

## Summary of Representations Received in Response to Whaley Bridge Neighbourhood Plan Regulation 16 Consultation

Represent or	Summary of Comments	V4W Comments
<b>Canal &amp; River Trust</b>	<p>We have reviewed the Draft Plan and consider that the amendments made following the previous Regulation 14 consultation are appropriate and we are satisfied that the Plan meets the 'Basic Conditions' set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 in relation to those matters that are relevant to the Trust.</p> <p>We therefore have no further comments to make on the Draft Plan.</p>	
<b>Coal Authority</b>	<p>It is noted that the Whaley Bridge Neighbourhood Plan does not appear to allocate any new sites for future development and on this basis the Planning team at the Coal Authority have no specific comments to make on this document.</p>	
<b>Environment Agency</b>	<p><u>WB-G3 – Residential Development</u></p> <p>In our previous comments we highlighted that this policy supports residential development within the settlement boundary and within the Town Centre boundary which remains unchanged. We did point out that there are areas within Whaley Bridge which are situated within flood zones 2 and 3. As such any proposed development will need to follow the flood risk requirements of the National Planning Policy Framework (NPPF) and Policy EQ11 (Flood Risk management) found within the adopted High Peak Local Plan.</p> <p>While we are pleased to see that within the interpretation section reference has been made to policy EQ11 we would still recommend that mention is made that parts of Whaley Bridge fall within flood zones 2 and/or 3 and therefore any</p>	

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	<p>proposals will need to follow the requirements of both the NPPF and policy EQ11.</p> <p><u>WB-E1 – Sustainable Design</u></p> <p>We wish to reiterate our previous response as this is still relevant to the latest iteration of the NHP as our previous advice does not appear to have been incorporated into the updated document. We would still advise that the below advice, provided in our June 2022 response is taken prior to publication of the NHP.</p> <p>The NHP should also include within this sustainable design policy a requirement for all new residential development to meet the tighter water efficiency measures of 110 litres per person per day. Producing mains water, treating waste water and in-home water heating has significant embedded energy and requires chemical inputs, therefore reducing water demand per capita by requiring the tighter standard of 110 l/p/d could lead to significant reductions in the associated carbon emissions.</p> <p><u>WB-E3 – Natural Environment</u></p> <p>We would like to reiterate our previous comments as while we are encouraged by the inclusion of the requirement for new development to create biodiversity net gain (BNG) we would still recommend that you mention the minimum requirement of 10% net gain and encourage net gain more than the minimum where possible. Our previous response is pasted below for completeness.</p>	

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	<p>“We welcome that this policy requires development to provide biodiversity net gain (BNG). The Environment Bill requires a ‘minimum of 10%’ BNG though your neighbourhood plan may want to consider the suitability and opportunities to ask for biodiversity net gain that is greater than the 10% minimum requirement.”</p> <p><u>WB-E5 – Local Green Space</u></p> <p>We would again reiterate our previous response which is pasted below.</p> <p>“We welcome that there is a policy asking to enhance or provide green infrastructure as part of the development. This policy should also include mention ‘blue infrastructure’ as it would be beneficial to link it with green infrastructure. Development should integrate and increase blue/green infrastructure to build in multi-functional solutions to future impacts such as increased flood risks, water shortages and overheating. Blue and green infrastructure can work together to achieve these aims.”</p> <p>It should be noted that Green Infrastructure is also mentioned within policies WB-E1 – Sustainable Design and WB-T2 – Active travel and therefore the above comments are also pertinent to these policies.</p>	<p><u>We have not sought to do this</u></p>
<p><b>Gladman Developments Ltd</b></p>	<p><u>Vision and Aims</u></p> <p>In principle, Gladman supports the WBNP’s vision and the majority of the aims of the plan, notably in relation to the meeting the diverse needs and aspirations of all the community, particular in relation to housing.</p>	

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	<p><u>WB-G2 Community Facilities</u> Gladman supports the retention and provision of community facilities and recognises their role in supporting sustainable living. However, the majority of this policy is a duplication of policy CF 5 of the adopted High Peak Local Plan. Gladman suggest parts 1; 2 &amp; 3 of this policy are removed to avoid an unnecessary duplication of policies as laid out in paragraph 16(f) of the Framework.</p> <p><u>WB-G3 Residential Development</u> Gladman contend that this policy as currently written is not necessary to include within the WBNP. The policy is concerned with ensuring residential development is located in appropriate locations; encouraging town centre and infill developments; encouraging the use of brownfield sites and promoting self-build and community led housing.</p> <p>The majority of the elements are duplications from the adopted High Peak Local Plan (policies H1 &amp; H3) and also national planning policy, for example supporting the reuse of brownfield sites. Therefore, Gladman suggest the policy be amended to remove the duplicated elements.</p> <p>In addition, the wording of parts 4 &amp; 5 restricts sustainable developments from coming forward where meeting these policy requirements would be unviable. In this regard, Gladman it is proposed that the policy requires further flexibility to meet the basic conditions and Gladman propose the following: "4. All new dwellings <del>must</del> 'should' include screened storage for bins and recycling, located away from the street frontage.</p>	

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	<p>5. All new dwellings <del>must</del> 'should' include secure, covered cycle storage, proportionate in capacity to the size of the property, meeting the requirements of Policy WB-T1."</p> <p><u>WB-E1 Sustainable Design</u> Gladman support the general principles set out in the above policy, however, consider that this is an unnecessary duplication of Part L of the emerging building regulation that will be introduced in 2025 and Policy EQ 6 of the adopted High Peak Local Plan, and therefore, should be deleted in line with paragraph 16(f) of the Framework.</p> <p>In addition, the adopted High Peak Design Guide SPD is not referenced and it would be worth sign posting readers to this document.</p> <p><u>WB-E3 Natural Environment</u> Gladman would suggest the removal of parts 1; 2 &amp; 3 of this policy as they represent a rewording of Local Plan policy EQ 2 and EQ 5 in relation to protection and enhancement of the landscape character, tree protection and biodiversity.</p> <p>Furthermore, parts 3 &amp; 4 of the above policy are in effect a duplication of the Environment Act 2021, specifically in relation to biodiversity net gain. The Act requires developments to deliver at least a 10% biodiversity net gain and this requirement is likely to come through the Local Plan process and would not be necessary to include within the WBNP.</p> <p><u>WB-E4 Rural and Landscape Character</u> Gladman again support the intentions behind the above policy but suggest that parts 1; 2 &amp; 3 of the above policy be</p>	

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	<p>removed to avoid an unnecessary duplication of Local Plan policy EQ 2.</p> <p>In addition, the adopted Landscape Character SPD is not referenced within the policy or its interpretation and would be worth sign posting to the reader as an adopted guidance document.</p>	
<p><b>High Peak Borough Council</b></p>	<p>(for full list and detail of suggested amendments refer to original submission)</p> <p>Main issues raised:</p> <ul style="list-style-type: none"> <li>• States that the Neighbourhood Plan period runs until the end of 2032. Is there any particular reason why 2032 has been selected? Was it informed by any evidence?</li> <li>• It would be helpful to explain that subsequent reviewed plans would also require examination and referendum.</li> <li>• It is noted that there is no mention of regularly monitoring the plan to ensure the vision, aims (and objectives – see point 3 below) are being achieved. Has monitoring been considered?</li> <li>• It is noted that the plan has a vision and aims but no objectives which is unusual. Is there any particular reason why this is the case?</li> </ul> <p><u>WB-G1 Town Centre and Economy</u></p> <ul style="list-style-type: none"> <li>• Point 2 - Should include reference to the scale of development being consistent with the strategic settlement hierarchy. Reference could be made to</li> </ul>	<p>We wanted the NP to run for as long a period as possible. The NP does not have to run concurrent to the LP, but may have to be updated as a new LP emerges.</p>

