

# **Consultation Report**

Moulton Neighbourhood Plan

Moulton Parish Council

August 2018



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# Introduction

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## 1. Introduction

- 1.1. The following document forms the Consultation Report and seeks to provide an overview of the consultation and engagement of stakeholders in preparation of the Moulton Neighbourhood Plan.
- 1.2. The document collates work sourced from a range of different types of events and methods for collecting the views of local residents, landowners and agents, businesses, statutory bodies to name a few.
- 1.3. Using such a range of methods aims to ensure that all those that want to input into the project have the opportunity to, and the plan seeks to represent all stakeholders.
- 1.4. Key findings from each form of consultation are recorded and summarised in order to draw out the key themes and concerns raised by stakeholders.

### Summary of Consultation

Moulton Village Survey was undertaken in February 2013.

Conducted by the Parish Council – 182 responses.



Regulation 14 consultation undertaken from the 4<sup>th</sup> December 2017 to the 11<sup>th</sup> February 2018.

Data collated by the Parish Council and analysed by Urban Imprint

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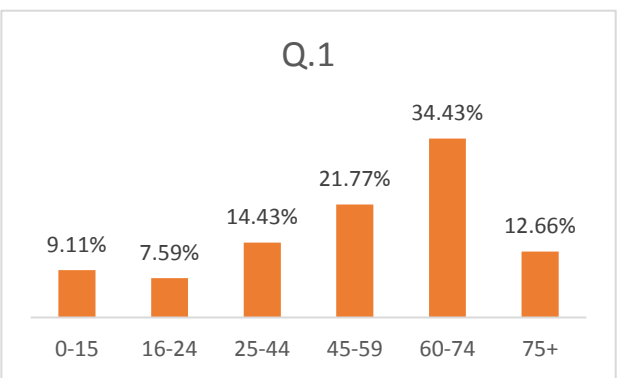
## 2. Initial Residents Survey

- 2.1. The Moulton Parish Council conducted a village survey in February 2013 in order to obtain the aspirations of the community in order to inform the planning policies in the Moulton Neighbourhood Plan.
- 2.2. Members from the Parish Council collated and analysed the responses from the Village Survey. A copy of the Village Survey (and analysis) are available in the appendix.
- 2.3. Each question has been summarised below on a question by question basis in order to identify the key issues raised by the community. The majority are supported by a graph.

### 1. Your Household

#### a) How many people in each of these Age Groups live in your home?

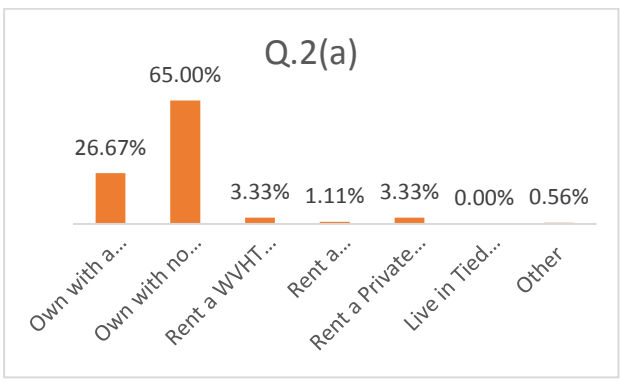
- 2.4. It is clear in this response that Moulton has an ageing population as the majority of respondents (34.43%) highlighted that those aged 60-74 lived in households in Moulton. Those aged 45-59 were the second highest with 21.77% and the lowest was 16-24 (7.59%).



### 2. Your Home

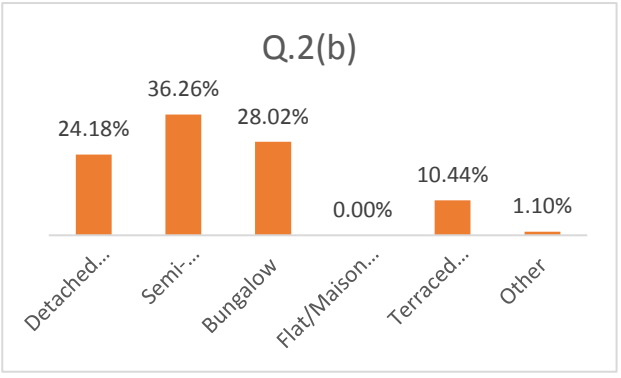
#### a) Do you currently?

- 2.5. Question 2(a) asks respondents whether they own or rent their property. 65% of residents stated that they own their property with no mortgage whereas 26.67% own a property with a mortgage. Only 3.33% rent a private dwelling in the village.



#### b) What type of property do you live in?

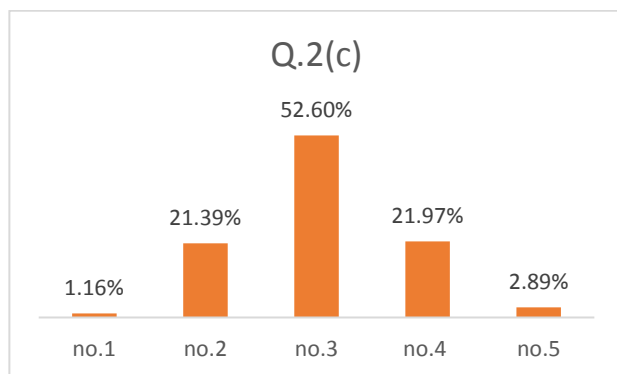
- 2.6. Question 2(c) identifies which type of property residents of the village live in. The majority of respondents (36.26%) stated that they live in semi-detached properties and 28.02% live in bungalows. Flats and maisonette were represented the least with 0%.



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## c) How many bedrooms does your home have?

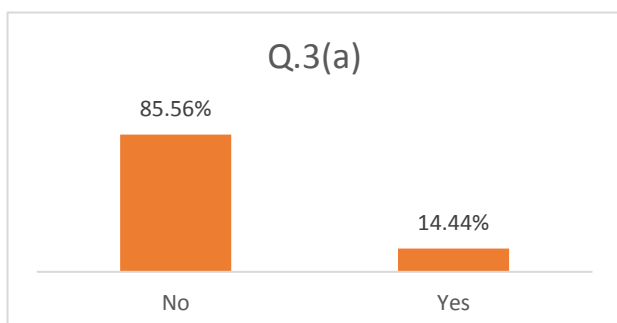
2.7. Properties with no.3 bedrooms received the highest representation with over half of the responses (52.6%). No.2 and 4 bedroom were equal in their provision with 21.39% and 21.97% responses respectively. No.1 bedroom properties received the lowest level of responses.



## 3. Your Housing Needs

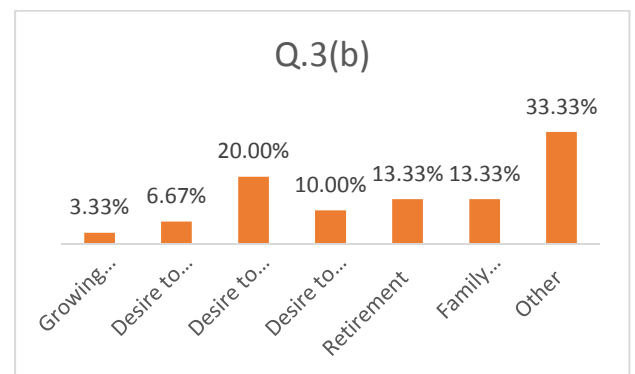
### a) Do you envisage moving home in the next five years?

2.8. A large proportion of the responses indicated that they are not likely to move house within the next five years (85.56%). The remaining respondents stated that they would not be moving in the next five years.



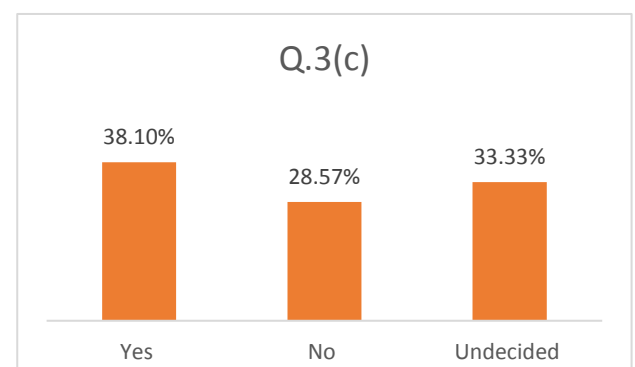
## b) If yes, please indicate a reason why?

2.9. 20% of respondents revealed that they desired to own a smaller property whereas 10% desired to move into a larger household. A number of respondents who answered 'no' stated that they will consider leaving Moulton if the proposed new development to the East of the village goes ahead.



