



## Planning Statement

**Site Address:**

Land North of Clavin Court, Kingsley, Staffordshire. ST10 2DY

**Applicant:**

Hammonds Construction Ltd

**Proposal:**

Erection of 10no. bungalows: 5no. for the over 55s and 5no. market value.

**Planning Statement:**

**Date Issued:** 30<sup>th</sup> August 2024

**Job Reference:** 6060

## 1. Executive summary:

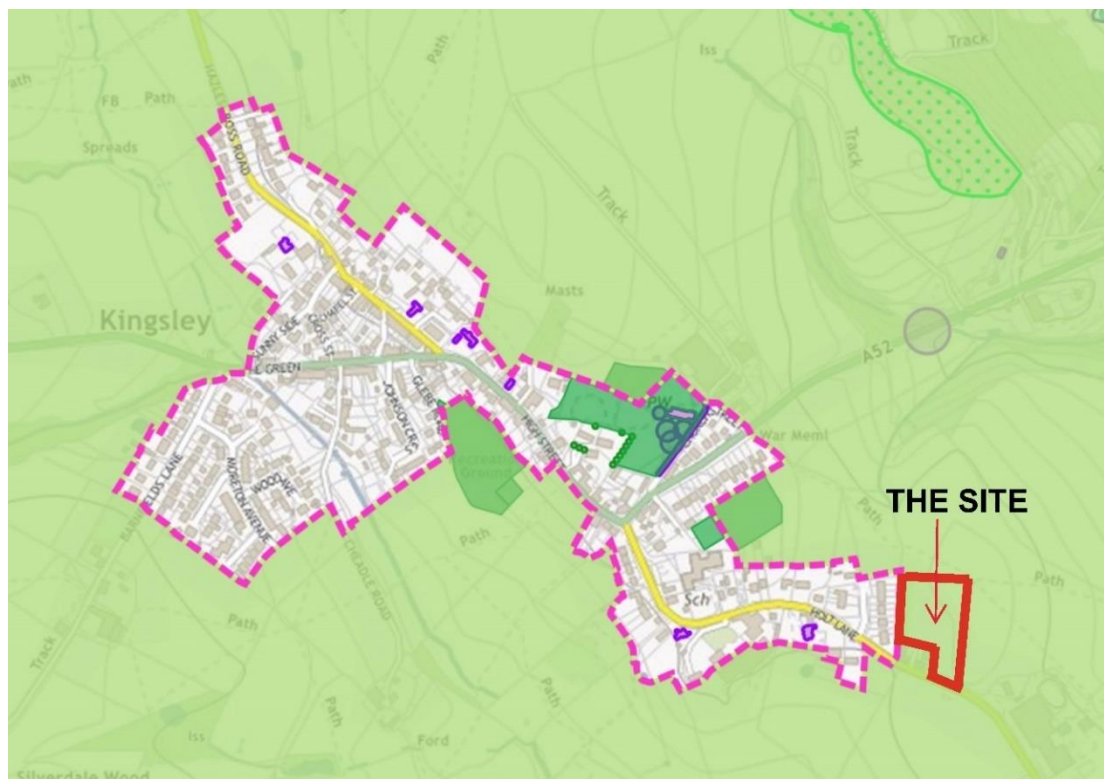
- 1.1 This planning statement is submitted in support of an application seeking full planning permission for the construction of 10no. bungalows. 5 of which are for over 55's, the other 5 are for standard market houses. All 10 properties are for the rental market.
- 1.2 The proposed development would deliver much needed accomdation for elderly residents throughout the district. The proposal will enable local and other residents within the district to move to a more suitable style of accomodation.
- 1.3 The site will benefit from landscape enhancements, with natural landscape screening to the North and East boundaries. Which will screen the development from the open countryside.
- 1.4 The applicant is willing to offer financial contributions to the following neighboring sports and recreational facilities:
  - Kingsley Park – Funds to improve the existing football pitch and for additional play equipment and picnic benches - £5000.00
  - Kingsley Holt Park - Funds to improve the existing football pitch and for additional play equipment and picnic benches - £5000.00
- 1.5 The application follows the refusal of an application seeking outline consent for the erection of 7 2-bedroom bungalows – refused on 08.02.2022 reference SMD/2021/0826. The application was refused for the following four reasons:
  - Appropriate development within the green belt
  - Intrusion on the open countryside
  - Loss of a football pitch
  - Safe vehicular access
- 1.6 This application follows a further assessment of the reasons for refusal. This report aims to satisfy those initial concerns and demonstrate the positive benefits of the scheme, which include helping to address the identified shortfall in Staffordshire Moorlands District. It should be noted that the district has one of the highest elderly populations in the Country.
- 1.7 There are some sustainable advantages with the location of the site being on a main bus service route and well-lit footpaths along the highway to nearby facilities:
  - Kingsley Village Hub - Shop
  - Kingsley Village Hall
  - St Werburghs Church
  - Kingsley Holt Centre – Community Hub
  - The Blacksmiths Public House
  - The Railway Public House

- Froghall Railway station and café
  - Hettys tea rooms at Froghall.
- 1.8 The site is in an area which is classified as village fringe, it is close to several other houses including the modern cul-de-sac of Calvin Court, which is a development of 4 bungalows on the former site of the Youth Centre and changing facilities for the former football pitch. Approved on 08.02.2019. Reference number SMD/2018/0511.
- 1.9 The site sits within the Green Belt and in the open countryside, however consideration should be given to the historic use of the site and the recent legislation change for "Grey Belt Sites". Formally the site was used as a football pitch and sports ground. The pitch has not been used since the closure of the Youth Centre and changing facilities. The subsequent approval of the 4 bungalows on the site further restricts any proposed future uses for the football pitch, however, an argument could be made that its existing recreational uses would constitute "previously developed land".
- 1.10 Whilst not a reason for refusal, the application SMD/2021/0826 added weight to the loss or diversion of the existing footpaths that cross the site. We can confirm that no footpaths will be lost as part of the development and only one footpath requires a minor diversion, which essentially merges two footpaths together. All footpaths will remain free from obstruction and open to the public at all times, even during the construction works.
- 1.11 Paragraph 154 g) of the Framework establishes that the partial or complete redevelopment of previously developed land is not inappropriate, providing the new development does not have a greater impact on the openness of the Green Belt than the existing development. It is accepted that the proposal would have a greater impact on the openness of the Green Belt than the existing development. The planning considerations which together comprise very special circumstances are summarized as follows:
- The critical need to provide housing for older people
  - The specific need for specialist elderly accommodation within Staffordshire Moorlands. We understand that there is a gap of circa 121 units to bring the Staffordshire Moorlands to the average for elderly-care provision.
  - There are no alternative sites outside of the Green Belt which are suitable, available or deliverable.
  - The provision of social and wellbeing benefits
  - Absence of a 5-year land supply
  - Economic benefits
- 1.12 These considerations should be afforded significant weight in the decision-making process. It is considered that they outweigh the definitional harm and the harm to openness of the Green Belt.

