

Programme Officer  
Directorate of Regeneration  
43 Civic Centre  
Glebe Street  
Stoke-on-Trent  
Staffordshire  
ST4 1RF

21 May 2009

EPP ref: L22-7182-PE-jb

Contact: Peter Emery  
Direct dial:  
PeterEmery@epp-planning.com

By Post and Email  
[examination@stoke.gov.uk](mailto:examination@stoke.gov.uk)

Dear Ms Hough

**RE: COUNCILS SCHEDULE OF PROPOSED CHANGES – CORE SPATIAL STRATEGY**

Thank you for your email of 20<sup>th</sup> May concerning the above.

I am writing in response to the letter from Gloria Dix of 12<sup>th</sup> May and our subsequent emails.

On behalf of Madeley Manor Care Home Limited, I comment as follows:-

**1. CHD 20**

- 1.1 It is noted that the councils have nothing further to add in response to our Appendix 1 – the Pinders Report. It is assumed that the "*nothing further to add*" relates to the councils hearing statement in respect of Matter 4 – Housing.
- 1.2 It is assumed therefore that the councils accept the findings of the Pinders Report in that:-
  - in terms of demographics there will be a substantial increase in the elderly population;
  - there will be a need therefore for additional care facilities for the elderly;
  - policies will need to be incorporated into the Core Spatial Strategy (CSS) that will encourage the provision of accommodation for the elderly through forthcoming development plan documents (DPDs) on allocation of specific sites and criteria based policies for determining planning applications.
- 1.3 The Core Spatial Strategy however, fails to address the forecast demographic changes and the consequent planning policy requirements, particularly for the elderly, and as set out in paras 2.14 and 2.15 of our statement, the CSS is not consistent with national policy in PPS 3 and therefore, fails the test of soundness.

**2. CHD 13**

- 2.1 The submission draft of the CSS at para 5.243 refers to

*"A positive approach will be taken towards development for supported and special needs housing where it supports the housing strategy in Newcastle Borough".*

- 2.2 While supporting the positive approach in principle, we sought clarification of what the councils meant by a *"positive approach"* (our para. 3.9) and by the term *"supported and special needs housing"* (our para. 3.10).
- 2.3 It is now noted that in the councils document CHD13 there has been a word change and reference to a positive approach being taken to supported and special needs housing has been deleted. This is objected to. It flies in the face of the evidence submitted in our statement and in the Pinders Report.
- 2.4 Further, this adds to our concern that the CSS is not sound. It is not based on a robust and credible evidence base as required by PPS 12, nor is it consistent with national policy PPS 3.

### **3. CHD 21**

- 3.1 The councils have responded to the Inspector's Hearing Document IHD 6 by stating that provision will be made for a housing mix that will meet needs, such as older and disabled people, identified through locally based assessments.
- 3.2 While this response clarifies the points made in our representations, further clarification is sought on what the councils refer to as *"locally based assessments"* rather than to *"identified needs"* as referred to by the Inspector. Are these to be carried out by the councils or by applicants? What factors do these assessments need to consider? What is meant by *"local"*? This term is not defined in the Glossary.
- 3.3 Further, the provision of a satisfactory housing mix should not be achieved solely through allocating sites in DPDs but policies should be adopted that encourage and enable such a mix to be delivered through the granting of planning permissions. The councils should amend their response accordingly.

I should be grateful if you would:-

- a) forward these comments to the Inspector for her consideration; and
- b) notify me of any responses received from the councils on the matters raised.

Yours sincerely

**EMERY PLANNING PARTNERSHIP LTD**

Peter Emery BA (Hons) MA MRTPI  
Joint Managing Director

Copy to: Client