

Hearing Statement on behalf of Thalia Bode

It is proposed that the following issues will be put forward at the hearing:

Topic	Issue
Housing land allocation	Housing related policy fails to allocate sufficient housing land, particularly in the rural areas. The plan has an overreliance on windfall sites to meet established housing need.
Housing Need & Allocation in Cheddleton and other Rural Areas	The plan fails to allocate sufficient housing land in rural areas, including in particular the village of Cheddleton.
Removal of land from Green Belt	The Plan proposes removal of land from the Green Belt in order to meet housing need. Exceptional circumstances are said to exist to justify this. However, one or more Green Belt sites(s) with good potential for development have been discounted for development due to a lack of exceptional circumstances. This is inconsistent. Alternative sites perform less well against Green Belt purposes.

These issues correspond to the following matters, issues and questions for the examination and hearing sessions:

- Session 2. Matter 2. (Issues 1.1, 1.3, 1.4, 1.6, 3.5, 3.6, 5.1, 5.3, and 5.4)
- Session 4. Matter 4. (Issues 1.4, 1.5)
- Session 11. Matter 8. (Issues 1.2, 1.3)

1. Housing Land Allocation Policies

Housing related policy fails to allocate sufficient housing land, particularly in the rural areas. The plan has an overreliance on windfall sites to meet established housing need.

Policy SS 3 ‘Future Provision and Distribution of Development’ states that *“Future Provision and Distribution of Development Provision will be made for at least 6080 additional dwellings (net of demolitions) to be completed in Staffordshire Moorlands during the period 2012 to 2031 - an annual average of 320 homes per year. Sufficient deliverable land will be identified to provide at least 5 years of development at all times.”*

This policy’s explanatory text goes on to provide a table that *“identifies the net housing requirement for the District once completions, commitments and the Peak District National Park allowance are taken into account”*. This table (Table 7.2 District net housing requirement) is reproduced below:

Gross housing requirement (2012 - 2031)	6080 dwellings
Total district-wide completions (2012 - 2017)	679
Total district-wide commitments	1442
Peak District National Park allowance	100
Net housing requirement (2017 - 2031)	3859

A further table is also provided (Table 7.3 Net housing requirement by area):

Area	%	Gross Requirement	Completions	Commitments	2017 net requirement
Leek	30	1794	241	538	1015

Biddulph	20	1196	205	106	885
Cheadle	25	1495	85	244	1166
Rural	25	1495	148	554	793
Total	100	5980	679	1442	3859

The explanatory text also explains that “*this policy sets out how the net housing requirement of 3859 will be met across the District up to the year 2031. Sources of future supply include allocations as set out in Policy H2 and windfall allowances for each area based on past trends. Windfall sites will be considered in the context of the Spatial Strategy and Policy H1*”.

Policy H 2 Housing Allocations states that “*The following sites will be allocated for housing or mixed use development. The Council will work with developers and the local community to bring forward sustainable developments in accordance with the other policies in the Local Plan*” This policy contains site specific allocations for housing, the totals for which are summarised below. The net requirement for each corresponding area is also provided for comparison.

Location	2017 net requirement	Number of dwellings allocated	Shortfall/Windfall need	Shortfall as a %
Leek	1015	630	385	38%
Biddulph	885	730	155	18%
Cheadle	1166	1026	140	12%
Rural	793	461	332	42%
Total	3859	2847	1012	26%

The table above shows a heavy reliance upon windfall sites coming forward over the plan period in order to meet established housing need. This reliance is particularly acute within Leek and the rural area. To rely upon 42% of housing delivery in rural areas to be accomplished through windfall sites poses a significant risk to delivery, particularly given that much of the District’s rural area is designated Green Belt, leading to constrained windfall opportunities within tight settlement boundaries. Additional land should be allocated for residential development within the Plan to reduce reliance upon windfall sites, thereby reducing the risk that too few houses will be delivered in the plan period. Allocations should not be seen as a maximum delivery target, and in the event that a substantial number of windfall sites do indeed become available during the plan period, in addition to increased allocations, then this should be welcomed in order to help meet the acute national need for housing.

2. Housing Need & Allocation in Cheddleton and other Rural Areas

There is a need for new housing in Cheddleton village. This need was recognised by Staffordshire Moorlands District Council during the plan making process. Cheddleton is defined by the Council as a ‘larger village’, which are intended to provide for the bulk of housing requirements in rural areas. However, the Plan fails to make any provision for housing land in Cheddleton. The failure to identify housing land at or in reasonable proximity to Cheddleton is a failure to pursue a strategy which seeks to meet development need.

Policy SS 8 Larger Villages Areas Strategy defines 12 settlements within the plan area as ‘larger villages’. Among those settlements is Cheddleton. This policy states that “*these settlements shall*

retain and enhance their role as rural service centres, providing for the bulk of the housing requirement of the rural areas”.