## 2. Context

## Site location and description

- 2.1 The site lies north of Holt Lane, Kingsley. Vehicular access to the site is via the existing vehicle access and egress point which serves Calvin Court.
- 2.2 The South and West boundaries of the site both consist of residential dwellings, beyond the North and East boundaries are open fields. The densely developed neighboring residential dwellings are made up of 2 stories semi and detached dwellings to the West, with single storey bungalows to the South.
- 2.3 The site is relatively level, with graded vehicle access from Calvin Court. The Eastern boundary is graded, such that the site cannot be seen from the wider public open space.
- 2.4 The settlement boundary for Kingsley runs directly along the Western Boundary of the site.



- 2.5 The applicant has explored new sites within Staffordshire Moorlands that would be suitable for bungalow development, with particular attention on the over 55's market. The reason for choosing Kingsley is that its statistics show that there is a significant number of elderly residents who live in the area who would want to downsize to a bungalow but wish to continue to live in the area.

2.6 The key characteristics of the site must be as follows:

- The site needs to be flat, in order to provide good accessibility and wheelchair access.
- The site must have good connectivity, with local amenities nearby and good public transport links. The nearest bus stop is less than 65m away from the site.
- It is desirable that the site and setting provide a high level of accommodation and amenity. The proposed layout affords good open vistas, with spacious gardens and enhanced natural landscaping

2.7 Further justification has been provided within this report regarding the suggested negative impact from the "loss of the football pitch".

However, integral to this point is the proximity of the two neighboring playing fields which have football pitches. One is located approximately 500 meters away at Kingsley Holt, the other at Kingsley which is only 600 meters away. In addition to these public facilities, there is also a playing field to the rear of the primary school at St Werburghs and other sports provisions such as the bowling green in Kingsley.

### 3. The application

3.1 The application proposes the construction of the following:

- Over 55's accommodation - Rental:
  - 1 no. detached 3-bedroom bungalow
  - 4 no. semi-detached 2-bedroom bungalows
- Market Value – Rental
  - 1 no. detached 3-bedroom bungalow
  - 4 no. semi-detached 2-bedroom bungalows

3.2 Each bungalow would be provided with 2 car parking spaces and rear garden areas

3.3 The bungalows would be purpose built to allow residents to live independently. The layout provides all ground floor accommodation, with fully accessible provisions, level access points, wide corridors, large door widths & provision for wet rooms to be installed.

3.4 Additional landscaping provision has been designed to enhance the scheme, with new native hedgerow planted to screen the development, the retention of all existing trees, with infill tree planting where required, and the inclusion of a native wildflower rich grassland all to the Eastern Boundary. The landscaping is to extend around to the Northern Boundary, with a large open space to the North-West section of the site to provide a buffer between the development at the open countryside.

3.5 The bungalows would be constructed on the site of a former football pitch, which was previously used in association with the Youth Centre and changing facilities, which we demolished in circa 2018.

3.6 The changing facilities and the football pitch were last known to have been used in circa 2010. During the period from 2010 to 2017 when the first application was made for the redevelopment at Cavlin Court, the site became overgrown and the buildings had been vandalised, which is acknowledge in the officer's report for the demolition of the youth club and changing rooms and the development of the previous 4 bungalows.

3.7 The evidence provided suggests that the trustees of the community centre considered all avenues to retain the use for its continued community use. Based on the simple fact that the youth centre/ changing facilities and the football pitch were put on the open market for sale on the 30<sup>th</sup> January 2017. It is clearly evident that the previous uses were not longer viable.

3.8 It must also be considered that if the local residents and community passed up the opportunity to purchase the building and the football pitch then there were no keen desires for the facilities to remain as part of a community asset. We cannot find any evidence of petitions or objections to the closure and sale of the youth club, changing facilities or the football pitch. We would therefore consider that the local residents and community have no issue with the football pitch being developed in line with the recent development on the part of the site where the Youth Club and Changing

rooms were.

3.9 A news article published on 30<sup>th</sup> January 2017 in the Stoke Sentinel reported that the Kingsley Youth and Community Centre is for sale, Trustee Ivor Lucas said that "they had to make a difficult decision to put the site on the market".

3.10 Access to the site would be provided via the existing vehicular access and egress point, which was reconstructed as part of the recent construction of the 4 bungalows at Calvin Court. No changes are proposed to the connection with the main principal highway. The proposed private road will meet the current highway standards, it will have 2 pedestrian footpaths and a suitable turning area at the head of the road.

## **4. Relevant planning history**

4.1 The relevant planning history for the development site is as follows:

- SMD/2021/0826 – Outline application with all matters reserved for the erection of 7 2-bedroom bungalows - Refused. The reasons and justification have been set out above.

4.2 The relevant planning history for the adjoining site (currently owned by the applicant) is as follows:

- SMD/2018/0511 – Proposed demolition of a redundant youth centre and construction of four bungalows with associated parking and landscaping and new access. - Approved.
- SMD/2017/0855 – Conversion of a village hall into a 6 bedroom dwelling with associated parking and landscaping. - Withdrawn

4.3 The relevant planning history site under its former use - Youth Club

- SMD/2000/0977 – Alterations and Extension to provide additional rooms and access ramp – Approved.

