

**High Lane Village Draft Neighbourhood Development Plan – Regulation 14 Public Consultation**

**Wednesday 11<sup>th</sup> September 2019 until Friday 1<sup>st</sup> November 2019**

**Table 2 Developers and Landowners**

<b>Consultee Name Address Ref. No.</b>	<b>Page No.</b>	<b>Para. No.</b>	<b>Vision/ Objective / Policy No.</b>	<b>Support / Object / Comment</b>	<b>Comments received</b>	<b>HLVNF Consideration</b>	<b>Amendments to NP</b>
Peacock and Smith  On behalf of  KCS Development and Q Developments  1.1		9.1	Draft Vision  Housing Objectives  T1  T2  HD2	Object / Comment	Dear Sir/Madam,  Thank you for notifying us of the above consultation. Please find attached comments prepared on behalf of KCS Development and Q Development in relation to the following aspects of the Draft Plan:  <ul style="list-style-type: none"> <li>• Draft Vision</li> <li>• Housing Objectives</li> <li>• Policy T1</li> <li>• Policy T2</li> <li>• Policy HD2</li> <li>• Para 9.1 Review</li> </ul> I would be grateful if you could confirm receipt of these comments. Yours faithfully	Noted.  See detailed responses below.	No change.

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1.2	All			Comment / Object	<p><b>Introduction</b></p> <p>These comments are made on behalf of KCS Development and Q Developments, the two promoters of GMSF draft allocation 38 High Lane. KCS Development are promoting the part of the allocation north of Buxton Road, whilst Q Developments are promoting the remainder of the allocation south of Buxton Road. Both promoters are working collaboratively to ensure that a comprehensive approach is adopted towards the masterplanning of the draft allocation.</p> <p>The promoters' vision for the draft allocation is to create a sustainable and vibrant new neighbourhood which is well connected to High Lane and to existing services; which places the promotion of sustainable</p>	<p>Noted.</p> <p>The HLVNDP does not include site allocations.</p> <p>The proposed site allocation is a matter for the GMSF and requires a change to the boundary of the Green Belt.</p> <p>Proposals will be considered against the policies in the NDP once the Plan has been made (adopted).</p>	No change.

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					<p>travel, health and well being at its heart; which comprises a wide range of housing types, including smaller homes and retirement accommodation; and which fosters social cohesion through high quality green infrastructure and community facilities.</p> <p>It is considered that there are significant advantages in pursuing a single allocation of 500 dwellings in High Lane as this will create the critical mass for sustainable travel to be addressed comprehensively, which could include support for improvements to be made to Middlewood Station - in line with the Transport and Air Quality objectives of the Neighbourhood Plan (NP). A range of smaller sites would not deliver the scale of local public transport improvements that</p>		

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					<p>can be achieved by a single large housing allocation.</p> <p>The promoters will seek to integrate existing pedestrian routes with informal green spaces and other green infrastructure which have been woven into a masterplan for the benefit of the wider community – in line with the Vision for the NP. The new residential areas will form strong links with the existing High Lane urban area and the facilities, amenities and public transport already provided within the settlement, whilst creating an identity befitting of this distinct gateway location.</p> <p>The draft allocation proposals will give rise to a wide range of benefits for High Lane including: - local housing choice and a significant number of affordable homes for local people who are</p>		

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					<p>currently unable to get on the housing ladder;</p> <ul style="list-style-type: none"> <li>- Increased demand for existing shops and services in High Lane, thus supporting their viability, and potentially creating the right conditions for new businesses to open;</li> <li>- Significant construction employment – support for 1,550 jobs during the construction period, and the creation of new apprenticeships/trainees/graduates;</li> <li>- New recreation opportunities for local residents in the form of informal open space, equipped open space and footpaths/cycleways that connect into existing infrastructure, including the Middlewood Way;</li> <li>- Improvements to local public transport services, including potential support for</li> </ul>		

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					<p>enhancements to Middlewood Station;</p> <ul style="list-style-type: none"> <li>- New tree and hedgerow planting and other habitat features that will deliver a net biodiversity gain;</li> <li>- New Homes Bonus of over £5M, which would assist Stockport MBC local spending priorities.</li> </ul> <p>It is our view that these positive impacts constitute significant planning benefits that weigh in favour of the draft allocation. KCS Development and Q Developments support the majority of the aims and ambitions of the NP, and wish to work constructively with the Neighbourhood Forum, but the promoters have some concerns about the content of the document. Those concerns are set out in individual representations that respond to the NP.</p>		

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1.3	12		Vision	Object	<p><b>Comments on Draft Vision</b></p> <p>KCS Development and Q Developments note that the Draft Vision of the NP refers to a range of objectives, including the provision of small-scale housing to meet local needs and the protection of the Green Belt. However, we are concerned that some of these objectives may not be realistic in the context of the strategic policy aims of the emerging GMSF, which seeks to ensure that Stockport provides for as much of its housing needs within the Borough as possible (notwithstanding that some of those needs are proposed to be met in Manchester and Salford) – which inevitably requires some Green Belt release in a number of settlements. Para 29 of the NPPF indicates that NPs should not promote less development than set out</p>	<p>Not accepted.</p> <p>The policies in the NDP will be superseded by more up to date local plans as and when they are adopted as the most recent adopted planning policy takes precedence.</p> <p>There is no need therefore to insert the proposed wording into the vision which is an expression of local residents' vision for the area. Therefore the proposed change should not be accepted.</p>	No change.

