

By email

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31 May 2018

Dear Sir/Madam

REPRESENTATION TO THE DRAFT MOSTON NEIGHBOURHOOD PLAN – REGULATION 14 VERSION

Thank you for the opportunity to comment on the emerging Neighbourhood Plan for Moston. We write on behalf of Seddon Homes Limited (SHL) who is promoting land off Tetton Lane within the neighbourhood plan area.

Overall, SHL supports the community's ambitions for a locally prepared plan that sets out a vision for the future of Moston. However, we write to set out our comments on the proposed draft, particularly in relation to the need to ensure that the plan does not restrict the amount of housing required to accommodate the growing population in Cheshire East.

Introduction

Indigo Planning act on behalf of SHL who has a legal option to purchase a site at Tetton Lane and is being promoted by SHL for development. It is in a suitable location for housing and is available now (site location plan enclosed).

The site lies within the open countryside and there are no other known constraints to the site coming forward for development to meet local housing needs. Land to the north, known as Glebe Farm, has a Local Plan allocation and planning permission for 450 houses. The SHL site would provide a natural extension to the Glebe Farm allocation with Tetton Lane to the south providing a natural boundary to the countryside beyond.

The site has been promoted as part of the 'Call for Sites' Cheshire East Council (CEC) Strategic Housing Land Availability Appraisal in May 2013 and the Site Allocations and Development Policies 'Call for Sites' exercise in April 2017.

Representations to Moston NDP

Housing

Middlewich, a Key Service Centre, is an important settlement for growth. The Local Plan Strategy sets out a vision that Middlewich will see growth with high quality new homes provided. Policy PG7 quantifies this as 1,950 homes. 1,653 dwellings were allocated in the Local Plan Strategy, including completions and commitments since the start of the plan period. This leaves circa 350 dwellings to be allocated in the forthcoming Site Allocations DPD.

Furthermore, Middlewich is the closest Local Service Centre to Crewe which is due to see significant economic growth over the next 20 years with the building of HS2. It is therefore likely that both Middlewich and Crewe will need to accommodate additional housing growth above that set out in the Local Plan Strategy during the life of the Moston Neighbourhood Plan to 2030.

Middlewich is a constrained settlement with limited opportunities for growth. The town is bound by Midpoint 18 Business Park and industrial developments to the east. Land to the north and west is within Cheshire West where housing would not meet the meet of Cheshire East.

The only logical area for growth is to the south beyond the Glebe Farm allocation. This land is within the Moston Neighbourhood Plan boundary so it is essential that the plan does not constrain the growth of Middlewich.

The draft plan acknowledges that the parish adjoins the two major settlements of Sandbach and Middlewich and that it is also in proximity to Crewe – the largest town in Cheshire East. It also highlights that it is traversed north to south by key transport infrastructure including the main rail lines and the man road between Sandbach and Middlewich (the A533). With the good connections and location to the important major settlements, the neighbourhood plan area offers an important location for housing development that is sustainably located and to meet housing needs.

Paragraph 2.8 of the draft plan strengthens this argument setting out that the residential core of the parish is physically and often visually connected to the neighbouring areas, with the community sourcing most services and practical day to day needs from the nearby larger settlements with the proximity of the rail station and to shops in Elworth and Sandbach deeming the area well connected.

It is important that the draft plan does not see housing as a threat (as suggested in Figure C – SWOT Analysis). National planning policy requires council's to significantly boost the supply of housing and the neighbourhood plan should not be used as a tool for thwarting well planned sustainable housing development.

The objectives of the draft plan set out at Section 5 are agreed with, particularly in terms of the need to deliver high quality sustainable homes that meet the needs of the parish. However, the wording should ensure that this does not restrict accommodating housing needs for the Borough should this be required in the future.

Policy HOU1 – Location of new homes

SHL support elements of draft Policy HOU1. SHL is encouraged that it recognises the need to provide housing within the area and considers the relationship with the nearby larger settlements of Middlewich and Sandbach. However, this policy needs to ensure the delivery of sustainable housing development is not overly restrictive.

SHL object to the fact that draft Policy HOU1 is overly restrictive and may lead to sustainable housing not being delivered in this area.

As such, SHL therefore conclude that at this stage, draft Policy HOU1 does not meet the 'basic conditions' test as required at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, and should be reworded appropriately.

HOU1 sets out that housing could be delivered on the periphery of the parish, close to the settlements of Middlewich and Sandbach to meet local housing needs however the use of 'periphery' could result in disputes as to the extent of land which falls within this definition. SHL request that this phrase is removed.

Furthermore, SHL object to the notion that only 'small scale residential development' will be accepted. This would unduly restrict larger sustainable housing developments which could be required to the south of Middlewich during the neighbourhood plan period, for the reasons set out above. SHL request that the words 'small scale' are removed.

Additionally, the use of 'and/or' within the criteria list provides uncertainty in terms of how the policy will be complied with when proposed housing developments within the neighbourhood plan area. The policy should be clear whilst not being overly restrictive and therefore the more flexible option of 'or' should be used.

Local character and design policies

SHL support draft Policy LCD1 in terms of looking to create development which is appropriate to the site and surroundings and the requirement for new development to take the criteria into account where it is appropriate and viable is wholly supported.

With regards to policy LCD2 referring to 'Dark Skies', this policy needs to ensure a balance between maintaining the night time skies dark as referred to in the policy, but whilst ensuring that new developments will be delivered that are secure in terms of occupier and vehicle safety. This policy should therefore include text to ensure an appropriate balance between preserving dark skies whilst ensuring new development is not overly restricted so much so that it is undeliverable due to pedestrian/vehicle security issues in terms of sufficient outdoor lighting.

