woodford Neighbourhood Plan and its policies are clear and unambiguous. The majority of consultees responding to consultation have not found otherwise.
Action: no change

³ Planning Practice Guidance, CLG, Paragraph: 040 Reference ID: 41-041-20140306

Alignment with National and Emerging Local Policy

- 4.4 As discussed, commentary on specific policies is contained below. However, it is important that all policies in the plan reflect the strategic direction of the emerging GMSF and SLP and the overarching NPPF. For clarity, PPG 074⁴ states that when assessing general conformity, the NP should consider the following:

“Whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with.

The degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy.

Whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy.

The rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach”.

- 4.5 PLSL consider that the NP should clearly demonstrate how and where policies align with strategic policy in the emerging GMSF, SLP and the NPPF.
- 4.6 The relationship between neighbourhood plans and strategic development needs is set out at NPPF paragraph 184, which states:

“The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”

- 4.7 Although in theory a neighbourhood plan may come forward before an emerging Local Plan⁵, when a neighbourhood plan comes forward before the Local Plan, the local planning authority should discuss the Plan with the qualifying body, i.e. the Neighbourhood Forum, because it is

⁴ Planning Practice Guidance, CLG, Paragraph: 074 Reference ID: 41-074-20140306

⁵ Paragraph: 009 Reference ID: 41-009-20140306

“important to minimise any conflicts between the policies in the neighbourhood plan and those in the emerging Local Plan.”⁶

- 4.8 However, the NP is completely silent on the strategic policies in the emerging GMSF and SLP. PLSL considers that the NP is deliberately attempting to thwart the as yet unconfirmed strategic guidance for the area to be contained in a draft GMSF (expected in July 2018) and the SLP, the timescale for which follows behind GMSF. The approach taken by the draft Neighbourhood Plan in the allocation of residential site allocations is not justified as it not the most appropriate strategy, when considered against the alternatives.
- 4.9 The NP has prejudged and excluded all development in Woodford apart from affordable housing exception sites. However, the strategic housing requirement for either Stockport or Woodford is not known at this stage and therefore if the NP is to progress in advance of the GMSF or SLP it must provide sufficient flexibility to be able to accommodate the minimum requirement set out within those. It is therefore not a consultation or a genuine attempt to identify new sites for development.
- 4.10 As currently drafted, PLSL considers the NP to be premature to the determination of key strategic issues (such as the level of housing need, green belt boundaries and spatial distribution).

260. WNF Comment

GMSF and the updated Stockport Local Plan have no status in planning at present. WNP complies with NPPF 2012 version which is fine provided that it is submitted to SMBC before 24 January 2019.

Action: no change

Evidence Base

- 4.11 In terms of the evidence required to accompany the Neighbourhood Plan, PPG Paragraph at 040⁷ states that:
- “While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.”*
- 4.12 The evidence that underpins the development of the NP includes the following technical studies:
- Woodford Landscape and Environment Study Part 1: Natural Features, WNF, 2015-2017
 - Neighbourhood Plan Housing Policy Advice, Aecom, July 2015
 - Movement Study, PBA, November 2015

⁶ Paragraph: 009 Reference ID: 41-009-20140306

⁷ Planning Practice Guidance, CLG, Paragraph: 040 Reference ID: 41-040-20140306

- Woodford Heritage and Character Assessment, Aecom, August 2016
- Protecting and Enhancing Woodford's Natural Environment, Cheshire Wildlife Trust, January 2018

4.13 PLSL consider that there are deficiencies in the technical evidence base used to prepare the NP and that additional work is required if the plan is to conform with Paragraph 040 of the PPG, namely that NPs should be based on robust evidence which support the choices made and the approach taken.

4.14 The NP refers extensively to the findings of the questionnaire surveys and resident opinion throughout the Plan. It is considered that this evidence carries little weight in relation to the technical aspects of the plan, particularly in relation to environmental policies and strategic housing need, and should be based on robust up-to-date evidence which can be tested by an Independent Examiner, as opposed to qualitative data, the validity of which is not assured.

261. WNF Comment

WNF considers the evidence base to be robust. The policies have arisen from residents' views, are supported by professional and voluntary studies and they have been supported by the majority of residents in all rounds of consultation to date.