### c) If yes, please indicate whether you would like to remain in Moulton

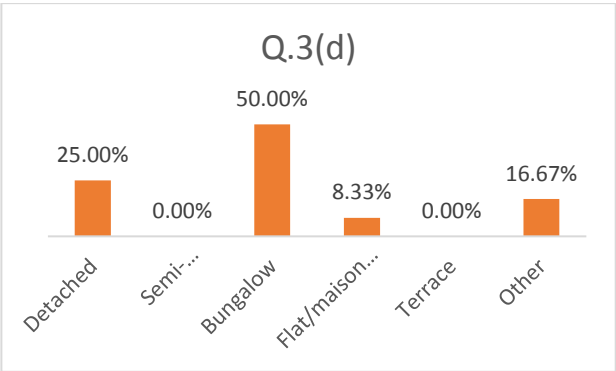
2.10. This question received a varied response with almost a third ticking each answer. 38.10% revealed that they would remain in the village whereas 28.57% stated that they would leave the village. 33.33% were still undecided.



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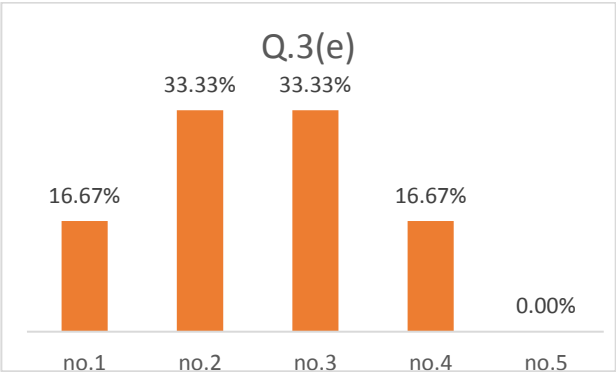
**d) If yes, what type of property would you like to move into?**

2.11. Bungalows were identified as the desired property type to move into in the village (50.00%). There was no desire to move into both semi-detached and terraced properties in the village (both with 0%). 25% of respondents revealed that they would move into detached properties.



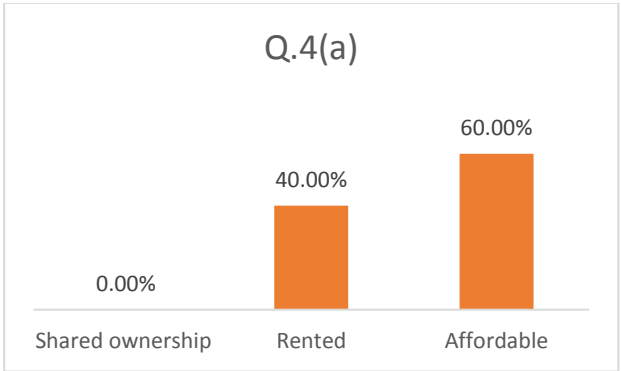
**e) How many bedrooms would you require?**

2.12. Both no.2 and no.3 bedrooms received the highest level of response with both receiving 33.33%. Equally, both no.1 and no.4 bedrooms received 16.67%. 0% of respondents stated that there is no need for no.5 bedrooms.



**f) Please indicate if any of the following would be of interest**

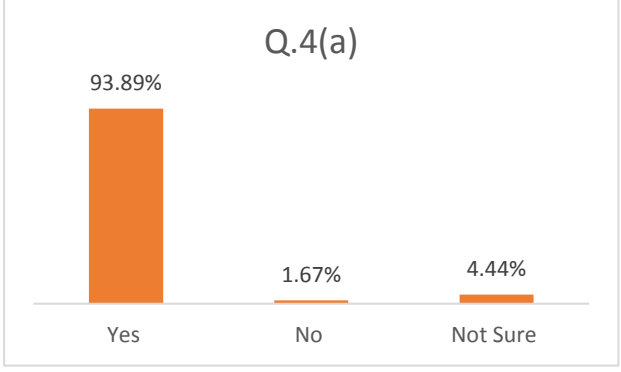
2.13. The final question in this section revealed that 60% of respondents desired affordable home ownership whereas 40% stated that renting would be of interest.



**4. Our Village**

**a) Overall do you think Moulton is nice place to live in?**

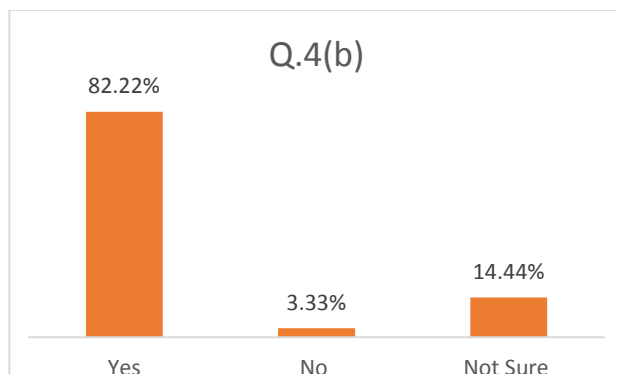
2.14. An overwhelming majority responded positively to this question as 93.89% stated that the village was nice to live in.



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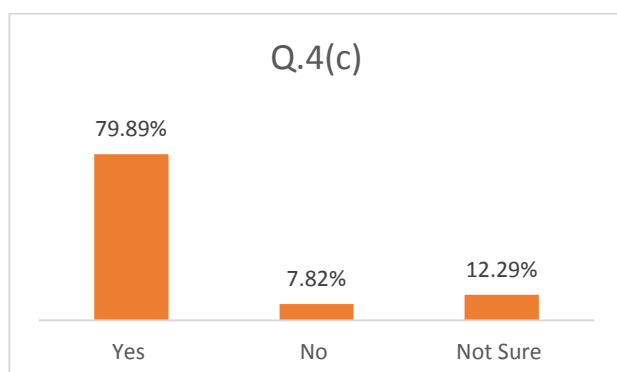
## b) Do you think Moulton has a friendly atmosphere and a community spirit?

2.15. 82.22% agreed that the village had a friendly atmosphere and a community spirit, an overwhelming majority compared to those who disagreed (3.33%). 14.44% were not sure.



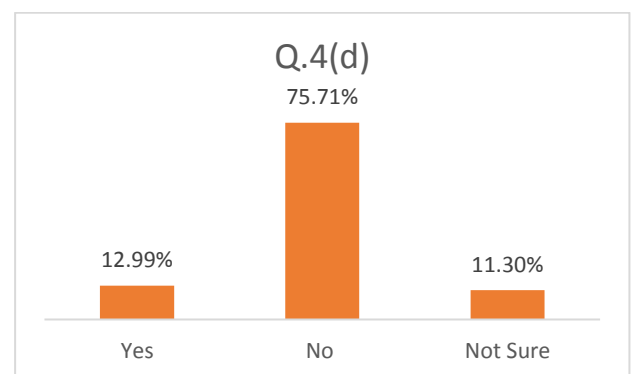
## c) Do you think Moulton has a balanced and varied population?

2.16. 79.89% of respondents felt that Moulton provided a diverse and varied population whereas 7.82% disagreed. Those who disagreed stated that there was little ethnic diversity in the village, the majority of the population elderly and that the village is socio economically balanced.



## d) Do you feel that some new house building within the village is needed?

2.17. The residents have clearly stated that they do not wish for more housing to be delivered in the village (75.71%) compared to the 12.99% whom supported further housing in Moulton. 11.30% revealed that they were unsure on this matter.



2.18. Those who replied 'no' to the above question stated that the village could not cope with additional growth as it will apply even further pressure on the school, the village's infrastructure, and increase traffic and the need for parking in the village which are all already at capacity.

2.19. Further comments revealed that residents are keen to retain the village gap and refrain both Moulton and Davenham from merging, which is an important element of Moulton's character.



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## **e) What two things that Moulton does not have would you like to see?**

2.20. The comment that received the highest response in this question was the need for more medical facilities such as doctors, pharmacies, and dentists. Better shops received the second highest response whereas new community buildings also received a high level of response.

## **f) If it is acknowledged that traffic problems often occur within the village, particularly on and around Main Road. What suggestions do you have to alleviate the problem?**

2.21. Amongst the main comments received from this question, 65 respondents suggested a one way system to aid in alleviating traffic issues in the village whereas many commented on the need for double yellow line on Main Road. Many commented on the need to provide more parking spaces in areas around the Village Green, Regent Street, and RBL.

## **g) Any other comments you wish to record**

2.22. The two main comments received for this question was the desire to increase litter and dog waste bins in the village, the need to tidy up the streets and to provide more facilities for teenagers.

## **Key Findings**

2.23. The key points identified from the responses in the initial residents survey are represented below:

### **Desired Housing**

2.24. There is a clear need to deliver smaller homes in Moulton with emphasis to provide bungalows with 50% of respondents supporting the delivery of this type of housing. This is supported by 20% of respondents indicating a desire to move into smaller properties.

### **Settlement Gap**

2.25. The settlement gap between both Moulton and Davenham was identified as a key element of the village character. There is a concern regarding the possibility of the two settlements from merging, this is exacerbated by the two recent development sites to the East of the village and the absence of a Green Belt.


2.26. The community are explicit in their desire to preserve this gap to ensure the village retains its nucleated settlement form.

