

MATTER 2 – STRATEGY AND STRATEGIC POLICIES

Response on behalf of

Muller Property Group – 1130072

MATTER 2

Introduction

Harris Lamb Property Consultancy (HLPC) are instructed by Muller Property Group (MPG) to prepare a response to the Inspector's issues and questions in relation to Staffordshire Moorlands Local Plan Examination. MPG's interest is in land to the west of Cheadle which is identified as the Mobberley Strategic Development Area. In addition, MPG are promoting additional land to the south of the draft allocation for removal from the Green Belt and to be identified for housing within this Plan if needed, or to be safeguarded for development beyond the end of the Plan Period. Our comments to Matter 2 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Questions

1. The spatial distribution of development

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

1. Yes. We agree that the spatial distribution of development across the district is acceptable as it seeks to focus over three quarters of the planned housing growth in the three larger settlements. These larger settlements are considered to be the most sustainable in terms of access to, and range of facilities on offer, for residents. It is, therefore, entirely appropriate to seek to locate the majority of new development in these locations.

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

2. We consider that the changes in the distribution of development, particularly to Cheadle are justified. It confirms that Cheadle is a sustainable settlement with a good range of services and facilities on offer and is capable of accommodating a significant quantum of new housing development. Whilst the explanation given at paragraph 7.28 of the Submission Draft Local Plan indicates that the reason for the increase in development at Cheadle is due to its ability to accommodate development on non Green Belt sites, this raises the issue of how the Council propose to accommodate further development in and around Cheadle when they come to review the Local Plan.

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?

3. No. We consider that the level of growth to be directed to the rural areas and larger villages is appropriate. The rural areas and larger villages are by their very nature less sustainable in terms of range of services and facilities on offer. Growth should be proportionate to sustain what is there rather than having to create additional capacity to service new residents.

1.4) No Comment

1.5) No Comment

1.6) *Should the Plan be more prescriptive in providing housing requirements for each settlement?*

4. We agree that it would be beneficial to be more prescriptive in providing a housing requirement for the larger settlements, such as Cheadle. In doing so, it would provide a target in terms of the number of dwellings to be delivered in that settlement, and would assist the Council in understanding whether it was achieving its planned levels of growth across the District.

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?*

5. We agree that Cheadle, as one of the three largest towns in the District should be included in the top tier of the settlement hierarchy as it has a greater range of shops, services and facilities to meet the needs of existing and future residents. Directing development to Cheadle is considered entirely appropriate with the aims of the National Planning Policy Framework (the Framework) to achieve sustainable development.

6. We offer no comment on the position of other settlements in the hierarchy.

2.2) No comment

3. Settlement Boundaries and the Countryside

No comments

4. Strategic Policies SS1 and SS1a

4.1) *Are the development principles within Policy SS1 justified and consistent with national policy?*

7. Whilst we do not have any particular objection to the development principles per se, they do appear to be quite formulaic and not particularly specific to Staffordshire Moorlands. If anything, they should relate back to the spatial objectives and set out how they intend to deliver the Council's overall vision.

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

8. No. It is not necessary and should be deleted.

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.*

9. We consider that where the Council have proposed to amend Green Belt boundaries they have demonstrated exceptional circumstances to justify the amendments. This includes the proposed amendment to the Green Belt to the south of the Mobberley Farm allocation in Cheadle in order to accommodate a new access to the site. The proposed amendment confirms that this parcel of land does not have a significant Green Belt function and as such, the land is proposed for removal from the Green Belt. The parcel of land proposed for removal from the Green Belt is part of a larger parcel of land (S22) that was assessed as part of the Council's Green Belt review which concluded that it could be considered for release from the Green Belt under 'exceptional circumstances'.

5.2) No comment

5.3) *Should more land be released from the Green Belt to provide areas of 'safeguarded land' to meet longer-term development needs?*

10. Yes. The Council's spatial development strategy has evolved from the Core Strategy to the Local Plan in that more development has been directed to Cheadle and less to the Rural Areas. The Council state at paragraph 7.28 of the Submission Draft Local Plan that this is due to the availability of non Green Belt sites around Cheadle. Whilst the Council have only sought to release land from the Green Belt in limited circumstances as part of the current Local Plan, we consider that this is a short sighted approach and does not accord with national policy in the Framework.
11. The Framework at paragraph 83 states that local authorities should, when amending Green Belt boundaries, have regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period. The Council, having undertaken a Green Belt review across the whole District, only see fit to make a small number of amendments to the boundaries in the Plan, and do not propose to remove any additional land from the Green Belt and safeguard it for future development beyond the end of the Plan Period. In light of the Council's strategy in the Local Plan that proposes more development around Cheadle as it did not require the removal of land from the Green Belt, it is our contention that such an approach would not work again when the Council come to review the Local Plan and steps should be taken now address this issue.
12. In the absence of further non-Green Belt land becoming available in around the main settlements when the Plan is reviewed, the Council will be left with little alternative other than to have to review the Green Belt again as part of the Local Plan review. This would be in direct contravention of the guidance in paragraph 83 of the Framework. It is our view that the Council should identify safeguarded land as part of the preparation of the Local Plan. Without prejudice to the case we have presented in our duly made representations to the Pre-submission draft Local Plan, the land to the south of the draft Mobberley Farm allocation would be suitable to be removed from the Green Belt and safeguarded for future

development. The Council's Green Belt Review (Examination document 22.4) confirms that the parcel of land that it sits within was considered to perform poorly in Green Belt terms and could be considered for release if exceptional circumstances are demonstrated. We return to this point in our response to Matter 8.

5.4) No comment

5.5) No comment

5.6) NO comment