

Staffordshire Moorlands Local Plan – Submission Version

Representations Form

Guidance Notes

Please ensure that you have read the guidance notes for submitting representations before completing this form.

The Local Plan and related background documents can be viewed on the District Council's website, Council offices and local libraries.

Website:

www.staffsmoorlands.gov.uk/localplan

Council offices:

Leek Moorlands House, Stockwell Street, Leek, Staffordshire, ST13 6HQ (8.45am - 5.15pm Monday - Thursday and 8.45am - 4.45pm on Friday)

Cheadle Councils Connect, 15a-17 High Street, Cheadle, Staffordshire, ST10 1AA (9.00am - 12.30pm & 1.00pm - 5.00pm on Monday, Wednesday and Friday)

Biddulph Town Hall, High Street, Biddulph, Staffordshire, ST8 6AR (9.00am - 5.00pm Monday – Friday)

Please return this form by **5pm on Wednesday 11th April 2018** to the email or postal address given below:

Email: forward.plans@staffsmoorlands.gov.uk

Post: Freepost RRLJ-XCTC-JBZK, Forward Plans, Staffordshire Moorlands District Council, Regeneration Services, Moorlands House, Stockwell Street, Leek, ST13 6HQ

Please note

Representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential.

Part A – Personal details and notifications

	Personal details	Agent's details (if applicable)
Title	Mr	Mr
First name	BJ	Grant
Last name	Fradley	Anderson
Job title (if applicable)	Developer	
Organisation (if applicable)		
Address line 1		
Address line 2		
Address line 3		
Address line 4		
Post code		
Telephone number		
Email address		

Notifications and Consent

- Please specify whether you wish to be notified of any of the following stages in the Local Plan process **and give consent for use of your personal data** (please tick relevant box/s)

Submission of the Local Plan for independent examination	✓
Publication of the recommendations of the Inspector appointed to carry out an examination	✓
Adoption of the Local Plan	✓
Please tick the box if you consent to storage and use of your personal data in order to contact you about arrangements for the examination and the stages above (if requested).*	✓

***IMPORTANT. We need your consent to store and use your personal data to contact you about the Local Plan ONLY. Note this information will only be used by the District Council and Planning Inspectorate and will only be used to contact you about the examination process. It will also be used by the Council to let you know about Submission of the Local Plan for independent examination, Publication of the recommendations of the Inspector appointed to carry out an examination and adoption of the Local Plan if you have asked to be notified about these stages by ticking the boxes on this representations form. If you choose not to consent, we will not be able to use your information, including your representations.**

Part B - Representations

Please use a separate Part B Form for each representation and ensure that one copy of Part A (Personal details) is attached.

1. To which part of the Local Plan does this representation relate?

	Insert paragraph, policy or map number
Paragraph	
Policy	SS4, table 7.7, SS8 and H1
Policies map	

2. In relation to the policy, paragraph or map that you have identified, do you consider that the Local Plan is (please tick relevant box/s) :

	Yes	No
Legally compliant	<input type="checkbox"/>	<input type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the Duty to co-operate	<input type="checkbox"/>	<input type="checkbox"/>

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1.Fradley Estates (“FE”) objects to the above policies of the Local Plan for the following reasons.

2.The Local Plan strategy for the provision of housing in the Rural Areas as set out in Policy SS4 and table 7.7 is to identify new allocations in the larger villages, providing 461 dwellings, with the balance of 420 dwellings for the Rural Areas proposed to come forward from a small sites allowance (infill provision of 30 per year).

3.In Policy SS8 of the Local Plan which sets out the area strategy for larger villages it is clear that the strategy proposes that the 420 dwellings will be achieved through the development of windfall sites within the development boundaries of the larger villages and by "giving consideration to limited infilling on the edge of settlement boundaries, subject to the criteria in Policy H1".

Policy H1(4) provides for windfall development within the boundaries of the larger villages and limited infill development of an appropriate scale outside the development boundaries.