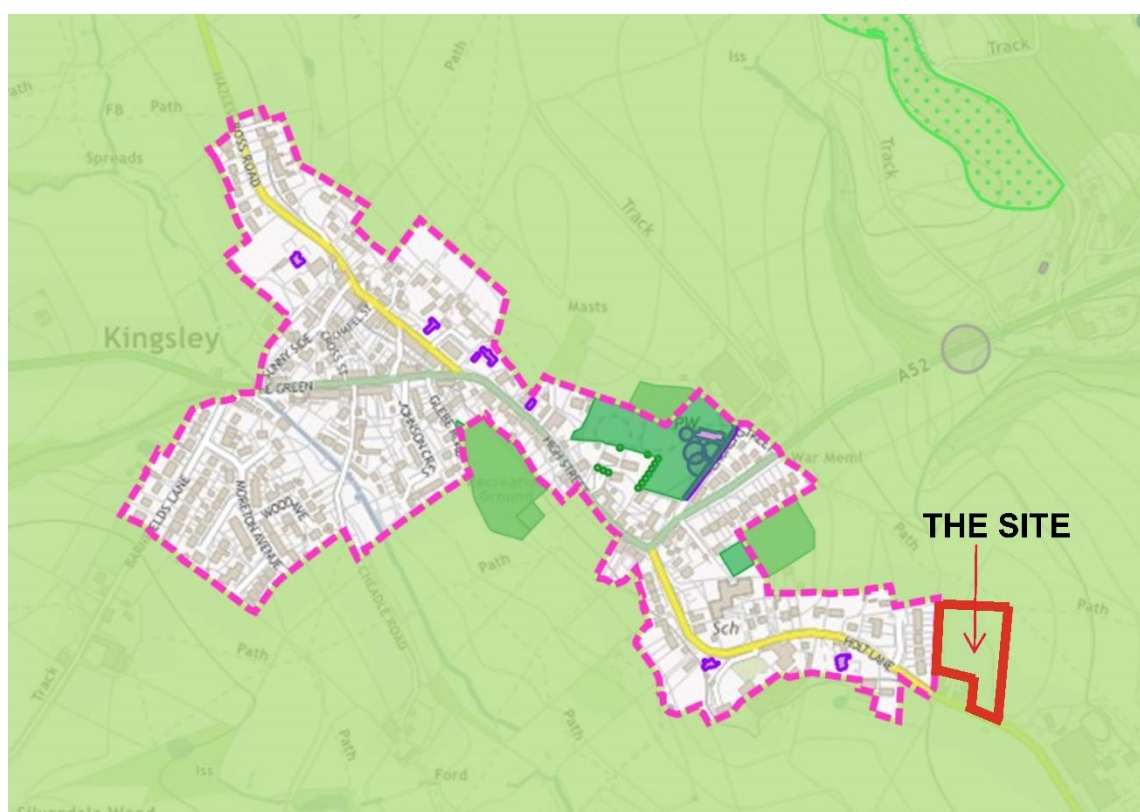
## 5. Policy context

5.1 The development plan comprises the Staffordshire Moorlands Local Plan.

### Development Plan Context

5.2 Staffordshire Moorlands Local Plan (adopted September 2020)

- The site is situated within the Green Belt. The settlement boundary of Kingsley is immediately to the west of the site as shown on the extract plan below:



5.3 Relevant policies comprise:

- SS1: Development Principles
- SS2 Settlement Hierarchy
- SS3: Future Provision and Distribution of Development
- SS8: Larger Village Areas Strategy
- SS10: Rural Area Strategy
- H1: New Housing Development
- H3 Affordable Housing
- DC1: Design Considerations
- DC3: Landscape and Settlement Setting
- SD1: Sustainable Use of Resources
- SD3: Sustainability Measures in Development
- SD4: Pollution and Flood Risk
- NE1: Biodiversity and Geological Resources
- NE2: Trees, Woodlands and Hedgerows
- T1: Development and Sustainable Transport
- T2: Other Sustainable Transport Measures

## **Other material considerations**

5.4 The following SPG/SPD's are of relevance to this application:

- Staffordshire Moorlands Design Guide SPD (Feb 2018)
- Space about dwellings (Extract from 1998 Local Plan)
- Housing for local people and affordable housing (Feb 2005)

5.5 Relevant documents from the council's evidence base include:

- Strategic Housing Market Assessment update (SHMA) 2017
- Strategic Housing Land Availability Assessment (SHLAA) 2015

5.6 Other relevant information

- Housing our aging population by the local Government association (Sept 2022)
- Too Little Too Late?
- Housing for an ageing Population by the Think Tank, the Centre for the Study of Financial Innovation (June 2020)

## **National Planning Policy Framework (Framework, 2023)**

5.7 The Framework was originally published in March 2012, the latest revision being December 2023. The relevant sections of the Framework are discussed in the planning considerations section of this statement below. However, the Framework states that there is a presumption in favor of sustainable development. For decision taking, this means approving development proposals that accord with the development plan without delay.

## **Planning Practice Guidance (PPG)**

5.8 The PPG was originally published on 6<sup>th</sup> March 2014 and has been updated since. The relevant sections of the PPG are discussed in the following sections of this statement.

## **Green Belt Considerations: Appropriateness of Development**

5.9 The site is previously developed land within the Green Belt. Prior to the demolition of the Youth Centre and changing facilities the site formed part of a recreational use. The proposals are contained within the curtilage of the site and as referred to in the previous refusal for the site, the development of the site would constitute the loss of the football pitch. It therefore must be considered that in planning terms SMDC planning department consider that in order for something to be lost, it must be established in the first instance.

5.10 New buildings within the green belt are generally regarded as "inappropriate development", which requires justification with reference to very special circumstances. There are exceptions to that general rule. One exception is set out in Para 154 (g) of the NPPF, which is as follows:

- Limited infilling of the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings) which would:

- Not have a greater impact on the openness of the Green Belt than the existing developments: or
- Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

5.11 As redevelopment of a previously developed site, in the context of para 154 of the NPPF, the principle of the proposals would not be inappropriate development in the Green Belt. This is subject to an assessment of the impacts on the openness and purposes of the Green Belt.