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	<p>the strategic Local Plan policy 'S2 Settlement Hierarchy' to reflect that Whaley Bridge is defined as a market town (the main focus for development), Furness Vale is classified as a 'larger village' and the other settlements in the Parish are part of the 'other rural area' in the hierarchy i.e. the least sustainable areas for development.</p> <p><u>WB-G2 Community Facilities</u></p> <ul style="list-style-type: none"> <li>• Point 2 - Should include reference to the scale of development being consistent with the strategic settlement hierarchy. Reference could be made to the strategic Local Plan policy 'S2 Settlement Hierarchy' to reflect that Whaley Bridge is defined as a market town (the main focus for development), Furness Vale is classified as a 'larger village' and the other settlements in the Parish are part of the 'other rural area' in the hierarchy i.e. the least sustainable areas for development.</li> <li>• Point 4 – as recommended in the Council's Reg 14 response, it is assumed that all landowners of the sites listed have been contacted to make them aware of this proposal.</li> <li>• Make reference to this policy augmenting with HP LP Policy CF5 in the interpretation.</li> </ul> <p><u>WB-G3 Residential Development</u></p> <ul style="list-style-type: none"> <li>• Point 2. It is acknowledged that the wording has been amended to reflect the Council's Reg 14 comments: "The suitability of a location could vary from person to person depending on their mobility making it hard to</li> </ul>	<p>See consultation statement of NP</p>

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	<p>apply this policy to proposed developments. Would it better to say distance from shops and services. Could give a more defined set of criteria on accessibility to services and facilities and clarify what would be suitable. Need to be clear on what suitable locations are”.</p> <p>However, the wording could still be more specific about the meaning of ‘suitable locations’ to include distance from shops and services and any other relevant criteria to make this point clearer for the policy user.</p> <ul style="list-style-type: none"> <li>• These comments made at Reg 14 stage are maintained:</li> </ul> <p>“The wording of points 4 and 5 regarding bin and cycle storage states all new dwellings must include various storage facilities this is very restrictive and does not allow for situations where it may not be appropriate not to mandate the provision of these facilities. The policy needs to be flexible to be able to respond to different types of development”.</p> <ul style="list-style-type: none"> <li>• “Point 5 repeats point 3 of policy WB- T1 Transport and Movement”.</li> </ul> <p><u>WB-H1 Heritage</u></p> <ul style="list-style-type: none"> <li>• It is noted that the Council’s recommendation from Reg 14 stage, to state that the policy is intended to augment policy EQ7 of the High Peak Local Plan and development needs to be in accordance with policy</li> </ul>	



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	<p>EQ7 (in order to ensure that it is consistent with the NPPF) has been followed.</p> <ul style="list-style-type: none"> <li>• Minor presentation issue – number 4 in the policy is blue and all the other numbers are black.</li> </ul> <p><u>WB-E1 Sustainable Design</u> These comments made at Reg 14 stage are maintained:</p> <ul style="list-style-type: none"> <li>• Should points 2-9 be sub-bullets of Point 1 as they detail the requirements to meet this point – “.....meeting the following requirements of this policy.....”?</li> <li>• The policy wording states ‘development must’ this is too restrictive and in some cases does not reflect the more nuanced approach in the NPPF or the Local Plan, it does not allow for changing circumstances or situations where certain types of development may be acceptable in certain circumstances. Policies need to be able to respond to changing circumstances.</li> <li>• Points 1, 2, 5 and 9 change ‘must’ to ‘should’ or similar non prescriptive wording.</li> <li>• Not all the bullet points in the ‘ways of building’ section are planning matters. This should be acknowledged or the non-planning matters removed from the list.</li> </ul> <p><u>WB-3 Natural Environment</u> <u>Point 1</u></p> <ul style="list-style-type: none"> <li>• “Development must preserve or enhance and not harm the rural and open landscape character of the</li> </ul>	

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	<p>area, including the Peak District National Park and its setting” is not consistent with HP LP strategic policy S1. Use of the words ‘must’ and ‘open’ conflict with this policy which is about achieving sustainable development. The LP policy lists a number of bullet points as to how sustainable development will be achieved. Bullet 4 covers “taking account of the distinct Peak District character, landscape.....”. Bullet 9 covers “minimising the risk of damage to areas of importance for nature conservation and / or landscape value, both directly and indirectly...”</p> <ul style="list-style-type: none"> <li>• The words ‘must’ and ‘open’ are inflexible and do not allow for situations where certain types of development may be acceptable. Any development on fields around a settlement would affect the ‘open’ landscape character of the area. One of the elements of achieving sustainable development set out in Policy S1 of the HP LP is ‘meeting most development needs within or adjacent to existing communities’ which presents a potential conflict. Use of the terminology “..must..preserve or enhance” is also queried in the context of whether it is NPPF compliant.</li> <li>• Perhaps the wording used is due to the plan also including some land within the PDNPA? It is acknowledged that NPPF paragraph 176 sets a greater weight for preserving and enhancing landscape in the National Parks. It is suggested that landscape in the national park and outside of the national park are dealt with in separate paragraphs of</li> </ul>	

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	<p>the policy so that policy wording is not so stringent for land outside of the national park.</p> <p><u>Point 2</u></p> <ul style="list-style-type: none"> <li>• “Development must enhance and have no adverse impact on the area’s extensive tree canopy and woodlands.” Again the use of ‘must’ is considered to be too stringent as it does not allow for situations where certain types of development may be acceptable. It is a bit unclear to the user as to which trees this policy is referring to. It is noted that ancient woodland is marked on the accompanying diagram. In addition to this is the policy just referring to groups of trees? Clarification in the interpretation section would be useful. It is noted that the interpretation states that the policy augments with policy EQ9 of the HP LP. Is this the clarification?</li> <li>• The NPPF (paras 174-182) seeks to protect and enhance biodiversity and recognises a hierarchy of international, national &amp; local designated sites. It does not completely prohibit all development which has an adverse impact on biodiversity but considers mitigation, compensation and the wider benefits development and applies different approach to designated sites in line with the hierarchy. The policy should not conflict with this. HP LP Policy EQ5 covers this and it is requested that this policy is also referred to in the interpretation section.</li> <li>• The maps accompanying the policy are difficult to read when they are zoomed in to focus on individual</li> </ul>	

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	<p>sites and this is how they would be used by a developer to examine the natural environment context for their site.</p> <p><u>WB- E4 Rural and Landscape Character</u>  These issues were raised at Reg 14 stage and are maintained:</p> <ul style="list-style-type: none"> <li>• The policy wording states development must or words to that effect. This is too restrictive and does not allow for changing circumstances or situations where certain types of development may be acceptable in certain circumstances. Policies need to be able to respond to changing circumstances.</li> <li>• Points 1,2 &amp; 3 wording should be changed to replace must with should or similar non prescriptive wording.</li> <li>• Points 2 and 4 will (as written) apply to all development this requirement may not be appropriate for small scale developments e.g. residential extensions, the policy wording should make this clear.</li> <li>• Points 3 and 4 refer to views and harmful visual impacts and for development to take account of the area's topography. The topography and long distance views diagram is helpful. However there are still some queries about how this policy would be applied. How could development enhance views along the Goyt Valley? Suggest expanding on how development could respond to views/landmarks in the policy. Suggest providing further explanation of</li> </ul>	

