



# Hearing Statement on behalf of Mr and Mrs Webb

In relation to: Matter 1 – Biddulph – safeguarded land and  
provision for housing

Mr & Mrs Webb

Emery Planning project number: 17-204



Project : 17-204  
Hearing : Matter 1  
Client : Mr & Mrs Webb  
Date : January 2020

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## 1. Introduction

- 1.1 Emery Planning is instructed by Mr & Mrs Webb to attend the Staffordshire Moorlands Local Plan Examination.
- 1.2 We have previously submitted representations to the submission version in April 2018, and we attended the examination hearings in October 2018. We also submitted representations to the consultation on the Housing Implementation Strategy in February 2019.
- 1.3 This statement summarises our client's position in response Matter 1: Biddulph – safeguarded land and provision for housing. It should be read in conjunction with our previous representations and hearing statements.

## **2. Response to Matters and Issues 1**

### **Q1. Consideration of options for Biddulph, including safeguarded land**

#### **1.1 Is the overall analysis of options for Biddulph, following the Inspector's Post Hearing Advice, robust?**

- 2.1 A change to the housing distribution was a reasonable alternative and should be have been considered. No justification as to why other site options have not been considered for addressing the shortfall; specifically why suitable, deliverable land in the closest large village of Biddulph Moor has not been considered. Biddulph Moor is within the same Neighbourhood Plan Area to Biddulph and is classified as a sustainable village within the settlement hierarchy.
- 2.2 We note that the Council has not considered amending the spatial strategy in spite of a host of constraints and issues being identified on the draft allocations, for example the viability assessment which clearly establishes that many of the draft allocations are not viable and/or will not deliver the policy requirement of affordable housing. This is a fundamental error as the Council is required to adopt the most appropriate strategy, when considered against the reasonable alternatives. National policy is clear that the proposed strategy must be viable. The approach must be re-considered in view of the draft main modifications.

### **Q3. Proposals for Wharf Road and Tunstall Road**

#### **3.1 Are the increases in density and housing numbers following master-planning work justified?**

##### Wharf Road

- 2.3 The Council's approach on this site is not clear. In respect of Wharf Road, the original allocation was for 588 dwellings. The HIS published in January 2019 indicated a capacity of 333 dwellings, following the Inspector's post hearing advice to remove BDNEW. However, the site is now included in the latest HIS for 442 dwellings.
- 2.4 The justification for the changes is not clear. We note that the Concept Masterplan Executive Summary (EL10.007) identifies a capacity for the site (excluding BDNEW) of 443 dwellings. However, this is a very high-level masterplan based on very limited information. The evidence base does not include any detailed site investigations or detailed assessments such as a full Landscape and Visual Impact Assessment. It is apparent that the gross densities applied across the site are extremely high, at 35-40 dwellings per hectare. There is no evidence to demonstrate that this level of development can be realistically achieved in the context of site constraints (once fully explored), the need for open space and landscaping, and market demand. The masterplan also refers to 33% affordable housing, when the Council's own viability assessment clearly indicates that this is not viable.
- 2.5 We address the delivery of this site in our response to Matter 2. The Council's masterplanning work has identified very significant issues which raise serious questions marks over whether the site will be delivered during the plan period. The Council's own evidence showed that site was not viable with BDNEW; as far as we are aware there is no viability update which shows the impact of removing BDNEW.
- 2.6 Debate over the capacity of the site is therefore somewhat academic, and the delivery of even 333 dwellings during the plan period is not realistic (let alone 442 dwellings).

##### Tunstall Road

- 2.7 Again, the approach is not justified. The Concept Masterplan Executive Summary (EL10.008) identifies a capacity for the site of 105 dwellings under 'option 3'. However, as with the Wharf Road masterplan, this is a high-level masterplan based on very limited information.

- 2.8 Policy DSB3 allocates the site for approximately 4.99ha of general employment development. The main modifications proposed a reduction to 4.29ha. However, the capacity of 105 dwellings appears to be based on only 3.3ha of employment land. There is no reference as to how this is justified, or how the reduction in employment land will be replaced in the plan. The Concept Masterplan refers to viability, but there is no viability evidence presented. Indeed, the Council's current evidence on viability indicates is not viable and the site is in multiple ownerships.
- 2.9 Notwithstanding the quantum of employment land, Option 3 assumes a high density of 42 dwellings per hectare. There is no evidence to demonstrate that this can be realistically achieved in the context of site constraints (including proximity of housing to employment land) and market demand.

## **Q4. Housing supply in Biddulph**

### **4.1 is it necessary to identify sufficient land in Biddulph at this stage to meet the housing needs of the town over the Plan period?**

### **4.2 If it is considered necessary to identify sufficient land, how is it to be achieved?**

- 2.10 There is a significant shortfall for both Biddulph itself and the plan as a whole. This is a whole Local Plan, with no Site Allocations DPD or subsequent Green Belt review to follow. The housing requirement must be met in full, with sufficient flexibility built into the supply to respond to rapid change.
- 2.11 The Council has failed to identify a sufficient housing land supply for the plan period, and there is no justification for not identifying further sites to meet the requirement in full. Furthermore, the housing trajectory has already been missed by a very significant margin in the first 2 years. Numerous sites have not progressed as originally expected and continue to be pushed back in the trajectory. There is compelling justification for allocating additional sites, and alongside that an adjustment to the distribution of housing. It is critical that the plan is deliverable and allocates the right sites in the right locations.
- 2.12 As discussed in our previous representations, additional housing land should be allocated within this plan. This is not an impossible task; there are over ready allocations which should be considered. Specifically, there are sites which were consulted upon as allocations for residential

development at previous stages of the plan, the release of which would accord with the Council's own evidence base in relation to Green Belt, landscape impact and delivery. Our client's site at Biddulph Moor is not subject to any significant constraints and can contribute to meeting the shortfall in housing land supply. As set out above, Biddulph Moor is within the same Neighbourhood Plan Area to Biddulph and is classified as a sustainable village within the settlement hierarchy.