

PLANNING AND COMPULSORY PURCHASE ACT 2004

The Town and Country Planning (Local Development)
(England) Regulations 2004

Submission Core Strategy
Development Plan Document

Hearing Statement of Stafford Borough Council
For Session 5 - Core Policy 10
Residential Development Provision
(C/HSS5/CP10)

Date : 19/05/06

Hearing Statement of Stafford Borough Council
For Session 5 - Core Policy 10
Residential Development Provision

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Hearing Statement 1 of Stafford Borough Council

For Session 4 - Core Policy 10

Residential Development Provision

1.0 Introduction

- 1.1 *The key objective for planning policies in the Core Strategy Development Plan Document is to deliver the strategic approach for spatial planning across the Borough Council area. The Core Strategy Development Plan Document will be the principal planning document in the Stafford Borough Local Development Framework and will form part of the new Development Plan for Stafford Borough alongside the Regional Spatial Strategy for the West Midlands (RSS). The Core Strategy will aim to cover the same time period as the Regional Spatial Strategy.¹*
- 1.2 *The purpose of this Hearing Statement is to prepare for the independent Examination into the Submission Core Strategy Development Plan Document in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 and requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004. This Hearing Statement presents the Council's response to the agenda for Session 5 - Core Policy 10, Residential Development Provision, of the Core Strategy Development Plan Document independent Examination.*

¹ 2001-2021

STAFFORD BOROUGH COUNCIL - CORE STRATEGY DPD EXAMINATION

AGENDA FOR SESSION 5 - CORE POLICY 10 RESIDENTIAL DEVELOPMENT PROVISION

1 The rate of housing land supply

- Are the rates in Table 2 the appropriate ones?
- Do these properly provide for flexibility, having regard to emerging national guidance?
- What alternative rates, if any, would be appropriate?
- Does the DPD provide sufficient information on housing land supply?
- If not, what should be included?

2 The location of future housing development

- Should this policy and/or policy 1 be more specific about the location of new housing developments?
- If so, what should it say?
- Are there any major proposals/potential areas that should be mentioned in this policy?
- Should the MOD's requirements for housing be recognised, and if so, how?
- Should the DPD be more specific as to the split between Stafford, Stone and the rural areas?
- Should the DPD be more specific about Stafford's ability to accommodate new housing in terms of development within, on the edge or planned extensions?
- Should redundant employment land be released for housing?

3 Criteria for new housing development

- Do the policy criteria provide clear and appropriate advice?
- Should other matters be included?
- Are the housing density targets appropriate?

4 Any other matters

RELEVANT SECTION

SUBMISSION CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Core Policy 10: Residential Development Provision

The purpose of this policy is to meet the residential requirements for the Borough as set out in the Regional Spatial Strategy.

SUBMISSION POLICY

Provision will be made for not more than the housing requirements for Stafford Borough identified in the West Midlands Regional Spatial Strategy, as set out in Table 2 below.

In allocating sites for housing and considering applications for residential development, where appropriate the Council will have regard to the provisions of Planning Policy Guidance 3: Housing or its successor documents and the following:

- (a) The capability of being served by public transport;
- (b) The availability of pedestrian and cycle links, being suitable for people with mobility aids;
- (c) Access to the strategic highway network and proximity to employment locations;
- (d) The capacity of existing health, education services and provision of additional (or improvements to existing) community facilities arising from increased demand;
- (e) The availability of utility services;
- (f) The ability to reuse previously developed land and buildings;
- (g) Viability, feasibility for implementation and capability for development;
- (h) Achieving acceptable densities;
- (i) Provision for housing mix and tenure including affordable housing and specialist needs; and
- (j) The capacity of the strategic highway network.

Developments should be consistent with the creation of attractive and safe living environments, be in keeping with their surroundings and must not take valuable open space. Providing a range of housing types and tenures is an essential part of establishing choice for the whole community.

Core Policy 10 is linked to Spatial Objective 5 & 6

Indicator

Housing trajectory showing:

- (i) net additional dwellings over the previous five year period or since the start of the relevant development plan document period, whichever is the longer;
- (ii) net additional dwellings for the current year;
- (iii) projected net additional dwellings up to the end of the relevant development plan document period or over a ten year period from its adoption, whichever is the longer;
- (iv) the annual net additional dwelling requirement; and

- (v) annual average number of net additional dwellings needed to meet overall housing requirements, having regard to previous years' performances.