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	<p>the importance of specific views shown on the diagram in the interpretation section. The examiner of the Biddulph Neighbourhood Plan which also has a policy on views recommended applications which are likely to affect the identified views will be expected to demonstrate how the development has taken into account these views in the form and layout of the development. Suggest using a similar approach. The policy wording in its current form is considered to be too vague for a developer to use to inform a development scheme in the area.</p> <p><u>WB-E6 Local Green Space Policy Wording</u></p> <ul style="list-style-type: none"> <li>• NPPF paragraph 103 states that “Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” Would query whether the wording used in the policy fulfils this requirement.</li> <li>• “Development must not encroach onto Local Green Space or harm its community value amenity, accessibility or safety, except in exceptional circumstances and where: it comprises very small-scale development; it relates directly to the community value and use of the space; it does not harm the open or green character of the space”.</li> <li>• What is ‘very small scale development?’ Need to be more specific as this is potentially open to interpretation. Would a cross reference to relevant</li> </ul>	

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	<p>parts of NPPF paragraphs 149/150/151 in the policy interpretation help?</p> <ul style="list-style-type: none"> <li>• Possible potential for conflict in relation to part c. What sorts of development may be needed in relation to community value and use of the space? For instance would any new building even something like a shed or small unit to store sports equipment harm the open or green character of the space? What does 'green character' in this context actually mean? Further clarification with additional text in the interpretation would be useful.</li> </ul> <p><u>Proposed Neighbourhood Plan LGS Designations</u></p> <p><b>LGS1 Roosdyche RIGS – wooded area</b> Site is designated as RIGS, SSSI and a local wildlife site and is within the countryside. Site is already very well protected – query the need for adding an LGS designation in addition to existing designations? What would this achieve?</p> <p><b>LGS2 Whaley Bridge Linear Park</b> Council owned site. The site is listed as a monument on the Derbyshire Historic Environment Records. It could also help to provide Biodiversity Net Gain – no objection to its inclusion.</p> <p><b>LGS3 Fernilee Chapel Graveyard</b> Site is a graveyard and use is unlikely to change. Within the countryside. Query the need for adding an LGS designation? Does the site adequately meet the NPPF criteria?</p> <p><b>LGS4 Shallcross Wood</b></p>	<p>LGS1 Roosdyche is not a designated SSSI. It was previously listed as such, and continues to be shown on High Peak's maps as such, but it is our understanding that it was de-listed. <a href="https://en.wikipedia.org/wiki/List_of_Sites_of_Special_Scientific_Interest_in_Derbyshire">https://en.wikipedia.org/wiki/List_of_Sites_of_Special_Scientific_Interest_in_Derbyshire</a></p> <p>Subsequent to the de-listing, part of the site was given planning permission as an archery field and the site was badly damaged by earth moving (for which consent had been obtained from HPBC). <a href="http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=41373">http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=41373</a></p>

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	<p>Site to the west of Long Hill is in the Peak District National Park. The part to the east of Long Hill is in the countryside and is ancient woodland. Site is already well protected – query the need for adding an LGS designation in addition to existing designations? What would this achieve? (NB comments relate to High Peak part of site only not land in PDNP).</p> <p><b>LGS5 Furness Vale Bowling Green, Sport Court and Playground</b> Council owned sites part of which is leased by the bowling club, in current recreational use – no objection to its inclusion.</p> <p><b>LGS6 Whaley Bridge Cricket Pitch</b> Site is within the countryside. Cricket pitch. No objection to its inclusion.</p> <p><b>LGS7 Shallcross Incline Greenway</b> The site is listed as a monument on the Derbyshire Historic Environment Records. It is mostly within the builtup area boundary. No objection to its inclusion.</p> <p><b>LGS8 Taxal Churchyard</b> Site is a graveyard and use is unlikely to change. Is within the Peak Park. No comments.</p> <p><b>LGS9 Whaley Bridge Incline</b> Council owned site. Within the Conservation Area. Listed as a monument on the Derbyshire Historic Environment Records. No objection to its inclusion.</p> <p><b>LGS10 Brookfield Pond and Nature Reserve</b> The site is within the countryside it is a local nature reserve and a local wildlife site. No objection to its inclusion.</p> <p><b>LGS11 Wooded Area to north of Jodrell Rd play area &amp; LGS12 Land to north of Meadowfield</b> Council owned sites. The sites are covered by a TPO and are within the built up area boundary. They could also help</p>	

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	<p>to provide Biodiversity Net Gain – no objection to their inclusion.</p> <p><b>LGS13 Furness Vale School Garden</b> Within the built up area boundary, maintained by the school. No objection to its inclusion.</p> <p><b>LGS14 Green at centre of Orchard Road</b> Council owned site. Site is within the built up area boundary, a small grassed amenity area. No objection to its inclusion.</p>	
	<p><b>LGS15 Carr Field, Horwich End</b> Council owned site in an open area in the town with no wildlife designation. Within the built up area boundary and within the Conservation Area, part of the site is flood zone 2 and flood zone 3. Query whether the evidence showing that this site is demonstrably special to the local community and holds a particular local significance is adequate?</p> <p><b>LGS16 Taxal Beeches</b> Within the countryside &amp; covered by a TPO. No objection to its inclusion.</p> <p><u>WB- T1 Transport and Movement</u></p> <ul style="list-style-type: none"> <li>• Should points 2-7 be sub-bullets of point 1, which states: “.....meeting the following requirements of this policy.....”?</li> <li>• Point 3 repeats part of point 5 of policy WB-G3 Residential Development. Is this necessary – surely it only needs to appear in one policy?</li> </ul> <p>The wording of point 3 states that secure covered cycle storage must be provided for all new dwellings and employment space. This is very restrictive and does not</p>	<p><b>LGS15 Carr Field</b> The preservation of wildlife has been identified to be of great importance to the local residents. So the value of this piece of land as a green space is demonstrably special due to its location. It sits between two water courses and is prime habitat for wildlife and of particular significance there is now an otter population. This area is highlighted in the Derbyshire Wildlife Trust as an area potential area of improvement. So to keep it as a LGS would encourage the continuation of wildlife to inhabit and thrive in the area. It is easily viewed both via the Buxton and Chapel Road. On the bridge on Chapel Road it is a particular stopping and viewing point for residents adding to their wellbeing.</p> <p>95.98% of those who responded to our survey on Green Spaces thought it should be allocated as an LGS.</p>



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	<p>allow for situations where it may not be appropriate to mandate the provision of these facilities. The policy needs to be flexible to be able to respond to different types of development. Wording states 'proportionate to the scale of the property' for dwellings but there is no indication of floorspace size this would apply to for employment space so does this mean <u>all</u> new employment space or should a threshold be applied?</p>	
<p><b>High Peak Developments Ltd (agent: Emery Planning)</b></p>	<p>The Submission Version of the Neighbourhood Plan covers the period 2022 – 2032. However, the High Peak Local Plan only covers the period up to 2031. The Neighbourhood Plan should either align with the Local Plan by setting out its strategy to 2031 or assess and factor in Whaley Bridge's development needs beyond those set by the current Local Plan (i.e., post-2031).</p> <p>Section 2.1 of the Draft Neighbourhood Plan 'Strategy for Sustainable Growth' states that the Plan does not undertake housing site allocations, instead leaving this to the Local Plan. We object to this approach. We consider that the Neighbourhood Plan should make housing allocations for the following reasons:</p> <ul style="list-style-type: none"> <li>• The allocations in the Local Plan are failing to deliver and therefore the Neighbourhood Plan should allocate sites to ensure housing delivery in the central area.</li> <li>• To ensure that affordable housing needs are met. There is a significant affordable housing need in High Peak and in Whaley Bridge specifically. In the absence of the delivery of housing allocations, this need will continue to grow.</li> <li>• Local Plan Policy S6 clearly expects residential allocations to be made in Neighbourhood Plans to assist in meeting the overall housing requirement.</li> </ul>	