Policy H 2 Housing Allocations specifies the following housing or mixed use development allocations for rural sites:

Location	Number of Dwellings
Land at Capri, Gallows Green, Alton (AL012)	13
Blythe Vale, Blythe Bridge (Policy DSR 1)	300
Land at corner of Brookfield Avenue / Stoney Lane, Endon 22 (EN128)	22
Haulage Depot, St Thomas's Road, Upper Tean (UT019)	15
Land at Waterhouses Enterprise Centre, Leek Road (WA004)	36
Land off Ash Bank Road, Werrington (WE003 & WE052) (Policy DSR 4)	75
Total	461

Of the identified rural need for 793 dwellings, Policy H 2 allocates only 461 dwellings. While 12 settlements are proposed to principally accommodate rural housing need, only six allocations are made in rural areas. This reflects a substantial imbalance in the spatial delivery of homes.

This imbalance is made still more extreme by the proposed split of development within these six sites. In particular, it is intended for 65% of all rural dwelling allocations be located within a single site at Blythe Bridge. This approach is likely to result in a shortage of homes where they are needed for local communities that make up the larger villages. This approach also presents a significant risk to delivery of dwellings in rural areas. In the event that unforeseen circumstances arise, it is possible that development will not be forthcoming at this site, severely compromising the likelihood of sufficient housing coming forward for rural areas over the plan period. Even if development does come forward, there is a risk that the delivery of homes will be much slower within a single allocated site compared to a balanced distribution of development sites.

Chapter 4 of the Site Options Consultation Booklet (Staffordshire Moorlands Site Allocations - July 2015) indicated an estimated housing need 2011 - 2031 for Cheddleton of 115 dwellings (section 4.5 refers). Policy H 2 fails to allocate any site within, adjacent, or near to Cheddleton for future residential development. This failure to allocate land does not accord with the stated Vision of the Plan and leads to internal inconsistency between the Plan's policies. The community of Cheddleton requires opportunity for modest growth in order to protect community cohesion and ensure that growing families are not obliged to leave their community and support network in order to find suitable accommodation elsewhere. Land at Policy DSR 1 and Policy DSR 2 for example is too far from Cheddleton to be considered as a reasonable alternative. Blythe Vale is approximately 10 miles by road from Cheddleton.

It is inappropriate to rely upon windfall sites to serve Cheddleton's needs, considering: the settlement's highly developed nature, tight settlement boundary, and envelopment within Green Belt, where development is typically restricted. There is very little opportunity for windfall sites to come forward in this area, and certainly no prospect of 115 dwellings. The failure of the plan to

identify housing land at or in reasonable proximity to Cheddleton is a failure to pursue a strategy which seeks to meet development need.

The lack of available land within the existing Cheddleton development boundary constitutes, in my view, an exceptional circumstance in which the release of land from the Green Belt would be appropriate (subject to likely impacts, including those relating to the 5 purposes of including land within Green Belt).

The Council has previously responded to these concerns citing:

“The Local Plan does not specify housing targets for individual larger villages. The indicative housing requirement for settlements in the Site Options Consultation 2015 was included as a guide based on the information at the time.”

“The Local Plan policies and site allocations were refined during the plan making period as more information became available. The Local Plan does not specify housing targets for individual larger villages.”

“It is considered there are no exceptional circumstances to justify the release of the site suggested [land at Cheddleton] from the green belt.” Schedule of Omission Sites, June 2018 (consultation response document)

“The Local Plan seeks to allocate sites to help meet the District’s housing requirement[. Not] all sites previously considered are needed to meet the housing requirement.”

It is not clear how information has changed to invalidate the indicative housing requirement for Cheddleton or how many dwellings are now thought to be needed for Cheddleton.

It is acknowledged that housing targets are not set for individual larger villages, but this does not remove the need for housing in those areas.

The Plan does not effectively provide for the District’s housing requirements, particularly for the rural area, relying overly on windfall sites.

The Plan proposes the removal of land from Green Belt in order to meet housing need. It is not clear how exceptional circumstances exist for some sites and not others.

3. Removal of land from Green Belt

In order to meet rural housing need, the Council proposes to remove land from the Green Belt at Ash Bank Road, Werrington (WE003 & WE052) (Policy DSR 4). These sites are hoped to provide 75 dwellings. Other Green Belt land that, according to the Council’s evidence base, performs less well against the purposes of the Green Belt than these sites is available to help meet rural area housing need. Sites that perform less well against the purposes should be released from the Green Belt in preference to other Green Belt sites.

The Plan proposes the removal of land from the Green Belt in order to accommodate housing allocations for 75 dwellings on the outskirts of Werrington. The inspector has queried the existence of exceptional circumstances sufficient to justify the removal of land from Green Belt, and the Council is expected to provide an explanation shortly. It is assumed for the purposes of this representation that the Council will demonstrate the existence of exceptional circumstances.

