

Staffordshire Moorlands Local Plan Examination

Matter 8: Allocations Villages

Wednesday 17 October 2018

Homes England

Introduction

1.1.1 Homes England supports the allocation of sites WE003 and WE052 (Policy DSR4) which are within its ownership. This is a highly sustainable location for new development to contribute towards the Council's housing supply and assist in meeting its Objectively Assessed Housing Needs (OAN). Initial technical work undertaken has indicated that there are no overriding constraints to developing these sites. Proposed allocation DSR4 is considered to be:

- J Justified; based on proportionate evidence the release of these sites from the Green Belt for housing is justified through being a sustainable location on the edge of a built-up area;
- J Effective; the sites are available now and could be developed within the early part of the Plan period to contribute to meeting the Council's five-year requirement; and
- J Consistent with national policy; the allocation accords with the NPPF's aspirations to achieve sustainable development including positively meeting development needs over the Plan Period.

1.1.2 The sketch Illustrative Masterplan at **Appendix A** is not fixed, rather it is intended as one potential design to demonstrate how the sites could be developed, and confirms that allocation DSR4 is achievable.

Issue 3 Land off Ash Bank Road, Werrington (DSR4)

Question 3.1 Have exceptional circumstances been demonstrated to justify the removal of land from the Green Belt?

- 1.1.3 NPPF Paragraph 83 states that Green Belt Boundaries *'should only be altered in exceptional circumstances through the preparation and review of the Local Plan.'* The plan is supported by a robust evidence base in which the strategic need for meeting sustainable development requirements is clearly justified.
- 1.1.4 It is considered that in light of the significant housing need in the District in the current plan period, the evidence justifies 'exceptional circumstances' for revisions to the Green Belt. Policy SS3 identifies that to meet the housing requirement of 6,080 dwellings between 2012 to 2031 allocations of 3,859 dwellings are needed taking into account completions and existing commitments. Although on face value it would appear from the Council's figures that there is just sufficient supply to meet the current Local Plan target, the level of delivery of new homes in recent years remains below target.
- 1.1.5 The Council's March 2018 Housing Land Supply Assessment considers that it has 5.6 years supply using the Liverpool method against the requirement for 320 dwellings per annum, and including a 20% buffer for past under-delivery. However, the five-year supply position is marginal, and the Council is reliant on all proposed allocations to assist in meeting their housing supply and maintaining a five-year supply of housing.
- 1.1.6 Sites WE003 and WE052 are included within the five-year supply 2018/19-2023/24 for 75 dwellings. As such, it is considered important that deliverable sites such as these are allocated. The NPPF indicates that relevant policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a five-year supply of deliverable sites. Therefore, unless a favourable five-year supply position can be maintained, the Local Plan review would be immediately out of date once adopted and would be ineffective.
- 1.1.7 As acknowledged in the Local Plan (para 7.28) the Green Belt is a constraint for many of the main settlements and rural villages and, as such, limits the number of sites available for development. It is therefore inevitable that growth can only be accommodated by releasing land. Accordingly, given the extent of the Green Belt in the District, the Council's assessment of the settlement boundaries is of fundamental importance to delivering the Spatial Strategy. To maintain and enhance the rural settlements and contribute to local housing needs, a proportion of housing needs to be delivered in these areas to ensure local housing needs are suitably addressed, as well as providing flexibility in relation to overall housing delivery.
- 1.1.8 The release of land at Werrington is consistent with the Policy SS2 (settlement Hierarchy) which defines Werrington as a larger village and a location that can play a proportionate role in meeting housing needs. The sites are in a sustainable location, within walking distance of local shops and services along the A52. There are also a number of bus stops along the A52 reducing the need for residents to travel by car. With regards to employment, Werrington is on the edge of Stoke on Trent, with good access into the City and surrounding settlements.

