

MATTER 2

Strategy and Strategic Policies

Issue 1 – The spatial distribution of development

1.1 Is the strategy for the distribution of development justified (Policy SS3)?

1.1.1 Yes. The distribution of development is consistent with that set out in the adopted Core Strategy with the exception of Cheadle and the Rural Areas (see response to Q1.2 below). This sought to focus growth in the Towns and Larger Villages with greater capacity to sustainably accommodate development. Limited development is permitted elsewhere to help realise regeneration opportunities and support local communities. As set out in the Core Strategy (ED32.7, Paragraph 8.1.22), the apportionment of housing between areas is based on the proposed development approach and the spatial strategy and on the findings of the Development Capacity Study which support the bulk of provision in the towns but also ensuring there is adequate provision in the rural areas to support local communities. The apportionment of the employment is based on achieving a balanced provision to support future workforce needs.

1.1.2 The Development Capacity Study (ED 21.1 to 21.6) informed the distribution of development in the Core Strategy by reviewing infrastructure and service provision for settlements across the District. The subsequent 2016 Infrastructure Delivery Plan Baseline Report provided an update to this review to inform the emerging Local Plan. Its overall conclusion was “that the distribution of growth in the Core Strategy can be supported by current and planned infrastructure. Schemes are identified which align with the spatial distribution of growth proposals in the Core Strategy and there are no significant constraints to the level of growth proposed.” (ED8.1, pages 5-6).

1.1.3 The Sustainability Appraisal of the Local Plan Preferred Options Policy SS3 (ED6.3, Table 16.4) scores the distribution of development positively in terms of most of the Sustainability Appraisal's objectives. For example, the positive effects of the distribution of development for improving access to jobs, services and facilities and reducing the need to travel by car are identified due to the focus of growth on the Towns and Larger Villages.

1.2 Are the changes from the distribution in the CS for Cheadle and the Rural Areas justified?

1.2.1 Yes. Notwithstanding the above, the Council proposed an amendment to the distribution of development in the 2017 Local Plan Preferred Options (ED2.1) to reduce the Rural Areas share of the housing requirement from 28% to 25% to reflect development constraints. Conversely, Cheadle's share was proposed to increase from 22% to 25% to reflect the availability of suitable sites.

1.2.2 Green Belt is a significant constraint in the Rural Areas with 8 of the 12 Larger Villages being constrained by the designation. The 2016 Preferred Options Sites and Boundaries consultation had applied the distribution of development as set out in the Core Strategy. However, a key theme of consultation feedback received in response was concern regarding the extent of the loss of Green Belt (ED5.1, Paragraph 5.8 -5.10). Resultant changes to the distribution of development and proposed allocations in the Local Plan Preferred Options significantly reduced the number of homes proposed in the Rural Areas in the Green Belt from 554 to 75. The Council considered this

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amendment to be necessary to help ensure compliance with Paragraph 83 of the Framework which only permits Green Belt release in exceptional circumstances. The Sustainability Appraisal also considered alternative development approaches for the Rural Areas (ED6.4, Paragraphs 6.1369 to 6.1410). Four options for the distribution of development were appraised, namely;

1. Preferred Options Sites and Boundaries 2016 approach - Green Belt release
2. Countryside release
3. Growth re-directed towards the towns
4. Strategic site release

1.2.3 Sustainability Appraisal then identified a 5th option (a hybrid of options 3 and 4):

5. Growth redirected to towns accompanied by strategic site release.

1.2.4 Option 5 proposed to reduce the Rural Areas' share of the District's housing requirement from 28% to 25% in order to reflect the constrained supply of suitable sites. Increase Cheadle's share of the District's housing requirement from 22% to 25% to reflect the availability of suitable development sites outside of the Green Belt. This option was recommended by the Sustainability Appraisal (ED6.4, Table 6.15). This matter is considered further in the Policy Topic Paper (ED13.5, Paragraphs 2.37 to 2.45).