Action: no change

Neighbourhood Plan Housing Policy Advice, Aecom, July 2015 - Housing Needs Assessment

4.15 PLSL has several fundamental concerns relating to this evidence base document. The Housing Needs Assessment (HNA) dates back to July 2015 and this is already some 3 years out of date. The HNA bases its findings on the 2008 Greater Manchester SHMA⁸ and 2010 Update⁹ and assesses the need between 2011 and 2026 (which does not align with the NP duration of 2018 to 2033). It has not been updated to consider the more recent assessments undertaken and published by Stockport Council¹⁰ and Greater Manchester Combined Authority (GMCA)¹¹, nor emerging government guidance on assessing housing need.¹² Furthermore, the forthcoming revision to GMSF will be supported by a revised evidence base, which the NP cannot take into account by attempting to run ahead of the strategic plan for the area.

4.16 As such PLSL consider that the evidence base and methodology for the HNA is out of date and the weight that should be afforded to it is limited. Before the draft NP is finalised and submitted, an up-to-date HNA should be undertaken and the draft NP reviewed accordingly. As set out elsewhere the NP should follow, rather seek to pre-empt, emerging strategic policy. Given these fundamental concerns regarding the HNA methodology being out of date, this representation does not go into specific detailed comments on the methodology utilised other than to object to any weight being given to an out of date HNA.

⁸ Greater Manchester Strategic Housing Market Assessment (SHMA) 2008 (GVA Grimley and Deloitte, December 2008)

⁹ Greater Manchester SHMA Update Report 2010 (New Economy, May 2010)

¹⁰ Stockport 2015 HNA – Final Report, November 2015

¹¹ Greater Manchester Strategic Housing Market Assessment October 2016

¹² Planning for the right homes in the right places: consultation proposals, DCLG, 14th September 2017

262. WNF Comment

WNF considers that the HNA does not need updating.

Action: no change

Woodford-Landscape-and-Environment-Report-Part-1-April-2018

4.17 PLSL's site is considered within this document under two separate character areas:

- Central Woodford, Area 5; and
- Central Woodford, Area 7

4.18 The document, produced on behalf of the WNF, does not follow a clearly stated methodology and the does not state who has undertaken the assessments and whether they are suitably qualified and competent.

263. WNF comment

The survey was conducted and written up by professional individuals with the following qualifications:

Evelyn Frearson BSc Botany and Zoology (1970)

Christopher Hayward BSc Botany and Zoology (1970)

Jane Sandover BA(Hons) B Arch(Hons) RIBA

Maxine Wood

4.19 PLSL also object to an evidence base document that supports a range of environmental policies within the plan, including ENV1 which seeks to protects views and vistas, yet does not properly cross reference view point locations on plan or photographs.

264. WNF comment

The views are listed in the table and marked on the map associated with ENV1 on pages 26 and 27 of the WNP Pre-submission draft (pages 34 and 35 of the WNP Submission Version).

4.20 Having specific regard to the assessment of Area's 5 and 7. The report states that there are 'excellent' and 'spectacular' views of the distant Pennines from many locations. Such statements are highly subjective and should not form part of the NP evidence base.

265. WNF comment

These terms reflect the language used by residents to describe their Neighbourhood Area and it is legitimate to use them in the supporting evidence. Nevertheless, they are subjective adjectives and have been removed from the Woodford Landscape and Environment Report. The revised document can be viewed on this link: <http://woodfordnf.co.uk/wp-content/uploads/2018/09/Woodford-Landscape-and-Environment-Report-Part-1-September-2018.pdf>

4.21 PLSL note the Greater Manchester Green Belt Assessment¹³ assesses the Woodford area as part of parcel SP-BA03 and it is judged to have a sense of urban encroachment as a result of the

existing development/housing, new development and the transport infrastructure through this landscape.

4.22 Furthermore, PLSL's own studies of the area, undertaken by fully qualified Landscape and Visual Impact Assessment consultants (see Appendix 1), conclude that wider views to their site are limited by the surrounding landscape, vegetation and generally flat topography. Limited long distance views are available from the surrounding landscape due to the lack of highly elevated topography. Although development would be outside of the limits to development for Woodford, it is considered that while a change in the local landscape character would be noticeable due to the change from agricultural fields to the proposed development, the predicted change would be relatively small due to the limited extent of the views and the proximity of existing housing to the eastern, southern and western boundaries.