Target: To be reported by the housing trajectory (measured from 2007)

Percentage of new and converted dwellings on previously developed land.

Target: 75 – 85% (measured from 2007)

Percentage of new dwellings completed at:

- | | |
|---|-------------------------------------|
| (i) less than 30 dwellings per hectare; | Target: 15%
(measured from 2007) |
| (ii) between 30 and 50 dwellings per hectare; and | Target: 70%
(measured from 2007) |
| (iii) Above 50 dwellings per hectare. | Target: 15%
(measured from 2007) |

Affordable housing completions

Target: 35 affordable homes to be completed per year (measured from 2007)

Milestones 2011, 2016 & 2021

Table 2 – Annual average rates of housing provision for Stafford Borough based on Regional Spatial Strategy requirements and the Ministerial letter dated 15 June 2004.

Annual average rate of housing provision 2001 – 2007	375
Annual average rate of housing provision 2007 – 2011	323
Annual average rate of housing provision 2011 – 2021	206

Implementation

Table 3 - Current completions and commitments of residential land

Completions – 1 April 2001 to 31 March 2005	2,168 dwellings
Commitments at 2004, including planning permission and sites subject to consent following the signing of Section 106 agreements	1,574 dwellings

Development industry
Landowners
Registered Social Landlords

Timescale for Delivery 2001 – 2021

COUNCIL RESPONSE

- 2.1 *The Council has considered each of the key questions raised in the agenda for Session 5 in turn, as set out below:-*

The rate of housing land supply

- **Are the rates in Table 2 the appropriate ones?**

- 2.2 *The figures that are contained in Table 2 are those that are derived by having applied the “appointment method” to the housing figures in the Regional Spatial Strategy (RSS) in order to derive the respective district-by-district split (this is in accordance with the Ministerial letter dated 15 June 2004 which set out that Authorities should establish levels of provision based on their existing appointment of Structure Plan figures); the calculation of the housing requirement figure for Stafford Borough according to this method is set out in paragraphs 2.2.2 - 2.2.4 of the Housing Supply Topic Paper (TP003) and the identical figures as contained in Table 2 of Core Policy 10 can be found in paragraph 2.2.4 of TP003.*

- 2.3 *The Council considers, in the current absence of any more up to date figures arising from the partial review of the RSS, that the figures contained in Table 2 are the most up to date housing requirement figures relating to Stafford Borough, having been derived by applying the methodology set out at Ministerial level.*

- **Do these properly provide for flexibility, having regard to emerging national guidance?**

- 2.4 *As stated above the Figures in Table 2 have been derived from the Regional Spatial Strategy. The Council acknowledges that the figures contained in Table 2 may not, inherently, provide flexibility to reflect changes in circumstances at national, strategic or local level.*

- 2.5 *The Council recognises that further work will be required concerning future housing provision in the context of Draft Planning Policy Statement 3: Housing (Draft PPS3), the Barker Review and the Regional Spatial Strategy partial review, which will be reflected in the Site-specific Allocations and Policies Development Plan Document or a subsequent review of the Core Strategy Development Plan Document. Further information is contained in the Housing Supply Topic Paper*

- **What alternative rates, if any, would be appropriate?**

2.6 *Given the current absence of figures for new housing land requirements for this Borough as part of the partial review of the RSS (as referred to in paragraph 2.3 above), the Council does not consider that any alternative rates would be appropriate at this time. However, following the undertaking and completion of the partial review of the RSS the Core Strategy could then be revised (if necessary) to reflect any necessary amendments to the policy figures as contained in Table 2.*

- **Does the DPD provide sufficient information on housing land supply?**

2.7 *In terms of information on housing land supply, Table 3 of the submission Core Strategy provides information both on the level of residential completions between the start of the period covered by the Local Development Framework (1 April 2001) and the most up to date information available (31 March 2005), and it also provides details of the level of the committed residential supply. At the time of submission of the Core Strategy, the most up to date information for this was as at March 2004 but this has since been superseded by the information contained in the “Land for Homes 2005” residential monitor (CD007) which has been the source of information for the Housing Supply Topic Paper (TP003).*

