



Hearing Statement on behalf of Mr and Mrs Ray

In relation to: Issue 3 – Settlement Boundaries (Policy SB1)

Mr & Mrs Ray

Project : 15-350
Hearing : Issue 3 – Settlement
Boundaries (Policy SB1)
Client : Mr & Mrs Ray

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1. Introduction

- 1.1 Emery Planning is instructed by Mr & Mrs Ray to attend the examination on their behalf to the Plan for Stafford Borough: Part 2 – Publication Stage in respect of Issue 3: Settlement Boundaries. Their representations specifically relate to land at The Farm, Stone Road, Tittensor, Stoke on Trent, ST12 9HA. A site location plan is appended at **EP1**.
- 1.2 This statement summarises our client's position in response to the Inspector's Key Issues and Discussion Note, specifically the questions under Issue 3: Settlement Boundaries. It should be read in conjunction with our detailed representations to the Submission Version of the plan.

2. Issue 3.1 – Criteria for determining the proposed settlement boundaries

(i) Are the criteria set out in paragraphs 2.11-2.23 appropriate to define the extent of the areas within the settlement boundaries to accommodate the necessary development, so as to enable the delivery of the objectively assessed housing requirement for Stafford Borough, as set out in PSB1?

- 2.1 Our concerns relate specifically to paragraph 2.19, which sets out the Council's approach to settlements within the Green Belt, and the implications that this has for Tittensor in particular.
- 2.2 The development and infrastructure needs for each of the individual 11 Key Service Villages have not been identified in either the Plan for Stafford (June 2014) or the consultation document.
- 2.3 We have reviewed the completions and commitments data for each of the 11 Key Service Villages and set this out in table 1 below:

Table 1: completions and commitments in the 11 Key Service Villages (2011 to 2031)

Key Service Centre	Completions				Commitments 2015 to 2031	Total
	2011/12	2012/13	2013/14	2014/15		
Yarnfield	10	0	1	66	194	271
Eccleshall	14	11	9	4	222	260
Great Haywood	2	1	0	2	241	246
Gnosall	1	6	41	17	134	199
Hixon	8	0	0	0	130	138
Weston	46	0	0	0	4	50
Barlaston	5	4	3	1	16	29
Tittensor	2	13	1	11	2	29
Haughton	7	1	3	0	11	22
Little Haywood	0	0	1	1	20	22
Woodseaves	4	0	0	1	17	22
Total	99	36	59	103	991	1,288

- 2.4 Whilst we acknowledge that the minimum target of 1,200 new dwellings between 2011 and 2031 as set out in policy SP4 of the Plan for Stafford (June 2014) could be achieved through completions and current commitments (assuming all of these will be delivered in the plan period), the above table demonstrates that there is a significant difference between the

number of dwellings to be delivered by each of the 11 Key Service Centres. For example, Yarnfield is expected to deliver almost ten times the number of dwellings as Tittensor.

2.5 There have only been 27 dwellings completed in Tittensor over the last 4 years. This is set out in the following table:

Table 2: Net completions in Tittensor (2011 to 2015)

Site	2011/12	2012/13	2013/14	2014/15	Total
Grayswood, Stone Road	1				
Rambler Cottage	1				
Groundslow Grange		12			
Beech House		1			
Riverside			1		
Land at the Winghouse P.H.				11	
Total	2	13	1	11	27

2.6 As shown above, the 27 figure includes 11 dwellings at the former pub site, which was the only vacant previously developed site in the village. It is our understanding that the planning permission at Groundslow Grange for the conversion of the care home to 12 apartments has not been implemented and the permission has subsequently expired. This therefore reduces the number of completions in Tittensor since 2011 to just 15 dwellings.

2.7 Over the remainder of the plan period, the Council's latest "Statement of Five Year Housing Land Supply" (as at 31st March 2015) only identifies two sites in Tittensor with planning permission:

- Land rear of Stone Road (1 dwelling); and
- Land to the north of The Farm (1 dwelling).

2.8 In total, this means that just 17 dwellings are expected in Tittensor over the plan period to 2031. Furthermore, because paragraph 85 of the NPPF states that when defining boundaries, local planning authorities need to satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period, this indicates that there will be no further development in Tittensor beyond 2031.

2.9 We note that in relation to development in the 11 Key Service Villages, paragraph 6.40 of the Plan for Stafford (June 2014) states:

"It should be noted that new development will need to be provided, generally, outside of the existing built up areas of these settlements because

the Strategic Housing Land Availability Assessment identifies insufficient infill sites to deliver the scale of new development required in most of the settlements. However, this will not be feasible at Barlaston, Tittensor and Yarnfield as these settlements are surrounded partly or wholly by the North Staffordshire Green Belt. Therefore, less development in settlements surrounded by the North Staffordshire Green Belt may mean proportionately more development to other identified settlements." (our emphasis)

- 2.10 However, it is incorrect to state that it will not be feasible to extend the built up area around Tittensor due as the Green Belt boundary can be reviewed through the Local Plan process. Paragraph 83 of the NPPF states:

"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."

