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Tatenhill and Rangemore Neighbourhood Plan

Housing Policy Consultation Report and Key Issues

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 $\label{thm:company} \mbox{ Urban Imprint Limited |.} Company number 8059162 | Registered in England and Wales Registered Office | 82 Reddish Road | Stockport | SK5 7QU$

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1. Introduction

- 1.1. It is important to recognise that the only changes proposed are to policy HE1 and all the other policies within the Neighbourhood Plan (made 1st February 2016) remain unaltered. Until such a time as the new elements are formally 'made' the existing policy remains in force.
- 1.2. The revised policies have been drafted by the Parish Council's consultants, Urban Imprint, who have, considered carefully suggestions from the Parish Council, Community Group, and the planning team at East Staffordshire Borough Council (both the local plans and the development management teams).
- 1.3. This process had taken around 7 months and has included a review of past planning decisions as well as ensuring that these reflect national policy (specifically the revised NPPF: July 2018) and decisions more widely

2. Outline of the consultation

- 2.1. As previously noted the revisions policy HE1 and its explanatory text (as set out in the Policy Revisions Document dated June 2018) were the subject of a six weeks consultation with the community and other stakeholders. This is in line with the requirements of the Neighbourhood Planning Regulations.
- 2.2. The consultation draft was produced based on feedback from the following organisations:
 - Tatenhill and Rangemore Community Group
 - Tatenhill and Rangemore Parish Council

- ESBC Planning (Local Planning Authority LPA)
- 2.3. Meetings have been held with the LPA throughout early 2018, specifically with Naomi Perry (Senior Planning Officer Policy) in order to understand the scope and nature of the changes that should be made.
- 2.4. The formal consultation ran for six weeks from 2nd July 2018 to 13th August 2018. The consultation only focused on the proposed revisions to policy HE1 and is not on any other policy or section of the existing plan, albeit responses were received on a wider selection of issues and concerns.
- 2.5. The consultation was publicised locally, including being posted on the Parish Council website and also including a summary that was placed into the Parish newsletter delivered to every household in the parish. A formal invitation to comment was sent to the Local Planning Authorities
- 2.6. Following the conclusion of the consultation the Parish Council and their consultants reviewed the responses received and where appropriate, made any amendments to reflect these. Chapter 3 of this document sets out the key issues identified as part of the consultation and how they have been considered in preparing the final submission draft of the policies.
- 2.7. The revised policy and its sub-policies will be submitted to East Staffordshire Borough Council who will manage an independent examination. Once 'made' the revisions will simply replace HE1 in the plan until that time the existing HE1 remains in force.

3. Key Issues Recommendations

and

- 3.1. This document summarises the key issues raised during Regulation 14 consultation on the Tatenhill and Rangemore Neighbourhood Plan Amendments.
- 3.2. Following discussions between EBSC, the parish Council and the appointed consultants, Urban Imprint, the following sections set out how the key issues highlighted have been responded to.
- 3.3. The outcomes have been *provided in red italic text*. In some instances the outcome is that no changes are made (no action taken).

4. HE1- Parish housing Strategy

4.1. Amended housing policies should recognise the uniqueness of Rangemore Village for proposed developments, including matters of its historical development and current land management.

Could be included in explanatory, but it is considered that this is adequately covered as part of the suite of neighbourhood plan policies. There are specific policies relating to the conservation areas and local details, all of which are specific to the each settlement. In terms of the way the land is managed is not really a planning matter and should not form the basis of a policy approach.

4.2. There is no mention of new developments including sustainable and environmental measures in their design. Development in keeping with the character of the parish excludes use of photovoltaic cells on roofs.

Much of this is included under extant policy SP4. (Sustainability and Climate Change) These policies are not designed to necessarily cover those points. Policy SP4 would affect any development in any location across the parish.

4.3. Would it not be prudent to include a need for car charging point? Would the parish council also consider further environmental measures such as rain water collection and geothermal heat pumps?

See comments above in relation to sustainable design.

4.4. There should be an a trigger that if more than a certain number of houses apply, that other policies will apply to them, requiring starter homes to be included.

This will be covered under the East Staffordshire Local Plan which should be a reference point for all future development as well as these amendments. Whilst starter homes are welcomed (and supported by extant policy HE2) the limited number of homes to be delivered as part of the entire strategy would make a policy such as this unworkable – or result in increased numbers of homes overall. No changes made.

