



Hearing Statement on behalf of Mr and Mrs Webb

In relation to: Matter 8 – Allocations (Villages)

Mr & Mrs Webb

Project : 17-204
Hearing : Matter 8 - Allocations
Client : Mr and Mrs Webb
Date : September 2018
Author : John Coxon

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited
trading as Emery Planning.

Contents:

1. Introduction	1
2. Response to the Matters and Issues	2

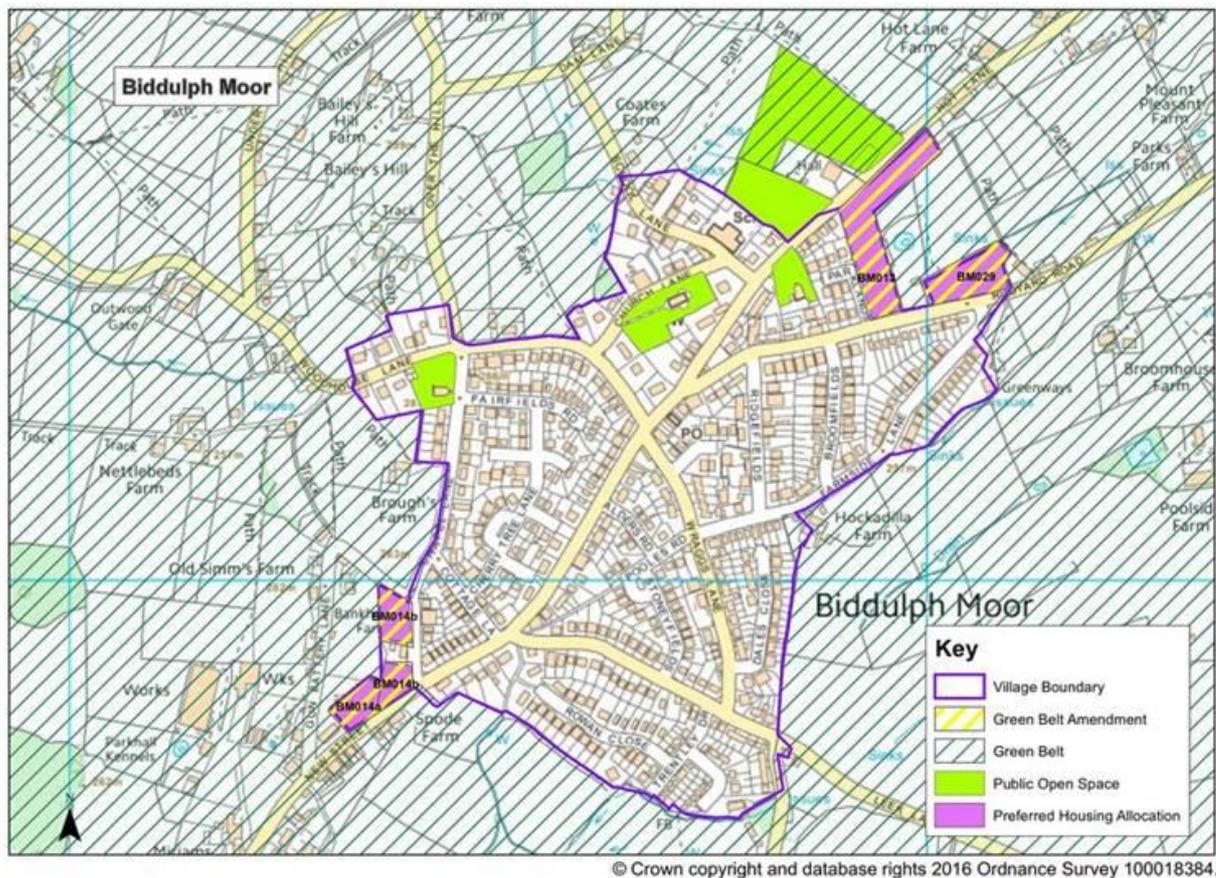
1. Introduction

- 1.1 Emery Planning is instructed by Mr and Mrs Webb to attend the Staffordshire Moorlands Local Plan Examination.
- 1.2 This statement summarises our client's position in response to the Inspector's schedule of Matters and Issues, specifically the questions under Matter 8: Allocations (Villages). It should be read in conjunction with our detailed representations to the Submission Version of the plan, and our other Position Statements submitted to this examination.
- 1.3 Please note that in relation to the site allocations, we have addressed matters relating to delivery under Matter 4. However if required we could attend the other Matter 8 hearings if site specific issues are not discussed under Matter 4.

2. Response to the Matters and Issues

1.2 Do the Green Belt assessments support the allocations in the large villages?

- 2.1 There is no clear justification for the selection of sites in the rural areas for allocation, particularly in relation to Green Belt release. A number of sites were identified as draft allocations in the Preferred Options Site and Boundaries Plan (April 2016), but have not been carried forward into the submission version. However the land off Ash Bank Road Werrington (Policy DSR4) remains in the plan for 75 dwellings. This is not justified by any evidence in relation to the evidence in relation to distribution or the site selection process.
- 2.2 One such example is our client's site in Biddulph Moor (land between Rudyard Road and Hot Lane). The Council's Preferred Options Site and Boundaries Plan (April 2016) identified part of the site as a preferred housing allocation (ref: BM013). The land immediately to the south-east of the site, north of Rudyard Road, was also identified as a preferred housing allocation (ref: BM029). The plan from the consultation document for Biddulph Moor is shown below:



2.3 The site is assessed within the Staffordshire Moorlands Green Belt Review Study (SMGBRS). Within the Additional Site Appraisals September 2016 document (SD 22.6), Parcel BM5 Land off Rudyard Road & Parklands falls within the western section of our client's land. On each of the Framework's Green Belt Objectives, this parcel is identified as having a 'Limited Contribution' to the overall Green Belt. It states:

"The site is largely bounded and development would be modest infill. The absence of a defined northwestern boundary could be problematic."

2.4 The recommended action for a Green Belt boundary revision is:

"Potential for release under Exceptional Circumstances reflecting the enclosed character of the site, although a northwestern boundary is absent. Extend village boundary to incorporate the site."

2.5 We agree that the parcel makes a limited contribution to the Green Belt when assessed against the Framework. The entire site would form an extremely logical release of Green Belt land, with negligible impact upon the purposes of including land within the Green Belt.

- 2.6 It is therefore not clear why then that the Council has not proceeded with the allocation of this site (and altered the proposed housing distribution), when other Green Belt land within the larger villages is proposed for release. The approach is not justified by the Green Belt assessment or any other evidence relating to site selection.
- 2.7 Furthermore the assessment contradicts the Council's justification for the proposed distribution of development (i.e. less development in the rural area, and no allocations within a number of larger villages, on the basis of harm to the Green Belt), when there are sites available which only make a limited contribution to the Green Belt purposes.

Does the LP provide for a range of sites of different sizes in the rural area?

- 2.8 No.
- 2.9 The distribution in the rural area is significantly distorted by the Blythe Vale allocation, which accounts for 65% of the allocations provided in the rural areas. In addition to failing to plan for the needs of each settlement, the Local Plan fails to provide a range of small and medium size sites. The Government has been clear in its support for small and medium sized sites, which can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. This is important in the context of Staffordshire Moorlands, which has a track record of extremely poor delivery in comparison to development targets.