1.2.5 Biddulph was not deemed suitable to accommodate additional development given that it is also severely constrained by the Green Belt. In spite of its status as one of three towns in the District, Cheadle has suffered from the lowest level of development for over ten years (ED13.5, Page 58) out of any of the towns and the Rural Areas as a whole. Given that Policy SS7 seeks to expand the role of Cheadle as a significant service and market town and the capacity of suitable development sites in the town, the allocation for the town was increased.

1.3 Should more growth be targeted to the rural areas, particularly the larger villages, to enhance and maintain their vitality and viability and increase the supply of affordable housing?

1.3.1 No. For the reasons highlighted above, housing growth in the Rural Areas should not be increased. In addition to the allocations, affordable housing in the Rural Areas can be delivered through Policy H1 and H3 as windfall, including rural exception sites.

1.4 Does the housing allocation at Blythe Bridge (300 dwellings) distort the strategy and the approach to the rural area by proposing a large proportion of dwellings in one place which will primarily serve the needs of the Stoke-on-Trent conurbation (65% of the dwellings to be allocated in the rural area)? Would an alternative approach of distributing allocations over a number of smaller villages be more sustainable?

1.4.1 The housing allocation at Blythe Bridge does not distort the strategy. Policy SS8 states that the Larger Villages shall provide for the bulk of the housing and employment requirement of the Rural Areas "of a scale and type appropriate to each settlement having regard to infrastructure capacity and character" (ED 1.1). As such, the Local Plan explicitly acknowledges that the scale of housing allocations should respond to local circumstances and the sustainability of settlements.

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- 1.4.2 The Assessment of Village Hierarchy as set out in the Core Strategy (ED32.7, Appendix J) identifies Blythe Bridge as benefitting from the broadest range of facilities and services of all of the villages in the District. In addition, the sustainability of the village is enhanced by Blythe Bridge railway station - the only passenger station in the District which provides services to Derby, Stoke-on-Trent and beyond.
- 1.4.3 The allocation at Blythe Bridge now already benefits from a detailed planning consent for 118 homes (ref. SMD/2017/0512) with the allocation making up the remaining 182 homes from the provision set out in the Local Plan. The site represents 34% of the total minimum expected housing land supply for the Rural Areas as set out in Policy SS4.
- 1.4.4 The Sustainability Appraisal of the site itself states that the proposed delivery of circa 300 dwellings is considered to have a "significant positive effect" (ED6.4, Paragraph 6.817).
- 1.4.5 The alternative approach of distributing allocations over number of smaller villages would not be more sustainable. As highlighted above, the Sustainability Appraisal also considered alternative options for the distribution of development and recommended Option 5. The background commentary in the Sustainability Appraisal identified minimised environmental impacts in support of the preferred approach (ED6.4, Paragraph 6.1409).
- 1.4.6 Allocations in the Smaller Villages would also exacerbate the issues identified above. Policy SS2 (Settlement Hierarchy) also acknowledges that the Smaller Villages "generally have a poor range of services and facilities and it is often necessary for local residents to travel outside of the villages for their daily needs". The Smaller Villages have been classified as such as they were considered to inherently unsustainable for large scale development. Consequently, allocations are not proposed for any of the Larger Villages.
- 1.5 Is the level of growth at Biddulph (20%) reflective of its role as a one of the main towns in the District?**
- 1.5.1 Yes. The 20% share of housing growth reflects Biddulph's role as a town whilst also recognising the significant constraint of the Green Belt which surrounds the town. This approach is consistent with that in the adopted Core Strategy.
- 1.6 Should the Plan be more prescriptive in providing housing requirements for each settlement?**
- 1.6.1 The Local Plan provides a housing requirement for each of the three Towns and the Rural Areas as this is how the plan establishes the spatially distinctive visions and policies for each area. Policy SS4 sets out requirements on a Parish basis for designated Neighbourhood Plan areas and Appendix 11 sets out how guidance on how requirements for future Neighbourhood Plans will be established. Policy SS2 and subsequent policies set out the role and function of individual assessments. The Council is not of the view that being more prescriptive than this would be beneficial and this does not appear to be an explicit requirement of the Framework.

Issue 2 – Settlement hierarchy

2.1 Is the settlement hierarchy within Policy SS2 and the position of villages within the hierarchy (Policies SS8 and SS9) justified?

