



## Woodford Neighbourhood Forum

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5<sup>th</sup> March 2019

### **Woodford Neighbourhood Plan Examination: Request for Clarification from the Examiner**

#### **Response from Woodford Neighbourhood Forum**

The Woodford Neighbourhood Forum (WNF) Management Committee has read the Examiner's questions carefully and we hope that these responses will provide clarification.

**Question 1.** We believe that the question is directed to SMBC.

**Question 2.** We believe that the question is directed to SMBC.

**Question 3.** We believe that the question is directed to SMBC.

**Question 4.** The WNF Management Committee does not wish to take up the opportunity to respond to Regulation 16 representations, except to acknowledge the representation from Savill's on behalf of Richborough, which points out the sections we omitted to publish from their Regulation 14 representation.

#### **Question 5. "Omitted information"**

WNF Management Committee apologises for omitting some of the representation submitted at Regulation 14 Pre-submission Consultation by Savills on behalf of Richborough Estates. The points we omitted were similar to those made in other representations and were covered by our responses to those, as shown in Consultation Statement Appendix D. For completeness, here are our responses to the omitted sections in the Savills representation:

## Savill's Regulation 14 Representation:

### **Affordable Housing**

Policy DEV3 of the pre-submission consultant draft states that where a site size threshold of any new housing site is more than 5 dwellings, 50% affordable housing shall be provided on site.

Stockport Core Strategy (Adopted 2011) is the current development plan document for Stockport Borough. Development Management Policy H-3 'Affordable Housing' of the adopted Core Strategy indicates that affordable housing is required on sites providing 15 dwellings (gross) or more and sites of 0.5 hectares or more. This requirement is reduced to sites of 5 dwellings in areas with property prices above the Stockport average, including Bramhall. Within the Core Strategy, a 40% affordable housing requirement is sought in areas with the highest property prices, such as Bramhall / Cheadle Hulme (south)/Woodford.

The affordable housing requirement for both the Stockport Core Strategy and submission-draft Neighbourhood Plan is evidenced on an outdated 2010 Economic Viability of Housing Study. We therefore request that Plan is informed by an up-to-date Housing Study to reflect current housing market trends.

The written ministerial statement of 28 November 2014 introduced a threshold beneath which affordable housing contributions should not be sought. The threshold stipulated that developments of 10-units or less and/or a maximum combined gross floor space of no more than 1,000 square metres should not be subject to affordable housing contributions. Following the order of the Court of Appeal dated 14 May 2016, the above policy has been given legal effect.

We believe that a 50% affordable housing policy is overly restrictive, excessive in nature and is not evidenced or based on a formal assessment of need or viability. The proposed requirement will stifle development on the site and ultimately have a negative impact upon deliverability and the Borough's housing target. The requirement should therefore be reduced to be in line with the wider Council policy.

## **WNF response**

During consultation, Woodford residents expressed a wish to see more small houses and more lower-priced houses in Woodford. This policy aims to achieve that. The policy is justified and compliant with NPPF and SMBC Core Strategy.

## Savill's Regulation 14 Representation:

### **Design**

Policy DEV8 of the pre-submission consultation draft states that any new development shall seek to achieve a high standard of design. This is to include a reflection of the local rural character, retaining the existing landscape and achieving 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.

We believe that Policy DEV8 should be written in the context of the emerging GMSF, as the rural character of

Woodford will inevitably change throughout the process of increased residential development. The Policy is therefore not reflective of the changing circumstances and should give greater consideration to the Borough's vision.

The SMBC Sustainability Checklist is informed by the Sustainable Design and Construction Supplementary Planning Document (SPD), which was adopted in April 2012. The checklist includes Gold sustainability standards, but several of these are now outdated. This includes the Code for Sustainable homes, which was withdrawn by the written ministerial statement of 25 March 2015. Local Authorities can no longer require the Code as a planning condition, and therefore the Sustainability Checklist is not a reliable source reference.

The ministerial statement indicates that local planning authorities should seek to update existing plan policies on technical housing standards, for example through a full neighbourhood plan replacement. The Plan therefore has the opportunity to update performance requirements, in line with the equivalent Code for Sustainable Homes Levels and relevant building regulations. We therefore request that Policy DEV8 is updated as appropriate to defer to Building Regulations.