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## 3. Regulation 14 Consultation

- 3.1. The Moulton Neighbourhood Plan underwent a 10 week consultation process as part of the regulation 14 consultation stage of developing a Neighbourhood Plan. The dates of the consultation were the 4th December 2017 to the 11th February 2018.
- 3.2. During this period, residents were given an array of opportunities and methods with which to view and respond to the plan and the policies within it:
- The information about the Neighbourhood Plan, along with an online version of the Plan was made available via the Parish Council website;
  - Information about the Plan and the consultation period was publicised across the village;
  - A hard copy of the Draft Neighbourhood Plan was sent to every home within the village, along with a feedback form which residents could fill in to give their opinions of the policies. Copies of the feedback form and leaflet can be found in the Appendix of this report;
  - Hard copies of the Plan were placed at various publicly accessible locations during the consultation period;
  - Residents were given the option of submitting their responses, by post, by email, and by drop-off at a local collection point.

## Key Findings

- 3.3. Consultation revealed that the community were in favour of all proposed policies in the Neighbourhood Plan.
- 3.4. The feedback form response table (in the appendix) highlighted that there was strong support for every policy with only three policies (H1, H4, and T. Asp) receiving less than 10 checks in the 'do not support' box.
- 3.5. Policies pertaining to Design and Heritage, the Environment and Open Space, and Community Facilities and Tourism received the strongest support with 11 or more indicating their support.
- 3.6. Policy H4 Development of Regent Street received the most checks (4) in the 'do not support' box. However, 9 respondents indicated their support for this policy therefore, there is a mandate to retain this policy.
- 3.7. Both aspirations in the Community Facilities and Tourism received complete support with no respondent indicating that they 'support with changes' nor 'do not support'. Policy DH3 Streets and Footpaths also received full support with no one indicating their dissatisfaction towards the policy .

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## 4. Appendix 1 – Consultation Strategy

## BRIEFING NOTE

**Title:** Recommended Consultation Strategy

**Project:** Moulton Neighbourhood Plan

**Purpose:** To provide an outline of possible consultation methods. These methods are considered appropriate and viable for Moulton's scale. The consultation strategy will act as a guide for delivering Regulation 14 Consultation – a statutory period lasting a minimum of 6 weeks.

**Date:** 22/11/2017

Below is the recommended consultation strategy for regulation 14 for the Moulton Neighbourhood Plan. The sections highlighted in orange are those that are compulsory for the process. Other sections aren't necessarily compulsory however, can be an important tool to get the Moulton Neighbourhood Plan across to the public. Additionally there are elements of the strategy that Urban Imprint can assist with subject to a further commission.

	Consultation Method	Summary	What the Steering Group can do	How Urban Imprint can help
1	Launch Event <b>EVENT</b>	This acts as an opening event to the consultation period, and should be highly publicised with flyers and posters.  The event should include a presentation to introduce the Draft Neighbourhood Plan and the role of the Regulation 14 Consultation.  This should be followed by a Q&A session to address any questions from attendees.	<ul style="list-style-type: none"> <li>- Printing and distributing flyers and posters (see Publicity method 2)</li> <li>- Short introduction to the presentation and Urban Imprint.</li> </ul>	<ul style="list-style-type: none"> <li>- Design flyers and posters to be provided digitally to the Steering Group</li> <li>- A short introductory presentation</li> <li>- 6 Exhibition Boards (see method 3)</li> <li>- Feedback box and questionnaires</li> </ul>
2	Publicity <b>ADVERTISING THE EVENT</b>	It is important that the Launch Event is highly publicised to obtain the maximum number of respondents.  Advertising via leaflets, flyers, newsletter articles and banners are relatively cost-effective methods of publicising.	<ul style="list-style-type: none"> <li>- Decide on the preferred form of publicity and notify Urban Imprint.</li> <li>- Printing and distributing advertisements.</li> </ul>	<ul style="list-style-type: none"> <li>- Urban Imprint can design publicity material, such as a newsletter article or summary flyer</li> </ul>

3	Exhibition Boards <b>MATERIAL</b>	<p>These boards will be used at the Launch Event to summarise all policies and make them clear to read.</p> <p>The boards can then be displayed at key public locations so that they can continue to be accessed throughout the consultation period.</p>	<ul style="list-style-type: none"> <li>- Approve the cost and appearance of the exhibition boards</li> </ul>	<ul style="list-style-type: none"> <li>- Writing the context and designing the boards</li> <li>- Collecting the boards from the printing supplier</li> <li>- Urban Imprint recommend obtaining 6 exhibition boards at A1 size.</li> </ul>
4	Availability of Information (General) <b>ADVERTISING THE PLAN</b>	<p>The Draft Neighbourhood Plan for Moulton should be accessible to all members of the community.</p> <p>It is advised that a link to the Plan is provided on the Moulton Parish Website. This should also include the exhibition boards.</p> <p>Hard copies of the Draft Neighbourhood Plan should be supplied at key public locations within Moulton (such as the church, public houses and schools).</p>	<ul style="list-style-type: none"> <li>- Provide links to the Draft Neighbourhood Plan and Exhibition Boards on the Moulton Parish Website.</li> <li>- Provide hard copies of the Plan at key locations</li> </ul>	
5	Survey <b>MATERIAL</b>	<p>A short hardcopy and online survey should be produced to collate feedback.</p> <p>Questions would focus on obtaining opinions about the Draft Neighbourhood Plan policies and Exhibition Boards.</p>	<ul style="list-style-type: none"> <li>- Steering Group to advise on collection points for hardcopy surveys.</li> </ul>	<ul style="list-style-type: none"> <li>- Devise a short survey that would provide clear results, which can be easily analysed.</li> </ul>
6	Written Feedback Responses <b>MATERIAL</b>	<p>Written feedback will form qualitative responses on a policy by policy basis.</p> <p>The feedback must include the respondent's full name and address or contact email.</p>	<ul style="list-style-type: none"> <li>- Steering Group to gather up written feedback responses from residents and send / email to Urban Imprint</li> </ul>	<ul style="list-style-type: none"> <li>- Urban Imprint can accept written feedback responses mailed to our office address or by email.</li> </ul>
7	Consultation Analysis <b>ANALYSIS</b>	<p>All consultation results will be analysed in-depth and presented to the Steering Group.</p> <p>These might include:</p> <ul style="list-style-type: none"> <li>- Comments from Q&amp;A at the Launch Event</li> <li>- Survey Responses</li> </ul>	<ul style="list-style-type: none"> <li>- Make decisions about amendments to the Plan based on consultation results from Urban Imprint.</li> </ul>	<ul style="list-style-type: none"> <li>- Analyse results from the consultation on a policy-by-policy basis.</li> <li>- Write-up results in report form.</li> </ul>

		<ul style="list-style-type: none"> <li>- Written Feedback</li> </ul> <p>Specific comments must be attributed to individuals for Regulation 14 so that the examiner can contact respondents for clarification.</p>		
8	Additional Support	<p>The methods mentioned in this table should be sufficient, however, additional support from Urban Imprint is available. This might include:</p> <ul style="list-style-type: none"> <li>- An information sheet regarding the consultation to be distributed by the Steering Group</li> <li>- Responding to specific questions by telephone or email at a time-charge basis</li> <li>- Additional sessions with the community aside from the initial Launch Event</li> </ul>	<ul style="list-style-type: none"> <li>- Steering Group to make decisions on whether or not they require additional support.</li> </ul>	<ul style="list-style-type: none"> <li>- Urban Imprint are happy to agree a price should the Steering Group require additional support.</li> </ul>

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## 5. Appendix 2 – Feedback Form

# Feedback Form

Please use this feedback form to tell us if you support the policies within the Moulton Neighbourhood Plan.

Name:

Email:

Address:

(Please provide your details as we need to demonstrate that no forms are duplicates.)

The Moulton Neighbourhood Plan has been prepared by the Moulton Parish Council, and once adopted it will allow the community to shape development and use of the land within the Parish. The consultation period will end on the 26th of January and any submissions after this time may not be considered. Comments must be received in writing, and include the name and address of the respondent.

Please read the draft Moulton Neighbourhood Plan before completing this questionnaire.

	SUPPORT	SUPPORT WITH CHANGES	DO NOT SUPPORT
General Principles			
GP1 Settlement First	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GP2 Sustainable Development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Housing			
H1 Housing Mix	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
H2 Infill	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
H3 Mix	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
H4 Development of Regent St	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Design and Heritage			
DH1 General Design	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
DH2 Heritage Assets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
DH3 Streets and Footpaths	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment, Open Space & Tourism			
EOT1 Natural Environment & Biodiversity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EOT2 Local Green Space	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EOT3 Green Infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EOT4 Key Views	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



	SUPPORT	SUPPORT WITH CHANGES	DO NOT SUPPORT
<b>Transport</b>			
T1 Sustainable Transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
T2 Parking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transport Aspiration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
T3 Traffic Management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<b>Community Facilities &amp; Tourism</b>			
CFT1 Community Buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community Facilities & Tourism Aspiration 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
CFT2 Developer Contributions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
CFT3 Tourism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Community Facilities & Tourism Aspiration 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

DO YOU HAVE ANY ADDITIONAL COMMENTS ON THE POLICIES AND ASPIRATIONS?  
OR WOULD YOU LIKE TO COMMENT ON THE DOCUMENT AS A WHOLE?