- 2.11 Therefore, it is possible to alter the Green Belt boundary of Tittensor through the Local Plan review process as long as exceptional circumstances can be demonstrated. In this case, the exceptional circumstances are that new residential development is required in Tittensor to support the vitality and viability of the village in the future.
- 2.12 The plan as drafted would only allow very limited growth in Tittensor to 2031. In our representations we have also drawn attention to the similar situation in the neighboring village of Barlaston, which is also a Key Service Village. It appears to be the Council's case that because the overall minimum requirement of 1,200 across all of the Key Service Villages has been met; there is no need to allocate any sites for development in any of the Key Service Villages. This is despite the fact that the difference between the numbers of dwellings expected to be delivered in each Key Service Village varies significantly, based on completions to date and existing commitments. This approach would restrict development in Tittensor without the Council having identified what the development and infrastructure needs are. The approach is therefore not justified.
- 2.13 The impact this would have on those Key Service Villages where the number of completions and existing commitments are limited does not appear to have been considered. In particular, by failing to allocate any sites in Tittensor, the Council is effectively restricting development in

the village not only to 2031, but beyond, taking into account the contents of paragraph 83 of the NPPF.

- 2.14 Paragraph 50-001 of the PPG: “How should local authorities support sustainable rural communities?” provides guidance on the NPPF policies for rural areas. It highlights the need to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. It also clarifies that a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.
- 2.15 Paragraph 50-001 of the PPG continues to state that blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. The onus is therefore on the LPA to demonstrate that the approach is appropriate. It is not sufficient to simply carry forward very tightly drawn Green Belt boundaries (effectively a blanket policy restricting future housing development) without considering the needs of rural settlements and communities, in particular where a settlement has been identified to play a role in providing services for its hinterland (i.e. a Key Service Village). In this instance no robust evidence has been put forward by the LPA in relation to Tittensor.
- 2.16 The Council's proposals for Tittensor are therefore not consistent with paragraphs 17, 28 and 55 of the NPPF and paragraph 50-001 of the PPG as they would not promote sustainable development in the village.

(ii) Are the boundaries drawn in accordance with these criteria?

- 2.17 Yes, the boundaries for Tittensor have been drawn in accordance with the principle identified in paragraph 2.19. However for the reasons we have set out above, we consider the principle to be unsound.

3. Issue 3.2 - Overall capacity within the proposed settlement boundaries

Is the overall capacity within the proposed settlement boundaries, having regard to the latest housing land supply situation, and taking into account constraints such as areas of importance for nature conservation, tree preservation orders and other environmental considerations, sufficient to satisfactorily accommodate the objectively assessed housing requirement for Stafford Borough, as set out in PSB1?

- 3.1 Our concerns relate to meeting the needs of the Key Service Villages, and in particular Tittensor. Therefore we have not assessed the overall housing land supply. We have considered the current capacity for Tittensor in response to Issue 3.1.

4. Issue 3.3 - Flexibility within the proposed settlement boundaries

Is there a case for flexibility within the proposed settlement boundaries in the light of the likely delivery of the housing requirement as set out in PSB1? If the answer is yes:

(i) What should the appropriate level of flexibility be for Stafford Borough?

(ii) Do the proposed settlement boundaries provide for this level of flexibility?

(iii) If not, which settlements should have their boundaries extended to provide the required level of flexibility and where/by what amount?

- 4.1 We agree that a degree of flexibility must be incorporated to provide a realistic prospect of the housing requirement being met, and also sufficient flexibility to deal with changing circumstances (for example if sites or settlements fail to deliver at the rates expected).
- 4.2 We note that the Local Plans Expert Group reported in March 2016 that flexibility in the order of 20% is required in order for a plan to be sufficiently robust to respond to changing circumstances. We consider this to be a sensible recommendation, given the number of plans adopted in recent years that have been found to be out-of-date shortly following adoption due to a shortfall in housing land supply.

- 4.3 The existing boundaries do not provide for this level of flexibility. In fact, the boundaries proposed for Tittensor would provide for practically no development at all during the remainder of the plan period.

5. Issue 3.4 - Specific settlement boundaries

In the light of the above considerations, are any of the proposed settlement boundaries inadequately drawn? If so, which of the following settlement boundaries should be redrawn, in terms of specific sites and development capacity?

