

MATTER 8 – ALLOCATIONS CHEADLE

Response on behalf of

Muller Property Group – 1130072

MATTER 8

Introduction

Harris Lamb Property Consultancy (HLPC) are instructed by Muller Property Group (MPG) to prepare a response to the Inspector's issues and questions in relation to Staffordshire Moorlands Local Plan Examination. MPG's interest is in land to the west of Cheadle which is identified as the Mobberley Strategic Development Area. In addition, MPG are promoting additional land to the south of the draft allocation for removal from the Green Belt and to be identified for housing within this Plan if needed, or to be safeguarded for development beyond the end of the Plan Period. Our comments to Matter 8 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Questions

1. Identification of Sites

1.1) No comment

1.2) *Do the Green Belt assessments support the allocations in Cheadle?*

1. The Green Belt Assessment (Examination Document 22.4) concluded that three sites in Cheadle would be suitable for removal from the Green Belt if exceptional circumstances were demonstrated. Of the three, only site CH128 and part of CH093 (SHLAA references) are proposed for removal from the Green Belt in order to facilitate the draft allocation of land at Mobberley Farm.
2. Notwithstanding the above, the Green Belt assessment concluded in Table 5.1 of the Green Belt Assessment (page 40) in respect of the rest of parcel CH093 that MPG are promoting for development that:

**“CH093 – Release under Exceptional Circumstances, plus amendment of
Draft Town Boundary to accommodate proposed development.”**

3. The Green Belt Assessment is quite clear that the parcel of land being promoted by MPG is suitable for removal from the Green Belt if, and when, there is a need for further land around Cheadle.

1.3) No comment

1.4) *1.4 What is the up to date position in relation to planning permissions affecting the proposed allocations?*

4. In respect of Mobberley Farm, we are not aware that any planning application has yet been submitted. We make no comment on the other draft allocations.

4. Mobberley Farm (DSC3)

4.1) *Have exceptional circumstances been demonstrated to justify the removal of land from the Green Belt?*

5. Yes. We consider that exceptional circumstances have been demonstrated to remove parcel CH128 from the Green Belt. The need to accommodate a new link road is key to the delivery of the allocation and will have wider benefits to Cheadle once implemented. In light of the potential benefits that the road will deliver we consider that it is necessary to remove this land from the Green Belt.

4.2) *If exceptional circumstances have been demonstrated have these been clearly articulated in the LP?*

6. Yes. They are set out in paragraph 9.82 of the Pre-submission Draft Local Plan.

4.3) No comment

4.4) *Are all the policy requirements necessary and clear to the decision maker?*

7. The list of policy requirements appears to be a requirement for what will be needed to be submitted with a planning application. We would expect these matters to be addressed through the normal development management procedures rather than being identified in a Local Plan policy.

8. The policy as it stands is lacking in any detail as to what the Council want or expect to see on the site. Whilst a masterplan led development is likely to come forward, it would be helpful to have some clarity as to what is expected to be delivered on the site, other than housing and public open space. For instance, there is no detail about the proposed link road in terms of what it is proposed to serve and the purpose it will have in the local highway network. In seeking such a significant piece of infrastructure through the development it would be helpful to know what was expected.

4.5) *Should land beyond the site to be used for open space/surface water mitigation be included within the allocation?*

9. Yes. It would be clearer for a future developer to plan the site accordingly knowing what was and wasn't included within the allocation. It could help increase the developable area of the site in that a future developer, if they controlled all the land would have more space within which to provide open space and drainage infrastructure and therefore, there would be the potential to deliver more housing on the balance of the site.

4.6) Should the disused railway line to the north of the allocation be included as GI?

10. Whilst we would welcome the inclusion of the disused railway line in the allocation and the contribution it could make to GI, we note the reference in the paragraph 9.83 of the Pre-submission Draft Local Plan to the railway line being in third party ownership. As such, there is no guarantee that the current owner will want to maintain the site as GI for the benefit of the future development and the allocation should not be dependent upon its inclusion in any subsequent planning application.

4.7) Would delivery of sufficient housing numbers in Cheadle, the site and the link road be assisted by the inclusion of additional land within the allocation?