PLEASE USE THIS SECTION TO WRITE ANY ADDITIONAL COMMENTS:

Thank you for your comments. Please submit your completed responses to Moulton Parish Council as detailed in the draft Neighbourhood Plan or on the Moulton Parish Council website.

# Consultation Report

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## 6. Appendix 3 – Response Table

## Moulton Neighbourhood Plan Reg. 14 responses

Code	NP Policy	Comments	Response
-	General	<b>D Bennet</b> → Support all the policies with the exception of certain elements of CFT1 and CFT2.	→ No Response
		<b>J Gormley</b> → This is a beautiful village please don't let it become a town by more homes being built	→ No Response
		<b>M. Davies</b> → Good, well thought out plan	→ Noted
		<b>A. Capstick</b> → The document is well presented and easy to read. I hope the Plan is adopted by CWaC to ease concerns of too much development in our small village	→ Noted
		<b>J. Gandy</b> → It's a fantastic opportunity to have a say on how the village will be cultivated over the next 10-15 years	→ Noted
		<b>CWaC Conservation</b> → The term 'new development' should embrace elements such as window replacement, extensions etc., the cumulative impact of which can seriously erode an areas local distinctiveness and character.  → There is no mention of permitted development. Over recent years the scope of permitted development has been extended and, where properties are not subject to Article 4 directions, this poses new threats to the historic townscape and local character. The NP could be an opportunity to provide guidance to house and business owners, promoting best practice.	→ Beyond scope of Neighbourhood Plan policies  → The Neighbourhood Plan will not be able to control (beyond scope planning). Moulton does not have a conservation area.
		<b>Stephen Day</b> → As a new resident to the village, the plan account for many facets that incorporate new and existing residents. Very forward thinking and positive for the growth and development of the village and community. Is there any	→ Add criteria in GP2 include energy efficiency and possible access to broadband.

		possibility of exploring developments such as broadband and technological advances that may benefit the local community?	
		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ <b>Effectiveness of Policies:</b> Whilst there is no specific requirement for this, our Client considers that it is equally important for the examiner to consider how policies outlined within the MNP may be implemented through submitted planning applications, and how these might be interpreted and applied through decision making. Regard should also be had as to whether policies outlined within the MNP will be effective in achieve the vision, objectives and aspirations of the community. The failure of the MNP to be effective through its implementation should see the examiner suggest modifications or deletions from the submitted Plan.</p> <p>→ <b>Moulton Parish Map and Settlement Boundary:</b> Our Client's land interests are located wholly within the Parish boundary map of Moulton. It is noted that the Moulton Settlement Boundary as shown within the MNP has been extended to include the existing Miller Homes development site located off Jack Lane, and the Bovis Home development site off Beehive Lane.</p> <p>This amendment boundary reflects the aspirations of the emerging CWaC Part Two Local Plan ("Part Two"), which seeks to amend and extend the settlement boundary.</p> <p>This proposed amendment is <u>supported</u> by our Client in relation to their existing development site off Jack Lane; equally however, our Client considers there to be merit in extending the settlement boundary further to incorporate their additional land interests of Niddries Lane. This would represent a logical extension to the settlement boundary, and provide the Neighbourhood Plan Steering Group with greater certainty over where future housing development in the village will be directed. This proposal is made on</p>	<p>→ Not relevant – can't be considered as it is not a comment regarding improvements to the plan</p> <p>→ No growth required – growth in plan period already exceeds average for villages in rural Cheshire West and Chester.</p> <p>→ Not required or supported by the community.</p>

		<p>the basis that our Client's land off Niddries Lane is suitable, available, and deliverable for a mix of housing types and tenures.</p> <p>The ongoing construction of our Client's existing site off Jack Lane means that the settlement boundary in this location has already been breached (and extended); accordingly, the inclusion of the land off Niddries Lane would result in a natural extension to the settlement pattern, and the creation of a new development which has the potential to come forward without having an adverse impact on the settlement pattern, residential amenity, and the local environment.</p>	
		<p><b>CWaC</b></p> <p>→ The land use planning strategy for the borough of Cheshire West and Chester is set out in the Local Plan (Part One) 2015. The Local Plan policies provide the framework for preparing the Neighbourhood Plan, together with relevant retained policies within the adopted Vale Royal Local Plan. Further detail is provided in the Local Plan (Part Two) Land Allocations and Detailed Policies, which is currently being prepared and has recently been out for consultation (January 2018). Once adopted, the Local Plan (Part Two) will replace policies in the Vale Royal Local Plan.</p> <p>→ As part of the preparation of a neighbourhood plan it is necessary to ascertain whether the plan would fall within the requirements of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) directives. This is done through a screening exercise, which we have undertaken. The screening assessment has concluded that the draft Neighbourhood Plan is unlikely to have any significant environmental effects, and as such does not need to be subject to a full SEA or HRA assessment. We have consulted the relevant statutory bodies (Historic England, Natural England, and Environment Agency) who have confirmed that they agree with this conclusion.</p> <p>→ Local Plan (Part One) policies which are particularly relevant to the Moulton Neighbourhood Plan are:</p>	<p>→ Noted</p> <p>→ Noted</p> <p>→ Noted</p>

		<ul style="list-style-type: none"> <li>• STRAT 1 Sustainable Development</li> <li>• STRAT2 Strategic Development</li> <li>• STRAT8 The Rural Area</li> <li>• STRAT9 Greenbelt and Countryside</li> <li>• STRAT11 Infrastructure</li> <li>• SOC3 Housing mix and type</li> <li>• SOC1 Delivering affordable housing</li> <li>• SOC6 Open space, sport and recreation</li> <li>• ENV3 Green Infrastructure</li> <li>• ENV5 Historic Environment</li> <li>• ENV6 High Quality Design</li> <li>• ENV2 Landscape</li> <li>• STRAT10 Transport and accessibility</li> </ul> <p>→ The Plan should be consistent in how it refers to the settlement boundary. Some policies and the proposals map refer to the 'settlement boundary' however other sections of the Plan say 'village boundary' or 'village settlement boundary'. Suggest using settlement boundary to be consistent with the Local Plan.</p> <p>→ 5.2: Missing number from 'at least XX of these objectives'. Para 6.1 states 'at least two'.</p> <p>→ 7.2: Suggest that another use of the policies is for developers and others proposing new development - so they can incorporate policy requirements into their schemes and proposals.</p>	<p>→ Make change as suggested – settlement boundary</p> <p>→ Noted – include '2' for consistency</p> <p>→ Agree – will include within text</p>
-	Section 1	<p><b>CWaC</b></p> <p>→ The Parish boundary map also needs to state 'Neighbourhood Plan Area' in the title and key as showing the Neighbourhood Area in the Plan will be a requirement for the Regulation 16 stage. A more detailed (smaller scale) OS map may also be required.</p>	<p>→ Agree – change wording of map to include 'Neighbourhood Plan Area'</p>