2.8 *The Land for Homes (2005) document constitutes background information to the Core Strategy and, as such, provides supplementary information on housing land supply to that as contained in the Core Strategy itself. The Council considers that since it produces on a regular (annual) basis a housing monitor document which contains very detailed information on residential land supply it would be inappropriate to include more detailed information on residential land supply in the Core Strategy document, particularly in that such information will “date” over time.*

- **If not, what should be included?**

2.9 *As stated in paragraph 2.8 above, the Council does not consider it either necessary or appropriate to include further information on housing land supply within the Core Strategy itself.*

The location of future housing development

- Should this policy and/or policy 1 be more specific about the location of new housing developments?**

2.10 *The purpose of Core Policy 10 is stated as being,
“... to meet the residential requirements for the Borough as set out in the Regional Spatial Strategy.”*

and in seeking to fulfil this purpose makes no reference to, and correspondingly gives no guidance concerning, where new housing development should take place.

2.11 *Core Policy 1 of the submission Core Strategy gives guidance as to where new housing development is expected to take place in the urban areas (viz Stafford and to a limited extent, in Stone) and Core Policy 2 likewise provides guidance on appropriate housing provision within the rural areas.*

2.12 *The Council consequently considers that the two policies referred to above provide satisfactory guidance concerning the location of new housing development within the Borough and that it would be inappropriate for Core Policy 10 to include any references as to where new housing development should take place.*

- If so, what should it say?**

2.13 *As stated in paragraph 2.12 above, the Council does not consider it either necessary or appropriate to include further information on the location of new housing development within Core Policy 10 since that guidance is provide elsewhere in the Core Strategy (Core Policies 1 and 2 refer). Further policy detail will be contained in the Site-specific Allocations and Policies Development Plan Document.*

- Are there any major proposals/potential areas that should be mentioned in this policy?**

2.14 *Although Core Policy 10 does not specify any major proposals/potential residential areas the Site-specific Allocation and Policies Development Plan Document will identify particular sites for residential development provision together with policies regarding the type of residential development considered appropriate for specific sites. The Council does not consider it is appropriate at this stage to identify major proposals/potential areas as such areas will be considered through the consultation processes of preparing the Site-specific Allocation and Policies Development Plan Document.*

- **Should the MOD's requirements for housing be recognised, and if so, how?**

2.15 *The submission Core Strategy seeks to be in general conformity with the Regional Spatial Strategy (RSS) and the representation received from the West Midlands Regional Assembly does in fact state that the general principles of the Core Strategy accord with the RSS (Representation No 5053 refers). Insofar as housing matters are concerned, the RSS does not provide for any exceptions - based on individual circumstances - to the housing provision figures as set out in Policy CF3 (and associated Table 1). The Ministry of Defence (MOD) considers that its requirements for housing should not be restricted by the annual average rate of housing or the phases identified in Table 2. The Council would not oppose the following sentence being added to the introductory text for Core Policy 10 as follows:*

"The Ministry of Defence requirements will be considered in addition to the Regional Spatial Strategy figures for housing provision".

- **Should the DPD be more specific as to the split between Stafford, Stone and the rural areas?**

2.16 *The Council does not consider that more specific information is required regarding the split between Stafford, Stone and the rural areas. Core Policy 1 of the submission Core Strategy gives guidance as to where new development is expected to take place in the urban areas (viz Stafford and to a limited extent, in Stone) and Core Policy 2 likewise provides guidance on appropriate provision within the rural areas. Further policy detail will be contained in the Site-specific Allocations and Policies Development Plan Document*

- **Should the DPD be more specific about Stafford's ability to accommodate new housing in terms of development within, on the edge or planned extensions?**

2.17 *The Council considers that Core Policy 1 and bullet point 1 sets out the position regarding Stafford's role for new housing development. It is not considered that either edge of the urban area development or planned extensions are required.*

