

My Ref

Your Ref

17 January 2019

Mr Mark Dakeyne
Planning Inspector
c/o Programme Officer
Moorlands House
Leek
Staffordshire
ST13 6HQ

Dear Mr Dakeyne

Re. Post Hearing Advice

Thank you for setting out your post hearing advice and next steps in the process. The Council has now commenced the consultation with all respondents to the Local Plan Submission Version on the updated housing land supply, draft Housing Implementation Strategy and related updated information as directed for a period of three weeks closing on 8th February.

In terms of the timescales for the further actions, I can confirm that they are achievable and we welcome the consideration given to the implications of the May elections.

However, we wish to express our disappointment at your conclusions regarding site BDNEW which forms part of the Wharf Road Strategic Development Area. In particular, the statement that the evidence base, including the Green Belt Review, does not justify the release of the site is challenging. The Council fully considered the respective merits of site options during the preparation of the plan. A summary of the relevant evidence and subsequent conclusions are set out in the Site Allocations Topic Paper for Biddulph (SD 13.2).

In relation site BDNEW, the Green Belt Review Additional Sites Assessment (SD 22.7) concluded that the site could be considered for release under exceptional circumstances and that *“Development could be considered without significant damage to the wider Green Belt, although there would be an impact on openness given the location of the land.”*

It is accepted that the review identified further sites that could also be released from the Green Belt under exceptional circumstances, including some that were found to have a more limited contribution towards Green Belt purposes. High landscape impact was also identified for BDNEW in the Council’s assessment (SD 22.8).

Simon W. Baker B.Ed MBA MIMSPA
Chief Executive

Nevertheless, in reaching a balanced view in determining the selection of appropriate site allocations, the Council also had regard to the wider planning issues of the site options as summarised in the Site Allocations Topic Paper. These include heritage impacts associated with development in the vicinity of Knypersley Hall (SD 22.5) and concerns raised regarding conflict with the Biddulph waste water treatment works on nearby site options. In their representation to the Local Plan Submission Version, United Utilities stated *“its preference for sensitive uses such as residential to be located away from our existing operational infrastructure. This is particularly relevant to our wastewater treatment works which are key operational infrastructure”* (LPS191).

Whilst it is recognised that your post hearing advice is not intended to be comprehensive, it is notable that the constraints identified by the Council on alternative sites are not acknowledged. Accordingly, we seek your assurances that the above matters have been taken into account in your deliberations.

The Council will need to closely consider its options to address your concerns regarding site BDNEW over the coming weeks before drawing any conclusions. However, Paragraph 22 of your advice refers to the fact that the Framework¹ does not require the identification of specific sites for the whole of the plan period. The latest housing trajectory indicates that with the removal of site BDNEW from the planned supply, the Local Plan still identifies sufficient land for 13 years. This exceeds the requirement set out in the Framework which only expects the identification of land for the 11-15 year phase of Local Plans “where possible”. Whilst the Council’s preference has been to identify land for the full plan period with the allocation of site BDNEW, we would like to seek your views on the potential for the site to be removed from the Local Plan without the subsequent deficit in housing supply being made up elsewhere.

In terms of your wider recommendations, the Council will give further consideration to the supporting evidence for the Local Green Space designations and other identified modifications ahead of the consultation expected from late May onwards.

Yours sincerely,

Dai Larnier
Executive Director – Place
Staffordshire Moorlands District Council

¹ Paragraph 47, National Planning Policy Framework (2012)