		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ <b>Socio Economic Profile:</b> Paragraphs 4.2 and 4.3 of the MNP state that there is a large proportion of the resident population aged between 60 and 74 years (34% of the village population, based on the 2011 census data). There is clearly a need for elderly accommodation within the settlement to help support this ageing population, and in doing so provide the opportunity for downsizing. This in turn could free up family homes, helping to retain young families in the village, and in doing so help to support and sustain the vitality of local services.</p> <p>→ <b>Employment and Services:</b> Paragraph 4.9 of the MNP identifies that “<i>traffic is perceived</i>” to be a problem in the village; however, there does not appear to be any evidence available to support this statement. The MNP’s justification for this position is based on 2011 census data, which is out of date, and which states that 80% of the working population use private transport to get to work.</p> <p>→ Paragraph 4.10 of the MNP appears to question the sustainability of the settlement in terms of its public transport linkages, but at the same time confirms that there is a bus service still available. It goes on to state that school buses and delivery lorries pass through the village. This is not uncommon for a settlement the size of Moulton (and its location between the Main Towns of Northwich and Winsford); further, the A533 by-pass has reduced the number of passing vehicles through the village along Jack Lane. Both CWaC and a Planning Inspector have previously concluded that Moulton is a sustainable settlement for housing. Compared to the majority of other proposed Local Service Centres identified in the emerging CWaC Part Two Local Plan, our Client considers Moulton to be one of the most sustainable settlements for growth in the Rural Area of Cheshire West and Chester, and this should be reflected in the MNP (in terms of its Vision and Objectives, and development strategy).</p>	<p>→ Reference to homes for the elderly, starter homes and family homes are already indicated in policy H3</p> <p>→ Census data is a typical tool to gather evidence for the development of a Neighbourhood Plan albeit information from 2011. The respondent in this case are happy to use Census data in the above case (socio-economic profile), but for some reason is considered ‘out of date’ in this case.</p> <p>→ Points noted – disagree</p> <p>→ The town has experienced significant growth which has increased both properties and traffic. It is highlighted that although Moulton is a local service centre, services and public transport is limited and the village should not be the focus for strategic growth.</p>
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	Vision & Objectives	<p><b>Barton Willmore/Miller Homes</b></p> <p>→ Whilst we are encouraged by the MNP’s overall intentions to create a Vision for the MNP Area, we have concerns regarding its practical deliverability. It is our Client’s position that the proposed Vision does not align with its Objectives and Policies.</p> <p>For example, the Vision states that it <b>“supports a strong local economy.”</b> Objective 3 (which relates to sustainable economic development) seeks to <b>“encourage economic growth in the parish through <u>controlled</u> (our emphasis) expansion of existing businesses and enterprises, whilst promoting the village as an attractive place for new economic activity”</b>.</p> <p>The wording of this Objective does not align with the overall Vision of the MNP, or the wording within the Objective itself.</p> <p>The approach is not proactive or supportive of a strong local economy because it seeks to “control” any proposed expansion of existing businesses; our Client is concerned that by restricting development beyond the settlement boundary (save for a few exceptions), the MNP will actually serve to minimise the potential for economic growth and a strong local economy in Moulton.</p> <p>As a housebuilder, our Client also has concerns with the alignment between the proposed Vision and the need to <u>“incorporate excellent design standards.”</u> This approach is not compliant with the Cheshire West and Chester Local Plan Part One (“Part One”) or emerging Part Two (“Part Two”) which seeks to achieve high quality design. Clarification is required as to what constitutes “excellent” design over and above “high-quality” design as stated in the Local Plan.</p>	<p>→ Concern raised about ‘controlled’ – suggest change wording to ‘manage’</p> <p>→ The Neighbourhood Plan is in compliance with Local Plan policies with regards to economic uses outside the settlement boundary</p> <p>→ This is a vision and is not required to be compliant. The vision is clear that ‘excellent’ is regarding the mitigation of flood risk and climate change impacts. The relevant policy to this comment is in compliance with the Local plan (see DH1)</p>
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Chapter 7	Planning Policies	<p><b>Barton Willmore/Miller Homes</b></p> <p>→ Paragraph 7.2 of the supporting text states that the policies have been written so they can:</p> <ol style="list-style-type: none"> <li><b>1. Be used by the local community to understand and support the direction for the development of Moulton; and</b></li> <li><b>2. Serve as a technical document for planning officers at the Council, who will be using the document to make planning decisions.</b></li> </ol> <p>No reference to developers or housebuilders has been included; this is considered to be a significant omission given that the MNP, when 'made,' will form part of the statutory development plan to which developers and housebuilders should have regard. This needs to be added to paragraph 7.2.</p>	<p>→ Good point - added. See CWaC comment</p>
<b>General Principles</b>			
GP1	Settlement First	<p><b>CWaC</b></p> <p>→ As per our general comment above, these policies refer to development in the 'village boundary' and the 'settlement boundary'. Suggest the wording is amended to read settlement boundary throughout the Neighbourhood Plan for consistency and conformity with the Local Plan.</p> <p>→ The Proposals Map which shows the settlement boundary should be referenced in these policies.</p> <p>Para 8.4 –</p> <p>→ The wording of the policy 'unlikely to be supported' is quite vague. This policy might reference policy STRAT9 of the Local Plan (Part One) which restricts development outside the settlement boundary to that which requires a countryside location and cannot be accommodated within identified settlements. The Neighbourhood Plan will need to be in general conformity with the Local Plan in terms of development within and adjacent to the Local Service Centre settlement policy boundary. Para 8.4 states that residential development outside the settlement boundary will be resisted by the</p>	<p>→ Noted – see above</p> <p>→ Noted – Include reference</p> <p>→ Policy needs to state 'will be resisted' rather than unlikely to be supported</p> <p>→ Include caveat for affordable housing (SOC2) policy</p>

		<p>Neighbourhood Plan. For information, Policy SOC2 of the Local Plan (Part One) states that where necessary to meet local affordable housing needs, schemes for 100% affordable housing may be permitted on small sites which would otherwise not be appropriate for housing adjacent to key service centres and local service centres.</p>	<p>→ ‘Development that requires a countryside location’ – which doesn’t include market housing. Strengthen explanatory.</p> <p>→ Noted – see changes recommended by CWaC</p>
		<p><b>Barton Willmore/Miller Homes</b></p> <ul style="list-style-type: none"> <li>- This Policy seeks to direct development to land within the settlement boundary, and states that uses out with the settlement boundary are unlikely to be supported. This Policy as drafted is contrary to Part One Policy STRAT8 which allows for development within Local Service Centres (which Moulton is defined as in the emerging Part Two Local Plan) and that the amount of development proposed within each Local Service Centres will reflect the scale and character of the settlement and the availability of services, facilities and public transport.</li> </ul> <p>The Policy is also contrary to emerging Local Plan Part Two Policy R1 which supports development in the rural area, and which allows for limited housing within the settlement boundary (infill, redevelopment sites and change of use) and rural exception sites beyond the settlement boundary (alongside community land trust development, allocated through a NP or brought forward through a Neighbourhood Development Order).</p> <p>Whilst our Client has concerns with Policy R1 as drafted, and have submitted representations to CWaC to this effect, we consider that Policy GP1 is overly negative towards development. Within the supporting text to this Policy (Paragraph 8.2), it states that “the character of the Village would be undermined by significant new development.” No justification for this</p>	

		<p>statement has been provided, and to substantiate why this is considered to be the case.</p> <p>Our Client has fundamental concerns that the proposed wording of GP1 does not align with emerging Part Two of the Local Plan (Policies R1, DM19, and DM24) because it does not seek to allow for development out with the settlement boundary, unless it is for agricultural or recreational uses. The Policy only allows for “limited” growth.</p> <p>This Policy as drafted is therefore considered to be contrary to basic conditions (a), (d), and (e).</p>	
GP2	Sustainable Development	<p><b>Barton Willmore/Miller Homes</b></p> <ul style="list-style-type: none"> <li>- Whilst our Client is supportive of the need to mitigate and reduce the impact of climate change, it is considered that the proposed policy requirements are overly onerous. This is due to its requirement to achieve a zero-carbon building; promote an appropriate layout, orientation and massing to maximise solar gain; and explore the use of on-site renewable energy generation technology.</li> </ul> <p>It is considered that this approach is onerous on any potential developer/housebuilder, and the approach is contrary to the following development plan policies:</p> <p>Part One – Policy ENV6) which seeks to <b>“incorporate energy efficiency measures and provide for renewable energy generation either on-site or through carbon offsetting measures; or mitigate and adopt to the predicted effects of climate change”</b>.</p> <p>Emerging Part Two - Policy DM4 which only expects proposals to <b>“achieve the highest level of energy and water efficiency that is practical and viable, and to maximise opportunities to incorporate sustainable design features where feasible”</b>.</p>	<p>→ Zero Carbon: is not a requirement, it is an aim/goal – “aid in achieving” - suggest change reference to zero carbon to the explanatory and change wording in policy to “introduces measures to improve energy efficiency and effect carbon reduction”</p>

		<p>As set out above, whilst innovative design for energy efficiency and low carbon energy is supported, there is no requirement within Local Plan policy to demonstrate a <b>“zero carbon and solar gain building (or on-site renewable)”</b>. Additionally, it may result in schemes becoming financially unviable to deliver, including schemes of 1 or 2 dwellings.</p> <p>This Policy is therefore considered to be contrary to basic conditions (a), (d) and (e).</p>	<p>→ Solar Gain: Disagree – solar gain is a common theme in design. It is unreasonable for developers not to follow.</p>
		<p><b>CWaC</b></p> <ul style="list-style-type: none"><li>- The Vision states that design standards will be used to mitigate climate change and flood risk. The supporting text to Policy GP2 states that new development should seek to tackle the effects of climate change, however mitigating flood risk through design is not addressed in the policy itself. If climate change and particularly flood risk is a particular issue which the community has identified and is the vision for the Plan, we suggest that this should be addressed through the policies of the Neighbourhood Plan.</li><li>- To help you with this, the Centre for Sustainable Energy has produced a guidance document ‘Low Carbon Neighbourhood Planning’ which includes suggestions for Neighbourhood Plan policies on a range of sustainability topics including flood risk: <a href="https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/energy-advice/planning/renewables/low-carbon-neighbourhood-planning-guidebook.pdf">https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/energy-advice/planning/renewables/low-carbon-neighbourhood-planning-guidebook.pdf</a></li></ul>	<p>→ Suggest introduction of flood risk/drainage/SUDs into this policy</p>
<b>Housing</b>			
H1	Location of New Residential Development	<p><b>Tracy Mead</b></p> <p>→ Just to say that I do absolutely NOT support any further development of housing in the village the infrastructure cannot cope and you can't create further roads as nowhere to put them. Notwithstanding the fact that the new building plots are raising current house prices to an unaffordable level.</p>	<p>→ Noted – but National policy states that we cannot stop development (this comment seeks to control development)</p>

