

Betley, Balterley & Wrinehill Neighbourhood Plan Steering Group

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Response to the consultation on Strategic Options

Could you please acknowledge receipt of this submission by e-mail as above?

Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan – Strategic Options Consultation (Regulation 18)

Thank you for the Borough Council's consultation on the Strategic Options for the Joint Local Plan 2013. The Neighbourhood Plan Steering Group delegated by Betley, Balterley & Wrinehill Parish Council (BBWPC) to prepare the Betley, Balterley & Wrinehill Neighbourhood Plan welcomes the preparation of the Joint Local Plan (JLP) and is keen to act in partnership with the Borough Council to facilitate its preparation.

The Parish Council, with your kind assistance, has undertaken their Neighbourhood Plan under the Localism Act, 2011, pursuing the Government stated objective “to allow local people to get the right type of development for their community”. The parishes of Keele, Madeley, and Whitmore have successfully undertaken Housing Need Assessments for their parishes, as advised and informed by Action with Communities in Rural England (ACRE), producing an “Objective Assessment of Need” (OAN) for their Neighbourhood Plans, and BBWPC is actively considering doing the same. The Parish Council sees its Neighbourhood Plan informing the Joint Local Plan enabling the Borough Council to be provided with detailed survey material, policies and proposals at the local level. The Borough Council will know that “Neighbourhood plans allow local people to get the right type of development for their community, but the plans must still meet the needs of the wider area.....”. - Ministerial statement, made on 12 December 2016, Department of Communities and Local Government Policy Paper 2010-2015 government policy: planning reform).

Fair share.

The Minister further stated that “My Department will be bringing forward a White Paper on Housing in due course. Following consultation, we anticipate the policy for neighbourhood planning set out in this statement will be revised to reflect policy brought forward to ensure new neighbourhood plans meet their fair share of local housing need and housing is being delivered across the wider local authority area. It is, however, right to take action now to protect communities who have worked hard to produce their neighbourhood plan and find the housing supply policies are deemed to be out-of-date through no fault of their own”. The Borough Council will know that many Neighbourhood Plans have now been made through the country based on this fundamental principle and already agreed with Loggerheads and Whitmore Parish Councils.

General considerations.

Sustainability underpins and is a golden thread running through our Neighbourhood Plan and will compliment the sustainability objectives of the JLP. There is real concern that the levels of growth - the 27,800 houses, the 199 ha of employment land and the 17,000 jobs proposed for the plan area, will put severe strain on our parish's school, health, transport and other facilities given the increasing restricted public resources available to invest in services and development in North

Staffordshire. The rural parishes do not have sufficient infrastructure or the capacity to accommodate large-scale housing allocations and, therefore, it is proposed that the parish's own up-to-date OAN should be a critical consideration in allocating development in the JLP. The high level of development currently proposed in the OAN will impact severely on the built and natural the environment of the Borough's rural parishes and could lead to the loss of valuable agricultural land.

In view of the high levels of projected growth, you will not be surprised that the Steering Group is most concerned about potential impacts on the capacity of the local community to accommodate extensive housing and associated activities the inevitable demands put on important local facilities, - Betley CE Primary School, the GP, and other facilities. Already commuter travel along the A53, A500, A525 and A531 creates congestion and rising pollution in certain locations and junctions, and this will be increased substantially given the growth proposed in the Strategic Options.

The 6 Strategy Options.

Strategies 1, 2, and 3 do not meet the JLP's OAN and, therefore, will fail to comply with the National Planning Policy Framework (NPPF) and though 1,2,an 3 would have the least impacts on rural parishes they are likely to be dismissed. Strategies 5 and 6 substantially exceed the OAN which would place unacceptable and unsustainable stress on the North Staffordshire environment and its infrastructure; and similarly in the rural parishes. Strategy 4, although failing to comply with NPPF, comes close to the OAN, but will place unacceptable development pressure on the the rural parishes, particularly beyond the Green Belt, i.e. Loggerheads and possible on Audley and Madeley, formerly designated growth points in previous plans. The Steering Group is anxious to avoid any strategy option which might mean that non-urban locations come under severe pressure from unplanned and unsustainable development.

The Steering Group would welcome, therefore, the development of new strategy which should incorporate the OAN from its Neighbourhood Plan, thereby minimising environmental harm and satisfying the needs and requirements of the local community as expressly emphasised in current government legislation. The Borough Council will clearly understand that, "Neighbourhood plans allow local people to get the right type of development for their community.. " - (Department of Communities and Local Government Policy Paper 2010-2015 government policy: planning reform).

Housing Growth.

"Vision 33", the Strategic Housing Market Assessment (SHMA) 2017, Employment Land Review and related documents set out four Housing Growth Scenarios. Of these, Scenario 3 seeking to support economic growth, is selected as the OAN for the level of housing, employment land and jobs to be provided in the JLP by 2033. The JLP's OAN proposes 27,800 dwelling, 199 ha of employment land and 17000 jobs for North Staffordshire, and of the housing the Borough would accommodate 586 dwelling per year, a grand total of 11,720 dwellings, by 2033, - a 22.4% or so increase in the Borough's housing stock of the 52,118 dwellings identified in 2011 Census.

The Strategic Housing Market Update June 2017 takes on board the sub-national population projections (SNPP) 2014-based Population and Household Projections 2013 – 2039 – this beyond the plan period. For the Borough the population is projected to increase by 12,674 (10.1%), households to increase by 7,950 (15.0%) with an annual migration of 506 people requiring 315 dwelling to be built each year. Turley and Edge Analytics appointed to prepare a Strategic Housing Market Assessment (SHMA) reported in July 2015 "On this basis, Newcastle-under-Lyme is projected to accommodate population growth over the period to 2039 which is some 75% higher than suggested by the previous dataset". This contrasts with ONS mid year estimates for the Borough of 123,920 in 2011 and 127,040 in 2015, a 2.5% change.