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	<p>Section 2.4 of the Draft Neighbourhood Plan sets out the aims of the Neighbourhood Plan. Namely, it states that the aims are to:</p> <ul style="list-style-type: none"> <li>• Meet the diverse needs and aspirations of all of the community in terms of housing, local facilities and economic opportunity; and</li> <li>• To attract investment, visitors, employment and sustainable development, to meet the needs of local residents and businesses.</li> </ul> <p>We support these aspirations and wish to emphasise that in order to meet these aims a positive approach to development proposals is required. This is particularly the case given as we have explained above that the general and affordable housing needs of the Central Area, including Whaley Bridge are not being met by the allocations set out in the Local Plan.</p> <p><u>WB-G1 Town Centre and Economy</u></p> <p>The High Peak Retail Leisure &amp; Town Centre Study 2022 (Nexus Planning), published as part of the evidence base for the emerging local plan, identifies a need for comparison and convenience retail floorspace in Whaley Bridge, and it also identifies a need for a new food store in a sustainable location. It is noted that the existing Tesco store at Hoys Yard is significantly over-trading and there is a leakage of expenditure to other parts of the region beyond High Peak. Our client's land (i.e. both sites at EP1 and EP4) is at the edge of Whaley Bridge Town Centre and benefits from excellent footpath and cycleway connectivity, and it has the potential to help meet identified retail needs in a sustainable manner.</p>	

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	<p>As well as the potential to accommodate housing development, our client's land at EP1 (Hogs Yard, Buxton Road, Whaley Bridge (South of Tesco Store) could accommodate identified retail needs in a highly sustainable manner alongside the existing retail units that already exist and have been found to be significant over-trading.</p> <p>Our client's site at (Hogs Yard, Buxton Road, Whaley Bridge (North of Tesco Store)) has been marketed for well over 10 years for employment purposes (i.e. B-type uses) by High Peak Developments Ltd and there has been no interest expressed. This site is also well located to accommodate a new retail store and it also has As the potential to accommodate a leisure and/or tourism use and this could include a new hotel (e.g. Travel Lodge) or a new bowling alley for instance. Whaley Bridge is an excellent base for the Peak District National Park and has a range of attractions in its own right including Goyt Valley and Bugsworth Basin and there are excellent walking and cycling trails in the surrounding countryside. A new hotel and/or leisure development has the potential to support the visitor economy and make an important contribution to supporting the role of Whaley Bridge in the overall settlement hierarchy for the local plan.</p> <p>The defined town centre boundary is very tightly drawn and there are very few development opportunities within this area. Our client's sites have potential to meet identified retail needs in a highly sustainable manner and could be allocated as such through the neighbourhood plan with Policy WB-G1 amended to reflect this.</p>	

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	<p>As drafted, we have concerns that part 1 of this policy will detract from the aim of meeting the housing needs of the area, particularly given that it encourages the change of use from residential in the town centre. In order to proactively meet housing needs, the Local Plan also needs to support the provision of residential use where appropriate.</p> <p>Object to part 2 of the policy. The need for a sequential test for visitor and recreational facilities is overly restrictive and does not conform with the Framework, which states at paragraph 84 that planning policies should <i>enable</i>:</p> <ul style="list-style-type: none"> <li>h) The sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings;</li> <li>i) The development and diversification of agricultural and other land-based rural businesses; and</li> <li>j) Sustainable tourism and leisure development which respect the character of the countryside.</li> </ul> <p>The development of visitor and recreational facilities in rural areas is not restricted by the Framework and therefore the requirement for a sequential test should be removed from the Neighbourhood Plan as it is not consistent with national policy.</p> <p><u>WB-G2 Community Facilities</u></p> <p>(part 2 of the policy) As set out above in relation to Policy WB-G1, we consider that this requirement is overly restrictive and should be removed from the Plan. It does not accord with the Framework for the reasons set out above.</p> <p><u>WB-G3 Residential Development</u></p>	

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	<p>(part 1) We object to this policy as it is more restrictive than Policy H1 of the Local Plan, which allows for residential development on the edge of settlements if the criteria within the policy are met. Policy WB-G3 should be amended to state that residential development outside of settlement boundaries will be supported in line with Policy H1 of the Local Plan.</p> <p>Policy WB-G3 (part 3) states that self-build housing and community-led housing are encouraged. We support the initiative of community-led housing however we note that this needs to actively encourage meeting local housing needs.</p> <p><u>WB-E1 Sustainable Design</u></p> <p>Policy WB-E1 (part 3) states that development should enhance the architectural diversity of the area. We object to the wording of this policy and consider that it should be amended to state:  “Development should <u>seek to</u> enhance architectural diversity” [our addition]  The requirement to enhance in every case is excessive and does not allow for consideration of site-specific circumstances.</p> <p>(part 4) states that schemes should incorporate high quality and well-functioning green infrastructure and public realm as an integral part of the design and layout. We object to the wording of this policy and consider that it should be amended to state:  “Schemes should incorporate high quality and well-functioning green infrastructure and public realm as an</p>	

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	<p>integral part of the design and layout <u>where appropriate and necessary</u>" [our addition]</p> <p>The requirement to incorporate green infrastructure may not be appropriate for smaller scale schemes and therefore the policy should allow for some flexibility.</p> <p>(part 9) states that development must include positive design features to reduce carbon impact. We consider that this policy is overly vague as it is unclear how this would be quantified. Further clarification is required.</p> <p><u>WB-E3 Natural Environment</u></p> <p>Policy WB-E3 part 1, states that development must <u>preserve or enhance and not harm</u> the rural and open landscape character of the area, including the Peak District National Park and its setting. The terminology here is not clear. 'Preserve' and 'not harm' have the same meaning in planning terms. Furthermore, 'preserve or enhance' are terms that are associated with an assessment of heritage assets in planning terms. The Framework and Policy EQ2 of the Local Plan use the words 'protect and enhance' in respect of the National Park and recognised landscape character areas. The Framework is clear at paragraph 175 that plans should distinguish between the hierarchy of international, national and locally designated sites and there should be a distinction between land in the National Park (which is a valued landscape) and other areas of the open countryside. The policy needs additional clarification to distinguish between the landscape hierarchy.</p> <p><u>WB-T2 Active Travel</u></p>	

Represent or	Summary of Comments	V4W Comments
	<p>Policy WB-T2 1 states that that development must not encroach onto the area’s footpaths, cycleways or green and blue routes. We object to the wording of this policy and consider that it should be amended to state:  “Development <del>must not</del> <b>should seek to avoid</b> encroaching onto the area’s footpaths, cycleways or green and blue routes, including the Shallcross Incline, The Linear Park and Whaley Bridge incline, unless adequate mitigation or alternate routes are provided” [our addition]</p> <p>Policy WB-T2 2 states that development adjacent to cycle routes or footpaths, must have no adverse impact on their safety, amenity or accessibility. We object to the wording of this policy and consider that it should be amended to state:  “Development adjacent to footpaths, cycleways or green routes must have no adverse impact on their safety, amenity or accessibility <b>unless adequate alternative routes or mitigation is provided.</b>” [our addition]</p> <p>The policy as drafted is overly restrictive and does not allow for the flexibility required on a case-by-case basis.</p> <p><u>Client’s Sites at Hogs Yard, Buxton Road, Whaley Bridge (north and south of Tesco store)</u></p> <p>The plan should allocate sites for residential development to meet the overall housing requirement for High Peak and that of the Central Area. Given the significant shortfall in affordable housing delivery in High Peak and in the Central Area including Whaley Bridge, sites</p>	