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					<p>in the strategic priorities for the area, or undermine those strategic policies. Planning Practice Guidance also advises that communities preparing a NP should take account of the latest and up-to-date evidence of housing need (Paragraph: 084 Reference ID: 41-084-20190509). Those needs are summarized at Table 7.1 of the Revised Draft GMSF (January 2019) – the annual average requirement for Stockport, 764 dpa, represents a 60% increase from the requirement in the Stockport Core Strategy (March 2011).</p> <p>In order to help meet that substantial housing need the GMSF has identified the Green Belt in High Lane as a location for a large-scale housing allocation at both Draft and Revised Draft consultation stages – the latter draft</p>		

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					<p>proposing 500 new homes (Allocation 38). There is therefore a strong possibility that this allocation will form part of the adopted GMSF, and if so, the Vision of the NP will be out of step with strategic policies, contrary to national policy.</p> <p>In our view the best way to reconcile the above issues is for the Vision of the NP to include a short reference to the fact that the strategic policies in the GMSF and the Stockport Local Plan will ultimately take precedence over the NP. This could be undertaken by the addition of the words "Subject to the strategic policies of the GMSF and Stockport Local Plan..." at the beginning of the Vision, and the provision of an explanatory supporting paragraph that also cross refers to Section 5 of the NP, where</p>		

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					we note there is reference to the GMSF proposals for High Lane.		
1.3	13		Obj 5	Object	<p><b>Comments on Housing Objectives (Objective 5)</b></p> <p>KCS Development and Q Developments note that Housing Objective 5 seeks to ensure that local people have first options/preference in new housing schemes.</p> <p>Whilst it is common to give local people first opportunity to rent/buy the affordable element of new housing schemes, it would be highly unusual to apply this approach to market housing, and such an approach has not been justified in the evidence base to the NP. We note that Policy H1 and Para 5.35 of the NP indicate that the intention is to introduce the local people clause for affordable schemes only.</p>	<p>Accepted.</p> <p>Amend wording as suggested.</p>	<p><b>Amend NDP.</b></p> <p><b>Amend Objective 5:</b></p> <p>Insert "<i>the affordable element of</i>" before the text "new housing development schemes".</p>

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					Accordingly, Housing Objective 5 should be amended to ensure that it is consistent with these other parts of the NP. This can be achieved by the introduction of the words “the affordable element” before the text “in new housing development schemes”.		
1.4	19/ 20		T1	Object	<p><b>Comments on Draft Policy T1</b></p> <p>KCS Development and Q Developments note that Policy T1 sets out planning application requirements for consideration of air quality. This is a general development management policy that risks repeating (and potentially conflicting with) air quality policies within the GMSF and the new Stockport Local Plan. We therefore question the need for such a policy in the Neighbourhood Plan, since it will overlap with higher level policy.</p>	<p>Not accepted.</p> <p>Policy T1 - SMBC and other consultation bodies have not objected to the wording of the Policy and addressing air quality issues is a primary concern of local residents. Refer to comments and advice of support submitted by residents in Table 3.</p> <p>Therefore the proposed change should not be accepted.</p>	No change.

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					<p>The policy refers to areas of High Lane that exceed the Air Quality Objectives. However, Para 4.20 of the NP confirms that a recent survey found that exceedance of these Objectives was not found at 10 separate locations along the A6 road network through High Lane. This follows surveys undertaken in 2015 (Para 4.16 to 4.17 of the NP) that demonstrated that exceedences of the Objectives were taking place at eight sites – thus suggesting that there has been some improvement in air quality.</p> <p>In relation to the GMSF draft allocation for High Lane, whilst it is acknowledged that the proposed development will lead to an increase in traffic flows once operational, it is anticipated that as new Euro class vehicles continue to be released with stricter emission</p>		

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					<p>limits and the uptake of non-conventionally fuelled vehicles increases in the future, reductions in emission to air should be achieved. At the earliest the proposed development is anticipated to be complete in 2026, by which time the proportion of the national vehicle fleet of newer Euro class vehicles (with lower emissions) and electric vehicles is expected to have grown significantly.</p> <p>The proposed transport strategy for the draft allocation includes, but is not limited to, making provisions for new cycle and footpaths to connect with the existing local network, and retaining existing routes, provision of electric vehicle charging points for all properties and a Travel Plan which will encourage the use of cycling and walking and</p>		

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					<p>discourage people from using cars. By maximising these opportunities for the transport strategy of the site any impact on local air quality will be reduced.</p> <p>We note that the second part of Policy T1 states that development proposals that are likely to lead to exceedences of Air Quality Limit Values in the High Lane NP will be resisted. This is a change to the wording of Policy T1 as set out in the First Draft NP (Spring 2019) that is not justified. It does not reflect national or emerging GMSF air quality policy and it does not take account of the potential for proposals to mitigate the air quality impacts of development.</p> <p>In the light of the above we consider that Policy T1 should be deleted and NP should seek</p>		