## **6. Impact on the openness of the Green Belt**

- 6.1 There is no definition set out in policy or law as to what constitutes "openness" and there is no standard methodology as to assessing the impact.
- 6.2 In the case of Samuel Smith vs Euro garages, the word "openness", is open-textured and there are a number of factors which are relevant when it comes to assessing the factors of the case. A key question among these factors is "how built up is the green belt in its existing form, vs how built up would the green belt be if redevelopment occurs. In addition, visual impact on the aspect of openness which the green belt presents. The decision makers must conclude that there is "harm", not merely change to the openness of the Green Belt.
- 6.3 In this case, the site has an extant use, it is well screened from public view, and the spatial impacts have been considered in the design, layout and scale of the proposals

### **Spatial Impact**

- 6.4 Whilst there is no building or structure on the application site at present (save for a small block building and goal post), the site as previously determined by the planning team does have an extant use as a football playing fields or pitch.
- 6.5 It can be accepted that the proposed buildings would have a greater impact on the openness than the existing, in spatial terms. However, consideration could be given to any proposed change of use to the site, or the installation of buildings to support the extant use. For example, a building to provide changing facilities or a storage building for equipment, high protective fencing, flood lights, covers or enclosures, park equipment or other leisure bases features.

## Visual Impact

- 6.6 In terms of visual impact, its necessary to look at the specifics of the site and how it fits into the wider context. The site, as argued by the LPA, has an extant use. It immediately adjoins the settlement boundary of Kingsley, it is flanked by the large agricultural holding to the East and is screened from view from the highway by the new development at Calvin Court and the established tree and hedges which are all to remain.
- 6.7 There is an argument which would suggest that the development at Calvin court has extended the settlement boundary, and that residential development already extends into the openness of the Green Belt. The case could be counter argued that the extant development sits within the previously developed area which contained the build structure of the youth club and changing facilities. However, historic records and documents with the application SMD/2018/0511 clearly show that the former building only sat on 50% of the now developed area, with the two bungalows to the Southeast creating an extension of the green belt.
- 6.8 Our application proposes to not extend the building line further East, than that what has already be set as precedent under the approved application SMD/2018/0511
- 6.9 On view from the public highway, the development at Calvin Court already extends the building line beyond the settlement boundary. The proposals would not extend any further to the east, than that which has already been permitted by the LPA.
- 6.10 The development does not have direct road frontage, but it would be well connected by the existing vehicles access to the Calvin Court.
- 6.11 The fundamental principle of the Green Belt Policy is to prevent urban sprawl by keeping land permanently open and to protect the countryside, harm would not be caused to the five purposes of developing land within the Green Belt:
- To check that unrestricted sprawl of large built-up areas – the proposal would have no impact in this regard, it is a small scale development and any argument for spawl must have been considered at the time of granting consent for the development at Calvin Court, as set out above.
  - To prevent neighboring towns merging into one another – The proposal would not cause such harm. There remains a large section of open green belt, between the proposed development and the neighboring Farm to the East. In addition to this, the proposal includes a native landscaping area, which will serve to create a formal break between development an openness.

- Beyond the farmstead, there are wide open fields which are used for agricultural purposes and the recreation ground at Kingsley Holt. There remains a vast swath of green belt between the two villages of Kingsley and Kingsley Holt.
- To assist in safeguarding the countryside from encroachment – The proposal would be contained within the curtilage of a previously developed site and there would be no greater encroachment into the countryside.
- To preserve the setting and special character of historic towns – There would be no impact on the setting and special character of historic towns in this case.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – there would be no harm caused to urban regeneration initiatives elsewhere. On a small-scale development such as this the proposal would contribute towards the regeneration of this previously developed, but currently an under-used site.

6.12 In conclusion, we would consider that the proposal would have a minor impact on the openness of the Green Belt. However, having considered the extant use, and the wider context, we conclude that the harm to openness would be moderate. There would be no harm to the purposes of including land within the Green Belt.

## 7. Other planning considerations

- 7.1 We consider other planning considerations to assess whether this “any other harm”, that needs to be appraised in the overall Green Belt:

### Character and appearance

- 7.2 Whilst accepting that the proposal would develop a site which is currently underused, the site is located in an area within a village fringe and is therefore close to other houses and built forms. The adjoining area at Haste Hill Avenue follows a very similar form of cul-de-sac style development and the pattern of development at Clavin court has been continued.
- 7.3 The development forms vary in style and appearance and there is therefore no defined style of property in Kingsley. The immediately adjoining properties around Haste Hill Avenue form a very linear development, with two rows of attached properties, the material palette is brown facing brickwork under red clay roof tiles. The development at Calvin Court comprises of detached bungalows, with facing brickwork under roofing tiles.
- 7.4 The proposed development follows similar principles, with facing brickwork being the primary facing material, with roof tiles to match Calvin Court.

### Highways and Access

- 7.5 Reason No.4 of the previous refusal. Stated that the application has insufficient information to demonstrate that safe vehicular access to the development is possible. The Highways departments commented to state that the principle of development would be acceptable, however the red line did not meet the highway. We consider that the point has been addressed in the latest submission.
- 7.6 Furthermore, we have considered points raised in the previous decision which relate to the potential loss of the football pitch, we would request that all parties consider that if this extant use was to become completely operational then vehicle movements and parking would be significantly higher than what is currently proposed within the current application.
- 7.7 Although residents may own cars, due to the occupation type it is anticipated that ownership levels would be much lower. The site has been selected based on the good amenity levels, with shops and a community building in walking distance (by pavements and public footpaths), and good bus service links.

## **Ecology**

- 7.8 The site is comprised of grassland, which is mown. The site is bound by trees and hedgerows to the East and West. All of the existing trees and hedgerows are to be retained and improved as part of the development.
- 7.9 Whilst not a reason that impacted the last decision for the same form of development, the applicant is willing to consider this point further.
- 7.10 We will consider the preliminary ecology assessment and the BNG in a separate report.