Represent or	Summary of Comments	V4W Comments
	<p>should be allocated in the Neighbourhood Plan to specifically deliver affordable homes.</p> <p>Our client's 2 no. sites at Hogs Yard (refer to submitted document for full site details) have capacity to deliver residential development in a sustainable manner or otherwise allocated for retail and/or visitor uses. We would welcome the opportunity to discuss our client's sites with the neighbourhood plan steering group in more detail.</p>	
<b>Historic England</b>	<p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>Recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about</p>	



Represent or	Summary of Comments	V4W Comments
	<p>ensuring that the character of the area is retained. These can be found at:-</p> <p><a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p> <p>Also, other advice:</p> <p><a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a></p>	
<b>Natural England</b>	Natural England does not have any specific comments on the Whaley Bridge Neighbourhood Plan.	
<b>Peak District National Park Authority</b>	<p>(for full list and detail of suggested amendments refer to original submission)</p> <p><u>Policy G1 - Town Centre and Economy</u></p> <ul style="list-style-type: none"> <li>• The proposed policy currently conflicts with NPA strategic policy.</li> <li>• The proposal is now more restrictive than PDNP policy (in that it is worded that none would be allowed in the national park).</li> <li>• Remove the PDNP reference and instead state that the policy does not refer to PDNP.</li> </ul> <p><u>Policy G2 -Community Facilities</u></p> <ul style="list-style-type: none"> <li>• The proposed policy currently conflicts with NPA strategic policy</li> <li>• The proposal is now more restrictive than PDNP policy (in that it is worded that none would be allowed in the national park).</li> </ul>	

Represent or	Summary of Comments	V4W Comments
	<ul style="list-style-type: none"> <li>• Point 3 - PDNP DMP document also has policy DMS2 which has marketing requirements, working with community and exploring other community uses before a community use is lost.</li> <li>• Remove the PDNP reference and instead state that the policy does not refer to PDNP.</li> </ul> <p><u>Policy H1 – Heritage</u></p> <ul style="list-style-type: none"> <li>• The proposed policy currently conflicts with national and PDNP strategic policy.</li> <li>• Point 1 appears to be more permissive than national and PDNP policy. Policy needs to clarify ‘appropriate size’</li> <li>• Example text to be included in policy or interpretation text:  ‘Proposals for alterations to a heritage asset will be informed by a heritage statement that clearly describes the significance of the asset including the contribution that the setting makes to its significance’</li> <li>• Point 2 – is addressed in interpretation notes however, it could be improved by adding: ‘The reinstatement of historic shop fronts or original features that have previously been lost will be supported’</li> </ul> <p><u>Policy E1 – Sustainable Design</u></p>	

Represent or	Summary of Comments	V4W Comments
	<ul style="list-style-type: none"> <li>• The proposed policy potentially conflicts with national and PDNP strategic policy.</li> <li>• Point 8 – it is not clear that point 8 and WBNP H1 are aligned.</li> <li>• Point 8 – doesn't clearly align to PDNP Design Guide which outlines that there may be circumstances where traditional design needs to be followed.</li> </ul> <p><u>Policy E2 – Minor villages and rural settlements</u></p> <ul style="list-style-type: none"> <li>• The included maps have the potential to undermine PDNP strategic policy.</li> <li>• Concerns over the 'character area' shown for Taxal and Fernilee. The policy needs to refer to the maps to make it clear what these boundaries are, or they need to be explained in the interpretation text.</li> </ul> <p><u>Policy E5 – Local Green Spaces</u></p> <ul style="list-style-type: none"> <li>• The proposed policy currently conflicts with PDNP strategic policy.</li> <li>• LGS4 (Shallcross Wood, south of A5004) is designated as Natural Zone so other than in exceptional circumstances relating to management of the Natural Zone of for conservation/enhancement of the PDNP, proposals for development would not be permitted.</li> </ul>	
<b>The Shuker Partnershi</b>	The Submission Version of the Neighbourhood Plan covers the period 2022 – 2032. However, the High Peak Local Plan only covers the period up to 2031. The Neighbourhood Plan	

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<p><b>p (agent: Emery Planning)</b></p>	<p>should either align with the Local Plan by setting out its strategy to 2031 or assess and factor in Whaley Bridge's development needs beyond those set by the current Local Plan (i.e., post-2031).</p> <p>Section 2.1 of the Draft Neighbourhood Plan 'Strategy for Sustainable Growth' states that the Plan does not undertake housing site allocations, instead leaving this to the Local Plan. We object to this approach. We consider that the Neighbourhood Plan should make housing allocations for the following reasons:</p> <ul style="list-style-type: none"> <li>• The allocations in the Local Plan are failing to deliver and therefore the Neighbourhood Plan should allocate sites to ensure housing delivery in the central area.</li> <li>• To ensure that affordable housing needs are met. There is a significant affordable housing need in High Peak and in Whaley Bridge specifically. In the absence of the delivery of housing allocations, this need will continue to grow.</li> <li>• Local Plan Policy S6 clearly expects residential allocations to be made in Neighbourhood Plans to assist in meeting the overall housing requirement.</li> </ul> <p>Section 2.4 of the Draft Neighbourhood Plan sets out the aims of the Neighbourhood Plan. Namely, it states that the aims are to:</p> <ul style="list-style-type: none"> <li>• Meet the diverse needs and aspirations of all of the community in terms of housing, local facilities and economic opportunity; and</li> <li>• To attract investment, visitors, employment and sustainable development, to meet the needs of local residents and businesses.</li> </ul> <p>We support these aspirations and wish to emphasise that in order to meet these aims a positive approach to</p>	

Represent or	Summary of Comments	V4W Comments
	<p>development proposals is required. This is particularly the case given as we have explained above that the general and affordable housing needs of the Central Area, including Whaley Bridge are not being met by the allocations set out in the Local Plan.</p> <p><u>WB-G1 Town Centre and Economy</u> As drafted, we have concerns that part 1 of this policy will detract from the aim of meeting the housing needs of the area, particularly given that it encourages the change of use from residential in the town centre. In order to proactively meet housing needs, the Local Plan also needs to support the provision of residential use where appropriate.</p> <p>Object to part 2 of the policy. The need for a sequential test for visitor and recreational facilities is overly restrictive and does not conform with the Framework, which states at paragraph 84 that planning policies should <i>enable</i>:</p> <ul style="list-style-type: none"> <li>h) The sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings;</li> <li>i) The development and diversification of agricultural and other land-based rural businesses; and</li> <li>j) Sustainable tourism and leisure development which respect the character of the countryside.</li> </ul> <p>The development of visitor and recreational facilities in rural areas is not restricted by the Framework and therefore the requirement for a sequential test should be removed from the Neighbourhood Plan as it is not consistent with national policy.</p> <p><u>WB-G2 Community Facilities</u></p>	

Represent or	Summary of Comments	V4W Comments
	<p>(part 2 of the policy) As set out above in relation to Policy WB-G1, we consider that this requirement is overly restrictive and should be removed from the Plan. It does not accord with the Framework for the reasons set out above.</p> <p><u>WB-G3 Residential Development</u></p> <p>(part 1) We object to this policy as it is more restrictive than Policy H1 of the Local Plan, which allows for residential development on the edge of settlements if the criteria within the policy are met. Policy WB-G3 should be amended to state that residential development outside of settlement boundaries will be supported in line with Policy H1 of the Local Plan.</p> <p>Policy WB-G3 (part 3) states that self-build housing and community-led housing are encouraged. We support the initiative of community-led housing however we note that this needs to actively encourage meeting local housing needs.</p> <p><u>WB-H1 Heritage</u></p> <p>We object to this policy for the following reasons:</p> <ul style="list-style-type: none"> <li>• The policy is not consistent with paragraphs 201, 202 and 203 of the Framework which sets out the circumstances in which there can be harm to a heritage asset if this harm is outweighed by public benefits and in the case of non-designated heritage assets, where a balanced judgement is made having regard to the scale of any harm or loss and the significance of the heritage asset.</li> <li>• Shallcross Incline is the only feature within the Neighbourhood Plan area that is referenced in the policy.</li> </ul>	