- 1.1.9 Not only is there a strategic need but the proposed boundary amendments are also clearly justified through a Green Belt review to meet the tests in NPPF paragraph 85 which suggests that new boundaries should be clearly defined using *'physical features that are readily recognisable and likely to be permanent.'* The Council's assessment of the settlement boundaries provides an evaluation of the contribution that the allocation makes to the purposes of including land within the Green Belt and justify their release.
- 1.1.10 The Council's Green Belt Review Study 2015 (GBR) (22.4) and Sustainability Appraisal 2018 (SA) (6.5) support development of these sites. The Green Belt Study confirms that development of WE003 would have a moderate impact on the Green Belt, with limited contribution towards maintaining separation and preventing encroachment, referring to the site as an infill parcel. Whilst the assessment refers to long distance views from the A52, it recommends retaining the top part of the site as open space to retain the gap between existing development. The landscaped edge to the southern boundary provides a clearly defined and defensible boundary on which to base a revision to the Green belt boundary.
- 1.1.11 The Green Belt Study assessed development of site WE052 as having a limited impact on the Green Belt, confirming the views from the A52 are already compromised by the prison to the south. As such, it is considered that this is an entirely sensible location for new housing.
- 1.1.12 The sites are situated adjacent to the A52, with development to the north, east and west. As such, these sites would essentially be infill development, and would provide sensible rounding off, of the settlement edge in this location to deliver much needed housing for the area to meet existing local needs.
- 1.1.13 Whilst only illustrative, the Masterplan has considered the initial technical assessments undertaken, as well as known utilities on the sites. The scheme includes public open space and SuDs requirements and retains important ecological and landscape features. This confirms that 75 dwellings on the sites is entirely achievable.
- 1.1.14 In summary, exceptional circumstances have been demonstrated; there is a clear strategic need for housing that cannot be met solely on land outside the Green Belt; the sites conform to the Spatial Strategy; and the boundary revisions around the sites have been fully justified through a robust review of Green Belt boundaries.

Question 3.2 If exceptional circumstances have been demonstrated have these been clearly articulated in the LP?

- 1.1.15 Whilst we agree that evidence demonstrates revisions to Green Belt boundaries have been properly assessed and justified, we suggest a slight modification to the boundary of Sites WE003 and WE052 on plan A4.11 to incorporate additional land within Homes England's ownership. The suggested modifications are outlined in blue on the Masterplan (Appendix A).
- 1.1.16 Although other access locations are available to deliver the allocation, this additional land should be included to provide flexibility in the access design. The additional land for Site WE003 is the existing prison access. The modifications are not material and would be viewed

within the context of the existing built form on Ash Bank Road. The GBR recommended amending the Green Belt boundary to include the proposed development at Werrington including the prison (page 41). As such, it would be entirely sensible to include this additional land within the allocation to provide flexibility in the sites' delivery.

Question 3.3 Are the landscape impacts acceptable?