## **Flood risk and Drainage**

- 7.11 The site is within Flood Zone 1, with a low probability of flooding. It is also in an area at very low risk of surface water flooding. There would be no increased risk of flooding because of the proposed development.

## **Landscaping**

- 7.12 Whilst not a reason that impacted the last decision, the applicant is willing to consider this point further.
- 7.13 Expecting all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative. Where any mitigation and compensation measures are required, they should be appropriately scheduled and managed according to the nature, size and scale of the development so as to minimise impacts that may disturb protected or important habitats and species.
- 7.14 Supporting opportunities to improve site management and increase public access to wildlife sites including supporting the objectives of the Staffordshire County Council Rights of Way Improvement Plan.
- 7.15 Ensuring development promotes the appropriate maintenance, enhancement, restoration and/or re-creation of biodiversity through its proposed nature, scale, location and design. The Staffordshire Moorlands Biodiversity Opportunity Map, in conjunction with the Staffordshire Biodiversity Action Plan, will be used to guide biodiversity enhancement measures to be included in development proposals as appropriate to the nature and scale of development proposed and other environmental interest, in particular supporting opportunities to increase grassland and heathland habitats including supporting targets in the UK and Staffordshire Biodiversity Action Plan.
- 7.16 Protecting and enhancing habitats and species of principal importance for the conservation of biodiversity as identified in legislation, and recognizing and implementing appropriate measures, including

landscape-scale conservation management, to take account of the fact that the distribution of habitats and species will be affected by climate change.

#### **Loss of the Football Pitch:**

- 7.17 One of the key considerations and a reason for refusal on the previous application was the potential loss of the football pitch. We suggest that there are a number of factors to consider on this point:
- 7.18 If it is to be considered in planning terms that there would be a "loss" of a football pitch, then it must be agreed that there is a strong justification to classify the land as previously developed land.
- 7.19 In terms of factual points, the last known use of the site was 2010. Since that time no requests have been made by any public or private body to use the site as a football pitch.
- 7.20 The loss of the changing facilities has made it less viable to be used as a club football pitch.
- 7.21 It should be noted, that during the last application Sports England stated, that they were not statutory consultees. The previous application dates December 2021.
- 7.22 Since the loss of the changing facilities, and the parking, it is unlikely that any team would choose to utilise the pitch. During the last application Sport England made the following comments:

*Given the above, the PPS does not specifically identify the site as such it does not make a recommendation for its protection. The PPS identifies that shortfalls could be met through pitch improvements of existing sites and reconfiguration of pitch types, this approach is currently being undertaken by Football Foundation in partnership with the Council.*

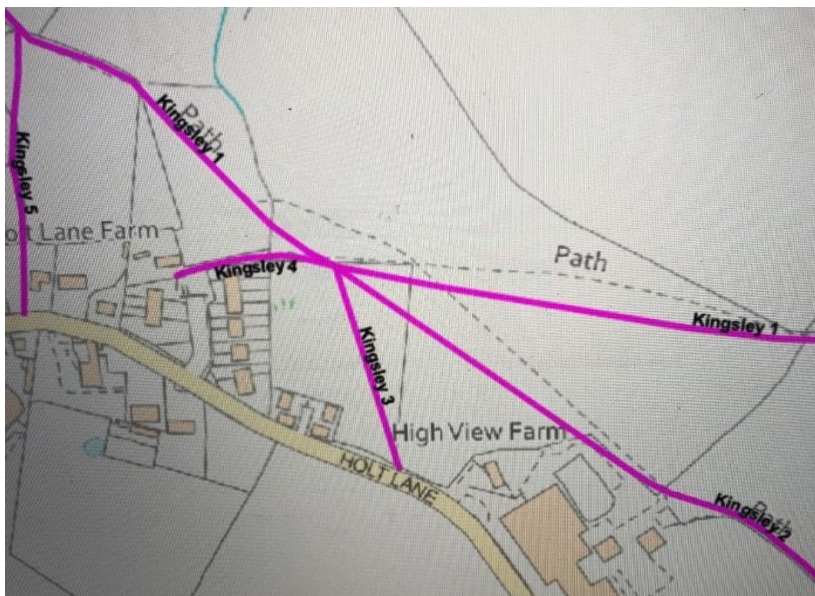
*we are currently involved in some positive and progressive discussions with Staffordshire Moorlands District Council regarding football pitch provision around the Cheadle area and with a view to strategically map provision against changes in team growth etc. and given the close proximity to Kingsley, this could be an opportunity to address PPS shortfalls in the area.*

- 7.23 We would welcome the opportunity to learn more about the positive and progressive discussions between PPS and SMDC. This would give us a better understanding of key principles and objectives allowing us to formally assess these points against our scheme.
- 7.24 Considering the above comments, we agree with Sport England. That the site does not require protection. Whilst we understand the principles of making improvements to the existing site or neighboring sites, we would like to see what improvements have been made to the existing sites in the last 2 years.

- 7.25 We would also respectfully request that if funds were needed, that they are invested in the two pitches which are near to the application site and not sites that are some 3.5 miles away. The applicant would be willing to contribute to the improvements to both playing fields at Kingsley and Kingsley Holt.
- 7.26 Based on the previous application, a contribution requested for offsite contributions to provide under 15.16s pitch. Whilst the applicant does not consider it appropriate to contribute outside of the neighboring villages, we would consider a formal business case made by Cheadle South Moorlands Football club, identifying where the contribution would be spent, and on what timescales.

### Public Footpaths

- 7.27 During the previous application the SCC team reviewed the development of this site. The previous application did not formally consider the position or the interaction of the development with the existing footpaths.



7.28 Out of the 4 footpaths that cross the site, only 1 requires a minor diversion, to join footpath 3 with footpath 2.

7.29 It should be noted that the paths which are walked currently across the site are not necessarily the designated footpath routes. For purposes of our assessment, we have considered the routes as defined in on the maps.