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	<p>There is no justification for this. Shallcross Incline is not a designated heritage asset. The requirement that development should preserve or enhance the Shallcross Incline is not consistent with national policy as set out above.</p> <p><u>WB-E1 Sustainable Design</u></p> <p>Policy WB-E1 (part 3) states that development should enhance the architectural diversity of the area. We object to the wording of this policy and consider that it should be amended to state:  “Development should <u>seek to</u> enhance architectural diversity” [our addition]  The requirement to enhance in every case is excessive and does not allow for consideration of site-specific circumstances.</p> <p>(part 4) states that schemes should incorporate high quality and well-functioning green infrastructure and public realm as an integral part of the design and layout. We object to the wording of this policy and consider that it should be amended to state:  “Schemes should incorporate high quality and well-functioning green infrastructure and public realm as an integral part of the design and layout <u>where appropriate and necessary</u>” [our addition]</p> <p>The requirement to incorporate green infrastructure may not be appropriate for smaller scale schemes and therefore the policy should allow for some flexibility.</p> <p>(part 9) states that development must include positive design features to reduce carbon impact. We consider that this</p>	

Represent or	Summary of Comments	V4W Comments
	<p>policy is overly vague as it is unclear how this would be quantified. Further clarification is required.</p> <p><u>WB-E2 Minor Villages and Settlements</u></p> <p>Policy WB-E2 sets out the requirements for development within Taxal, Fernilee, Horwich End and Bridgemont. We seek clarification as to whether these policies are limited to development only within the settlement boundaries as shown on pages 45 and 46 of the Plan. It is unclear whether these policies would apply to, for instance, a rural exception site outside of the defined boundary.</p> <p><u>WB-E3 Natural Environment</u></p> <p>Policy WB-E3 part 1, states that development must <u>preserve or enhance and not harm</u> the rural and open landscape character of the area, including the Peak District National Park and its setting. The terminology here is not clear. 'Preserve' and 'not harm' have the same meaning in planning terms. Furthermore, 'preserve or enhance' are terms that are associated with an assessment of heritage assets in planning terms. The Framework and Policy EQ2 of the Local Plan use the words 'protect and enhance' in respect of the National Park and recognised landscape character areas. The Framework is clear at paragraph 175 that plans should distinguish between the hierarchy of international, national and locally designated sites and there should be a distinction between land in the National Park (which is a valued landscape) and other areas of the open countryside. The policy needs additional clarification to distinguish between the landscape hierarchy.</p>	



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	<p><u>WB-T2 Active Travel</u></p> <p>Policy WB-T2 1 states that that development must not encroach onto the area’s footpaths, cycleways or green and blue routes. We object to the wording of this policy and consider that it should be amended to state:  “Development <del>must not</del> <b>should seek to avoid</b> encroaching onto the area’s footpaths, cycleways or green and blue routes, including the Shallcross Incline, The Linear Park and Whaley Bridge incline, unless adequate mitigation or alternate routes are provided” [our addition]</p> <p>Policy WB-T2 2 states that development adjacent to cycle routes or footpaths, must have no adverse impact on their safety, amenity or accessibility. We object to the wording of this policy and consider that it should be amended to state:  “Development adjacent to footpaths, cycleways or green routes must have no adverse impact on their safety, amenity or accessibility <b>unless adequate alternative routes or mitigation is provided.</b>” [our addition]</p> <p>The policy as drafted is overly restrictive and does not allow for the flexibility required on a case-by-case basis.</p> <p><u>Client’s site at Wheel Farm and Shallcross Farm</u></p> <p>The plan should allocate sites for residential development to meet the overall housing requirement for High Peak and that of the Central Area. Given the significant shortfall in affordable housing delivery in High Peak and in the Central Area including Whaley Bridge, sites should be allocated in the Neighbourhood Plan to specifically deliver affordable homes.</p>	

Represent or	Summary of Comments	V4W Comments
	<p>(refer to submitted document for full site details) The site is sustainably located, being well related to the Market Town of Whaley Bridge, which is identified through the adopted Local Plan as a focus for future growth. The site has the potential to assist in the delivery of a mix of housing as part of the Local Plan review through the delivery of a landscape led residential development.</p>	
<p><b>Treville Properties Ltd</b> (agent: Emery Planning)</p>	<p>The plan period should either align with the High Peak Local Plan or the development needs for the Whaley Bridge area beyond 2031 should be identified and planned for (as above).</p> <p>Section 2.1 of the Draft Neighbourhood Plan ‘Strategy for Sustainable Growth’ states that the Plan does not undertake housing site allocations, instead leaving this to the Local Plan. We object to this approach. We consider that the Neighbourhood Plan should make housing allocations for the following reasons:</p> <ul style="list-style-type: none"> <li>• The allocations in the Local Plan are failing to deliver and therefore the Neighbourhood Plan should allocate sites to ensure housing delivery in the central area.</li> <li>• To ensure that affordable housing needs are met. There is a significant affordable housing need in High Peak and in Whaley Bridge specifically. In the absence of the delivery of housing allocations, this need will continue to grow.</li> <li>• Local Plan Policy S6 clearly expects residential allocations to be made in Neighbourhood Plans to assist in meeting the overall housing requirement.</li> </ul> <p>Section 2.4 of the Draft Neighbourhood Plan sets out the aims of the Neighbourhood Plan. Namely, it states that the aims are to:</p>	<p>During consultation with Treville Properties this was not something they previously objected to.</p>

Represent or	Summary of Comments	V4W Comments
	<ul style="list-style-type: none"> <li>• Meet the diverse needs and aspirations of all of the community in terms of housing, local facilities and economic opportunity; and</li> <li>• To attract investment, visitors, employment and sustainable development, to meet the needs of local residents and businesses.</li> </ul> <p>We support these aspirations and wish to emphasise that in order to meet these aims a positive approach to development proposals is required. This is particularly the case given as we have explained above that the general and affordable housing needs of the Central Area, including Whaley Bridge are not being met by the allocations set out in the Local Plan.</p> <p><u>WB-G1 Town Centre and Economy</u> As drafted, we have concerns that part 1 of this policy will detract from the aim of meeting the housing needs of the area, particularly given that it encourages the change of use from residential in the town centre. In order to proactively meet housing needs, the Local Plan also needs to support the provision of residential use where appropriate.</p> <p>Object to part 2 of the policy. The need for a sequential test for visitor and recreational facilities is overly restrictive and does not conform with the Framework, which states at paragraph 84 that planning policies should <i>enable</i>:</p> <ul style="list-style-type: none"> <li>h) The sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings;</li> <li>i) The development and diversification of agricultural and other land-based rural businesses; and</li> <li>j) Sustainable tourism and leisure development which respect the character of the countryside.</li> </ul>	