(i) Tittensor

- 5.1 To provide context, the Green Belt boundary in the 2001 Local Plan (adopted 1997) was tightly drawn around Tittensor. That plan was prepared and adopted under a very different policy context in terms of planning for housing and rural areas (i.e. the first iteration of PPG3 was published in 1992, and PPG7 was adopted in February 1997). PPG3 sought to constrain development in particular on greenfield sites, and consequently settlement boundaries drawn under PPG3 rarely have any flexibility. However, the national policy context in relation to planning for housing and other development needs, including in rural areas, has drastically changed since 1997.
- 5.2 The Council does not propose to amend the settlement or Green Belt boundary for Tittensor, instead carrying forward of the boundary shown in the 2001 Local Plan. This would effectively limit development within the village to 2031 to the few, if any, opportunities that exist within the existing settlement boundary, which has been tightly drawn up around the village.
- 5.3 As we have set out in our response to Issue 3.1, we consider that the Council's approach to the Key Service Villages in the Green Belt, and in particular Tittensor, is contrary to the provisions within the NPPF regarding sustainable development in rural areas. The NPPF seeks to encourage new residential development in villages to support and maintain the existing services and facilities that exist within them.
- 5.4 New housing in Tittensor would fully accord with the principles of sustainable development in rural areas as set out in national policy. Tittensor has already witnessed the loss of the pub. New housing is needed to protect the remaining services and facilities here as well as support those

in nearby Barlaston and potentially increase demand for further services and facilities. It would also meet needs for open market and affordable housing in Tittensor.

- 5.5 We therefore consider that in order to make the plan sound, the Green Belt boundary for Tittensor should be amended so that new residential development could be accommodated in the plan period. We propose that our client's site at The Farm be released from the Green Belt and allocated for housing.

Land at the Farm, Tittensor

- 5.6 We consider that our client's land at The Farm would be a logical extension of the village to the north-west and propose it be released from the Green Belt and allocated for residential development. A site location plan is appended at **EP1**. An aerial photo is appended at **EP2**.
- 5.7 Due to existing constraints, there are few opportunities beyond the existing settlement boundary, which would allow the village to expand; to the north, west, south and south west of the village is dense woodland, whereas to the south east is the employment estate, and beyond this are reservoirs.
- 5.8 Our client's site is approximately 2 ha in area. It is located to the north east of Tittensor and is accessed via Stone Road. It is bound to the north and east by hedgerows and beyond this is open countryside. The site is bound to the south and west by existing residential development, which fronts onto or is accessed via Stone Road. Beyond this to the south east is employment land. With the exception of the building known as The Farm, the site is adjacent to, but outside of the existing settlement boundary of Tittensor. It is consequently in the Green Belt.
- 5.9 Paragraph 84 of the NPPF states that:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”

- 5.10 The site is capable of accommodating approximately 60 dwellings at a density of 30 dwellings per hectare. We consider that this would be a modest but acceptable level of development for Tittensor during the plan period, having regard to the role of the settlement as a Key Service Village, and the need to accommodate natural growth to meet local needs and maintain services.

5.11 The site is located within walking distance of the existing employment opportunities to the south east of the village, the bus stops on Stone Road, the village hall, school, post office and shop. There are no other suitable locations adjacent to the village that are better located in terms of accessibility to these services and facilities.

5.12 Paragraph 85 of the NPPF states that when defining boundaries, local planning authorities should (amongst other things):

“define boundaries clearly, using physical features that are readily recognisable”.

5.13 The removal of our client's site from the Green Belt would form an organic extension to the urban environment. The site is well contained. The site is adjacent to residential development to the south and west, and is well contained by existing hedgerows and trees to the north and east. The development of the site would be seen against a background of urban development, and its use for residential purposes would create a readily identifiable and defensible settlement boundary based on the permanent physical features of residential development.

5.14 The development of the site would not prejudice the objectives of including land in the Green Belt as defined in the NPPF. We set out our assessment of the site in this context below:

- Check the unrestricted sprawl of large built-up areas – the development of the site would not result in unrestricted urban sprawl. The site is adjacent to development and would represent a rounding off of the Green Belt boundary.
- Prevent neighbouring towns from merging into one another – The development of the site would not in itself lead to neighbouring towns merging into one another. The nearest settlement, Barlaston is some distance from the site to the east and the bulk of the Green Belt would remain.
- Assist in safeguarding the countryside from encroachment – There would be some encroachment but this must be considered in light of need to maintain the vitality and viability of the village and the fact that releasing Green Belt is the only realistic option for meeting that need. The development of the site would be well screened by existing mature boundary trees and given its location adjacent to existing development, not appear as an intrusion into the open countryside.
- Preserve the setting and special character of historic towns – the development of this site would not impact upon the setting or special character of a historic town.
- Assist in urban regeneration, by encouraging the recycling of derelict and other urban land – The development of the site would assist in maintaining the vitality and viability

of Tittensor, which is in the rural area. It would not undermine urban regeneration priorities elsewhere.