2.1.1 Yes. The settlement hierarchy is consistent with that set out in the adopted Core Strategy. The Policy Topic Paper (ED13.5, Paragraphs 2.1 to 2.5) provides further explanation of the approach.

2.2 Should Leekbrook be treated as part of Leek or as a Larger Village within the Settlement Hierarchy rather than as a Smaller Village taking into account the character and accessibility of the settlement?

2.2.1 No. For the reasons cited in response to Question 2.1, the Council considers the Settlement Hierarchy to be appropriate. Specifically in relation to Leekbrook, the Council responded to the categorisation of the settlement in response to representation reference LPS414 (ED5.3, Appendix 1).

Issue 3 – Settlement Boundaries and the Countryside

3.1 Is the approach to settlement boundaries for the larger and smaller villages justified (Policy SS2) particularly the removal of boundaries for the smaller villages?

3.1.1 Yes. The Council's approach to settlement boundaries is explained in the Policy Topic Paper (ED13.5, Paragraphs 2.65 to 2.74).

3.2 Will the removal of settlement boundaries for the smaller villages lead to uncertainty and unsustainable patterns of development?

3.2.1 No. As set out in the Policy Topic Paper (ED13.5, Paragraphs 2.70 to 2.74), the Local Plan proposes to apply a criteria-based approach to ensure that such development is managed appropriately. Furthermore, as highlighted in response to representation, including LPS104 (ED5.3, Appendix 1), of the 29 Smaller Villages, only 11 have defined boundaries on the Proposals Map for 1998 Local Plan.

3.3 Are the policies relating to development within and adjoining settlements justified and consistent with national policy (Policies SS2, SS8, SS9 and H1)?

3.3.1 Yes. Policies SS2, SS8, SS9 seeks to support growth in sustainable locations in line with Paragraphs 34 and 151 the Framework. The strategic policies in combination with the criteria set out in Policy H1 "provide a clear indication of how a decision maker should react to a development proposal" as per Paragraph 154 of the Framework.

3.4 Do the policies provide sufficient scope for brownfield development within and close to villages?

3.4.1 Development within and adjoining the Larger Villages is given explicit support in Policy H1, subject to the criteria being met, irrespective of whether the land is brownfield or not. Similarly, development that is well related to a Smaller Village is also supported regardless of whether the site is brownfield. Support for the re-development of brownfield sites in the other rural areas in the open countryside is also given in Policy H1 and SS10 to support regeneration.

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3.5 Is the approach to 'limited infill' justified and consistent with national policy, particularly in relation to the larger and smaller villages?

3.5.1 Yes. The concept of infill policies insofar as Green Belt is established in Paragraph 89 of the Framework. The Local Plan seeks to establish a clear policy for land which is also outside of the Green Belt to enable the Council to consider the merits of development proposals adjoining or well related to villages. As outlined in response to representations, including LPS104 (ED 5.3, Appendix 1), the proposed approach to infill was introduced following a review of consultation feedback which indicated support for more flexibility in the villages.

3.6 Will the reliance on windfalls in villages through Policies SS2, SS8, SS9 and H1 undermine the ability of development to provide affordable housing and contribute to infrastructure?

3.6.1 No. Windfall development is supported through the provision of "limited infill". The Local Plan does not provide a definition of this in terms of the number of units that would be permitted. As such, the approach does maintain the possibility of affordable housing being sought on such sites assuming that the relevant threshold for developer contributions has been met. In addition, Policy H3 enables provision on rural exception sites.

3.7 Is Policy SS10 too restrictive in only providing for development which has an essential need to be located in the countryside?

3.7.1 No. The Policy does not restrict development to only that which has an essential need to be located in the countryside. Support is also given to development which supports rural diversification, sustainability of the rural areas, sustainable tourism or enhancements to the countryside. Specifically in relation to housing, support is given to the conversion of rural buildings, development that would secure the future conservation of a heritage asset.

Issue 4 – Strategic Policies SS1 and SS1a
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4.1 Are the development principles within Policy SS1 justified and consistent with national policy?