- 1.1.17 Assessments have shown that there are no landscape constraints to developing the sites. In terms of site WE003, the existing landscape is composed of un-managed grassland with mature tree lines and hedgerows that run centrally across the site and form the southern and eastern boundary. The site's topography falls away from Ash Bank Road to the south allowing open views towards the wider countryside. Existing development adjacent to the site (residential dwellings and prison) and visible urban fringe elements (i.e. close board fencing, security fencing, lighting columns) reduce the potential for built development to adversely affect views from the surrounding area. Site WE052 is viewed within the context of the prison complex and is also not a sensitive location.
- 1.1.18 The SA indicates that development of both sites would have a significant positive effect in terms of delivery of housing, access to services and facilities, and to open space and that the sites fit well with the existing settlement pattern. Whilst there is a listed building within 400m the Landscape Local Green Space and Heritage Impact Study concluded that the sites are unlikely to adversely affect the setting of this asset. It concluded that the sites are not in an area of high landscape sensitivity and can accommodate development.
- 1.1.19 The GBR (Appendix C (22.4f) concluded that the sites should be considered for release from the Green Belt but also suggested that the northern part of site WE003 could be retained as open space, allowing for the retention of some views of the open countryside from the A52. Retaining a green gap along the street frontage would maintain a sense of openness, with housing set back further down the slope reducing its overall height and impact.
- 1.1.20 The Illustrative Masterplan demonstrates how the sites could be developed to provide the allocation of 75 dwellings without significant landscape impacts. Site WE052 could provide up to 25 dwellings, and site WE003 could provide around 50 dwellings. This is just one illustration of how development could be accommodated across the sites, and there is flexibility to alter the quantum of development on each site to achieve the most appropriate design and minimise the landscape impact at the detailed design stage whilst also delivering the full allocation. It is considered that the scale of development is appropriate for the location and it would provide a suitable rounding off to the settlement utilising the existing landscape framework.
- 1.1.21 Whilst some trees may need to be removed to enable the development, additional planting within the scheme will mitigate this loss. It is, however, likely that the majority of the trees on-site could be retained and incorporated into the scheme's design. The existing strong hedgerows that bound the site on the southern and south eastern boundaries provide a strong landscape framework that can be augmented to form a new landscaped edge to the settlement.

- 1.1.22 Initial ecological surveys have been undertaken. They identify trees that have potential for bat roosts and a badger sett was identified on site WE003. These issues have been taken into account in the Illustrative Masterplan design. These issues are not expected to be a constraint to development and the features can be maintained within a significant open space network on-site and will be subject to further assessment at the planning application stage.
- 1.1.23 A landscape review has been undertaken by Homes England which agrees with the Council's evidence that this is not a sensitive landscape location. It also highlights a number of benefits that could be accrued through a high-quality development:
- ▶ Retention of southern view corridor (from Ash Bank Road) to link the settlement to the wider open countryside.
 - ▶ Retention and enhancements of existing tree cover and hedgerows providing a rich landscape framework.
 - ▶ New public open space and play facilities for the benefit of existing and new residents.
 - ▶ Provision of an appropriate visual and physical buffer to the existing prison security fence and boundary.
 - ▶ A design which sensitively responds to the amenity of neighbouring homes.
- 1.1.24 In summary, the Council's evidence concludes that these are not sensitive locations and can accommodate new development. Good quality design will ensure landscape impacts are acceptable.

Question 3.4 Can safe and suitable accesses and sustainable links to village facilities be achieved for the sites?

- 1.1.25 The transport implications of the proposed allocation have been fully considered. Allocation DSR4 offers a sustainable location for new development, a suitable access can be achieved to the sites and the surrounding roads have capacity to accommodate this scale of development. Given the length of road frontage there are a number of options to provide safe vehicular access. A survey demonstrates that traffic speeds along the A52 are lower than the current speed limit. A potential access solution is shown on the Illustrative Masterplan.
- 1.1.26 Site WE003 could utilise the existing access to the prison, the northern part of which is within Homes England's ownership. The development is only expected to generate a modest amount of traffic movements and the development would be compatible with the existing operation of the prison. There are options for locating an alternative access into the site off the A52 west of the existing access which could be considered in detail at the planning application stage. It is not considered that a secondary access is essential, but an emergency access/pedestrian link can be provided on the north western site boundary.
- 1.1.27 Access to WE052 can also be achieved in a number of locations along the road frontage on Ash Bank Road. It is considered that there is scope for relocating the bus stop along the A52, to enable safe access into the site.