## 8. Green Belt considerations: very special circumstances

- 8.1 Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, are clearly outweighed by other considerations. In essence there is a requirement to assess the harm resulting from the proposal, outline and assess the other considerations and undertake a balancing exercise whereby the harm caused by the proposal is weighed against the other considerations. If the other considerations clearly outweigh the harm, this comprises the very special circumstances required to justify granting planning permission.
- 8.2 The Framework does not prescribe or define the scope of very special circumstances. The weight to be given to very special circumstances is therefore dependent upon the context of each individual case. However, case law has also determined that the circumstances do not need to be unusual or specific to the particular case to be special.
- 8.3 There are materials considerations in favor of the development proposals, which should be afforded significant weight in the decision-making process such that they outweigh the definitional harm and the moderate harm which may be caused to the openness of the Green Belt. This amounts to the very special circumstances in which planning permission can be granted for inappropriate development in the Green Belt.
- 8.4 The considerations that comprise the very special circumstances in this case are as follows:
- The critical need to provide housing for older people.
  - The specific need for elderly accommodation within Staffordshire Moorlands.
  - There are no alternative sites outside of the Green Belt which are suitable, available or deliverable.
  - The provision of social and wellbeing benefits.
  - Absence of a 5-year land supply.
  - Economic benefits.

## The critical need to provide housing for older people

- 8.5 The Framework recognises that different groups of people have different housing needs. It states at paragraph 60:

“To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community”

- 8.6 It goes on to state in paragraph 63:

Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers<sup>28</sup>; people who rent their homes and people wishing to commission or build their own homes”.

- 8.7 The Framework is therefore very clear on the need to identify and address the needs of groups with specific housing requirements, including older people and people with disabilities.

- 8.8 The PPG has a specific category of guidance dedicated to housing for older and disabled people. It explains that the need to provide housing for older people is ‘critical’. People are living longer lives and the proportion of older people in the population is increasing. It explains that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. An understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking. It states at paragraph 003 (ID:63-003- 20190626) that:

“The National Planning Policy Framework glossary provides definitions of older people and people with disabilities for planning purposes, which recognize the diverse range of needs that exist. The health and

lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support".

- 8.9 The report 'Too Little Too Late? Housing for an Ageing Population' published by the Think Tank, the Centre for the Study of Financial Innovation, in June 2020 explains why retirement communities are essential to tackling the UK's dysfunctional housing market.
- 8.10 The Think Tank report sets out that by 2040, the UK population will have grown to circa 73m (10% growth) and that it is projected that nearly one in four people will be aged 65+. This represents a 41% increase in that age cohort to nearly 18m. This projected growth fuels the demographic case for downsizing, and it argues that in order to meet the challenge of providing a sufficient supply of housing for older people, downsizing is both necessary and desirable. The report estimates that in the 65+ cohort, the number of surplus bedrooms in homes is on track to double from 6.6m in 2000 to 12.8m by 2040 unless behavior and public policy change (the youngest households have a bedroom deficit).
- 8.11 To make this an attractive option, the supply of good quality age-friendly housing needs to increase substantially. The report states that only 750,000 homes, less than 3% of the UK stock cater specifically for the retirement market and this represents only 9.4% of households aged 65 and over. Surveys have shown that up to a third of older households are amenable to downsizing but only a small minority do so. Under-occupation of the housing stock caused by an ageing population has contributed to creating a dysfunctional housing market. The report states that far too few homes are being built to cater for older people and calls for a national strategy and for government departments and local authorities to be accountable for its delivery.
- 8.12 The Local Government Association Report 'Housing our ageing population' published in September 2022 makes several recommendations to government on how we can best meet the needs of people in later life. The report states that society is ageing and more people require housing that meets their needs as they age. The report reaffirms that between 2014 and 2039, over 70 per cent of projected household growth will be made up of households with someone aged 60 or older. The suitability of the housing stock is of critical importance to the health of individuals and impacts on public spending, particularly adult social care, and the NHS.

- 8.13 It recommends that the planning system should be used to facilitate suitable housing for older people as follows:

Councils set out in their evidence base as part of developing local plans, details of the need for different types of housing suited to older people, including mainstream housing that is suitably designed and/or adapted and specialist types of housing, such as retirement housing and housing with care;

councils consider developing guidance for developers, for example as Supplementary Planning Documents (SPD), as a way of directly influencing the market to deliver the types of housing and accommodation required by older people; and

guidelines are published by the Government through the Task Force on Housing for Older People, that clarify the different housing models/typologies for older people with appropriate recommendations regarding planning Use Class and planning facilitation measures for the assessment of applications.

- 8.14 At the local level, the Staffordshire Frail Elderly Strategy (June 2015) explains that consistently across Staffordshire, those over 65 account for the majority of general hospital users with the longest length of stay. For many older people, a stay in hospital is disempowering and affects their ability to recover who they were and how they were living before admission. The strategy sets out a series of objectives which focus on prevention and to drive a culture of change that delivers individual independence where people are able, confident and empowered to participate in their own care. A significant part to this, is ensuring that people's homes are suitable for their return home, accessibility being a major factor.

- 8.15 The Local Plan recognises that one of the challenges facing the borough is the need for accommodation to support a growing elderly population (page 26). Policy H1 of the Local Plan states that new housing development should provide for a mix of housing sizes, types and tenure including a proportion of affordable housing as set out in Policy H3, and where appropriate, housing for special groups to meet the needs and aspirations of the current and future population. The explanatory text to Policy H1 at paragraph 7.49 states that housing for special groups will be needed to meet the future increase in elderly persons across the district and the needs of those with a learning or physical disability. The policy itself states at H1 (a) that:

housing for special groups, particularly for older people and other as identified in the SHMA or successor documents should be of a scale and in a location which is appropriate to its needs."

- 8.16 In summary, the PPG recognises that the need to provide housing for older people is “critical”, and there is a very significant identified local need. The provision of homes which can provide adaptable and flexible accommodation to meet the need of the elderly in perpetuity is a material consideration which is recognised in both national policy and in the development plan. The proposal would assist in contributing towards this need by providing accommodation to enable elderly people to live independently and safely in their own homes with a care package available to their specific needs as required.
- 8.17 The most recent ONS population projections were published in January 2022 and were based on the existing population in 2020. The projected population increase to 2030 is shown in the table below.