The Strategic Housing Market Assessment states "Supporting this notably higher level of job growth in the area would require either a substantial change in labour force behaviour or a further growth in the labour force. Accommodating the higher level of population growth required to support likely job growth will generate a greater need for housing than implied by the demographic projection, requiring **1,390 dwellings per annum** when simultaneously allowing for a return to

higher levels of household formation for younger households. This enables stronger growth in the working population (16–64) through an allowance for higher – but not unprecedented – levels of net migration to the area. And more - “This represents an uplift of 73% above the ‘starting point’ and 31% above the adjusted demographic projection, and evidently captures and surpasses the adjustment considered necessary to provide a supply response to the moderate worsening of market signals in Newcastle-under-Lyme. Provision of this scale would also almost double the average rate of development over the past fifteen years, significantly boosting the supply of housing in line with the objectives of the NPPF. The update also confirms that it is reasonable to assume that this level of provision would also facilitate the delivery of the updated calculation of affordable housing needed. This recognises an updated calculated annual need for 453 affordable homes over the next five years and 265 affordable homes per annum thereafter recognising the clearing of the existing backlog of need across the HMA”.

The Steering Group strongly queries these assumptions which significantly inflate the housing requirements included in the JLP's OAN, and take the projected figures to 2039 beyond the plan period. The argument underpinning level of housing provision is that to meet the 17,000 jobs required to support the North Staffs' economy with an ageing population and, therefore, an insufficient labour force, the population requires to increase by 44,000 or by 13 to 14%, and which will need to be housed, at annual growth rate never previously attained. The projected growth now considered necessary is based on key assumptions of an annual inward migration of 958 people, the retention of students educated in the area, a high level of household formation including hidden households, (those wanting but are unable to establish independent households). Without the additional houses it is argued that there will be an insufficient labour force to support the predicted level of employment required. 586 new dwelling per year will need to be built in Borough against an actuality of 243 dwellings completed annually between 2013 and 2015. The JLP's OAN proposed level of housing growth will create severe and unsustainable problems for the rural parishes and, indeed, for the whole Borough, and should be reviewed and revised.

The Steering Group would also request the Borough Council to address the issue of “fair share” to the rural parishes, as set out previously, in the allocation of the projected housing growth in the OAN.

5 year supply of housing land.

The Borough Council does not have a current 5 year supply of deliverable housing land and is, therefore, at real danger of being hostage to the whims of speculative development, open to the costs of successful planning appeals and housing development on unplanned sites in non-sustainable locations. Newcastle-under-Lyme Borough Council's “5 Year Housing Land Supply Statement: 2015-2020 October 2015 mid-year update” set out the latest data that 243 dwellings were completed annually between 2013 and 2015. This contrasts starkly with the JLP's OAN requirement of 586 dwellings per year and suggests achieving a 5 year supply of deliverable housing land in accord with the NPPF is an impossibility. The projected level of growth will put the Borough Council, as Local Planning Authority, in a very difficult position placing an unsustainable burden on its Planning Policy and Development Control Services.

The Ministerial statement on the on Neighbourhood Planning introduced by the Localism Act 2011, December 2016, said that “Neighbourhood planning was introduced by the Localism Act 2011, and is an important part of the Government's manifesto commitment to let local people have more say on local planning.....This means that relevant policies for the supply of housing in a neighbourhood plan, that is part of the development plan, should not be deemed to be ‘out-of-date’ under paragraph 49 of the National Planning Policy Framework where all of the following circumstances arise at the time the decision is made: -

- This written ministerial statement is less than 2 years old, or the neighbourhood plan has been part of the development plan for 2 years or less;
- The neighbourhood plan allocates sites for housing; and
- The local planning authority can demonstrate a three-year supply of deliverable housing sites.

This statement applies to decisions made on planning applications and appeals from today. This statement should be read in conjunction with the National Planning Policy Framework and is a material consideration in relevant planning decisions.” - 15th December 2016.

3 year supply of housing land.

The need to have to demonstrate only a 3 year supply of deliverable housing land in made Neighbourhood Plans will support and facilitate the Borough Council, as Local Planning Authority, in determining planning applications and at appeal, and will help to avoid unplanned speculative development in non-sustainable locations.

In conclusion, the Steering Group feels that to help it to prepare its Neighbourhood Plan the following issues will need to be addressed and for the Borough Council to explain: -

- The assumptions behind the OAN calculations to enable our Neighbourhood Plan to comply with the JLP;
- The OAN is required to be a proper assessment of need but as proposed it appears to address an aspirational level of growth, which needs to be justified and explained;
- The level of growth proposed in the OAN means that to achieve a 5year supply of deliverable housing land will require sites to allocated, impossible to deliver, are unsustainable and will cause immense harm to the rural communities;
- “Is there scope to review the OAN's projected population growth and level of migration against changed circumstance i.e. Brexit, HS2 and so on? And further, how can the JLP avoid over-allocation of housing to the rural parishes”?
- Demonstrate how the Parish's existing OANs will be incorporated in the Joint Local Plan as a “fair share of local housing need”;
- What is the Staffordshire County Council's position on the provision of services and infrastructure to accommodate the level of growth projected in the OAN;

Yours sincerely,

Richard Head (Chairman)

Gwyn Griffiths (Clerk)

Betley, Balterley & Wrinehill
Neighborhood Plan
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