



Hearing Statement on behalf of Mr and Mrs Webb

In relation to: Matter 1 – Legal Compliance, Procedural
Requirements and the Duty to Cooperate

Mr & Mrs Webb

Project : 17-204
Hearing : Matter 1 – Legal
Compliance, Procedural
Requirements and Duty
to Cooperate
Client : Mr and Mrs Webb
Date : September 2018
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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 responds to the Inspector's schedule of Matters and Issues, specifically the questions under Matter 1: Legal Compliance, Procedural Requirements and the Duty to Cooperate. It should be read in conjunction with our detailed representations to the Submission Version of the plan, and our other Hearing Statements submitted to this examination.

2. Response to the Matters and Issues

Is the timeframe of the LP appropriate (2016-2031) or should it be extended to provide a 15 year period upon adoption?

- 2.1 Paragraph 157 of the 2012 Framework requires that plans should be drawn up over an appropriate time scale, preferably a 15-year time horizon. This is a particularly pertinent issue when planning for Green Belt release, and seeking to provide permanence in revised Green Belt boundaries as is the case in this plan.
- 2.2 The Local Plan proposes a plan period of 2016 to 2031. This would not cover a full 15 years from the date of adoption. We note that modifications to the plan have already been put forward by the Council, and that these will require further public consultation. The earliest that the plan could realistically be adopted is 2019, subject to how the remainder of the examination proceeds.
- 2.3 Therefore given that the end date of the plan is March 2031, it would only plan for 12 years or less from adoption, and not the 15 year horizon preferred by the Framework. If there is slippage in the timescales and the examination takes longer than 12 months, which is highly likely from our experiences elsewhere and given our significant concerns in relation to the soundness of this plan, the horizon from adoption would be shortened even further.
- 2.4 Whilst the Inspector examining the Core Strategy endorsed a review to cover the plan period 2016 – 2031, he was assuming that the plan would be adopted before 2016. He could not have anticipated that the review may not be adopted until 2019. In fact the Core Strategy Inspector's report is clear at paragraphs 37 and 38 that the fundamental purpose of the review was to provide a 15 year time horizon:

37. The CS has been a long time in gestation and, if it were to be adopted before the end of 2013, would have only 12 years to run compared to the NPPF (para 157) preference for a 15 year time horizon. The Housing Requirements Paper [doc C(3)] recommends (para 5.3.4) that consideration should be given to extending the plan period to 2031 in order to give a longer time horizon. The justification for this is that it would give greater certainty over the long term and give more time for the housing market and the economy to recover. However, in my view, it would be impractical to extend the lifetime of the Plan without considerable additional work since, as the Paper indicates, it would result in a total requirement of 6,875 dwellings.

38. The Council has accepted an alternative course of action as more appropriate. This would be based on a clear commitment to an early and comprehensive review of the Core Strategy for the period 2016 – 2031 and rolling it forward into a single local plan combined with the Site Allocations DPD.

- 2.5 Therefore the 15 year plan period that the Core Strategy Inspector anticipated will now not be provided. Instead the remaining plan period will be 12 years, which was what the Core Strategy Inspector considered inadequate. It is extremely disappointing that the Council has remained loyal to the 2016-2031 plan period, without due consideration as to what the Core Strategy Inspector had said and what the inevitable implications are if the plan period is not extended (i.e. another early review).
- 2.6 Consequently we consider that the plan period should be extended by at least 4 years (i.e. to 2035) to ensure that it plans for a full 15 year horizon on adoption.