4.1.1 Yes. Policy SS1 broadly reflects the equivalent policy in the adopted Core Strategy which was found sound. Amendments from the Core Strategy are proposed to bring it up to date to reflect consultation feedback, new legislation (Housing and Planning Act 2016) and other amendments specifically to ensuring consistency with the Framework.

4.2 Is Policy SS1a necessary in that it largely repeats national policy contained within paragraph 14 of the Framework?

4.2.1 As per the Council's response to the Inspector's preliminary questions (EL1.001b), Policy SS1a was included in the Core Strategy as a main modification to make the plan sound. However, the Council will modify the Local Plan by removing the policy if appropriate.

Issue 5 – Green Belt

- 5.1 Have exceptional circumstances been demonstrated to justify the alteration to Green Belt boundaries? This question is targeted at the in principle approach to the release of Green Belt land within in LP. Specific sites will be dealt with under Matter 8.**
- 5.1.1 Yes. It is not possible to meet identified development requirements without Green Belt release. The adopted Core Strategy anticipated that Green Belt release would be necessary and a main modification was made to Policy SS5b to commit the Council to a comprehensive review of the Green Belt in Biddulph.
- 5.1.2 The Council has considered alternatives including inviting relevant neighbouring authorities to accommodate some of the District's requirements (ED9.2 and 9.3), allocating high density sites such as the mills in Biddulph and alternative options for the distribution of development within the District (see responses above). Consideration of these factors during the preparation of the Local Plan resulted in a reduction in homes planned in the Green Belt in the Rural Areas from 554 to 75 and in Biddulph from 480 to approximately 255 when compared with the 2016 Preferred Options Sites and Boundaries consultation (ED3.1).
- 5.2 How should the LP be modified to demonstrate exceptional circumstances, assuming that such circumstances have been justified?**
- 5.2.1 A main modification (MM4) is proposed for Chapter 7 to set out the over-arching exceptional circumstances for Green Belt release. Main modifications for site specific exceptional circumstances are proposed for Chapter 9 (MM42, MM45, MM51, MM58).
- 5.3 Should more land be released from the Green Belt to provide areas of 'safeguarded land' to meet longer-term development needs?**
- 5.3.1 Paragraph 85 of the Framework refers to safeguarding land "where necessary". Given the relatively small scale of settlements that are prevalent in the District, it is considered that safeguarding land for longer term (and currently unknown) development requirements may prejudice future consideration of site options.
- 5.4 Do exceptional circumstances exist to release more Green Belt land around some of the larger villages such as Biddulph Moor, Blythe Bridge, Brown Edge, Cheddleton, Endon and Werrington?**
- 5.4.1 No. The Local Plan makes sufficient provision for housing to meet the identified development requirements.
- 5.5 Are policies SS2, SS8 and SS9 consistent with national Green Belt policy?**
- 5.5.1 As per the Council's response to the preliminary questions, A main modification is proposed to SS2 (MM2) to distinguish between the level and type of development that would be allowed in those smaller villages in the Green Belt compared to those beyond the Green Belt. The modification also ensures that the term "inappropriate" only applies to Green Belt development, rather than the open

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countryside. Policies SS8 and SS9 cross refer to Policy H1 which in turn confirms that when located in the Green belt, national Green Belt policy will apply.

5.6 Is it clear which Smaller Villages are to be 'washed over' by Green Belt and which are to be excluded from the Green Belt by retention of a settlement boundary and is the distinction between these villages justified?

5.6.1 Appendix 5 illustrates the proposed extent of Green Belt in the vicinity of the Smaller Villages having regarding to proposed Green Belt and settlement boundary amendments. As per the Council's response to the Inspector's preliminary questions, there are no further villages proposed to be washed over beyond those previously identified on the 1998 Proposals Map (ED32.8). This is clarified in an additional modification (AM22).

5.6.2 The Green Belt Review considered the "washed over" and inset status of settlements (ED22.4, Section 5.2). No case was found (for example by virtue of size) for settlements which are currently washed over to be given a new inset boundary. Specific recommendations were made regarding the case for potential release in exceptional circumstances but the Council does not propose such amendments in the Smaller Villages as any such amendments have not been justified.