

23 August 2023

Dear Chris

### **Whaley Bridge Neighbourhood Development Plan Independent Examination – Response to Examiner’s letter seeking clarification of matters**

Thank you for your letter dated 4<sup>th</sup> August 2023 where you raise 7 matters which you are seeking clarification on.

It is noted that in your letter you request that any response to these matters is agreed as a joint response of the Town Council and Borough Council and National Park Authority (PDNP) wherever possible and that the Town Council may consult with Vision4Whaley and advisors. A meeting was held between all parties today and joint responses were agreed where appropriate. This is explained in the text below.

#### **Policy WB-G1**

1. The Town Council and Borough Council agrees with your proposed modifications in relation to this policy. The PDNP do not have any comments with regards to policy G1.

#### **Policy WB-G2**

2. The Town Council and Borough Council agrees with all proposed modifications in relation to this policy. However, in relation to your proposed modification for Part 2 (point c):  
“the scale of development is consistent with the strategic settlement hierarchy set out in Local Plan Policy S2 where Whaley Bridge is defined as a market town, Furness Vale as a larger village, and the other settlements as part of the other rural area.”  
The Town Council would like to point out that it should be noted that a Neighbourhood Plan cannot apply Local Plan policy. With this in mind, they are happy for a reference to the Local Plan policy to be made in the interpretation section and the wording of the proposed modification to be adjusted accordingly.

The PDNP would like to make the following points in relation to this policy:

- With regards to the query on Point 2 of Whaley Bridge NP policy G2 PDNP would like to raise the Examiners attention to PDNP Core Strategy policy HC4, which outlines the policy route for community facilities within the PDNP (as there are no DS1 settlements in the Whaley Bridge parish within the National Park the policy route would be via enhancement through policy HC4B).

- Point 3 of Whaley Bridge NP Policy G2 relates to change of use of community facilities (which as written would still apply to the PDNP) and PNDP would like to draw the Examiners attention to PDNP DMP document policy DMS2 which also outlines marketing requirements, working with community and exploring other community uses before a community use is lost.

The Town Council would be happy to include these points in the interpretation or rationale if the Examiner considers that to be appropriate.

### **Policy WB-G3**

3. Regarding parts a and b of the policy, the Town Centre Boundary (shown on page 24 of the plan) is within the Built-up Area Boundary (shown on page 12 of the plan as 'urban area'). It is correct that a specific requirement is stated within the Town Centre. (NB Part a of the policy wording states "Whaley Bridge Settlement Boundary" and the Town and Borough Councils have noted that this terminology is not consistent with the High Peak Local Plan whose proposals map refers to it as a "Built-up Area Boundary". Both organisations would support an amendment to the policy wording and the map on page 12 of the plan to reflect this point).

In response to your other questions, the Town Council supports residential development on brownfield sites, though recognises the need to retain some of these sites for employment. No specific brownfield sites have been identified. The Brownfield Register, held by the Borough Council, only identifies one available brownfield site in the Parish and this is within the Built-up Area Boundary of Whaley Bridge. Regarding infill sites, the Town Council's intention is to reflect the Local Plan policy on infill sites.

The Town and Borough Councils agree that points c (brownfield sites) and d (infill sites) are confusing and it seems from your questions that the wording is not precise from your point of view. As a consequence, the removal of parts c and d of this policy from the plan would be supported by the Town and Borough Councils if you consider this to be appropriate.

4. The Town Council has not produced a Housing Needs Assessment for Whaley Bridge Parish to support the plan.

In 2021, Vision for Whaley asked the Borough Council for the most up to date local housing need assessment as well as how many of the proposed 100 houses (included for Whaley Bridge on small sites in High Peak Local Plan Policy S3) have been granted planning permission.

The Borough Council's response was that the level of growth in the area is set by High Peak Borough Council (in the 2016 Local Plan) which provides the following units in the Neighbourhood Plan area over three sites:

- C9 – South of Macclesfield Road (allocated for 83 dwellings) (increased to 107 – currently under construction)
- C16 – Furness Vale A6 (allocated for 39 dwellings – decreased to 37 units – permission issued - HPK/2020/0201)
- C19 – Furness Vale Business Park (allocated for 26 dwellings – no planning applications received to date)

The plan also has a windfall allowance of 100 dwellings on small sites within the Whaley Bridge and Furness Vale built-up area boundaries. There are 45 windfall dwellings that have been granted permission between 1st April 2011 and 31st March 2022 in the Whaley Bridge Parish. The most significant in scale includes the site at Bridgemont (at the rear of Nos. 54-64 Buxton Road, Furness Vale) where 13 affordable housing units within the green belt have now been completed (HPK/2017/0536). (NB please note that the figures above have been updated to 31<sup>st</sup> March 2022, as additional monitoring data has become available since the query from 'Vision for Whaley' was originally made).

These figures show that at the time of writing based on the information available there is still a need for additional development in the Parish to meet the area's proportion of the overall housing requirement set out in the 'Strategic Housing Development' Local Plan policy (Policy S3) namely 33 dwellings on small windfall sites (taking into account the net increase of 22 dwellings on the two allocated sites at the planning application stage). Also the C19 allocation has not yet come forward for development.

The High Peak Local Plan is currently in the early stages of review and in September 2022, the Borough Council published a new 'High Peak Housing and Economic Land Needs Assessment' as an evidence base document to inform this Local Plan Review.

[https://www.highpeak.gov.uk/media/7530/High-Peak-HELNA-ISSUE-12.09.22/pdf/61492\\_High\\_Peak\\_HELNA\\_ISSUE\\_120922.PDF?m=1663773285323](https://www.highpeak.gov.uk/media/7530/High-Peak-HELNA-ISSUE-12.09.22/pdf/61492_High_Peak_HELNA_ISSUE_120922.PDF?m=1663773285323)

At this early stage, the Council has not yet taken a decision on the number of houses to be provided in the Borough going forward nor decided how these would be spatially distributed.

The response highlights that there is still a need for more new housing in the Whaley Bridge Parish to contribute towards the Borough's housing land supply figures set out in the High Peak Local Plan. It is the Borough Council's view that policy wording should not undermine the delivery of housing set out in High Peak Local Plan strategic policy S3.

5. It is the Town Council's view that the Housing policy makes clear that it supports the Local Plan growth strategy and the interpretation makes clear: "*The policy sets out sustainable locations for residential development, in addition to sites allocated in the adopted Local Plan, High Peak Borough Council, April 2016.*"

## Policy WB-E5

6. Please refer to the Town Council's attached paper on LGS 15 Carr Field and references made in The Manchester Man book.
7. According to the Natural England dataset (last updated on 14<sup>th</sup> June 2023):  
<https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::sites-of-special-scientific-interest-england/explore?location=53.329264%2C-1.979654%2C16.00>  
LGS1 (Roosdyche) does not have current SSSI status. Therefore, all parties are in agreement that site LGS1 is *not* a current SSSI.

Kind regards

Claire Sansom  
(Planning Officer, High Peak Borough Council)