

Ms Rachael Simpkin
High Peak Borough Council - Planning
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16 June 2023
EP ref: 20-159
By email: rachael.simpkin@staffs Moorlands.gov.uk

Dear Rachael,

Re: Application ref: HPK/2023/0061 – Outline planning Application for Affordable Housing

Further to your advice that the above application will be considered at the Development Control Committee meeting on 10th July 2023, we write to respond to comments raised through the consultation process to date. We note that these include a number of supportive responses from local residents, that the Town Council “strongly supports” the proposals for affordable housing on this site and that a further Parish Council submission has not raised any objection to the development, noting that that site has no particular landscape merit and is well screened.

Whilst there have also been some objections from local residents, the concerns they raise either focus on detailed/technical matters where it has been shown that issues can satisfactorily be addressed at the reserved matters stage, or else relate to issues such as congestion, or service provision where relevant statutory consultees are satisfied that subject to appropriate conditions, the development would not give rise to unacceptable impacts. A number of responses also refer to the development being located within the Green Belt. However, the planning statement that accompanied the application fully addressed the appropriateness of the development within the Green Belt and its compliance with the Development Plan and the LVIA undertaken by Barnes Walker confirms that the proposed development would not exert itself visually, to any great extent upon the remaining surrounding Green Belt land between Whaley Bridge to the south and Furness Vale to the North. The site is well contained and related to this part of Bridgemont and does not play a wider functional role in terms of Green Belt objectives. The fact that a number of the objections (as well as letters of support) also acknowledge the need to provide local affordable homes is indicative of the level of need in this part of High Peak which we respond to in more detail below.

In terms of local affordable needs and in response to the Housing Officer’s comments dated 20th April 2023, we make the following comments. Firstly, the Housing Officer helpfully confirms that there is a significant need for affordable housing which is not being met by the pipeline of sites coming forward. As the Housing Officer states, there is a net annual need of between 45 and 63 homes for affordable / social rent and a net annual need of between 36 and 40 affordable homes to purchase (i.e., first homes or intermediate housing including

shared ownership) in the Central Area over the period 2021 to 2041. This is a total of between 85 and 99 affordable homes per annum. However, the Housing Officer has only identified a pipeline of affordable housing supply in the Central Area of 137 homes under construction and a further 25 which have planning permission. This is clearly less than two years' worth of supply against need and does not factor in the shortfall since 2021. Only 36 affordable homes were delivered in the Central Area in 2022/23, which has created a shortfall in that year alone of between 45 and 63 homes and effectively a need that should be addressed now.

Secondly, the pipeline of sites listed includes 23 affordable homes at Marsh Road in New Mills which has stalled due to ground conditions. The resolution of this issue is likely to affect the viability and consequently the delivery of affordable homes on that site. Whilst 37 affordable homes have been approved at Furness Vale, there has been no progress to date on the discharge of 14 of the 15 pre-commencement conditions.

Thirdly, in terms of the definition of "local need", policy H5 of the Local Plan states that this is defined in the Affordable Housing Supplementary Planning Document (SPD). An Affordable Housing SPD has not been adopted. Whilst a Developer Contributions SPD is being prepared and sets out a proposed definition of "local need" for the purposes of policy H5 of the Local Plan as set out in the Housing Officer's report, this is only draft, is the subject of outstanding objections and has not been adopted. Therefore, it only carries limited weight in the determination of this application.

Nevertheless, the Home Options data provided by the Housing Officer identifies that there are 66 applicants in the parish of Whaley Bridge in need of affordable housing. Of those, 45 are in Whaley Bridge and 2 in Bridgemont. This is despite the recent completion of 13 affordable homes in Bridgemont and 10 at Linglongs in Whaley Bridge. There is also an identified need for 22 affordable homes in Furness Vale.

We note that despite the delivery of 13 affordable homes in Bridgemont and 10 at Linglongs, the affordable housing need in Whaley Bridge has increased to 66 from:

- 51 in February 2022 (as set out in the Committee report for the previous application at the application site); and
- 57 in July 2022 (as set out in our Affordable Housing Statement).

Within this context, it is not surprising that Whaley Bridge Town Council "strongly supports" the application and there have also been several letters of support from those in need of affordable housing in Whaley Bridge. Additionally, the proposals are supported by Great Places, a well-respected RSL who are willing to take the proposals forward and this in itself indicates a continued need for affordable housing in this location.

The needs of those 66 applicants on the Housing Options in affordable housing will not be addressed by the pipeline of housing in the parish of Whaley Bridge, which is only 59 (22 at Linglongs and 37 at Furness Vale). However, even if the 37 dwellings at the Furness Vale site are delivered then they would be looking to meet some of New Mills' unmet affordable housing need due to its proximity to New Mills and the fact that most of the allocations in New Mills have failed to come forward (as set out in our Affordable Housing Statement).

Finally, in terms of the Housing Officer's comments on the layout, this has been informed by feedback from the Town Council on the identified requirements of those in need of affordable housing and would be determined in agreement with the Council and Town Council at the reserved matters stage. Given the time it may take to progress the Reserved Matters application and to get to a start on site it makes complete sense not to fix the mix of housing at this stage as that may or will more than likely change and evolve over the period leading in to completion of the first homes.

In terms of the responses of other statutory consultees, we understand that Environmental Health, the Coal Authority, Derbyshire Wildlife Trust, Leisure and Recreation and United Utilities have no objections to the development subject to the imposition of standard planning conditions.

The response from DCC Highways dated 14th March 2023 refers to the earlier application at the site and lists a number of points that were raised, but which have not been addressed through the current application. However, the reasons for this have been fully explained and ultimately the Highways Officer was satisfied with the previous outline application for the site, indicating that there were “no major objections to the proposals”. Similarly, the response to this application does not constitute an objection. In essence, the application is made in outline only and the applicant is only seeking approval of the access arrangements from the highway. The details of internal access arrangements are reserved for subsequent approval as these will be impacted by the final layout of the development and the housing mix as referred to above. We note that DCC Highways response dated 11 April 2023 in respect of the Travel Plan contains a number of comments that will guide the provision of details at the reserved matters stage, and which can be dealt with by means of condition as required.

At the time of writing, we have not been advised of any comments from the Tree Officer, LLFA, or Network Rail. Given additional work has been undertaken to address comments raised in relation to flood risk and drainage since the previous application and that United Utilities are now satisfied with the proposals, we anticipate that the flood risk and drainage considerations should be acceptable. Any considerations in respect of proximity to the railway and railway assets would not be materially different to those for approved application reference HPK/2017/0536 and can be dealt with by way of condition, especially given that this is an outline application and as reason for refusal 2 for application reference HPK/2020/0180 was included on the basis that Network Rail had advised that the Council should be satisfied there would no adverse impacts to the operation of the railway line in relation to drainage and noise matters specifically. The fact that Environmental Health and United Utilities have raised no objections to the current application indicates that matters have moved on positively since the previous application and that technical consultees are satisfied that matters can be dealt with effectively at the reserved matters stage/by condition.

We trust that the above addresses the various responses to the application and that it can now progress with a positive recommendation to address what is acknowledged as a pressing local need. If any additional consultee comments are received which highlight any areas of concern, we request you notify us at the earliest opportunity so that we can resolve any issues in advance of the Committee meeting.

Yours sincerely
Emery Planning

Rawdon.

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