11. Yes. We would fully support the enlargement of the current allocation, and consider that the land immediately to the south of the draft allocation would be suitable for development. Additional development on the site would help fund the provision of the new link road. Furthermore, if the draft allocation was enlarged to include the land to the south, a more suitable junction could be constructed for the link road with the A522. Similarly, the route of the link road through the allocation could then serve more development making a longer term contribution to the future development needs of Cheadle.
12. The Council's SHLAA assessed the land to the south of the draft allocation as site CH093. The assessment of the site noted that it would provide a logical extension to development area CH085 (included in the draft allocation) and opportunity to extend Brookhouse Way alongside site to Tean Road forming southern link road. The SHLAA confirmed that the site was available, suitable and achievable.
13. We have set out in our response to Matter 3 that we consider that there are question marks over the Council's OAN and ability to demonstrate a five year supply of housing upon adoption of the Plan. Furthermore, we have stated in our response to Matter 2 in respect of Green Belt, that the land to the south of the draft allocation would be suitable for removal from the Green Belt. Clearly, if it were concluded that there is a need for further residential allocations in the Plan we would request that the Council consider the land to the south of the draft allocation. In doing so, this would necessitate revisiting the Green Belt Review.
14. Whilst we consider that there is a need for further or additional housing sites to be identified within the Plan, one option that the Council has, but which hasn't been pursued at present, is the option to remove land from the Green Belt and to identify this as safeguarded land for future development. In light of the level of new development that is proposed at Mobberley Farm and the Council's desire to see a new link road implemented as part of the development, this, in our view, would make the site highly suited a further phase of development. The site could be planned so that a further phase of development could follow on in due course and make use of the new infrastructure that is going to be constructed.
15. In addition to a larger site helping fund the construction of the road, an enlarged area for development will mean more dwellings and increased provision of affordable housing. The additional dwellings could be in addition to those already identified or released if some of the other allocations within Cheadle are not delivering as expected.

16. By increasing the size of the allocation, it may also be possible to deliver other benefits such as public open space, play areas and sports and recreational facilities. Land could be made available for a new primary school if needed and a local centre could also be incorporated to meet the day to day needs of future residents, thereby contributing to the supply of facilities in this part of Cheadle.

4.8) *Is the site deliverable taking into account different ownerships including land required for access?*

17. MPG consider that the site is deliverable from a technical point of view and are not aware of any matters that would present a constraint to the development of the site.

4.9) *Are the density assumptions reasonable?*

18. It is not clear what the density assumption is as its not set out in the policy or supporting text. Assuming a gross density across the allocation as it stands would equate to 25 dwellings per hectare (dph). However, this figure has no regard for the inclusion of open space, roads, circulation space and drainage infrastructure amongst others. A typical rule of thumb is that 35% of the site would be used for such matters. If this was the case, a net density of nearly 40 dph would result. Whilst this is very achievable, it must be considered in the context of the site being located on the edge of the settlement and the potential impact that development of this density may have on the setting of Cheadle and the wider landscape.

7. Infrastructure

- 7.1) No comment

7.2) *Is the new link road in Cheadle necessary, viable and deliverable within the plan period? (Note – the link road is described as ‘desirable’ infrastructure in the IDP, not ‘essential’)*

19. We note that the IDP describes the new link road as ‘desirable’ rather than ‘essential’. In light of our comments above about enlarging the site, delivery of a new road through the site would be a more realistic option if the size of the development was enlarged, as it would greatly assist with the viability and funding of the construction of the road.
20. Notwithstanding this, it is not clear what the Council mean by a ‘link’ road. Depending on what purpose it is intended to serve and the size and scale of the road that will be constructed, will have significant implications for whomever eventually has to build it. There is a significant cost differential between a new distributor road compared to an estate road capable of accommodating a bus for example. Clearly, the latter could be more easily accommodated within a residential development than the former.
21. Whilst the road could potentially be delivered through the proposed allocation, there are question marks over its deliverability in terms of the current location of the proposed access off the A522, but also the fact that a new bridge is required over the disused railway, which is also in third party ownership. Whoever develops the site could potentially be at risk of a ransom situation, thereby bringing into question the delivery of road.