Table 2: UK population projections to 2030

| <b>Age group</b> | <b>UK</b>                         |                                    |                                 |
|------------------|-----------------------------------|------------------------------------|---------------------------------|
|                  | <b>Existing population (2020)</b> | <b>Projected population (2030)</b> | <b>Change in population (%)</b> |
| Aged 0 - 4       | 3,782,330                         | 3,323,294                          | -12.14%                         |
| Aged 5 - 9       | 4,147,413                         | 3,474,076                          | -16.24%                         |
| Aged 10 - 15     | 4,797,826                         | 4,807,854                          | 0.21%                           |
| Aged 16 - 19     | 2,930,968                         | 3,490,085                          | 19.08%                          |
| Aged 20 - 24     | 4,133,158                         | 4,398,449                          | 6.42%                           |
| Aged 25 - 34     | 8,998,605                         | 8,481,841                          | -5.74%                          |
| Aged 35 - 49     | 12,799,610                        | 13,468,938                         | 5.23%                           |
| Aged 50 - 64     | 12,982,686                        | 12,765,968                         | -1.67%                          |
| Aged 65 - 75     | 7,269,226                         | 8,282,384                          | 13.94%                          |
| Aged 76 - 84     | 3,580,043                         | 4,620,820                          | 29.07%                          |
| Aged 85 and over | 1,659,369                         | 2,093,488                          | 26.16%                          |

- 8.18 The ONS population projections show that the age of the UK population is expected to increase overall, with significant increases in those aged 65 – 75, 76 – 84 and 85 and over.
- 8.19 The most recent population projections at a local authority level were published in 2020 and were based on the existing population in 2018. The projected population increase in Staffordshire Moorlands to 2043 is as follows:

Table 3: Staffordshire Moorlands population projections to 2043

|              | Staffordshire Moorlands    |                             |                          |
|--------------|----------------------------|-----------------------------|--------------------------|
| Age group    | Existing population (2018) | Projected population (2043) | Change in population (%) |
| Aged 0 - 4   | 4,302                      | 4,385                       | 2%                       |
| Aged 5 - 9   | 5,153                      | 4,679                       | -9%                      |
| Aged 10 - 14 | 5,351                      | 4,972                       | -7%                      |
| Aged 15 - 19 | 5,108                      | 4,867                       | -5%                      |
| Aged 20 - 24 | 4,537                      | 4,191                       | -8%                      |
| Aged 25 – 29 | 4,991                      | 4,897                       | -2%                      |
| Aged 30 - 34 | 4,760                      | 5,283                       | 11%                      |
| Aged 35 – 39 | 4,992                      | 5,433                       | 9%                       |
| Aged 40 – 44 | 5,422                      | 5,467                       | 1%                       |
| Aged 45 - 49 | 7,454                      | 6,247                       | -16%                     |
| Aged 50 – 54 | 7,963                      | 6,872                       | -14%                     |
| Aged 55 – 59 | 7,358                      | 6,664                       | -9%                      |
| Aged 60 - 64 | 6,580                      | 6,501                       | -1%                      |
| Aged 65 - 69 | 6,786                      | 6,163                       | -9%                      |
| Aged 70 - 74 | 6,946                      | 7,342                       | 6%                       |
| Aged 75 – 79 | 4,687                      | 7,108                       | <b>52%</b>               |
| Aged 80 - 84 | 3,270                      | 5,376                       | <b>64%</b>               |
| Aged 85 - 89 | 1,803                      | 3,232                       | <b>79%</b>               |
| Aged 90 +    | 934                        | 1,865                       | <b>100%</b>              |

- 8.20 As shown in the table above, over the 15 year period to 2043, there is projected to be a significant increase in the elderly population of Staffordshire Moorlands. This increase is expected to be particularly substantial for those aged 75 and above. Indeed, the population of those aged 90 and above is expected to double by 2043. This will give rise to a large increase in demand for specialist housing.
- 8.21 Paragraph 7.85 of the SHMA indicates that research by CABE shows that semi-detached and detached houses are the preferred house type for the majority of households and that older couples also aspire to live in detached houses.

## 9. Site Assessment:

- 9.1 A review of the Council's Strategic Housing Land Availability Assessment (SHLAA, 2015) had been undertaken to assess possible alternative sites. The SHLAA identifies 111 sites between 0.4ha – 1ha. Of these, 42 sites have an identified capacity of between 10-15 dwellings. The developable area of the application is 0.55ha and the proposal is to provide 10 residential units. The assessment therefore rules out sites with a capacity greater than 15 units. Anything above 10 would represent an inefficient use of land, which would be contrary to para 123 of the NPPF.
- 9.2 Based on our review of all SHLAA between 0.4-1ha, we concluded that there are no suitable alternative sites outside of the Green Belt that are available and sequentially preferable to our client's site.
- 9.3 The applicant has been proactively looking for opportunities. The application uses a number of resources to identify suitable land. With extensive online searches or via the local and national estate agents. No sites have been identified as being suitable.
- 9.4 Furthermore, in considering the suitability of the application site, the proposed development would be on previously developed land. This is considered sequentially preferable to an undeveloped site in the Green Belt in the context of the unmet need for elderly care. It is considered that the development of previously developed land should be given some weight in the planning balance.

### **Absence of a 5-year housing land supply**

- 9.5 Target for the new 5-year housing supply is currently under review with new anticipated targets to be issued by Q4 of 2024. For the purposes of this application, we are using the latest and most up to date policies and figures, however we expect the policies and targets to change during the application process, and with that we reserve the right to update and amend this statement.
- 9.6 Paragraph 60 of the Framework seeks to support the Government's objective of significantly boosting the supply of homes. It states that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 9.7 The Written Ministerial Statement of December 2015 set out that unmet need is unlikely to clearly outweigh harm to Green Belt and any other harm as to establish very special circumstances. However, in the 8 years since the statement was made, the provision has not been incorporated within the Framework and similar guidance within the Planning Practice Guidance has been removed. We consider and therefore accept that

very limited weight should be attached to this.