- **Should redundant employment land be released for housing?**

- 2.18 *The Council does not consider that employment land should be released for housing. In so far as the potential loss of employment land to housing is concerned, the Council acknowledges that former industrial land is the prime source of Previously Developed Land (PDL) within the Borough, and that where proposals are put forward to re-develop PDL - particularly in respect of former employment sites - these are very often in respect of housing being the new use; indeed, there are examples both of where this has taken place in the past and also where existing commitments are currently being implemented.*
- 2.19 *The Council's Draft Employment Land Review (CD009 refers) constitutes the background evidence to the Core Strategy, Site - Specific Allocations and Economic Development Control DPD's; it will be the subject of public consultation when the Site - Specific Allocations and policies DPD Issues and Options Paper is consulted upon (scheduled for May and June 2006).*
- 2.20 *By way of summary, the Draft Employment Land Review has considered existing committed and allocated employment sites and those 27 existing business/industrial sites as incorporated in the Council's Business Directory in terms of their suitability for development/continued use for employment purposes - the conclusion being, inter alia, that those identified sites were suitable for development for continuing in employment use and should be protected as such. (In so far as all existing employment sites are concerned, the Draft Employment Land Review takes the view that these are expected to continue in that use unless specific overriding circumstances dictate otherwise.)*

Criteria for new housing development

- **Do the policy criteria provide clear and appropriate advice?**

- 2.21 *The Council considers that the purpose and content of Core Policy 10 is both clear and appropriate. However, the Council has been in receipt of representations to the submission version of the Core Strategy Development Plan Document which either seek amendments to or other criteria in addition to those that are included in the submission version of Core Policy 10. The Council considers that the changes being sought by a number of these representations would add value to the content and*

application of Core Policy 10 by aiding its clarity and purpose, and the Council is not opposing those particular changes as set out below (see paragraph 2.22).

- **Should other matters be included?**

2.22 The Council has received representations which seek, inter alia, either amendments to the criteria as included in the submission version of Core Policy 10 or recommending the inclusion of additional criteria. The following listing gives the numbers of those submissions that the Council would not oppose insofar as Core Policy 10 is concerned:-

- National Farmers Union
 - U7/CP10/0001/5004
 - recommends additional criteria (k) to read:

“(k) existing “bad neighbour” uses in the vicinity”.
- Sport England
 - U4B/CP10/0008/5026
 - recommends change to criteria (b) to read:

“... the availability and scope for pedestrian and cycle links, being suitable for people with mobility aids”.
- Government Office West Midlands
 - U4C/CP10/0011/5040
 - comments that criteria (i) refers to “specialist housing needs” and that the reasoned justification should explain what is referred to by “specialist needs”.
 - the Council would support the amendment to criteria (i) to read:

“Provision for housing mix and tenure including affordable housing and the needs of specific groups”.
- Development Planning Partnership for Tesco’s Stores Ltd
 - U9/CP10/0021/5079
 - recommends amendment to criteria (d) to read:

“(d) The capacity of existing health, education services and provision of additional (or improvements to existing) services and facilities arising from increased demand”.

- *Gough Planning Services for George Wimpey Strategic Land* - U4B/U6/U8, U9/CP10/0035/5138
 - *considers that Policy 10 is deficient in that it does not specify that regard should properly be had to Stafford's role as the strategic centre within the Borough.*
 - *by way of response, the Council would not oppose an amendment to Core Policy 10 through the following additional criteria:*

"(l) Stafford's role as the strategic centre within the Borough".

2.23 *For the avoidance of any doubt, the Council would point out that it has been in receipt of other representations which have sought amendment to/additional criteria in respect of Core Policy 10. Those referred to in paragraph 2.22 above are those whose suggested changes are not opposed by the Council. Insofar as those other representations are concerned that are seeking amended / new criteria which the Council does not consider appropriate reference should be made to the Council's individual response statements.*

- **Are the housing density targets appropriate?**

2.24 *The density targets as embodied in Core Policy 10 align with the density thresholds as contained in Planning Policy Guidance 3 (Housing) and reflect the need to take account of both a site's location and the character of the area in which it is situated.*

