



Hearing Statement on behalf of Mr and Mrs Webb

In relation to: Matter 2 – Strategy and Strategic Policies

Mr & Mrs Webb

Project : 17-204
Hearing : Matter 2 – Strategy and
Strategic Policies
Client : Mr and Mrs Webb
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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 summarises our client's position in response to the Inspector's schedule of Matters and Issues, specifically the questions under Matter 2: Strategy and Strategic Policies. 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 strategy for the distribution of development justified (Policy SS3)?

- 2.1 We consider that the proposed distribution to the rural areas is too low, and insufficient to meet development needs, particularly within the larger villages.
- 2.2 National planning policy is very supportive of providing housing in rural areas in order to meet identified needs. The Framework seeks to implement the findings of the Taylor Review (2008), which was critical in the production of the Framework and has been found by Inspectors to still be relevant to planning in rural areas post the adoption of the Framework¹. The report specifically highlighted the failure of planning to properly address development needs in rural areas, and the implications for the sustainability of rural communities. Paragraph 54 of the Framework provides:

“In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.”

- 2.3 Paragraph 55 of the Framework provides:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.”

- 2.4 Paragraph 50-001 of the NPPG also provides:

“How should local authorities support sustainable rural communities?”

It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. *This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.*

¹ For example see APP/Y3940/W/16/3164255 – Land north of St Georges Road, Semington (14th December 2017) & APP/R0660/A/13/2192192 – Land opposite Rose Cottages, Brereton Heath (12th February 2014)

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities.**

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so **blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.** A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan and the plan proposal meets the basic conditions.

The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas." (our emphasis)

2.5 The Submission Version proposes a total housing requirement of 6,080 dwellings to 2031. Table 7.2 of the Submission Version proposes the following distribution:

Area	% of District Total	Gross housing requirement	Net housing requirement
Leek	30%	1,794	1,015
Biddulph	20%	1,196	885
Cheadle	25%	1,495	1,166
Rural	25%	1,495	793
Total	100%	5,980	3,859

Table 5.3 – Housing distribution

2.6 We have concerns in relation to the distribution ratios for main towns and the rural area contained within Tables 7.1 and 7.2. In the Preferred Options consultation last year the Council reduced the distribution to the rural area from 28% to 25%, on the basis that it “reflects the constrained supply of suitable sites”. No evidence has been provided in terms of need between the settlements. We are also concerned as to whether the quantum of development proposed within Leek, Biddulph and Cheadle is realistically deliverable, having regard to our assessment of the draft allocations (see our representations to Policy SS4) and the local delivery record. The proposed distribution is therefore not justified.

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

2.7 No.

2.8 Whilst the availability of land outside of the Green Belt is a material consideration in establishing whether exceptional circumstances for Green Belt release exist, the Framework is clear on the need to consider the consequences for sustainable development of such an approach. Increasing the requirement for Cheadle would not address the unmet needs of many rural areas within the district, including the need for affordable housing. The evidence base does not consider this issue.

2.9 Furthermore the Council's position is not justified by its own Green Belt assessment, which identifies land for potential release which only make a limited contribution to the Green Belt purposes (for example our client's site at Biddulph Moor, as detailed within our representations to the Submission Version). This fundamentally contradicts the Council's justification for the proposed distribution of development. Additional allocations could be made in the rural areas with limited (if any) impact on the strategic role and function of the Green Belt.

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?

2.10 Yes.

2.11 Insufficient consideration appears to have been given to meeting housing and other needs within the villages. The 2017 SHMA Update identifies an affordable housing need of 442 per annum (or 224 per annum based on a 35% income threshold), and also that affordability issues are particularly severe within the rural areas. However the 2017 Update does not provide a figure for the rural area or specific villages. Paragraph 9.65 of the 2014 SHMA states:

"It is also noted that there is growing pressure nationally to assess the housing needs of rural communities, as a separate and distinct study from more broad based housing needs assessment. Rural communities and their housing needs are of particular importance in Staffordshire Moorlands given the Peak District National Park and the considerable area of the District that is rural in nature."