Natural environment policies

Figures M and N are visually unclear in the current drafted plan which therefore makes draft Policy ENV1 difficult to understand particularly with regards to the proposed 15m buffer zone. Further clarification is required in terms of being able to understand the boundaries of both the 'habitat distinctiveness' zones and the wildlife corridors so that Policy ENV1 can be properly understood.

Further clarification is also required as to what 'very special circumstances' constitute when considering wildlife habitats, corridors and biodiversity. This is not defined in the policy nor in the supporting justification text.

The policy should be reworded to allow for new development to incorporate

mitigation measures where appropriate so as not to unnecessarily restrict development in the area. Whilst the final paragraph sets out the need for new developments to demonstrate a net gain in biodiversity through, for example, mitigation strategies, this point needs to be reflected at the start of the policy with regards to the 15m buffer zone as this could unduly restrict new development.

Land at Tetton Lane

Tetton Lane is a suitable location for housing and is available now. The site is currently vacant and no land uses would be displaced by its future development.

The site represents a deliverable site for housing. There are no land ownership issues that would prevent the site from being brought forward for the development and the site is unconstrained ie there are no physical constraints relating to access, infrastructure, flood risk or land contamination which would preclude development.

The site lies a short distance from Middlewich and its associated facilities and amenities and would form a natural extension to the housing allocation at Glebe Farm with Tetton Lane acting as a defensible boundary.

It is important that a range of sites are identified to meet the housing need for Moston and Cheshire East over the plan period.

Summary

We trust our comments will be given due consideration as the Moston Parish Council commences the next stages preparing its Neighbourhood Plan. SHL would like to stay involved with the work of the Parish Council and in the preparation of the Neighbourhood Plan.

We look forward to hearing from you in due course and request that we are kept informed of any further consultation on the emerging Neighbourhood Plan.

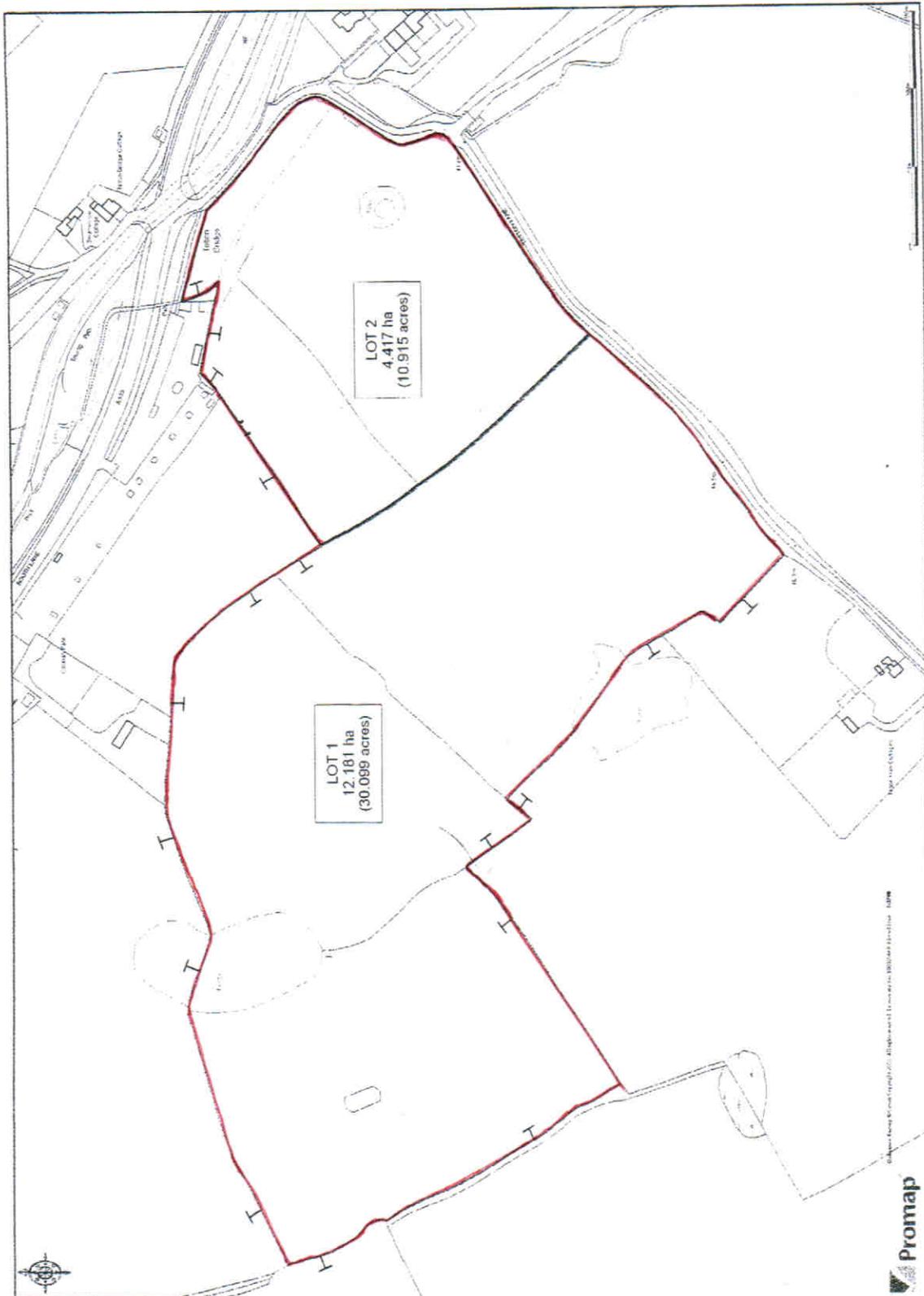
Yours sincerely



Maria Marks

Enc: Site Location Plan

Plan of Land at Tetton Lane, Middlewich



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