		<p><b>CWaC</b></p> <ul style="list-style-type: none"> <li>→ As per our general comment above, these policies refer to development in the 'village boundary' and the 'settlement boundary'. Suggest the wording is amended to read settlement boundary throughout the Neighbourhood Plan for consistency and conformity with the Local Plan. The Proposals Map which shows the settlement boundary should be referenced in these policies.</li> <li>→ Para 9.2 - It would be useful to provide information in the explanatory text to policy H1 about where information on 'local needs' is provided.</li> <li>→ As with policy GP1, the policy wording 'likely to be refused' is vague. Development outside the settlement boundary would be subject to policy STRAT9 of the Local Plan (Part One).</li> <li>→ We suggest that the issue of development within and outside the settlement policy boundary and the key settlement gap between Moulton and Davenham could be dealt with in separate policies. The settlement gap could also be shown on the proposals map and cross referenced within the settlement gap policy.</li> <li>→ Para 9.2 – The text within this paragraph can form the basis for a separate key settlement gap policy. Policy GBC3 of the Publication Draft Local Plan (Part Two) includes the settlement gap between Moulton and Davenham. Development within a key settlement gap will only be supported where it does not harm the separation and identified functions of the gap (as identified in the Local Landscape Policy Review document) and meets the requirements of Local Plan (Part One) policies STRAT 5 and ENV 2. The policy states that development within key settlement gaps will be supported where: <ul style="list-style-type: none"> <li>1. it would not lead to coalescence of the settlements;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>→ Noted</li> <li>→ Reference paragraph 9.8/ask Charlotte re: HNS</li> <li>→ Suggest delete reference</li> <li>→ Suggest separate the elements of the policy. Evidence from landscape document (see notes on EOT1)</li> <li>→ Already referenced but will form separate policy</li> </ul>
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		<ol style="list-style-type: none"> <li>2. it would not result in a significant increase in intervisibility between settlement edges, either by the extension of development or the loss of screening features such as woodland;</li> <li>3. it would not harm the undeveloped character or perception of openness of the key settlement gap</li> <li>4. including through individual or cumulative impacts of isolated small developments; and</li> <li>5. it would not serve to materially alter historic form of the settlements such as its relationship to topographical features, open spaces, roads or important buildings.</li> </ol> <p>→ The Local Landscape Policy Review document and any other reference documents and evidence base documents need referencing fully in a 'Reference' Appendix at the back of the Plan. Links to the documents can also be included.</p>	
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		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ There are three parts to this proposed Policy:</p> <p><b>New residential development will only be supported where it aligns with other NP Policies (H2 and H3); are of a small scale; and must demonstrate how they meet the local needs within the Parish.</b></p> <p><b>Proposals out with the development boundary will be considered inappropriate and likely be refused.</b></p> <p><b>Developments should avoid the village from merging with Davenham and Winsford, and applications which erode the gap between the village and neighbouring settlements will be resisted.</b></p> <p>Our Client does not support this Policy as drafted. Moulton is proposed as a Local Service Centre within the CWaC Part Two Local Plan. Policy R1 of the Part Two Local Plan allows for limited housing within the settlement boundary to include infill, redevelopment sites, and change of use, and development out with the settlement boundary where it is a rural exception site or promoted through a NP. Policy H1 seeks to restrict development both within and out with the settlement boundary, and does not allow for rural exception sites. This approach and policy as drafted is contrary to both adopted and emerging development plan policy and the NPPF, both of which allow for the provision of rural exception sites.</p> <p>As drafted, this Policy is therefore contrary to basic conditions (a), (d) and (e).</p>	<p>→ Noted – See CWaC recommended changes</p>
		<p><b>J. Harding</b></p> <p>→ Development on Jack Lane and Fountain Lane make the status quo intolerable and further development must address this.</p>	<p>→ Noted</p>

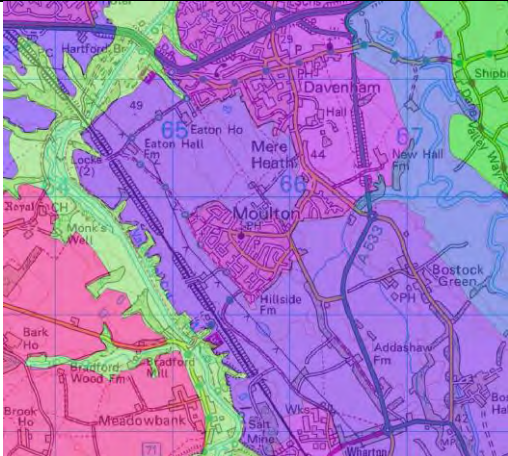
H2	Infill	<b>CWaC</b> → Generally support this policy. However the reference to ‘adequate’ garden space is a bit vague – in the supporting text you could provide some further explanation – perhaps have a look at the former Vale Royal document ‘Outdoor space standards for new dwellings’ for suggestions? See <a href="http://consult.cheshirewestandchester.gov.uk/file/3342644">http://consult.cheshirewestandchester.gov.uk/file/3342644</a>	→ Suggest policy referencing some elements of the standards set out in paragraph 2.0/2.1/2.2 of CWaC SPD.
		<b>Barton Willmore/Miller Homes</b> → Our Client is supportive of infill housing within the settlement boundary; however, clarification is required as to what is an <b>“appropriate scale and plot size.”</b> Additionally, we do not support the inclusion of an additional criteria requiring a site to be “bounded by existing properties on two or more sides and fronting an existing highway.” Policy R1 of the Part Two Local Plan only requires the criteria of <b>“one to two dwellings within a small gap in a built up frontage.”</b> Policy H2 should reflect this.  As drafted, this Policy is contrary to basic condition (d).	→ Noted: include – “scale and plot size commensurate with adjacent properties → Additional guidance – no need to include
H3	Mix	<b>CWaC</b> → Could include support for provision of lifetime homes to help meet the needs of all residents? The policy as written doesn’t apply to proposals for 10 units. We would also suggest deleting ‘subject to viability and deliverability’ as this weakens the policy. Suggest rewording to ‘on all residential schemes of 10 or more dwellings, a mix of housing types should be provided which include the following.....’	→ Agree – change wording of policy
		<b>Barton Willmore/Miller Homes</b> → The Policy seeks to deliver a mix of smaller properties for the elderly, first time buyers and family homes, subject to viability and deliverability. This is supported by our Client, and is compliant with Local Plan Part One Policy SOC3 which states that a mix of housing should be provided. It also takes account of the needs of the local area, including those who wish to downsize.  Whilst it is accepted (and supported) by our Client that a range and mix of housing should be provided, CWaC is currently preparing a new “Borough	→ Noted: good point but document is still not available



		Wide Housing Mix and Type Survey.” The findings of this document will not be available until after this consultation process is closed. We would advise that this document is taken into consideration by the MNP Steering Group as part of the next phase of the MNP process as it should provide more up-to-date evidence of housing need than the 2013 village survey and provide a robust evidence base for this Policy.	
H4	Development of Regent Street	<b>CWaC</b> → Anything to add on the design of new development in this location? Could add a reference to policy DH 1	→ Add criteria stating the need to meet the design requirements of DH1 (reference)
		<b>Barton Willmore/Miller Homes</b> → The information provided in relation to “Regent Street” is limited, and no details on the number of dwellings etc is provided. It is unclear if this site is actually available, suitable, or deliverable within the Local Plan period. It is also unclear as to whether the MNP seeks to designate this as an allocation. Clarification of the MNP’s intentions for this are required.  As drafted, this Policy is considered to be contrary to basic conditions (a), (d) and (e).	→ Owned by Parish Council, some support for redevelopment. Disagree, land is available and deliverable.
		<b>D. Wakefield</b> → I don’t agree with the development of new houses on the rear of Regent street to pay for a new village hall. I feel there is enough new housing being built in the local area and Parish lane should be made into more open spacing. At no point in your document have you made any provision for allotments as set out in the 1908 allotment act and this did get brought up in the meeting. → More than ever allotments are playing a vital role in connecting people to the process of food production and healthy eating, enabling them to grow fresh, cheap food whilst reducing food miles. They provide valuable urban green space and wildlife habitats	→ Very interesting point, will discuss with Parish Council.
Design and Heritage			
DH1	General Design	<b>CWaC</b> → Would suggest that this is an opportunity to give greater weight to the Village Design Guide – ideally to encourage schemes to follow the guidance from the outset – perhaps the policy could say ‘proposals should reflect the	→ Agree – swap 10.4 with policy and revise explanatory, include additional paragraph in explanatory on the Village Design Guide.