4.23 It is considered that the landscape mitigation offered would integrate the scheme into the local landscape and the proposed development would not have a significant impact on the landscape character of the area. Views of the development from the wider area are filtered and screened by

¹³ Greater Manchester Green Belt Assessment, LUC, July 2016

the intervening buildings and surrounding mature hedgerow and tree boundaries and surrounding curtilage vegetation.

COMMENTS ON ENVIRONMENTAL POLICIES

4.24 The NP approach to its environmental policies and supporting text in Section 7.2 is overly onerous, does not comply with national guidance and is not based on any succinct or robust evidence. As such, it is difficult to come to an informed view on the NP proposals and any tangible evidence that has informed these highly prescriptive environmental policies.

4.25 Policy ENV1 lacks any robust justification to determine why the 'important local views' are identified for protection. As highlighted above the evidence base that justifies this approach is deficient, considered to be highly subjective and does not contain the justification for the specific viewpoints identified for special protection.

266. WNF Comment

ENV1 is based on residents' wishes and is supported by the majority of responses to consultation. This is the purpose of neighbourhood planning.

Action: no change

4.26 Policy ENV2 also lacks robust justification for the countryside and green spaces identified. It is also unclear whether the policy is seeking to designate these areas as Local Green Spaces (LGS) as the reference to 'green spaces' is ambiguous. To designate land as LGS the NP must ensure that it is able to demonstrate robust evidence to meet national policy requirements set out in NPPF. Paragraph 076 states that:

'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'

267. WNF Comment

ENV2 is based on residents' wishes and is supported by the majority of responses to consultation. The policy is quite clear in not seeking to designate these areas as Local Green Spaces. All of the Neighbourhood Area has Green Belt status and 78% of it is farmland (and a small amount of recreational land), therefore designation of LGS is not required.

Action: no change

4.27 Further guidance is provided in paragraph 77 which sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:

'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: - Where the green space is in reasonably close proximity to the community it serves; - Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and - Where the green area concerned is local in character and is not an extensive tract of land.'

- 4.28 PLSL does not consider that robust evidence has been presented to justify designating vast tracts of land that collectively amount to the entire undeveloped area of Woodford as LGS.

COMMENTS ON DEVELOPMENT POLICIES

- 4.29 Policies DEV1 and DEV2 reiterate NPPF policy on Green Belts and provide no additional local guidance and as such their inclusion in the NP is superfluous.
- 4.30 Policy DEV3, should demonstrate general conformity with the adopted development plan and emerging SLP. No justification is provided for seeking 50% affordable housing when the current adopted plan requires 40% affordable housing. Indeed, the evidence cited at paragraph 8.5.3 is contradictory stating that there does not appear to be a significant demand for affordable housing within the village. Moreover, the NP evidence base document: Housing Needs Assessment recommends that there is no requirement for a specific affordable housing policy in the NP.

268. WNF Comment

The justification for the policy is to achieve more smaller houses in the Neighbourhood Area.

5 SUMMARY

- 5.1 It is considered that the NP as drafted does not meet the Basic Conditions of Neighbourhood Plan preparation, and in particular policy contained in National policy and is premature in relation to the emerging strategic policies of the GMSF and SLP. The NP should not be a document that is ambiguous, prescriptive and overly restrictive; and should provide a level of clarity on how it will be applied and implemented. A NP provides an opportunity for the local community to guide development in their area and should not be restrictive in assisting the development of key sites in the area.
- 5.2 PLSL is willing to work with the Woodford Neighbourhood Forum and Stockport Council to deliver high quality, residential led development in this sustainable location, and to participate actively and positively in the formulation of appropriate Plans and policies at both the neighbourhood and District levels which can contribute effectively to the sustainable development needs of this area.

269. WNF Comment

WNF considers that the NP meets the Basic Conditions of a Neighbourhood Plan and complies with current national and local authority policies, as set out in detail in Section 8 of the Plan document (Appendix 2 in the Submission version).

Action: no change.

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OC318465