- 1.1.28 The most appropriate and safe access arrangements would be confirmed through discussions with the Highways Authority at the planning application stage but, as noted, there are a range of options.
- 1.1.29 The sites are also well located to pedestrian and cycle routes meaning it offers significant potential to deliver sustainable development and reduce car dependency. They are within walking distance of the amenities and services including schools, health care facilities and local shops. They are well located and connected by public transport with four services an hour running along the A52. These provide regular buses to Stoke-on-Trent, including employment opportunities. Given the site's proximity to employment opportunities, local community facilities and services, all of which are accessible by sustainable transport modes, it is considered that allocation DSR4 represents a highly sustainable option for housing. This view is shared by the Council in its SA.
- 1.1.30 Overall, the sites offer significant potential to deliver sustainable development in line with the emphasis of NPPF. In preparing Local Plans, the NPPF (paragraph 30) states that '*...local planning authorities should...support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.*'

Question 3.5 Will living conditions for future occupants be acceptable given the proximity of the allocations to the prison?

- 1.1.31 It is considered that the development is compatible with surrounding land uses, including the prison and will provide a satisfactory level of amenity for future residents. The Illustrative Masterplan has sought to demonstrate how homes could be developed to sensitively respond to the surrounding uses.
- 1.1.32 It is considered that there is sufficient distance between the main prison building and development on WE003 so as not to detrimentally impact on new residents. There is an area of car parking and buildings in between the prison and the site which, with the additional planting proposed along the eastern edge of the site, would assist in acting as a noise buffer.
- 1.1.33 Development on WE052 could be situated on the northern part of the site, thereby maintaining a green buffer to ensure residential amenity and privacy, and reduce potential noise impacts from the prison. Due to the sloping nature of the site and concerns from the prison regarding security and amenity of inmates, the southern part of the site would be retained as open space, and would include substantial tree planting to act as a noise and visual buffer between the dwellings and prison. Dwellings would be set back around 60m from the main prison façade, with a new planting buffer of around 30m from the prison boundary to maintain its security.
- 1.1.34 The impacts from road noise on the A52 are also not considered significant. Standard glazing and ventilation measures could reduce the external noise impacts on residents. Dwellings fronting on to the A52 can also be orientated towards the road to provide a noise bund for the development and achieve suitable noise levels in private amenity space.

1.1.35 A noise survey would be undertaken at the planning application stage to assess the potential noise impact from the adjacent prison and the A52. Whilst the results will confirm if mitigation is required it is considered that these are detailed design points for future consideration and that the design can safeguard the amenity of future residents and the operation of the prison.

Question 3.6 Are all the policy requirements necessary and clear to the decision maker?

1.1.36 The requirements set out in Policy DSR4 are considered to be appropriate. Whilst initial noise, ecology, landscape and transport assessments have been undertaken, detailed assessments would be undertaken as part of any planning application.

Issue 8 Delivery

Question 8.1 Are the assumptions about the rate of delivery of houses from the allocations realistic?

1.1.37 The housing trajectory 2018 includes the following for allocation DSR4 across both sites:

- J 2021/22 – 15 dwellings
- J 2022/23 – 30 dwellings
- J 2023/24 – 30 dwellings

1.1.38 The sites are in Homes England's ownership, which is the Government's agency responsible for increasing the number of new homes built, including affordable homes, and for bringing surplus public land to the market to drive housing growth which meets the high levels of housing need across the country. Homes England wishes to move this sites forward as quickly as possible to deliver much needed new homes in the District.

1.1.39 Initial assessments and survey work has confirmed that there are no overriding constraints to delivery of the allocation, it is considered that development of 75 dwellings across both sites is entirely achievable and realistic, making an important contribution towards the Council's five-year supply.

Word count: 2986














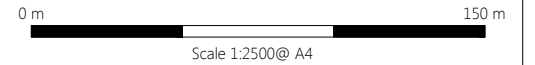
Appendix A – Illustrative Masterplan





Key

-  Site allocation boundary
-  Other land in Homes England ownership
-  Indicative residential development
-  Roads/shared surface
-  Paths/pedestrian route
-  Public open space
-  Retained trees
-  New trees
-  Utility easement
-  Proposed SuDS
-  30m landscape buffer to boundary of secure facility



SPSL Werrington

Illustrative Sketch Masterplan

September 2018