		guidance in the Village Design Statement'. Alternatively use the wording from para 10.4 which is currently stronger than the policy.	
		<b>CWaC Conservation</b> <ul style="list-style-type: none"> <li>→ Under 'Suggested additional points for possible inclusion within the Plan:' it should read "original architectural details .....are important to the character and local distinctiveness of the area....".</li> <li>→ Whilst Moulton is not a designated conservation area, it does benefit from historic buildings, street patterns (derived from historic field boundaries), details, etc. which together contribute to the areas local character and which can be highlighted within a Neighbourhood Plan if the community see this as a priority. In many respects, this is especially important for those areas which aren't designated conservation areas, as it provides some level of planning control where otherwise there would be none.</li> </ul>	<ul style="list-style-type: none"> <li>→ Recommend consideration of 'historical character' as a new section of policy DH1.</li> <li>→ Also suggest additional elements of DH2 on historical pattern (streets, spaces, field patterns)</li> </ul>
		<b>Barton Willmore/Miller Homes</b> <ul style="list-style-type: none"> <li>→ The Policy has identified a need to deliver high-quality, contextually responsive design, and to use the Moulton Village Design Guide (2009) as guidance.</li> </ul> <p>Our Client supports the need for high quality housing; however, we again question the evidence base used to inform this policy. Whilst it is accepted that it is important to respect the character of the area, because this is only a "general design" policy, it cannot stipulate these requirements, rather it can only provide guidance, particularly as house types required may vary throughout the settlement.</p>	<ul style="list-style-type: none"> <li>→ The Design Guide is an important element of the evidence base which is an adopted supplementary planning document</li> <li>→ This is incorrect, this view is counter to the NPPF and the Local Plan – unacceptable.</li> </ul>
DH2	Heritage Assets	<b>Barton Willmore/Miller Homes</b> <ul style="list-style-type: none"> <li>→ This Policy seeks to ensure that development takes account of designated and non –designated heritage assets, based on the 2009 Village Design Guide. Whilst we support the need for heritage assets to be taken into account as part of any development proposals, the weight that should be attributed to designated and non-designated assets and a balanced judgement undertaken in accordance with Paragraph 135 of the National</li> </ul>	<ul style="list-style-type: none"> <li>→ Noted</li> </ul>

		Planning Policy Framework (“NPPF”). This should be reflected in this Policy, and reference made to the relevant paragraphs of the NPPF.	
		<b>CWaC Conservation</b> → The Plan should reference consultation with Cheshire Historic Environment Record. Future users of the Plan (Inc. developers) should be directed to consultation with HER.	→ Include reference to consulting HER in policy DH2
DH3	Streets and Footpaths	<b>CWaC</b> → Second paragraph – this could be expressed more positively – taking opportunities to improve the features mentioned and also enhance linkages from new developments into existing footpaths and rights of way.	→ Noted – change to positive wording → Noted – suggest linking to existing network
<b>Environment, Open Space and Tourism</b>			
EOT1	Natural Environment & Biodiversity	<b>CWaC-</b> → The second bullet point of this policy refers to the national character area profile’ for the area. The up-to-date evidence base for the Local Plan in terms of local landscape designations can be found in the Council’s Landscape Strategy (Part 1 and 2) and the Local Landscape Policy Review (Part 1 and 2). We suggest that the local designations are referenced in the Neighbourhood Plan. The Landscape Character Areas identified for Moulton are shown on the map below: <ul style="list-style-type: none"> <li>• Urban area (Pink)</li> <li>• Undulating enclosed farmland (Purple) Ref: LCT5</li> <li>• River Valley (Green) Ref: LCT15</li> </ul>	→ Noted – change reference to local designations → Cross reference to documents in the explanatory → Add map in comments to explanatory

		 <ul style="list-style-type: none"> <li>- Detailed information on each of these character areas can be found in the Landscape Strategy which is available to view via the link below: The Landscape Strategy also recognises the key role and character of the identified key settlement gaps as open areas that should be protected to prevent coalescence and to retain the separate identities of the settlements. Part 2 of this document (Feb 2016), defines Key Settlement Gaps between Moulton and Davenham. These documents can be viewed via the following link: <a href="http://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/cw_lp_part_two/ev_base/ev_docs?tab=files">http://consult.cheshirewestandchester.gov.uk/portal/cwc_ldf/cw_lp_part_two/ev_base/ev_docs?tab=files</a></li> <li>→ EOT1 - Third bullet point – ‘Within the village’ is this anywhere in the settlement boundary? If so do some of the following bullets duplicate this requirement?</li> </ul>	<ul style="list-style-type: none"> <li>→ Use this evidence to support policy on settlement gaps (revised H1)</li> </ul>
		<p><b>Barton Willmore/Miller Homes</b></p> <ul style="list-style-type: none"> <li>→ Whilst our Client supports the MNP’s aspirations to ensure that the natural environment is protected and enhanced where appropriate, clarification is required as to whether the protection afforded to the identified trees and hedgerows cited within this Policy is justified.</li> </ul>	<ul style="list-style-type: none"> <li>→ None point: clearly GI is a consideration. The Village Design Guide (SPD) considers the trees to be afforded some protection. Tie to Local Plan part 1 policy ENV2 / ENV3. Change description to Green Infrastructure (trees and hedgerow).</li> </ul>

EOT2	Local Green Space	<p><b>CWaC</b></p> <p>→ The reference to Green Belt policies could be confusing as Moulton is not in the Green Belt. Suggest changing the wording to ‘unless there are exceptional circumstances to justify it’ instead.</p>	<p>→ Acknowledge confusion but make it clear that Green Belt policies are compliant with para 78. (word for word inclusion in Neighbourhood Plan).</p> <p>→ Make explanatory more clear</p>
		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ The MNP has sought to designate a number of areas as “Local Green Space” on the basis of their character, significance, and community value. This is derived from the Moulton Village Design Statement.</p> <p>The basis for the MNP’s justification for the inclusion of this as a “Local Green Space” is that it accords with Paragraph 77 of the NPPF. Our Client disagrees. It is clear in Paragraph 77 of the NPPF that:</p> <ol style="list-style-type: none"> <li><b>1. “The local green space designation will not be appropriate for most green areas or open space. The designation should only be used:</b></li> <li><b>2. Where the green space is in reasonably close proximity to the community it serves;</b></li> <li><b>3. Where the green area is demonstrably special to a local community and holds a particular local significance; and</b></li> <li><b>4. Where the green area concerned is local in character and is not an extensive tract of land.”</b></li> </ol> <p>Whilst we acknowledge that Policy ENV2 of Part One allows for the designation of “Local Green Space”, we do not consider that adequate justification has been provided by the NP in relation to why the identified areas should be designated as “Local Green Space” in accordance with Paragraph 77 of the NPPF.</p> <p>→ As drafted, this Policy is considered to be contrary to basic conditions (a), (d) and (e).</p>	<p>→ Disagree – see justification table</p>

EOT3	Green Infrastructure	No comment	
EOT4	Key Views	<p><b>CWaC</b></p> <p>→ First bullet point refers to key landmarks, however the proposals map refers to local landmarks. These references should be the same and ‘as identified on the proposals map’ added to the policy text in this bullet point.</p>	→ Noted, will amend.
		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ Policy EOT4 seeks to ensure that the development does not have a negative impact on “key views” in the Parish. It sets out that planning applications will be required to demonstrate how they have:</p> <ul style="list-style-type: none"> <li>• <b>Reinforced, where relevant, the existing patterns of streets, spaces and building lines, and maintained views of key landmarks;</b></li> <li>• <b>retained and framed, where relevant, views of the wider countryside, landscape features and distant landforms;</b></li> <li>• <b>Reflect the local character of these views through sympathetic design and materials, the use of appropriate vegetation types.</b></li> </ul> <p>The Policy seeks to identify four key views, which includes land towards our Client’s land interests at Jack Lane. Whilst we support the MNP conclusions that that views towards our Client’s land interests off Niddries Lane are not “Key Views”, consideration should be given to PPG Paragraph:041 Reference ID: 41-041-20140306 which states that:</p> <p><b>“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”</b></p>	<p>→ Identified in the village design guide (suggest better cross reference)</p> <p>→ For clarity – swap orders:</p> <ol style="list-style-type: none"> <li>1. Identify key views</li> <li>2. Provide criteria for assessment</li> </ol>

		<p>The wording of this Policy as drafted is unclear particularly in relation to how the Policy will be assessed and measured, and by whom. Furthermore, the identified “key views” do not appear to be based on any evidence base, and nor has any sound justification seemingly been provided other than “the community is strongly opposed to any detrimental impact on key views around the parish”. No detail is provided within the MNP as to how these will be assessed, and what is deemed to be “detrimental.” As drafted, the Policy lacks clarity, and cannot be applied with confidence.</p> <p>The Policy as drafted is therefore considered to be contrary to basic conditions (a), (d) and (e).</p>	
<b>Transport</b>			
T1	Sustainable Transport	No comment	
T2	Parking	<p><b>CWaC</b></p> <p>→ Comments of the Principal Highways Development Officer: Policy T2 Parking – Question whether the car parking levels taken from the Parking Standards need to be duplicated through this policy? If the policy is to stipulate the requirements this could be extended to include other uses not just residential.</p>	→ Disagree – the importance of parking means that the SPD needs to be upgraded through this policy. In fact, the policy needs to be strengthened to remove flexibility as avoiding on-street car parking was highlighted by the community.
		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ We support the NP’s approach to car parking and compliance with CWaC’s recently adopted car parking SPG (2017).</p>	→ Noted
		<p><b>J. Harding</b></p> <p>→ Parking and traffic, and the state of the road is poor we need more transportation options</p>	→ Noted
Asp		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ We note the NP’s aspirations to provide additional parking in various locations with Moulton; however, it is unclear how this will be delivered.</p>	→ This is why it is an aspiration and not a policy