The Council has suggested that exceptional circumstances do not exist for the removal of land from the Green Belt elsewhere within the plan area. This position is apparently contradictory and should be justified.

Alternative sites may be considered preferable to sites WE003 and WE052. One such site is site CD0017. This site offers a number of benefits including the provision of housing land for a larger village that would not otherwise benefit from any housing land allocation.

Site CD0017 is located at 'Land at/to rear of addresses 203/399-411 Cheadle Road', Cheddleton. The Council's 'rationale for not taking this site forward' and 'key issues' relating to this site are addressed below:

"The site is in the Green Belt. Green belt sites should only be released if there are exceptional circumstances. In this case it is considered that there are no exceptional circumstances."

"The site suggested is in the Green Belt. The Council needs to demonstrate exceptional [sic] to remove land from the Green belt, in this case it is considered there are no exceptional circumstances."

The site is partially within Green Belt. There has been no explanation as to why exceptional circumstances are considered to exist elsewhere in the District, but not at this location.

The lack of available land within the existing development boundary, and absence of any housing land allocation in or around the settlement, constitutes in my view an exceptional circumstance in which the release of land from the Green Belt would be appropriate (subject to likely impacts, including those relating to the 5 purposes of including land within Green Belt).

"On planning balance the Council has concluded that the allocated sites are the most appropriate solution for the rural Areas and minimises the release of green belt land."

The planning balance decision making process has not been transparent. It is not clear how this conclusion been reached. Site DC0017 performs less well against the purposes of the Green Belt than land proposed for release elsewhere, suggesting that the harm of its removal from the Green Belt would be lesser.

The Council considers that exceptional circumstances exist for the release of land from the green belt at Biddulph (proposed mixed use allocation BD117) and Werrington (proposed housing allocations WE003 and WE0052). These sites are considered by the Council to 'on planning balance be the most appropriate solution'. However, the Plan fails to explain why exceptional circumstances exist that justify development at WE003 and WE0052 other than the following:

"In this case it is considered that there are exceptional circumstances that warrant releasing this site from the Green Belt. Werrington is defined as a larger village in the Core Strategy and has a number of facilities and services and is considered to be a sustainable location to support some growth."

"The Green Belt is tightly drawn around Werrington and there is limited capacity in the settlement for further growth without releasing Green Belt land."

Para 9.120 of the Local Plan submission draft states that:

"The Green Belt Review (2015) considered that the [site WE003] was suitable for release from the Green Belt as the overall impact of development on the purposes of the Green Belt would be moderate".

Cheddleton is subject to the same constraint as Werrington regarding the tightly drawn Green Belt, which provides limited capacity in the settlement for further growth without releasing Green Belt land.

The Green Belt review study 2015 'Appendix C: Settlement and Site Appraisals' finds the following:

	CD0017 (29 dwellings)	WE003 (50 dwellings)	WE052 (25 Dwellings)
Check Sprawl	Limited Contribution	Contribution	Contribution
Maintain Separation	Limited Contribution	Limited Contribution	Limited Contribution
Prevent Encroachment	Contribution	Limited Contribution	Limited Contribution
Preserve Setting	Limited Contribution	Significant Contribution	Contribution
Overall impact of development on the purposes of the Green Belt	Limited	Moderate	Limited

This demonstrates that Site CD0017 makes less contribution to the Green Belt than either WE003 or WE052.

The Green Belt review suggests that Site CD0017 is considered acceptable for release, subject to the demonstration of exceptional circumstances. The analysis of this site includes the following:

"Most of the land in question is within the Green Belt. In order for Cheddleton to accommodate new development, the Green Belt boundary will need adjustment as there are not enough sites in the existing settlement boundary to accommodate the level of development needed. The Council has recently completed a Green Belt Review in order to assess parts of the Green belt where minor adjustments can be made without having an impact upon the function of the Green belt as a whole."

Two other 'key issues' are referred to for site CD0017:

"Listed buildings in vicinity of the site impact of the development needs to be mitigated"

"Access needs to be clarified"

There is one listed building nearby: COTTAGE APPROXIMATELY 100 METRES NORTH OF FELTHOUSE LANE. List UID: 1038105 Grade: II. No works are proposed to this building, which is at least 70m from the closest point of site CD017. Between the listed building and site CD017 is landscape bunding and mitigation planting associated with the Bones Lane access road to John Pointon & Sons Ltd. It appears highly unlikely that development within site CD0017 could have a material impact upon the setting of this listed building; this does not appear to be a key issue for the site.

Site CD0017 includes at least 26m of interface with a straight section of the A520. In addition to this, other access options exist to the north and south of the site. While no access arrangement has yet been designed for this site, it is considered that access can easily be agreed as part of a future planning application.

The Council has failed to adequately justify the selection of sites for removal from the Green Belt. Other sites exist that are preferable for Green Belt release. These sites should be allocated for development in preference to sites that contribute more to the purposes of the Green Belt.