

Mr. M. Dakeyne  
c/o Mrs. A. Weate (Programme Officer)  
Moorlands House  
Stockwell Street  
Leek  
Staffordshire  
ST13 6HQ

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Dear Mr. Dakeyne

**STAFFORDSHIRE MOORLANDS LOCAL PLAN EXAMINATION – SESSION 2 (POLICY H1)**

Thank you for the opportunity to submit further representations pursuant to the upcoming public examinations into the Staffordshire Moorlands Local Plan.

Within my submissions on the Local Plan Submission Version I raise concerns that the criteria based approach set out in policy H1 is unsound, as it does not provide sufficient certainty that the required quantum of development for the rural areas can be delivered. Specifically I highlight a fundamental concern that the required compliance with national Green Belt policy renders the policy ineffective.

The Local Plan seeks to deliver the bulk of the housing needs for the rural areas within the larger villages. However, some 67% of these larger villages are located within the Green Belt, as follows:

- Biddulph Moor
- Blythe Bridge & Forsbrook
- Brown Edge
- Cheddleton
- Endon
- Kingsley
- Werrington & Cellarhead
- Wetley Rocks

The requirement for schemes to meet the criteria laid down in policy H1 *as well as* also meeting the Green Belt tests set out in the NPPF will severely restrict the delivery of new development in the

aforementioned larger villages (as well as development in the smaller villages) and will instead lead to an inability to deliver the required quantum of housing for the rural areas. It could also give rise to a consequential risk of a disproportionate quantum of development taking place in those villages which are not encircled by the Green Belt, such as Alton and Upper Tean.

The proposed settlement boundaries are drawn so tightly it severely restricts the number of potential 'appropriate' forms of development that could come forward that comply with the provisions of the NPPF, most notably that of 'infill development'. To demonstrate this I have prepared a number of Appendices for your consideration. These comprise of extracts of the proposals maps for the respective larger villages, and within each I have identified what I consider *may* amount to potential *infill* opportunities within the Green Belt. My conclusions are set out below:

Appendix A shows the inset map for Biddulph Moor. The most obvious infill opportunity lies on the northern side of Woodhouse Lane, but planning permission for the erection of three dwellings on this site was recently refused by the Local Authority on account of the site being too wide to constitute 'limited infilling' (SMD/2017/0775). The site further west along Woodhouse Lane is arguably not 'infill' as it has a road running alongside it rather than built development. Consequently there are considered to be precious few opportunities for infill development around this village.

Appendix B shows the inset map for Blythe Bridge & Forsbrook. A disproportionate amount of new residential development is potentially feasible in this area owing to the proposed expansion of the village boundary on its southeastern-most fringe. Beyond that however there are only a few limited opportunities for 'appropriate' Green Belt development, along Chapel Lane, and Draycott Old Road as indicated.

Appendix C shows the inset map for Brown Edge. The morphology of this settlement means that opportunities for infill development are very limited, with perhaps 1 or 2 opportunities along High Lane towards the southwestern-most fringe of the settlement, and a larger site near Upper Stonehouse Farm to the north. The latter site however is very wide (see comments on Appendix A above) and also has a Listed Building in close proximity and thus may be deemed unsuitable by the Local Authority for infill development on that basis. No other obvious opportunities exist.

Appendix D shows the inset map for Cheddleton, and it is considered that opportunities for 'appropriate' development within the Green Belt in and around this village are extremely limited, restricted to perhaps one or two sites. The one I have identified could be argued as infill, but again

constitutes a large gap, which the Local Authority have raised on numerous applications as not being 'limited infill'.

Appendix E shows the inset map for Endon. Some limited infill opportunity exists along Clay Lake towards the western fringe of the settlement, and indeed is currently the subject of an application for the erection of two dwellings as infill development (SMD/2018/0455). There are otherwise no obvious opportunities for 'appropriate' development within the Green Belt on the fringes of this settlement. Endon is one of the better serviced villages, with a large range of facilities on offer, yet its opportunities for sustainable growth are limited by the current wording of policy H1.

Appendix F shows the inset map for Kingsley. A few potential opportunities for infill development are identified. The site to the north of The Green is currently subject to an application for the erection of two dwellings as infill development (SMD/2018/0554). The other sites identified have development on either side, and thus could potentially constitute infill, but are wide in nature, and in light of the Local Authority's refusal of application SMD/2017/0775 (see discussion on Appendix A) it couldn't be said with any certainty that these would be regarded as suitable for infill development, on account of their overall width.

Appendix G shows the inset map for Werrington & Cellarhead. This settlement offers the most potential for 'appropriate' development in the Green Belt, with a number of potential infill plots available on the southern side of the main road.

Appendix H shows the inset map for Wetley Rocks. There is only one obvious 'infill' opportunity on the edge of this village, as shown on the map. This site has been subject to an outline planning application for residential development back in 2015 but remains un-determined (SMD/2015/0701). One other site is identified (within the proposed settlement boundary), but it should be noted that this site has previously been subject to an application for residential development which was refused and subsequently dismissed at appeal on the grounds of the site's positive contribution to the setting of the village (SMD/2009/0460). A further application has since been submitted to develop the site for 9 dwellings (submitted March 2018), but that also remains undetermined (SMD/2018/0164).

Utilising the above information I would estimate that there are realistic infill opportunities for perhaps 20 – 35 dwellings in total across the eight larger villages. This is substantially short of the required number set out within the Submission Version of the Local Plan, which seeks to deliver in the order of 881 dwellings.

To require compliance with the provisions of paragraph 145 of the NPPF (formerly paragraph 89) as well as the other criteria of policy H1 renders the policy ineffective and unreliable in terms of delivering the required quantum of development for the rural areas. I would therefore submit that either the NPPF compliance requirement needs to be omitted, or the criteria based approach be abandoned in favour of defining specific settlement infill boundaries within the proposals maps, as had been the original intention within the early stages of the plans preparation. The latter approach provides a greater degree of certainty all round, and should also be applied to the smaller villages.

I would request that these comments be taken into consideration in your deliberations on the matter.

Yours faithfully



**Rob Duncan**