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					to pursue an air quality management approach that is in line with policy set out in the GMSF and the new Stokcport Local Plan. In the alternative the second part of Policy T1 that states that development proposals that likely to lead to exceedences of Air Quality Limit Values in the High Lane NP will be resisted should be amended to require proposals that are likely to lead to exceedences of the Air Quality Limit Values to mitigate those impacts.		
1.5	26		T3	Object	<p><b>Comments on Draft Policy T3</b></p> <p>KCS Development and Q Developments note that Point 5 of Policy T3 requires continental design standards for the strategic road network, whereby vehicles do not have to negotiate junctions when travelling along the road and closely spaced junctions.</p>	<p>Not accepted.</p> <p>This wording was provided by SusTrans. SMBC and other consultation bodies have not objected to the wording of the Policy.</p> <p>Therefore the proposed change should not be accepted.</p>	No change.

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					<p>Our client objects to this requirement for the following reasons:</p> <ul style="list-style-type: none"> <li>☐ Point 5 is generally poorly worded and as such it is not clear how this part of the draft policy is intended to support cycling and walking provision in the village;</li> <li>☐ There is no justification made for roads being designed to 'Continental Design Standards'. The roads which serve the village are under the remit of Stockport Borough Council who are the Local Highway Authority. The roads would generally be designed in accordance with the Council's local design standards or possibly Manual for Streets. There is no evidence provided to demonstrate how or why 'Continental Design Standards' are required or whether they</li> </ul>		

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					<p>conflict or accord with current standards;</p> <ul style="list-style-type: none"> <li>- By the nature of travelling through a village, vehicles will have to negotiate junctions which provide access to residential properties and local facilities away from the main A6 route through the village;</li> <li>- The Strategic Road Network is referred to which is confusing, considering that the nearest road on the SRN is the M60 around 7km to the north-west. It may be that the NP is referring to the A6, but this is not clear; and</li> <li>- A 1-2km junction spacing is not considered to be 'closely spaced' and it is not clear how this would benefit pedestrians and/or cyclists.</li> </ul>		

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					In the light of the above we consider that Point 5 of Policy T3 should be deleted.		
	65/6 6		HD2	Object	<p><b>Comments on Draft Policy HD2</b></p> <p>KCS Development and Q Developments note that Policy HD2 cross refers to a number of design codes, and there is a requirement for new development to incorporate the principles set out in those codes.</p> <p>In respect of Design Code T1, this seeks to maximise connectivity and permeable street layouts, which are reasonable design objectives. However, the same design code also requires new residential development to be located within a 5 to 10 minutes walk of key facilities. The rationale and justification for this specific requirement is not substantiated by the evidence</p>	Partially accepted.	<p><b>Amend Design Codes</b></p> <p><b>Amend Design Code T1 to:</b></p> <p><i><u>"In line with Manual for Streets (See 4.4 The Walkable Neighbourhood, paragraph 4.4.1 insert footnote / reference <a href="https://www.gov.uk/government/publications/manual-for-streets">https://www.gov.uk/government/publications/manual-for-streets</a> ), new residential development should be located within a 10 - 15 minute walk (or 800m) of key facilities such as the schools, shops and public transport facilities and should demonstrate how accessible new walking and cycling linkages to such facilities and the existing walking and cycling network in the area can be achieved."</u></i></p>

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					base of the NP. We are also concerned that this is an in principle locational/transport requirement rather than a design principle, and as such it is not appropriate for it to be included within a design code. In the light of the above, we consider that the requirement of Design Code T1 for new residential development to be located within a 5 to 10 minutes walk of key facilities should be deleted.		
1.6	66	9.1		Object	<b>Comments on Para 9.1 Review</b>  KCS Development and Q Developments note that Para 9.1 commits the Neighbourhood Forum to a review of the NP within 3 years of adoption of the GMSF and Stockport Local Plan. We consider that this commitment would be clearer, and more effective, if it were	Not accepted.  This wording was supported / suggested by SMBC at an earlier stage of plan preparation so the proposed change should not be accepted.	No change.

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					<p>encapsulated within a discrete policy within the NP. We also consider that the 3 year timescale for a review is too long. Significant aspects of the NP will be rendered out of date if the Draft GMSF Allocation for High Lane is adopted. However, KCS Development and Q Developments have sought, and will continue, to keep the Neighbourhood Forum informed about their proposals for the Draft Allocation, which should allow the NP to be updated in a shorter timescale. In this context, and given that Para 29 of the NPPF requires NPs to not promote less development than set out in strategic policies or to undermine those policies, we consider that the NP should set out a more ambitious timescale for review of the NP following adoption of the the GMSF and Stockport Local Plan. In our</p>		

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					view a more appropriate timescale to commence such a review would be within 12 months of adoption of the latter plans.		