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	<p>The development of visitor and recreational facilities in rural areas is not restricted by the Framework and therefore the requirement for a sequential test should be removed from the Neighbourhood Plan as it is not consistent with national policy.</p> <p><u>WB-G2 Community Facilities</u></p> <p>(part 2 of the policy) As set out above in relation to Policy WB-G1, we consider that this requirement is overly restrictive and should be removed from the Plan. It does not accord with the Framework for the reasons set out above.</p> <p><u>WB-G3 Residential Development</u></p> <p>(part 1) We object to this policy as it is more restrictive than Policy H1 of the Local Plan, which allows for residential development on the edge of settlements if the criteria within the policy are met. Policy WB-G3 should be amended to state that residential development outside of settlement boundaries will be supported in line with Policy H1 of the Local Plan.</p> <p>Policy WB-G3 (part 3) states that self-build housing and community-led housing are encouraged. We support the initiative of community-led housing however we note that this needs to actively encourage meeting local housing needs.</p> <p><u>WB-E1 Sustainable Design</u></p> <p>Policy WB-E1 (part 3) states that development should enhance the architectural diversity of the area. We object to</p>	

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	<p>the wording of this policy and consider that it should be amended to state:  “Development should <u>seek to</u> enhance architectural diversity” [our addition]  The requirement to enhance in every case is excessive and does not allow for consideration of site-specific circumstances.</p> <p>(part 4) states that schemes should incorporate high quality and well-functioning green infrastructure and public realm as an integral part of the design and layout. We object to the wording of this policy and consider that it should be amended to state:  “Schemes should incorporate high quality and well-functioning green infrastructure and public realm as an integral part of the design and layout <u>where appropriate and necessary</u>” [our addition]</p> <p>The requirement to incorporate green infrastructure may not be appropriate for smaller scale schemes and therefore the policy should allow for some flexibility.</p> <p>(part 9) states that development must include positive design features to reduce carbon impact. We consider that this policy is overly vague as it is unclear how this would be quantified. Further clarification is required.</p> <p><u>WB-E2 Minor Villages and Settlements</u></p> <p>Policy WB-E2 sets out the requirements for development within Taxal, Fernilee, Horwich End and Bridgemont. We seek clarification as to whether these policies are limited to development only within the settlement boundaries as shown</p>	

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	<p>on pages 45 and 46 of the Plan. It is unclear whether these policies would apply to, for instance, a rural exception site outside of the defined boundary.</p> <p><u>WB-E3 Natural Environment</u></p> <p>Policy WB-E3 part 1, states that development must <u>preserve or enhance and not harm</u> the rural and open landscape character of the area, including the Peak District National Park and its setting. The terminology here is not clear. 'Preserve' and 'not harm' have the same meaning in planning terms. Furthermore, 'preserve or enhance' are terms that are associated with an assessment of heritage assets in planning terms. The Framework and Policy EQ2 of the Local Plan use the words 'protect and enhance' in respect of the National Park and recognised landscape character areas. The Framework is clear at paragraph 175 that plans should distinguish between the hierarchy of international, national and locally designated sites and there should be a distinction between land in the National Park (which is a valued landscape) and other areas of the open countryside. The policy needs additional clarification to distinguish between the landscape hierarchy.</p> <p><u>WB-E5 Local Green Space</u></p> <p>Object to designation of LGS16: Taxal Beeches, Taxal Moor Road. This should not be included as Local Green Space – this proposal should be deleted.</p> <p>Our client previously wrote to Vision4Whaley on 22nd June 2022, setting out their objection to the designation, including concerns that the proposed boundary of the LGS did not</p>	

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	<p>accurately reflect what is on the ground in terms of the width of the footpath and also incorporated a strip of our client's private land, which should not be included in a Local Green Space designation as it is not accessible to the public. This appears to have been rectified in the current version of the proposed LGS boundary. However, our client maintains an objection to the proposed LGS designation due to their deeded right of way over the proposed designation, both vehicular, on foot and for access to install utilities. This right extends to the full length of Taxal Beeches and continues to be exercised. It is unclear how the land can be classified and protected as Local Green Space whilst respecting such Deeded Rights, which include the right to bring vehicles up the track for access and maintenance, be that a quad bike, a car or even a truck (or horse or bicycle). Given that this is a linear route which is already classified as a public right of way, with no prospect of being developed or diverted, it is unclear why an additional level of protection is required in the form of the proposed LGS as its status as a PRow is already established.</p> <p>It remains unclear how the land in question was found to meet NPPF criteria i.e. why it is demonstrably special; why it holds particular significance over and above other public rights of way/public footpaths and vehicular routes in the local area; and why designation as LGS is necessary. Site should be removed as LGS as it does not clearly meet the designation criteria.</p> <p><u>WB-T2 Active Travel</u></p> <p>Policy WB-T2 1 states that that development must not encroach onto the area's footpaths, cycleways or green and</p>	

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	<p>blue routes. We object to the wording of this policy and consider that it should be amended to state:  “Development <del>must not</del> <b>should seek to avoid</b> encroaching onto the area’s footpaths, cycleways or green and blue routes, including the Shallcross Incline, The Linear Park and Whaley Bridge incline, unless adequate mitigation or alternate routes are provided” [our addition]</p> <p>Policy WB-T2 2 states that development adjacent to cycle routes or footpaths, must have no adverse impact on their safety, amenity or accessibility. We object to the wording of this policy and consider that it should be amended to state:  “Development adjacent to footpaths, cycleways or green routes must have no adverse impact on their safety, amenity or accessibility <b>unless adequate alternative routes or mitigation is provided.</b>” [our addition]</p> <p>The policy as drafted is overly restrictive and does not allow for the flexibility required on a case-by-case basis.</p> <p><u>Client’s site – Land to the west of Bridgemont, Whaley Bridge</u></p> <p>The plan should allocate sites for residential development to meet the overall housing requirement for High Peak and that of the Central Area. Given the significant shortfall in affordable housing delivery in High Peak and in the Central Area including Whaley Bridge, sites should be allocated in the Neighbourhood Plan to specifically deliver affordable homes.</p> <p>(refer to submitted document for full site details) The site is in a sustainable location and would help to deliver a mix of</p>	



Represent or	Summary of Comments	V4W Comments
	<p>housing to meet local needs, including affordable housing. There are no constraints which would prevent the site from being developed and a number of benefits could be delivered as part of future proposals. The site does not contribute to the purposes of the Green Belt and we consider there is a wider case, on the basis of exceptional circumstances, to justify removal of the whole of the village of Bridgemont from the Green Belt. We therefore consider that our client's site should form a housing allocation within the Neighbourhood Plan.</p> <p><u>Client's site - Land at Linglongs Road, Taxal, Whaley Bridge</u></p> <p>(refer to submitted document for full site details) The site is in a sustainable location and would help to deliver a mix of housing as part of the Local Plan Review. There are no constraints which would prevent the site from being developed and a number of benefits could be delivered as part of future proposals. Beyond the significant benefits associated with the delivery of local housing, these include significant opportunities for ecological enhancement and improvements to the character of the settlement edge of Whaley Bridge. The land is largely owned by our client who is a local house builder with a track record of delivering high quality housing schemes. In light of this, it is anticipated that the site could be brought forward for housing within the first 5 years of the plan period. In light of the above, we consider that the land to the West of Linglongs Road should form a housing allocation in the Neighbourhood Plan.</p>	
<b>United Utilities</b>	<p><u>Environment and Climate Change</u></p> <p>UUW notes the importance of climate change and the wider issues associated with the climate emergency that are outlined in the NP. A critical element of the response to</p>	

Represent or	Summary of Comments	V4W Comments
	<p>climate change is sustainable surface water management and the efficient use of clean water supply. We wish to ensure that the NP gives appropriate emphasis to designing new development so that it is resilient to the challenges of future climate change, such as, multi-functional sustainable drainage, avoidance of flood risk, natural flood management techniques and the incorporation of water supply efficiency measures.</p> <p><u>Policy WB-E1 Sustainable Design</u>  U UW recommends the following additional wording as part of Policy WB-E1 Sustainable Design.</p> <ul style="list-style-type: none"> <li>“• All new development should apply the surface water hierarchy and incorporate sustainable drainage which is multi-functional, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible.</li>   <li>• All new development should ensure landscaping proposals are integrated with the strategy for sustainable water management.”</li> </ul> <p>We also wish to suggest the following additional paragraphs to the Justification section of Policy WB-E1 Sustainable Design:  “Sustainable surface water management and the efficient use of water are critical elements of the design and development process. Sustainable surface water management should be at the forefront of the design process and linked to green/blue infrastructure, landscape design and biodiversity. Green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue</p>	