2.25 *Insofar as the thresholds themselves are concerned, the Council has recognised and acknowledged - in its response to Representation No 5138 - the deficiencies of providing a target for housing density of less than 30 dwellings per hectare. The second target - of 70% of new dwellings (measured from 2007 onwards) to be at a density between 30 and 50 dwellings per hectare - is considered to be reasonable in that the majority of the residential schemes submitted would fall within this threshold, whilst the remaining category of above 50 dwellings per hectare would apply to the (increasing) number of schemes that propose relatively high density (such as apartments or terraced/mews properties). The Council considers that the corresponding target of 15% of all new housing completions being at this density is likewise reasonable and appropriate.*

- 2.26 *The most recent pronouncement concerning density is that as set out in Annex C of Draft PPS3 which advocates that in determining appropriate approaches to density at the local level, local planning authorities should have regard to the indicative density ranges for specific types of location as set out below:*

Table 1: Indicative density ranges

	Location			
	City Centre	Urban	Suburban	Rural
Density range (dwelling per hectare)	Above 70	40-75	35-55	30-40

- 2.27 *The Draft guidance advises that local planning authorities should then work with local stakeholders and local communities to set appropriate density ranges for specific types of location, having regard to the indicative density matrix set out in Table 1 above (and to the approach to density as set out in the Regional Spatial Strategy). It further advises that:-*

- *densities should be expressed as a range*
- *the bottom of the range should act as a minima*
- *densities below those in Table 1 could be set but should be clearly justified*
- *there is a presumption that the minimum density should be no less than 30 dwellings per hectare*

- 2.28 *The Council considers that the density bands that have been incorporated in the submission Core Strategy are themselves appropriate - in that they replicate current national planning guidance (as contained in PPG3) - and that the targets applied to each density banding are, likewise, appropriate. Further policy details are contained in the Residential Development Control DPD and for specific sites in the forthcoming Site-specific Allocations and Policies Development Plan Document.*

- 2.29 *Significantly in terms of the relationship between the density bands in the submission Core Strategy and the emerging guidance as referred to in Draft PPS3, it is evident that Draft PPS3 would require clear justification for densities below 30 dwellings per hectare. If such were to become adopted national planning policy guidance, then this would have associated implications for both the density bands and their associated*

targets within the submission Core Strategy. This also reinforces the acknowledgement by the Borough Council, as made in paragraph 2.25 above that there are inherent deficiencies in the application of a target to schemes which are at a density of below 30 dwellings per hectare.

Any other matters

2.30 A number of representations were received to Core Policy 10 - Residential Development Provision through the consultation period of the Submission Core Strategy Development Plan Document. In March 2006 Stafford Borough Council provided a response to each of these representations. For further details refer to the individual Written Statements prepared for the respective representations set out below:-

- National Farmers Union - U7/CP10/0001/5004
- Sport England - U4B/CP10/0008/5026
- Government Office West Midlands - U4C/CP10/0011/5040
- Government Office West Midlands - U8/CP10/0011/5040f
- Environment Agency - U7/CP10/0014/5048
- West Midlands Regional Assembly - U7/CP10/0015/5054
- Defence Estates - U9/CP10/0017/5060
- McDyre and Co for J F Bostock Settlement - U4A/U4B/U4C/U6, U9/CP10/0019/5066
- Development Planning Partnership for Tesco's Stores Ltd - U9/CP10/0021/5079
- Paul Sharpe Associates for Fradley Estates - U4B, U6, U7, U9, CP10/0022/5094
- JVH Town Planning Consultants - U7, U9/CP10/0023/5096
- Home Builders Federation - U0/CP10/0025/5105
- St Modwen Properties plc - U7, U9/CP10/0027/5112

- *RPS Planning for Barratt West Midlands* - U7/CP10/0033/5132
- *Gough Planning Services for George Wimpey Strategic Land* - U4B, U9/S06/0035/5134
- *Gough Planning Services for George Wimpey Strategic Land* - U4B, U6, U8, U9/CP10/0035/5138
- *English Nature* - U4B, U6, U7/S06/0037/5143
- *Creswell Parish Council* - U7/CP10/0038/5183
- *Creswell Parish Council* - U7/CP10/0038/5183
- *Creswell Parish Council* - U7/CP10/0038/5184
- *Tetlow King Planning for West Midlands RSL Planning Consortium* - U0/S06/0039/5192
- *Tetlow King Planning for West Midlands RSL Planning Consortium* U4C, U9/CP10/0039/5204