2.12 Paragraph 12.25 of the 2014 SHMA states:

Residents in rural areas were considered to be less likely to apply for a place on the Council's Housing Register given the limited supply of units becoming available in rural parts of the District. Stakeholders considered that there remained a strong demand for housing in rural areas and an overall shortage of social rented stock, with much lower stock turnover compared to the urban areas of the District

- 2.13 The failure to identify and meet the housing needs of the rural areas is contrary to paragraphs 47, 50, 54 and 55 of the Framework.
- 2.14 Furthermore as identified within the PPG, housing is essential to ensure viable use of local facilities in rural areas. There does not appear to be any assessment of these factors within the evidence base.
- 2.15 There is no evidence to support the Council's assertion that the amount of development apportioned to the rural area should be restricted to reflect a "constrained supply of suitable sites". Our client is putting forward an unconstrained omission site in Biddulph Moor, where presently the Council is not proposing any allocations. This is one of a number of sites which was identified for an allocation in the Preferred Options Site and Boundaries Plan in April 2016, but the allocation was subsequently not taken forward. Aside from existing planning policy designations, the site is not constrained and could contribute to meeting local housing needs.
- 2.16 We consider that insufficient housing is being apportioned to the rural area. This is inconsistent with national planning policy, not justified by the evidence base, and inconsistent with the Council's own spatial strategy. We consider that the distribution to the rural area should be increased, with sufficient housing provided within all of the rural villages in accordance with Policy SS2.

Viability Assessment

- 2.17 As set out in our representations to the Submission Version, a whole plan viability assessment had not been undertaken at the time the plan was prepared and consulted upon. This has now been prepared (SD 24.1), but the evidence indicates that a large number of the strategic allocations are not viable with the full policy requirements for affordable housing and necessary infrastructure. This has fundamental implications for the distribution of development, as it is clear from the assessment that the strategy would not address affordable housing need to anywhere near the extent anticipated in the submitted plan, and furthermore that an alternative distribution (i.e. allocating more land in the rural areas and Cheadle) could deliver significantly more affordable housing / other infrastructure than the current strategy.

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?

2.18 Yes.

2.19 Blythe Vale is located within Blythe Bridge. Although Blythe Bridge falls within Staffordshire Moorlands administrative area and is a village, it directly adjoins and is effectively a suburb of the city of Stoke-on-Trent. It was this direct relationship between Blythe Vale and Stoke-on-Trent which underpinned the identification of the site to meet the inward investment needs of the Stoke/Newcastle conurbation. We note that Stoke-on-Trent City Council still considers the Blythe Vale site to be an important strategic employment site on the boundary of Stoke-on-Trent².

2.20 The proposed residual requirement in the rural area is 793 dwellings. Table 7.6 sets out how this is proposed to be met, with 461 dwellings to be provided on new allocations, and 420 dwellings to be provided by way of a small sites allowance (infill provision of 30 per year). Details of the proposed allocations throughout the rural areas are provided at Policy H2:

Location	No of dwellings
Land at Capri, Gallows Green, Alton (AL012)	13
Blythe Vale, Blythe Bridge (Policy DSR 1)	300
Land at corner of Brookfield Avenue / Stoney Lane, Endon (EN128)	22
Haulage Depot, St Thomas's Road, Upper Tean (UT019)	15
Land adj to Waterhouses Enterprise Centre, Leek Road (WA004)	36
Land off Ash Bank Road, Werrington (WE003 & WE052) (Policy DSR2)	75
Total	461

² CD 9.3 – SOCG between Staffordshire Moorlands DC, Stoke-on-Trent CC, Newcastle-under-Lyme BC & Stafford BC

Table 5.4 – Housing allocations in the rural area

- 2.21 Therefore of the 461 dwellings to be allocated within the rural area, 300 dwellings are to be provided on one site (Blythe Vale, Policy DSR1). The distribution around the rural area is extremely uneven, with most villages not accommodating even one site allocation, and consequently their needs would not be met.
- 2.22 In the adopted Core Strategy it was acknowledged that the site should not count towards the employment land requirements for the district as it caters to a wider sub-regional need. Having regard to what reasonably can be considered the housing market area, and importantly the needs of individual sub-areas and villages within the rural area, there is no evidence to suggest that the delivery of the Blythe Vale site would contribute to addressing housing needs in the rural area of Staffordshire Moorlands.
- 2.23 We therefore do not consider that the site should be included within the requirement for the rural area. Instead it should be included within a separate category relating to the city of Stoke-on-Trent.
- 2.24 We consider that insufficient housing is being apportioned to the rural area, as the current figure is severely distorted by the Blythe Vale site. The strategy for the rural areas needs to be fundamentally re-adjusted, with sufficient housing provided to meet needs across the rural area.