4.5. The amendments miss the opportunity for the positive development of brownfield sites within the neighbourhood plan area – especially those outside of the villages.

Additional changes have been made to sub-policy HE1.3 which consider the opportunities for previously developed land across the parish and ensuring that the opportunities are not missed, but developed sensible and sustainably in line with the government growth agenda and changes suggested by national policy (NPPPF July 2018 on making efficient use of land).

4.6. An additional policy (HE1.5) should be added to specifically refer to previously developed land outside of the main villages.

See comment above – details added to HE1.3.

4.7. The plan should allocate specific sites for development.

This has been the subject of discussions for some time between the Parish Council and their consultants. In final analysis it was considered that this would be inappropriate as the original intention of the plan was never to allocate, but set out a framework for determining the acceptability of schemes that come forward. To allocate would depart from the original intention of the plan. No changes made.

5. HE1.1 - Infill Residential Development

5.1. HE1 seeks to limit development within Rangemore to infill sites only but you will know from your local knowledge that there are no such sites in "Rangemore".

HE1.1 only refers to infill sites, further policies exist to promote the development of sites which are not related to infill sites – as is the case in Rangemore – but there are this type of development elsewhere in the parish. One of the reasons for the plethora of 3 different types of sub-policies developed is to ensure that different sites can come forward in different locations reflecting the varied development forms throughout the parish. Our understanding is that there is possible development opportunities under sub-policies HE1.2, 1.3 and 1.4. This varied approach to housing delivery is supported by the NPPF. No changes made.

6. HE1.2 - Re-use of non-agricultural buildings

6.1. Clarification is needed about how long an equestrian building must be built before it can be considered for conversion to a dwelling and how this might be linked with the Local Plan.

Equestrian buildings are not classified as agricultural buildings as they are a leisure use therefore it is appropriate that they are covered by sub-policy HE1.2. Changes have been made to HE1.2 to include a ten year time limit which reflect the guidance in the GPDO for conversion of discussed buildings for residential purposes.

7. HE1.3 - Previously developed land

7.1. Requirement of development on unsightly and underused brownfield sites is too restrictive

Currently the redevelopment of previously developed (brownfield) land is supported by the neighbourhood plan. Changes that have been made to policy HE1.3 is designed to provide a clear support for the redevelopment of such sites where they need the clear criteria. (See comments made against point 4.5). No changes made.

7.2. Requirement of housing needs survey is too restrictive and stifles the re-use of previously developed land. Inclusion of additional policy which refers to previously developed land outside of main villages could promote positive development of brownfield sites.

This requirement has been removed, but has been replaced with the specific types required based on the original housing needs survey for the original 2016 Neighbourhood Plan for housing for elderly persons and starter homes in line with the requires set out in extant policy HE2.

7.3. Policy HE1.3, previously developed land in villages, notes that any proposal includes measures which significantly improve the environmental quality of the conservation area. There is no other mention within the proposed amendments for any new development to included sustainable and environmental measures within the design.

This is dealt with in policy SP3, DC1 and DC2, which is signposted to in the last line of this policy. In any event, other policies within the extant policies support this point. Considered unnecessary – no change made.

8. HE1.4-Former Agricultural Buildings

8.1. No specific comments relating to the policy

9. Other considerations

9.1. Advice should be sought from the Planning Consultant to strengthen policy DC1 to further protect landscape features, such as Rangemore Hall Gardens, the historic parts of St Georges Park, and to further protect listed buildings and their curtilages.

The points raised by this policy are actually dealt with under extant policies SP2 and LC3. Following detailed discussion and consideration, it has been suggested that additional explanatory paragraphs have been added reflecting the latest work on these matters by local residents and historians.

9.2. It should be ensured that developers can't "buy out" their affordable housing obligations

Whilst this point is noted, there is little that the neighbourhood plan can do to address this point, as it is controlled by the strategic policies of the Local Plan prepared by ESBC. It is not a neighbourhood plan matter.



Urban Imprint Limited 16-18 Park Green Macclesfield SK11 7NA

01625 265232 info@urbanimprint.co.uk www.urbanimprint.co.uk