It is widely acknowledged that there is difficulty in achieving zero carbon homes. Whilst it is critical that new buildings are as energy efficient as possible, greater flexibility should be given within the policy framework to reflect challenging circumstances such as increased development costs, which will ultimately affect housing viability and delivery.

### **WNF response**

DEV 8 clause d) was amended in response to the representation from Emery Planning to allow for changes in energy standards to read:

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 .....

This amendment was acknowledged by Savill's in their Regulation 16 response:

#### Design

Despite our representation to Policy DEV8 not being included, we welcome the changes made to Policy DEV8 including the removal of the reference to Gold sustainability standards within the SMBC Sustainability Checklist and the requirement to achieve zero carbon buildings.

Savill's Regulation 14 Representation:

#### **Woodford Neighbourhood Plan**

We support the intention of the Woodford Neighbourhood Forum leading and undertaking a Neighbourhood Plan, and are grateful for the opportunity to comment on the proposed policies. We would, however, like to express our concerns regarding the prematurity and conformity of the Plan when taking into consideration the emerging GMSF and Stockport Local Plan. We consider that the Neighbourhood Plan should be clearer about the emerging Development Plan for the area and also provide sufficient flexibility should proposals for the area emerge through this process.

#### General Comments

We welcome the draft Neighbourhood Plan and its community-led approach. However, we believe that the Plan should be developed alongside the draft GMSF to ensure maximum conformity, and should seek adoption once the GMSF is established. We are formally engaged in the GMSF process and believe that the Neighbourhood Plan is premature in its submission and consultation as it cannot be informed by borough-wide and sub-regional draft policy.

**WNF response:**

The Government's advice is that Neighbourhood Forums should produce their plans as soon and as quickly as possible. Neither the Stockport Local Plan nor the GMSF have potential adoption dates. These could be four or five years in the future. On that basis the Woodford Plan should be completed now and not put "on ice" for an indeterminate period of many years.

**Question 6: Wording of Policies**

Yes, the WNF Management Committee can confirm that it is the intent of the wording of Policies to the effect that development "will be permitted" is to effectively provide a supportive land use planning policy framework.

Yes, Woodford Neighbourhood Forum can confirm that it is the intent of the wording of Policies to the effect that development "will not be permitted" is to effectively provide a preventative land use planning policy background.

**Question 7: Countryside and green space**

The WNF Management Committee can confirm that "countryside and green space" is not the same thing, and is not intended to be the same thing, as "Local Green Space."

A number of representations raised a similar point and our responses can be found in Appendix D of the Consultation Statement.

For example, in response to Emery Planning on page 46 of Appendix D:

**WNF response**

The option of designating Local Green Space was considered but it was thought to be inappropriate in the WNA.

...and in response to How Planning on page 101 of Appendix D:

**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.

**Question 8: Infilling**

Policy DEV 1 refers to infilling being limited to 1 dwelling, whilst Policy DEV 2 refers to infilling being for one or two dwellings. This point was raised by Emery Planning in their representations at Regulation 14 Consultation.

In our response on page 51 of Appendix D of the Consultation Statement, we explained that 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.

In DEV2, WNF believes that 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 small 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.

**Question 9: “Woodford Connection”**

The consultation evidence base showed that local people wanted housing to be available for local people, including their offspring, elderly relatives, and residents wishing to downsize. The WNF Management Committee conducted research into other neighbourhood plans to investigate how this had been dealt with and found references to a local connection in this context. It was thought that the “Woodford Connection” was a viable policy to address these concerns.

**Question 10: Policy DEV 4**

Yes, WNF Management Committee can confirm that Policy DEV 4 is intended to apply to any agricultural building anywhere in the Neighbourhood Area.

We hope the responses above provide clarification on the questions asked.

In addition, we have provided links to the appendices and supporting documents in the Consultation Statement so that these are accessible from the SMBC website.

Submitted on behalf of the WNF Management Committee,

A handwritten signature in black ink, reading 'E. M. Frearson'.

Evelyn Frearson  
Honorary Secretary  
Woodford Neighbourhood Forum