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

- 2.25 It is not necessary for the plan to set a specific minimum housing requirement for each settlement. However to be effective and to reflect the particular needs of each settlement, in particular the larger villages, the plan should identify the indicative distribution for each of the villages. For example, the plan should identify that Biddulph Moor will accommodate approximately [insert figure] number of dwellings. A table could be inserted in Policy SS8. However as noted elsewhere within our representations, at present the plan

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

2.26 Policy SS2 sets out the settlement hierarchy for the district. Biddulph Moor is identified as a larger village, which we support. Policy SS2 sets out the following approach in relation to the large villages:

“Rural Area Larger Villages – these are the most sustainable settlements in the rural areas which generally have a good local social infrastructure, some local employment opportunities and good accessibility to the towns and larger centres. These villages also have an important role in terms of serving and supporting their immediate surrounding rural areas and smaller villages. The spatial strategy focuses the bulk of the rural development in these settlements and seeks to ensure that they are sustained and promoted as service centres. These settlements will be defined by a Development Boundary. It is recognised that there is a significant range amongst these villages in terms of their size and facilities and it is proposed therefore that the scale of development in each area should be relative to their current size and infrastructure capacity.”
(our emphasis)

2.27 It is therefore clear from the settlement hierarchy that Biddulph Moor is a sustainable rural settlement, which has an important role in terms of serving their rural hinterland. Furthermore the bulk of rural development is intended to be focused in these settlements, including site allocations. This accords with the Framework, in particular paragraph 55. However, the as presently drafted the plan does not proposed any site allocations within Biddulph Moor. The Green Belt boundary would remain tightly drawn around the settlement, with few if any opportunities available to provide much needed market and affordable housing in the village.

2.28 Policy SS8 states that these settlements shall retain and enhance their role as rural service centres, providing for the bulk of the housing requirement of the rural areas and also for employment needs of a scale and type appropriate to each settlement having infrastructure capacity and character. Our concern is that allocations and distribution of development within the Submission Version does not reflect this strategy, with insufficient housing development being apportioned to the villages within the rural area, and in particular Biddulph Moor

2.29 It is therefore clear that the plan is internally inconsistent. In the case of Biddulph Moor the spatial strategy set out at Policy SS2 is not being implemented throughout the remainder of the plan.

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?

2.30 Yes. Most windfall development will be of less than 10 dwellings, and is therefore unlikely to deliver affordable housing.

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

2.31 Yes. The presumption in favour of sustainable development should be enshrined within the development plan for the benefit of Section 38(6) of the Act.

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

2.32 Yes. It is extremely concerning that despite releasing land from the Green Belt for development, the Submission Version does not make any reference to the identification of safeguarded land. This is in the context of a plan where the plan period only extends to 2031.

2.33 Paragraph 83 of the Framework requires that when Green Belt boundaries are established or reviewed, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

2.34 Paragraph 85 states that when defining boundaries, local planning authorities should where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. They should also satisfy themselves that Green Belt boundaries will not need to be reviewed at the end of the plan period.

2.35 Therefore national policy is clear on the need to provide for safeguarded land to provide permanence to the Green Belt. The main towns and larger villages in Staffordshire Moorlands are currently, and will continue to be, the main focus of development in the future. It is therefore critical that sufficient safeguarded land is provided to meet needs stretching well beyond the plan period, in addition to site allocations.

2.36 How much safeguarded land is needed in practice was considered in detail at the examination of the Cheshire East Local Plan, which has recently been adopted. In summary, sufficient safeguarded land should be provided to ensure that the current requirement could be carried forward to the next plan period without the need for Green Belt release. In practice the

minimum requirement is to provide a similar amount of safeguarded land to the amount of Green Belt being released for development in this plan period. Ideally more should be provided, to allow flexibility for higher growth, to increase the permanence of the Green Belt and to provide certainty to local residents as to the location of future development.

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?

- 2.37 The Council considers there are exceptional circumstances to justify Green Belt release at a strategic level, and a number of the proposed site allocations involve the release of land from the Green Belt. We consider that there are also exceptional circumstances to justify the release of Green Belt around the larger villages, and specifically at Biddulph Moor.
- 2.38 The exceptional circumstances are two-fold. Firstly, it is necessary to review detailed Green Belt boundaries during the preparation of the plan given that they have not been reviewed in full for such a significant period of time. Changes to the built and natural environment occur on a regular basis, necessitating review of the Green Belt boundaries to reflect what is actually on the ground. Furthermore there is a need to promote sustainable patterns of development having regard to the current planning policy and housing need context, which is very different now to when the existing Green Belt boundaries were established.
- 2.39 Secondly and most importantly, we consider that Green Belt boundary changes are required to provide sufficient housing to meet the needs of rural settlements, which is a key objective of the Framework. This should also be viewed in the context of our overall representations which seek an increase in the overall housing requirement, and an increase in the housing requirement within the rural areas. The majority of larger villages, including Biddulph Moor, have very limited development opportunities within them. Small scale Green Belt release is realistically the only way that local housing needs for market and affordable housing can be met. Whilst unplanned, small-scale affordable housing exception sites may be one way in which a limited amount of affordable housing can be delivered as appropriate development in the Green Belt, this does not provide certainty that needs within particular settlements will be met. It also would be unlikely to deliver market housing, which in accordance with the Framework's definition forms a key part of the objectively assessed need.