4.In summary the strategy of the Local Plan is that approximately half of the housing for the Rural Areas in which area nearly half of the overall population of the District reside is proposed to be achieved on windfall sites and limited infill sites outside the settlement boundaries. This approach fails all four elements of the test of soundness.

5.Positively prepared -The approach cannot possibly be considered as a strategy which is positively prepared. A positively prepared strategy would be one which identifies deliverable allocations to meet the requirements and objectives of the Local Plan which for the Rural Areas is to create sustainable rural communities. For the Council to propose that half of the future housing provision for half of the District’s population is met through windfall sites is wholly inconsistent with national policy, is not positively prepared and in reality is an approach of “hit and hope”.

6.Justified - The approach is not justified when considered against an approach which identifies a range of allocated sites to meet the identified needs.

7.By its very definition, sites that come forward under the limited infilling approach in accordance with Policy H1 will be very small. Not only is it highly unlikely that this approach will make a material contribution to the provision of housing in the Rural Areas, but it is almost certain that any sites coming forward under this policy approach will not make any contribution to the provision of affordable housing for which the Local Plan identifies there is a "**high need**" at section 4 (224 -432 affordable dwellings per annum), and further identifies that "**the need for affordable housing is particularly critical to encourage young and/or smaller households to remain in the rural settlements**". The approach of the Local Plan in relation to housing in

the Rural Areas and larger villages is therefore wholly at odds with these key aims/issues of the plan.

8. Similarly, a strategy which is so reliant (to the extent of 50%) on infill proposals delivering its housing provision will also fail to contribute to the infrastructure needed to deliver sustainable communities. The small infill sites that come forward in this approach will make no contribution through s.106 agreements to infrastructure for example education, open space. The obvious conclusion of such an approach is that the necessary infrastructure to create sustainable communities will not be provided/maintained in the future.

9. Effective - The amount of housing proposed to come forward for the Rural Areas will simply not be delivered with the current approach of the Local Plan.