Represent or	Summary of Comments	V4W Comments
	<p>infrastructure and landscape provision play an important role in managing water close to its source.”</p> <p><u>Water Efficiency</u>  Recommend the inclusion of the following additional wording in the emerging NP regarding water efficiency. This could be included as an additional criterion to Policy WB-E1 Sustainable Design or as a separate new policy:  ‘All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM ‘Excellent’ standard. Where the ‘Excellent’ Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM ‘Very Good’ standard must be met as a minimum.’</p> <p>We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reduction noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills.</p> <p><u>Sustainable Drainage – Foul Water and Surface Water</u>  In addition to the recommended changes to Policy WB-E1 Sustainable Design set out above, we recommend that the NP includes a comprehensive policy on foul and surface water management. This is because control over the management of surface water is a critical response to the challenge of climate change. Our example sustainable</p>	

Represent or	Summary of Comments	V4W Comments
	<p>drainage policy is set out below and we recommend that you include this in your NP.</p> <p>'Sustainable Drainage – Foul and Surface Water All applications must be supported by a strategy for foul and surface water management. Surface water should be discharged in the following order of priority:</p> <ul style="list-style-type: none"> <li>i. An adequate soakaway or some other form of infiltration system.</li> <li>ii. An attenuated discharge to a surface water body.</li> <li>iii. An attenuated discharge to public surface water sewer, highway drain or another drainage system.</li> <li>iv. An attenuated discharge to public combined sewer.</li> </ul> <p>Proposals should be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site. On greenfield sites, any rate of discharge shall be restricted to a greenfield run-off rate. On previously developed land, applicants must also follow the hierarchy for surface water management and target a reduction to a greenfield rate of run-off.</p> <p>Proposals on previously developed land must achieve a minimum reduction in the rate of surface water discharge of 30% rising to a minimum of 50% in any critical drainage area identified by the SFRA. To demonstrate any reduction, applicants must submit clear evidence of existing operational connections from the site with associated calculations on rates of discharge. Where clear evidence of existing connections is not provided, applicants will be required to discharge at a greenfield rate of run-off.</p>	

Represent or	Summary of Comments	V4W Comments
	<p>The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.</p> <p>Applications for major development will be required to incorporate sustainable drainage which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain.</p> <p>For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage systems must be minimised and a proliferation of pumping stations on a phased development will not be acceptable.</p> <p>Applications must be accompanied by drainage management and maintenance plans including a plan for any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights.</p> <p><i>Explanatory Text</i> Application of the hierarchy for managing surface water will be a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available.</p>	

Represent or	Summary of Comments	V4W Comments
	<p>Foul and surface water drainage must be considered early in the design process. Sustainable drainage should be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, including retrofit SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.</p> <p>The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve</p>	

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	<p>private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.</p> <p>Holistic site-wide drainage strategies will be required to ensure a coordinated approach to drainage between phases, between developers, and over a number of years of construction. Applicants must demonstrate how the approach to drainage on any phase of development has regard to interconnecting phases within a larger site with infrastructure sized to accommodate interconnecting phases. When necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase(s). The strategy shall demonstrate communication with infrastructure providers and outline how each phase interacts with other phases.</p> <p><u><i>Flood Risk</i></u>  We welcome the reference to flood risk on page 37. We request that this references all sources of flood risk in accordance with national planning policy and guidance. In accordance with the definition of flood risk in the National Planning Practice Guidance and the need to ensure new development is resilient and responsive to the challenge of climate change, we continue to recommend the inclusion of the following wording relating to flood risk:</p> <p>'The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs.  For sewers, the consultation should confirm:  a) if there are any sewer surcharge levels at the point of connection that could influence site design;</p>	

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	<p>b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and  c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding.</p> <p>This information will inform whether to apply the sequential approach. Development should not be located in an area at risk of flooding. Applicants must demonstrate that proposals do not increase flood risk and are safe. Applicants should not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.'</p> <p><u>WB-E5 Local Green Space</u>  We note that Policy WB-E5 identifies various locations designated as Local Green Space which include 'LGS15: Carr Field Horwich End, Buxton Road'. We welcome the additional paragraph in the interpretation text which acknowledges the operational function of this area and the potential need for work on such assets to maintain the operation of essential services. Whilst welcoming this wording, we request that this is amended as follows:</p> <p>'It is noted that United Utilities own a small parcel of land in LGS15 Carr Field which has an operational function relating <u>to the utility infrastructure</u>. It is recognised that they may need to undertake work on <del>underground</del> <u>utility infrastructure at and around the site</u> in order to maintain <u>and / or improve the operation of essential services.</u>'</p>	<p><u>LGS15 we are happy to support the changes in wording.</u></p> <p><u>LGS4 Shallcross Wood. We have no objection to this additional wording.</u></p>



Represent or	Summary of Comments	V4W Comments
	<p>We request that a similar paragraph is inserted in respect of 'LGS4: Shallcross Wood' where the designated area of Local Green Space may also require investment in utility infrastructure. Our recommended wording at this site is:</p> <p>'It is noted that United Utilities has utility infrastructure at and near to LGS4 Shallcross Wood which has an operational function. It is recognised that they may need to undertake work on utility infrastructure at and around the site in order to maintain and / or improve the operation of essential services.'</p> <p>In accordance with our below comments on '<i>Supporting Utility Infrastructure</i>', we request that the policy on Local Green Space includes some flexibility to reflect the fact that green spaces are often locations for underground utility infrastructure where works may need to take place in the future to maintain the operation of essential services.</p> <p><u>New Policy - Water Catchment Land</u>  UUW wishes to note that part of the Whaley Bridge NP area is located in public water supply catchment land. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch for information on the location of catchment land in the area.</p> <p>In cases of wind energy proposals on water catchment land the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation</p>	

Represent or	Summary of Comments	V4W Comments
	<p>measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land.</p> <p>We recommend you include the following policy relating to water catchment land.</p> <p><i>'Water Catchment Land Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.'</i></p> <p>For any site specific allocations that you may identify which fall in such locations, it will be important that adequate information is presented to justify the principle of the development in advance of allocation and that the proposal is covered by site-specific detail which clearly identifies this constraint and the need for proposals to be undertaken in accordance with the above recommended policy.</p> <p><u>New Policy – Supporting Utility Infrastructure</u> UW wishes to highlight that it owns assets which are currently situated beyond the settlement boundary in an area of countryside and within the green belt. This includes Whaley Bridge Wastewater Treatment Works. Upgrades to such assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these</p>	

Represent or	Summary of Comments	V4W Comments
	<p>sites can be made in order for us to meet the infrastructure requirements of proposed future development in the borough and future environmental drivers. U UW requests support for any investment in our assets. It is therefore requested that a policy is included in the NP to recognise that investment in water and wastewater infrastructure, including infrastructure located outside the settlement boundary, is appropriate for development for operational infrastructure purposes. Our recommended wording is:</p> <p><i>'The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.'</i></p> <p><u>Goyt Estate</u> We wish to note that we own significant other land in the designated neighbourhood plan area. This includes part of the Goyt Estate. Our ownership of this estate is related to our water supply function.</p>	