T3	Traffic Management	<b>CWaC</b> → Policy T3 – Traffic Management – Concern is raised regarding the requirement that developments proposals regardless of scale and size should demonstrate that they have considered the wider impacts on traffic throughout the parish. The Council would only seek such information from applications where the size of a site exceeds certain thresholds, the premise being that small scale sites of a few houses/ or other small scale applications for instance would not be required to demonstrate levels of traffic as it is assumed that the Council would pick that up through the planning application process.	→ Disagree  → Under what policy requirement?
		<b>Barton Willmore/Miller Homes</b> → The NP states that development proposals should consider the wider impacts of traffic through the Parish, and consideration given to access, parking and servicing arrangements.  Paragraph 32 of the NPPF is clear. Development should only be prevented or refused on transport grounds were the residual cumulative impacts of development are severe. The proposed wording of Policy T3 is therefore incorrect and should be amended to reflect the guidance contained within the NPPF.  The policy as drafted is therefore considered to be contrary to basic conditions (a), (d) and (e).	→ Replace with direct wording in final paragraph “severe residual cumulative impacts of development”
Community Facilities and Tourism			
CFT1	Community Buildings	<b>Barton Willmore/Miller Homes</b> → This Policy seeks to list a number of buildings which are valued by the community for their recreation and amenity value. These include St Stephen’s Church Village Hall and Moulton Adventure Group Buildings. Neither of these sites are included in the Council’s latest list of Assets of Community Value, rather the only one listed is the Lion Hotel in Moulton (but it is not identified in the NP as a “community building”). We do not consider that a Policy restricting against the loss of these buildings is appropriate and if the MNP wishes to include this as policy, then consideration needs to	→ Disagree – Retain  → In compliance with emerging policy, however suggest re-wording to link to emerging DM39



		<p>be given to emerging Local Plan Part Two Policy DM39, which sets out a criteria based approach to safeguard against the loss of these buildings.</p> <p>The Policy as drafted is therefore considered to be contrary to basic conditions (a), (d) and (e).</p>	
		<p><b>A. Capstick</b></p> <p>→ Would like to see some mention of improvements to services such as doctors, dentist, pharmacy etc.</p>	→ Noted, see amendment
Asp		No comment	
CFT2	Developer Contributions	<p><b>D Bennet-</b></p> <p>→ does not support the enlargement of Moulton School as Moulton does not have the available land for further expansion and Moulton School's strength is in its small size and the fact teachers know all of the children – an environment which would be damaged by further expansion.</p>	→ Could simply state 'improvements' as no further growth pressure is sought
		<p><b>Trace Mead</b></p> <p>→ I vehemently am opposed to ANY expansion of the school, the school works as it is, and it gets good grades and provides an excellent educational establishment. All years are not currently full and have not been for a few years even with extra housing expansion. 1 class per year is most definitely the way to go for a junior school.</p>	→ See above

		<p><b>Barton Willmore/Miller Homes</b></p> <p>→ The MNP seeks to direct developer contributions towards footpaths and walkways, enlargements for educational facilities, either on-site or elsewhere within the village or improvements to the Church Hall or development of a new community building.</p> <p>The NPPF is clear in Paragraphs 203 – 204 that:</p> <p><b>“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning Obligations should only be sought where they meet all the following tests:</b></p> <ul style="list-style-type: none"> <li>• <b>Necessary to make the development acceptable in planning terms;</b></li> <li>• <b>Directly related to the development; and</b></li> <li>• <b>Fairly and reasonably related in scale and kind to the development”</b></li> </ul> <p>The MNP’s requirement for developer contributions to be used other than when these tests have been met is incorrect.</p> <p>The Policy is therefore contrary to basic conditions (a), (d) and (e).</p>	<p>→ Suggest re-wording explanatory for clarity and make reference in explanatory to the tests for this</p> <p>→ Also suggest adding ‘where appropriate’ in to the policy</p>
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		<b>J Harding</b> → Any significant development must come with additional primary school facilities. Moulton school cannot be extended due to space and the local schools are oversubscribed	→ Noted, see amendment
CFT3	Tourism	<b>CWaC</b> → To ensure compliance with the strategic policies in the Local Plan, suggest that reference be added in the first sentence to meeting the requirements of policy STRAT9.	→ Ok, reference will be included at the end of first sentence
Asp		No comment	
.14	Monitoring and Review	<b>CWaC</b> → Good to see a section on monitoring included in the plan.	→ Noted
		<b>Barton Willmore/Miller Homes</b> → The MNP states at Paragraph 14.2 that the existing monitoring arrangements which are in place will be sufficient for most of the proposed policies. As set out earlier within these representations, we have concerns regarding the alignment of this document with both adopted and emerging development plan policies (and national policy), and consider that a thorough review is needed prior to the next round of consultation (Regulation 16).  We would suggest in terms of “review” that an extra criteria is included whereby in addition to any changes to development plan policy, the MNP	→ Thank you  → Still awaiting – but suggest mention of changes to National policy as a trigger

		<p>should be reviewed in light of the revised NPPF which is due by the end of March 2018.</p> <p>However, our Client does support the intention to undertake a partial review by 2022 and a full review of the NP by 2026.</p>	
<b>Supporting Documents</b>			
	Basic Conditions Statement	<p><b>Barton Willmore/Miller Homes</b></p> <ul style="list-style-type: none"> <li>→ At the outset, we do not consider the MNP to meet the basic conditions, and we have identified deficiencies in respect of the preparation of the MNP which are required to be addressed. The MNP has been written to restrict development through the use of various policy devices. It is not compliant with both national policy and guidance (see Basic Conditions (a), (d) and (e), as defined by Paragraph 8 (2) of Schedule 4B).</li> <li>→ <b>Basic Condition 1 (a) – Having Regard to National Policy</b> Our Client does not consider that the draft MNP has been prepared fully in accordance with National Planning Policy. We have clearly evidenced within our response that the draft MNP does not apply a presumption in favour of sustainable development, nor does it seek to deliver a wide choice of high quality homes. The draft MNP has failed to meet Basic Condition (a).</li> <li>→ <b>Basic Condition 2 (d) – Contribute to the achievement of sustainable development</b> The draft MNP seeks to introduce policy mechanisms which restrict development, the draft MNP has failed to meet Basic Condition (d).</li> <li>→ <b>Basic Condition 3 (e) – Be in general conformity with Strategic Local Policy</b></li> </ul> <p>It is clearly evident throughout this representation that a number of the MNP policies as drafted conflict with the adopted CWaC Part One and emerging Part Two Local Plan.</p>	<ul style="list-style-type: none"> <li>→ Noted. Will revisit with revised plan for regulation 15 submission.</li> </ul>

		<p>→ <b>Basic Condition 4 (f) – Be compatible with EU obligations</b> No Screening Opinion request and Habitat Regulation Assessment screening opinion has been undertaken.</p> <p>→ <b>Basic Condition 5 (g) – Compliant with Prescribed Matters</b> No other prescribed matters have been provided. No assessment of Basic Conditions (b) and (c) has been undertaken.</p> <p>It is considered that the draft BP has failed to meet Basic Conditions (a), (d), (e) and (f) at this time.</p>	
	SEA Screening	<p><b>Barton Willmore/Miller Homes</b></p> <p>→ There is no evidence to suggest that the MNP has been subject to screening under either the Environmental Assessment of Plans and Programmes Regulations 2004 or the Conservation of Habitats Species Regulations 2010. This is required to be undertaken. As drafted, the MNP is contrary to basic condition (f).</p>	→ Has been done
	Evidence Base	<p><b>Barton Willmore/Miller Homes</b></p> <p>→ Our Client is concerned with the limited evidence base which has been used (or is available) to support the draft policies of the MNP. The document is strongly reliant on the Moulton Village Design Guide (2009); census data from 2011 and Village Survey (2013). We do not consider this evidence to be up-to-date and is not derived from a sound evidence base. Further justification and evidence to support the policies and MNP is required.</p>	→ Disagree – proportional evidence – tied to Local Plan policies
	Glossary	<p><b>Barton Willmore/Miller Homes</b></p> <p>→ The MNP seeks to provide a glossary of terms. We have concerns with the proposed definition of “affordable housing” and consider it to be limited because it only refers to “<b>social rented, affordable rented and intermediate housing.</b>” It does not take into account starter homes or discounted market housing which is proposed by the White Paper – Fixing our broken housing market. This needs to be amended as part of the next round of the MNP (Regulation 16).</p>	→ Disagree. Include definition from Local Plan part 1 for clarity

	Formatting and Referencing	<b>Barton Willmore/Miller Homes</b> → It is noted that the formatting, paragraph references and page numbers are incorrect in a number of places throughout the document. These should be reviewed and updated as part of the iteration of the MNP.	→ Noted
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