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Angela Weate
Programme Officer
Staffordshire Moorlands Local Plan

For the attention of the Inspector

Our Ref: ALP/Sea/SMLP/MIQs/Bidd/5

24 September 2018

Dear Angela,

Staffordshire Moorlands Local Plan Examination Response to MIQ's
On behalf of Seabridge Developments Limited

1.0 Introduction

- 1.1 On 11 April 2016, we submitted comprehensive representations in respect of the Submission Plan on behalf of Seabridge Developments Limited. That representation focussed on the provision of housing for the District and more specifically, the development strategy for Biddulph. Our main concerns were set out at paragraph 1.6 of the representation letter. Section 4 provided a summary of our suggested remedies to overcome the concerns we had highlighted.
- 1.2 We have since been invited to consider the various Matters, Issues and Questions that have been raised by the Inspector and also to indicate whether we seek to attend any of the sessions to discuss the MIQs.

1.3 We wish to offer passing comment on a number of the questions raised by the Inspector on various Matters, but the primary focus of our concerns and objections are in relation to the Strategy for Biddulph. More particularly the proposed allocation of DSB1 – BDNEW, coupled with the findings of the Sustainability Assessment (SA) belatedly applied to BDNEW and also its findings/weightings in relation to our client's land off York Close, Gillow Heath, Biddulph which at the Draft stage was proposed for housing (BD062).

1.4 **In the circumstances, we wish to appear at Session 9 of the Examination Hearings, in relation to Matter 8 Allocations Biddulph on Tuesday 16th October 2018.**

2.0 Responses to Various Matters, Issues and Questions

Matter 1 Legal Compliance, Procedural Requirements and the Duty to Cooperate
Issue 3 The SA and its consideration of reasonable alternatives

Question 3.1 Does the SA meet statutory and legal requirements in relation to the assessment of reasonable alternatives?

2.1 To avoid repetition, please refer to paragraphs 2.30 – 2.32 and 3.6 – 3.11 of the objection representation letter dated 11 April 2018.

2.2 **On the assumption that the discussion on this issue represents the only opportunity we will have to elaborate on our concerns about the credibility of the SA in relation to Biddulph (Wharf Road and Alternative/Omission Site BD062), then we request the opportunity to appear at Session 1 of the Examination,**

Question 5.1 Is the timeframe of the LP appropriate (2016-2031) or should it be extended to provide for a 15 year period upon adoption

2.3 The old NPPF (paragraph 157) suggests a 15 year timeframe and in the interests of sound plan-making, it must surely be correct that the period should extend from adoption not commencement of the Plan as is now more clearly stated in the Revised NPPF (paragraph 22)? Hence, we suggest that the timeframe should be up to 2034.

Matter 2 Strategy and Strategic Policies

Issue 1 The spatial distribution of development

Question 1.5 Is the level of growth at Biddulph (20%) reflective of its role as one of the main towns in the District?

- 2.4 We refer to paragraph 2.2 of our original representation letter objected to Policy SS3. The Local Plan proposes to increase the percentage provision for Cheadle. Biddulph is an important main town and the Core Strategy envisaged the need for the release of land from the Green Belt, so we see no compelling justification as to why the percentage provision for Biddulph should not also be increased to match that of Cheadle.

Issue 5 Green Belt

Question 5.3 Should more land be released from the Green Belt to provide areas of 'safeguarded land' to meet longer-term development needs?

- 2.5 Paragraph 83 of the old NPPF stated that:
"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, 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." (emphasis added)
- 2.6 Paragraph 136 of the Revised NPPF makes a similar statement.
- 2.7 There will clearly be a continuing need for development in Biddulph throughout and beyond the Plan period and so the Plan should identify 'safeguarded land' at this time in accordance with national guidance.

Matter 3 Housing and Employment Objectively Assessed Needs (OAN) and Requirements

Issue 1 The Housing OAN and Requirement

Question 1.2 Should the requirement be higher to support job growth and the delivery of affordable housing e.g at the top of the range identified in the SHMA – 330 dpa?

- 2.8 The NPPF is all about increasing economic growth and prosperity and the Government and the Local Plan also places great importance on meeting the need for affordable housing. We therefore consider that it is appropriate to set the housing requirement at the top of the range identified in the SHMA.

Question 1.4 Does the requirement reflect the failure to deliver housing to meet past 'targets'?

- 2.9 We consider that the constraints imposed by the Green Belt have restricted the opportunities for housing growth, but there is now an opportunity to address this issue and plan for more housing growth through a review of the Green Belt by the allocation of more sites.

Question 1.7 Is the discrepancy between the plan period (2016-2031) and the period for the housing requirement within Policy SS3 justified?

- 2.10 We have already commented that the Plan period should in fact be extended to allow for 15 years upon adoption (e.g. 2034)

Issue 4 Alignment between housing and employment requirements.

Question 4.1 Is there sufficient alignment between housing and employment in that the employment land requirement is at the top of the range, whilst the housing requirement is 10dpa below the top of the range?

- 2.11 Similar to our response to Question 1.2 of Matter 3, we consider that the housing requirement should be at the top of the range.

Matter 4 Housing Land Supply

Issue 1 Components of Housing Supply

Question 1.4 Is the windfall allowance justified by compelling evidence?

- 2.12 We are concerned that there is inadequate evidence to justify the large site allowance for Biddulph.

Question 1.5 Is there an over-reliance on windfalls?

- 2.13 The Council's past performance on delivery of housing land is poor and we consider that it is unsound for the Plan to place such an over-reliance on windfalls to delivery its housing requirement.

Question 1.6 Should there be a slippage/lapse allowance as in the CS?

- 2.14 In the light of past non implementation, it stands to reason that there really ought to be a slippage/lapse allowance

Question 1.9 Should there be an allowance for demolitions?

- 2.15 It is good practice to make an allowance for demolitions and there is no sound reason for omitting such an allowance in this Plan.

Issue 2 The Housing Trajectory and Housing Implementation Strategy

Question 2.3 Is the approach to making up any shortfall in delivery over the LP period justified (the Liverpool approach)

- 2.16 The NPPF aims to boost the supply of new homes, significantly. To achieve this objective in this District, it is vital that any shortfall in past delivery is made good as soon as possible and this can be achieved by the release of more land which has hitherto been restricted. We take the view that the Sedgefield approach is more appropriate.

Issue 3 Five Year Housing Land Supply

Question 3.1 Is the use of a 20% buffer to calculate the housing land supply position appropriate?

- 2.17 In our opinion, given the consistent past under-delivery of housing we consider it entirely appropriate that a 20% buffer should be applied.

Matter 8 Allocations – Biddulph

- 2.18 Our representations to the Submission Plan focus the unsoundness of the over-reliance on Wharf Road Strategic Development Area and more particularly the unsuitability of the land to the west of the Biddulph Valley Way (BVW), which we consider fails the test of soundness (paragraphs 2.10 and 2.12 – 2.28).
- 2.19 The decision to allocate the land to the west of the BVW was a late, ‘top-down’ decision at senior management level (not necessarily by planning officers) and not a ‘bottom-up’ one that is justified by the evidence base.
- 2.20 **As stated at paragraph 1.4 above, we wish to appear at Session 9 in order to contribute to the discussion on Issue 1 (Identification of Sites); Issue 2 (Wharf Road Strategic Development Area (SDA –DSB1)) and Issue 6 (Delivery)**

Andy Williams

**A J Williams Dip TP, MRTPI
Director**