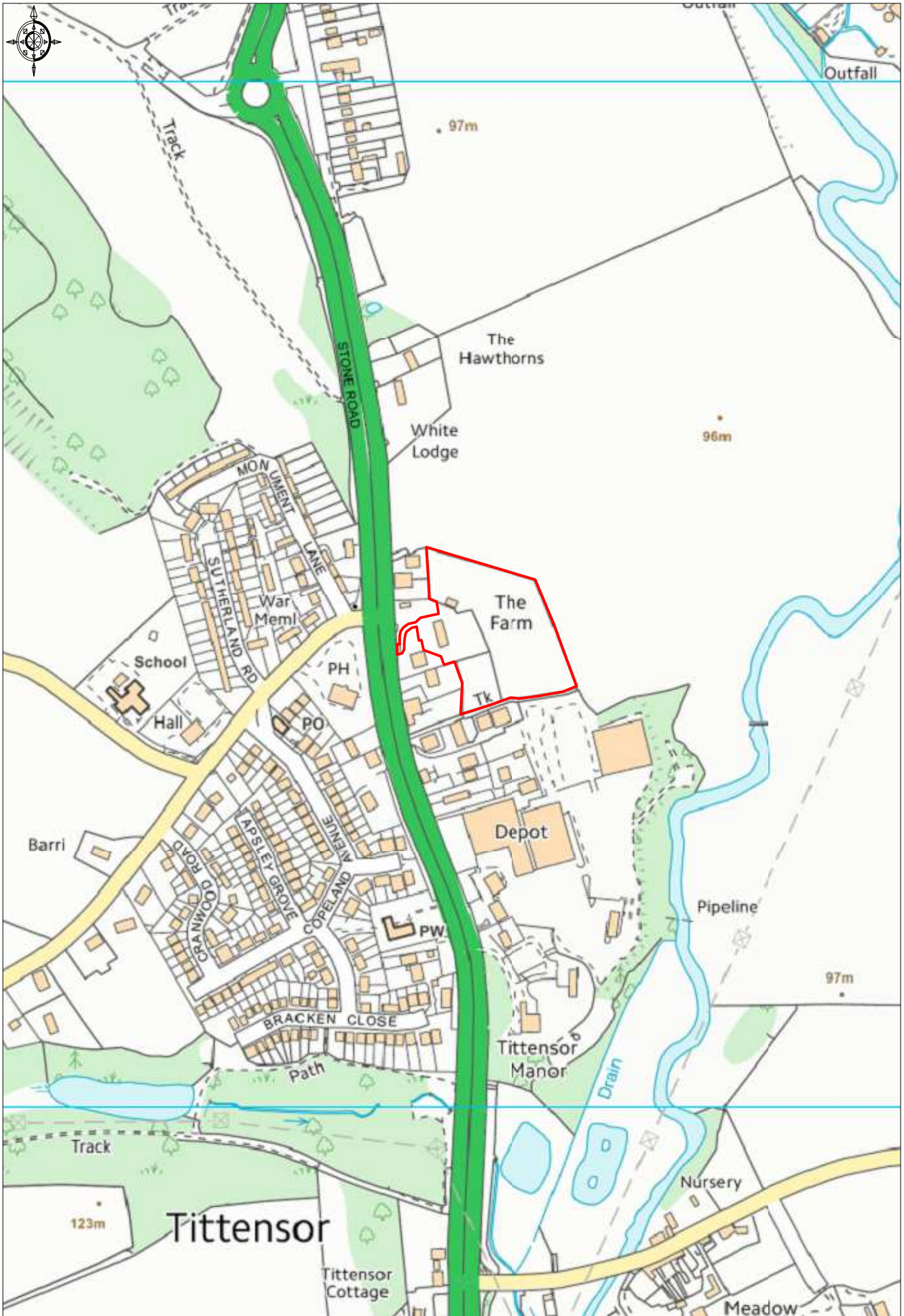
5.15 To conclude, the site is well related to the settlement and would comprise a logical small scale urban extension. Its development for residential use would not appear as an intrusion into the open countryside. We therefore consider that it is suitable for development and exceptional circumstances can be demonstrated in terms of ensuring the vitality and viability of Tittensor in the future.

6. Appendices

- EP1. Site location plan
- EP2. Aerial photograph

EP1

Land at The Farm, Stone Road, Tittensor, Stoke-on-Trent



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Licence number 100022432. Plotted Scale - 1:5000

EP2



Google earth

feet
meters