- 9.8 The Council's Five Year Housing Land Supply Report sets out the five year housing land supply position at a base date of 1<sup>st</sup> April 2021 and a five year period to 31<sup>st</sup> March 2026.

**9.9 Economic benefits**

- 9.10 The proposal would deliver benefits to the economy through the creation of jobs during the construction and operational phase.

- 9.11 There would also be a long-term economic benefit to the local economy, with increased footfall to the shops, community buildings, public houses, bus serves etc.

**Summary of very special circumstances**

- 9.12 In summary, the other considerations set out above should be afforded significant weight in the decision-making process. We consider they outweigh the definitional harm and the harm which would be caused to the openness of the Green Belt, and consequently comprise the very special circumstances in which permission may be granted for development that is inappropriate in the Green Belt.

## 10. Appendix A:

| Policy | Allocation ref | Site                                              | Settlement | Net Area (ha) | Capacity | Allocation Topic Paper Notes                                                                                                                                                                                                                                                                                                                                                                    | Planning application details                                                                                                                                                                                                                                                          | Conclusions                                                                                                            |
|--------|----------------|---------------------------------------------------|------------|---------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| DSL1   | ADD01          | Land east of Horsecroft Farm, Leek                | Leek       | 0.89          | 15       | <ul style="list-style-type: none"> <li>• Access via new Nightingale Estate (SCC no objection)</li> <li>• Reasonable access to services &amp; facilities</li> <li>• May be footpath crossing site, but this does not appear adopted</li> <li>• Whole of site is high landscape sensitivity in Landscape, Local Green Space &amp; Heritage Impact Study 2016</li> </ul>                           | Nonrelevant                                                                                                                                                                                                                                                                           | In a highly sensitive landscape area.                                                                                  |
| N/A    | LE022          | Land west of Ashbourne Road                       | Leek       | 0.45          | 16       | <ul style="list-style-type: none"> <li>• Site has full planning permission for 12 x dwellings SMD/2016/0510</li> <li>• Ladydale SBI a short distance to S/W neighboring areas</li> <li>• Pickwood Rec, a non-designated heritage asset on the Council's Local List, lies with 400m of the site.</li> </ul>                                                                                      | SMD/2016/0510 - granted 30/11/2017 - Proposed 12 dwellings with associated car parking and landscaping<br>Site now built out                                                                                                                                                          | Site is not available - planning permission granted for 12 dwellings and development appears to be completed.          |
| N/A    | LE102          | Land north of Macclesfield Road                   | Leek       | 0.59          | 25       | <ul style="list-style-type: none"> <li>• Access via Bridge End</li> <li>• Site steeply slopes up to north/west</li> <li>• Site is of District ecological importance</li> <li>• Inaccessible to services</li> </ul>                                                                                                                                                                              | Nonrelevant<br>For info - Application submitted on adjacent land for 12 bungalows (pending decision - SMD/2021/0113)                                                                                                                                                                  | Significant terrain issues and therefore not suitable - viability issues due to costs.                                 |
| N/A    | CH015          | Stoddarts Depot, Leek Road                        | Cheadle    | 0.72          | 32       | <ul style="list-style-type: none"> <li>• Brownfield site currently in use as a coach depot and oil depot yard.</li> <li>• Likely contamination</li> <li>• Within Source Protection Zone 2, and partially within Source Protection Zone 1.</li> <li>• Traffic congestion in the town centre.</li> </ul>                                                                                          | Nonrelevant                                                                                                                                                                                                                                                                           | Likely contamination and Source Protection Zones issues and therefore not viable for the proposed end use.             |
| N/A    | AL012          | Land at Capri, Gallows Green                      | Alton      | 0.6           | 13       | <ul style="list-style-type: none"> <li>• Large modern house within level site, southern area is paddock</li> <li>• Mature trees/hedgerows on boundary</li> <li>• Footpath runs adjacent to site</li> <li>• Five Grade II Listed Building &amp; Conservation Area within 400m</li> <li>• Access on Allotment Lane needs improvements/realignment</li> <li>• Spring/watercourse nearby</li> </ul> | SMD/2021/0089 - Granted at committee subject to S106 - 27/01/2022 - S106 not yet completed - Outline planning application with all matters reserved for a residential development (13 dwellings inc. the existing)<br>For info - previous outline approved 15/12/2017 (SMD/2014/0824) | Site is not available. Development appears to have been built out.                                                     |
| N/A    | EN128          | Land at corner of Brookfield Avenue / Stoney Lane | Endon      | 0.83          | 22       | <ul style="list-style-type: none"> <li>• Flat grassed open space within settlement boundary</li> <li>• Low level perimeter dwarf wall/hedging along Stoney Lane &amp; school boundary</li> <li>• Individual TPOs along southern boundary</li> <li>• Three Grade II listed buildings and Conservation Area within 400m</li> <li>• FRA required</li> </ul>                                        | Nonrelevant                                                                                                                                                                                                                                                                           | Flood risk issues. Potential impact on heritage assets.                                                                |
| N/A    | UT019          | Haulage Depot, St Thomas's Road                   | Upper Tean | 0.4           | 15       | <ul style="list-style-type: none"> <li>• In active employment use.</li> <li>• Within Conservation Area.</li> <li>• Possible contamination</li> </ul>                                                                                                                                                                                                                                            | Nonrelevant                                                                                                                                                                                                                                                                           | Site not available and still in use as haulage depot. Possible contamination issues.                                   |
| DSR3   |                |                                                   |            |               |          | <ul style="list-style-type: none"> <li>• Is a gap in the built frontage</li> <li>• Adjacent to Young Offenders Institute</li> <li>• Public right of way adjacent to eastern boundary</li> <li>• One Grade II listed building 400m away</li> <li>• Potential noise issues</li> <li>• Access needs to be clarified</li> <li>• Part of wider allocation</li> </ul>                                 | SMD/2021/0694 - approved 26/09/2022 - Development of 75 new dwellings, new access, provision of green infrastructure and all associated works                                                                                                                                         | Site is not available - planning permission granted as part of wider allocation - development commenced on 16/01/2023. |