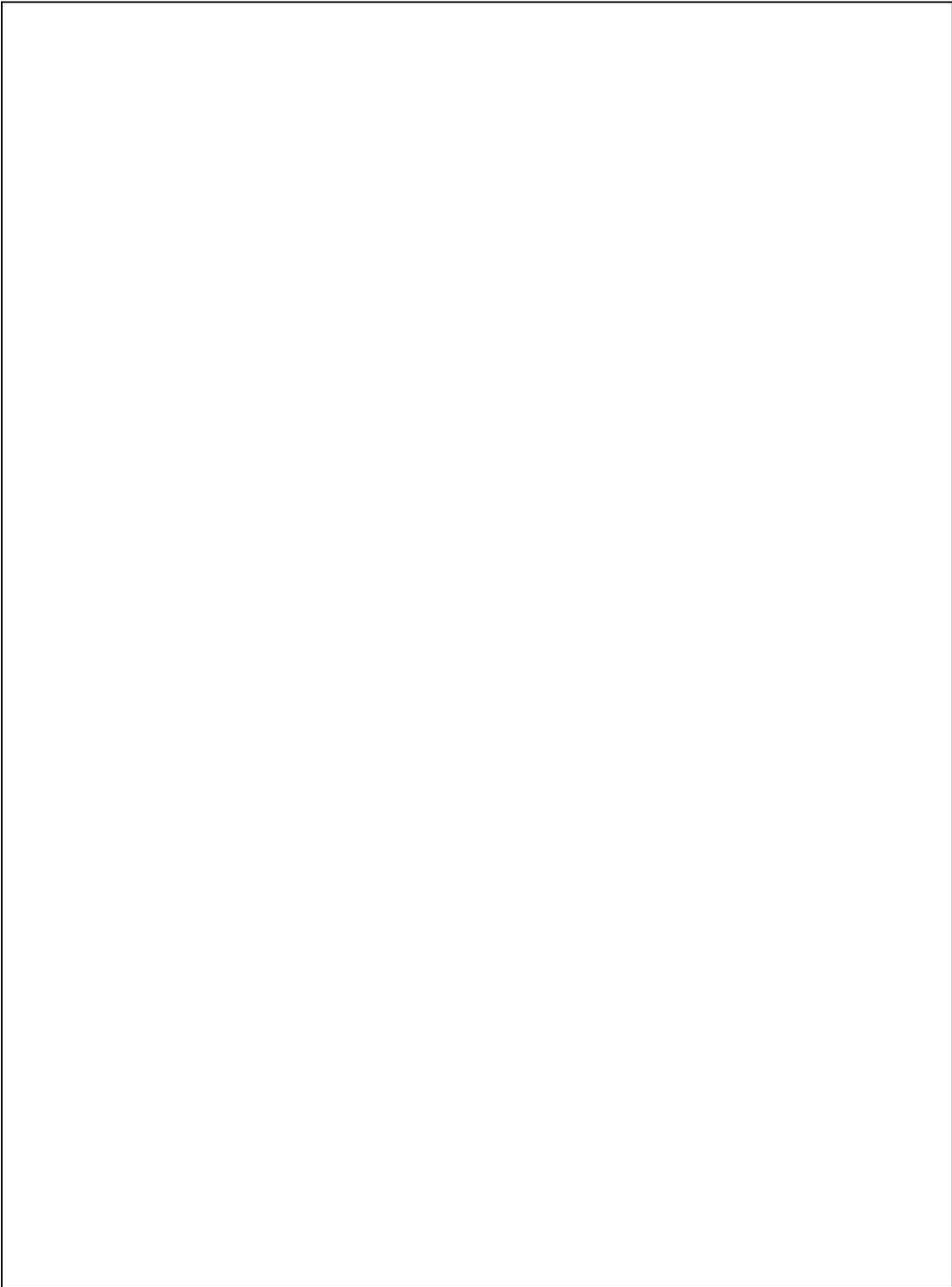
10. The approach of the Local Plan in seeking to rely on small infill development outside settlement boundaries to deliver a significant proportion (nearly 50%) of its rural housing in the Local Plan is also **inconsistent with national planning policy**.

11. What the Local Plan should be doing is identifying additional housing allocations for the Rural Areas in the largest villages. This approach will enable the Local Plan to plan positively for the delivery of the necessary development to sustain the future of rural communities. This approach will also facilitate the delivery of more affordable housing and infrastructure as larger allocated sites will be far better placed to make a meaningful contribution to affordable housing and community infrastructure than small windfall/infill sites.

12. Policy SS2 – Settlement Hierarchy – states in relation to the Rural Area Large Villages that there is a significant range amongst the large villages identified in the Local Plan in terms of their size and facilities and that "it is proposed therefore that the scale of development in each area should be relative to their current size and infrastructure capacity".

Werrington is the second largest of the twelve large villages identified in the Local Plan, being one of three villages (along with Cheddleton and Blythe Bridge) which are all significantly larger than the remaining nine villages. It is therefore clear in accordance with Policy SS2 that Werrington, Cheddleton and Blythe Bridge are the villages, in terms of their size and facilities, where the majority of development for the Rural Areas should be allocated.

The Local Plan currently proposes under Policy H2 an allocation of 75 dwellings for Werrington. Given the size and facilities of Werrington, it is capable of accommodating a much greater share of the rural housing distribution and further housing allocation should therefore be identified in Werrington. In this respect it is submitted that FE's site at Langton Court / Tregaron Court (ref: WE042 and WE043) should be allocated for housing under Policy H2.



4. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified in the question above where this relates to soundness. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

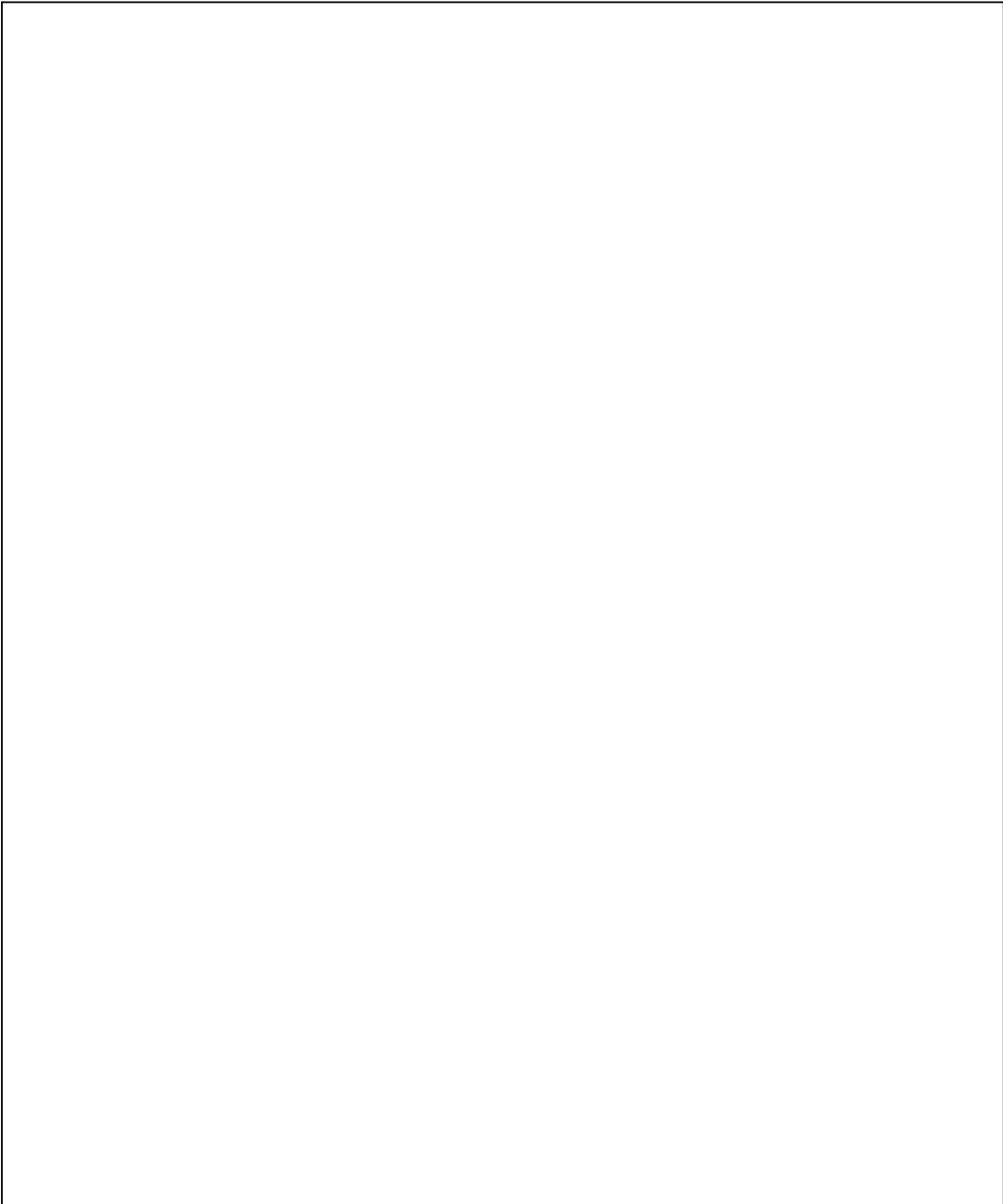
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Please note

Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at submission stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please tick one box only)

No , I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes , I wish to participate at the oral examination	<input checked="" type="checkbox"/>

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

It is important for FE to have the opportunity to robustly test the Council's evidence at the examination and to adduce any additional technical evidence it considers relevant. Without that opportunity being provided FE's position is likely to be prejudiced.

(Continue on a separate sheet / expand box if necessary)

Please note

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

7. Signature:

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8. Date:

