



# **The Plan for Stafford Borough – Publication**

## **Background Statement**

**September 2013**

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## **INTRODUCTION**

### **1. Introduction: Scope and Content of the Statement**

1.1 This Background Statement has been prepared at the request of the Inspector, to help inform the Examination into the Plan for Stafford Borough. It is intended to provide a general explanation and justification for a number of key matters which will be discussed at the Examination, and to assist those representors in making any further statements concerning the Matters and Issues for Examination, which have been set out by the Inspector.

1.2 Further, more detailed, Statements will be submitted by the Council in relation to each of these Matters and Issues, but this Background Statement is intended to provide an initial context for the Examination. It should be read in conjunction with three other supporting Statements:

**i. Duty to Co-operate Statement (B3)**

- this explains how the Council has complied with the legal duty to co-operate in the preparation of the Plan. It identifies matters of cross-boundary significance, and those partners with responsibilities and interests in relation to those issues – and shows how the Plan has been developed to reconcile interests wherever possible;

**ii. Legal Compliance Check-List (B5)**

- this Statement demonstrates how the preparation of the Plan has complied with all the relevant legal requirements.

**iii. Soundness Self Assessment (B4)**

- this Statement provides the Council's own assessment of the soundness of the submitted Plan (A1), and demonstrates how the Plan complies with the different tests of soundness set out in the National Planning Policy Framework (F1) (para. 182).

1.3 This Background Statement takes the form of a series of individual Topic Papers, addressing the initial key matters raised by the Inspector (with the exception of the cross-boundary issues, addressed in the above Duty to Co-operate Statement):

*Topic Paper A: the Spatial Principles*

- this Paper explains the intention behind, and the derivation, of the 7 Spatial Principles which together constitute the Development Strategy within the Plan for Stafford Borough (A1), as set out in Chapter 6. Topic Papers B and C provide more details on housing matters;

*Topic Paper B: establishing the Borough housing requirements*

- explains the derivation of the objective assessment of housing requirements, and why the proposed figure (500 dwellings per annum) is considered preferable to any alternatives;

*Topic Paper C: meeting the Borough housing requirements*

- explains how the requirement (discussed in Topic Paper B) will, in practice, be achieved, in terms of the location and availability of suitable sustainable sites, and the expected rates of development through time;

*Topic Paper D: the Sustainable Settlement Hierarchy and the distribution of development*

- explains which settlements have been selected for development, and the apportionment of the scale of growth between settlements, and justifies why this approach has been taken in comparison with any reasonable alternatives;

*Topic Paper E: Strategic Development Locations in Stafford and Stone*

- explains why the major development proposals for Stafford and Stone are being advanced, as opposed to any alternatives, and demonstrates that such development is feasible and will be achieved;

*Topic Paper F: Habitat Regulations Assessment (HRA) implications for the Cannock Chase Special Area of Conservation (SAC)*

- explains the HRA recommendations relating to Cannock Chase SAC, including the nature, extent and means of implementing mitigation measures, and the consistency of approach with neighbouring authorities;

*Topic Paper G: Revocation of the West Midlands Regional Spatial Strategy (WMRSS)*

- explains background to the WMRSS revocation, and the implications for the Plan for Stafford Borough.

## **TOPIC PAPER A: THE SPATIAL PRINCIPLES**

### **A1. Scope and Purpose**

A1.1 This Topic Paper explains the intention behind, and the derivation, of the 7 Spatial Principles which together constitute the Development Strategy of the Plan for Stafford Borough (A1), as set out in Chapter 6. Topic Papers B and C provide more details on housing matters.

### **A2 Spatial Principles: explanation and justification**

A2.1 The following section of this Topic Paper sets out the justification for each of the Spatial Principles within the Development Strategy chapter of the Plan for Stafford Borough – Publication (A1) in turn, providing a brief description of the Spatial Principle, an up-date regarding the evidence base supporting the Spatial Principle where relevant, the national policy context from the National Planning Policy Framework (F1) and the rationale for the Council’s approach.

#### *Spatial Principle 1*

A2.2 Spatial Principle 1 (SP1) – Presumption in Favour of Sustainable Development within the Plan for Stafford Borough (A1) sets out the fundamental principles for delivering the development strategy for the Borough in line with the National Planning Policy Framework (NPPF) (F1). The NPPF re-emphasises achieving sustainable development, to be delivered through the planning system by building a strong and competitive economy, strong and healthy communities, and protecting the environment. The Government is committed to ensuring that the planning system delivers sustainable development by balancing economic, social and environmental roles. Furthermore the NPPF states that there should be a presumption in favour of sustainable development running through plan making and decision making, ensuring that local planning authorities meet the development needs of their areas when assessed against specific policies in the Framework. On this basis the Council considers that Spatial Principle 1 is appropriate for inclusion in the Plan for Stafford Borough – Publication (A1).

## *Spatial Principle 2*

- A2.3 Spatial Principle 2 (SP2) – Stafford Borough Housing & Employment Requirements sets out the level of housing provision at 500 dwellings per year over the Plan period, not including military housing and provision for gypsies, and 8 hectares per year of employment land. The NPPF (F1) sets out the context for the provision of new development. It requires local authorities to meet locally established needs, having a clear understanding of housing and business requirements for the area using the evidence base including a Strategic Housing Market Assessment, Strategic Housing Land Availability Assessment, viability studies and the Employment Land Review. It is therefore necessary, as the NPPF indicates, to establish the appropriate scale of development for the area based on objectively assessed needs
- A2.4 Advice in the NPPF (F1) states that there should be a significant increase in the delivery of new homes, with local authorities responsible for establishing the right level of local housing provision in their area and identifying a long term supply of housing land, based on objectively assessed development needs. This means that the Plan for Stafford Borough must establish the level of housing across the area and identify where it will be delivered. Topic Paper B explains, in detail, the Council’s approach to establishing the objective assessment of housing requirements, and Topic Paper C explains how the delivery of this scale of housing will be feasible.
- A2.5 In terms of supporting economic development the NPPF (F1) states that Local Plans should set out a clear economic strategy for an area, and encourage local and inward investment to meet anticipated requirements in the local authority area by identifying strategic sites and overcoming potential barriers such as a lack of infrastructure, services or housing provision.
- A2.6 Evidence prepared through the Employment Land Review 2012 (D14) for Stafford Borough in terms of identifying future employment land supply considered two approaches: continuation of past trends and a labour demand led approach. The two approaches yielded significantly different results. The continuation of past trends approach looked at rolling forward historical development patterns from the last 10 years to establish a predicted land requirement yield of 178 hectares over a 20 year period. However the labour supply approach, which seeks to predict levels of land needed to serve predicted future growth in employment, provides a yield of only 24.5 hectares over the same period. This is because in the future the new economic sectors predicted to grow in the Stafford Borough area need less land and, in addition, the number of employee jobs is anticipated to decrease over the next 20 years. If Stafford Borough continues to develop its employment land in line with past trends it is likely that new sites for employment will need to be identified to deliver a balanced portfolio. However if future employment

development follows the forecast in the labour supply projections limited new employment land will need to be identified.

- A2.7 How should the Plan approach provision, given these two different conclusions? A key and crucial determinant for establishing the scale of employment land in Stafford Borough must be delivery of the vision for the Borough. A growth vision would suggest much higher employment land requirements and the need to identify new land, whereas conversely a non-growth development approach might be achieved with employment growth on existing sites. Establishing the appropriate scale of housing and employment cannot simply be a matter of considering past rates of growth, or current forecasts, which are estimates at a single point in time (and notoriously variable).
- A2.8 In addition to the overall approach to change or growth, there are other factors which need to be taken into account such as impact on the environment, availability of supporting infrastructure, services and facilities, loss of greenfield land and pressure on existing areas regarding re-location, implications for neighbouring authorities, demand from the market as well as the available supply of new land.
- A2.9 The Plan for Stafford Borough – Strategic Policy Choices (G1) considered the comparative merits of different housing and employment growth levels. Based on this analysis the Borough Council considered that it is appropriate to continue to develop the Plan for Stafford Borough based on an average provision of 500 new homes per year (explained in Topic Paper B) and 8 hectares of employment land per year as set out in the Plan for Stafford Borough – Publication (A1).
- A2.10 The strategy for growth at Stafford is key to providing for the Borough's communities. Providing new housing simply for local need and not in-migration would undermine the local economy. The implications of not providing for local communities in the future would be to price out many people from the housing market, not meet objectively assessed needs, reduced investment in Stafford and Stone town centres, less job creation and employment development, as well as poorer quality infrastructure such as schools, roads, health services and utilities. The approach set out in Spatial Principle 2 is considered to be the most appropriate, since it will meet local requirements, is supported by the evidence base and is consistent with those of our neighbours, having been established through significant dialogue through the West Midlands Regional Spatial Strategy process and more recently the Duty to Co-operate as recorded in the Duty to Co-operate Statement (B3). Furthermore this approach has previously been considered through local community consultations as part of Delivering the Plan for Stafford Borough – Issues and Options (G6).

### *Spatial Principle 3*

- A2.11 Spatial Principle 3 (SP3) – Stafford Borough Sustainable Settlement Hierarchy - identifies which settlements will deliver the majority of future sustainable development across Stafford Borough. Topic Paper D (Section 3) considers the Hierarchy in detail. A key element of the early Plan making process and the supporting evidence base focused on establishing the most appropriate settlements for development and service provision, starting with Stafford and Stone, but extending the analysis to determine which of the rural settlements have the most potential, and should be defined as Key Service Villages. This process considered the level of infrastructure, services and facilities currently available and those areas with the most scope for future provision, in order to determine the most appropriate location for new development in terms of access to existing and future facilities. The evidence provided by the Assessment of Services and Facilities (D55) and the Stafford Borough Infrastructure Strategy (D58) were critical in this formulation.
- A2.12 The West Midlands Regional Spatial Strategy (F7), relevant during much of the Plan's preparation, set out a clear settlement hierarchy approach based on the County Town of Stafford as the key focus for development, followed by Stone as a 'market town', and then smaller settlements in the rural area where local housing requirements should be met. This general approach remains valid today, even without the WMRSS direction, and is consistent with national planning policy contained in the NPPF (F1). The NPPF sets out future planning policies at the national level to which Local Plan policies need to conform. With regards to rural areas, paragraph 55 of the NPPF states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities." In addition the NPPF also states that Local Plans should promote a strong rural economy including the retention of local services and community facilities in villages (paragraph 28 of F1).
- A2.13 At the top of the Borough hierarchy is undoubtedly the County Town of Stafford, with a current population of 65,716 (Census 2011). Stafford is the principal administrative centre for the County and Borough Councils, acting as a sub-regional centre of governance for a number of County-wide services including Police and Ambulance services, the local Health Authority, and a range of Government bodies and other agencies. In July 2008 Stafford was announced as a Growth Point (E100, E101 & E102) by the previous Government. In supporting Stafford Borough as a Growth Point, the Government at that time committed to a long-term partnership with Stafford Borough Council and Staffordshire County Council by recognising their ambitions for growth, subject to the statutory regional and local planning processes.



- A2.14 Stafford is located on the national road and rail network and has the highest level of services and facilities in the Borough area, shown through the Assessment of Facilities and Services Stafford (E68), which means, in general terms, that it offers the most potential for major new development. This conclusion is fundamental to the approach taken in the Plan. The growth aspiration for Stafford town is a critical element of the Plan's strategy. As part of Stafford's future it is vital to maintain and enhance high levels of local sustainability such that the majority of local people can access local jobs and services without having to travel significant distances. This means that housing growth needs to be complemented by local employment, retail and leisure growth, together with new transport and social infrastructure to ensure Stafford continues to be a vibrant and active community. The future role of Stafford town, and the growth aspirations consistent with that expanding role, are discussed more fully in Topic Paper D (Section 3).
- A2.15 Both Stafford Borough and Staffordshire Councils remain committed to these objectives for growth to support Stafford's future, which will maximise the potential for continued inward investment and sustainable development as well as resolve existing pressures through the delivery of key infrastructure. For these reasons Stafford town sits at the top of the Borough's Settlement Hierarchy.
- A2.16 Next in the hierarchy is Stone. The market town of Stone has a distinctive local character with a vibrant local economy, providing a very attractive place to live and visit. Stone has potential for growth, reflecting its size and range of facilities through the Assessment of Facilities and Services in Stone (E69) with a current population of 16,385 (2011 Census). New development will require an upgrade to local electricity network although gas supply and waste water capacity are not significant constraints, as set out in the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57). However, major development at Stone could have implications for the North Staffordshire urban regeneration initiatives and therefore it is necessary to constrain the overall quantity of new development, and the timing of its delivery. The Strategy proposes that development should be phased for delivery after 2021, in order to provide an opportunity to deliver high quality housing on brownfield regeneration sites in the North Staffordshire conurbation first. This has been a major area of discussion, undertaken latterly under the Duty to Co-operate, with the relevant neighbouring authorities. It follows from this analysis that Stone is included within the Settlement Hierarchy as the second principal settlement within the Borough.
- A2.17 Below Stafford and Stone, the Plan for Stafford Borough's evidence base includes an assessment of services and facilities for settlements across the Stafford Borough area (D54 and D55), to identify settlements with potential for further development as sustainable communities - and which would limit the

need to travel to Stafford and Stone for services and facilities. It is proposed that the largest of these, with the most potential for the location of sustainable development with good access to current and future services, should be defined as the next tier in the hierarchy, to be known as Key Service Villages. From the assessment Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood and Colwich, Haughton, Weston, Woodseaves all clearly stand out in terms of the range of facilities and potential from the other settlements, and are suggested to be identified as Key Service Villages. In addition Barlaston, Tittensor and Yarnfield also have a significant number of services and facilities, and are thus worthy of designation, but are surrounded or abut the North Staffordshire Green Belt, which suggests that development potential may be more limited, linked to infill opportunities. The Key Service Villages are all located on main transport links running through the Borough with Eccleshall, Gnosall, Haughton, Great Haywood, and Little Haywood and Colwich having good accessibility to Stafford whilst Hixon, Weston, Barlaston, Tittensor and Yarnfield have good links to Stone. Woodseaves is well related to Eccleshall and links through to both Stafford and Stone.

A2.18 In July 2009 the Stafford Borough Infrastructure Strategy – Stage 1 report (D58) set out the existing infrastructure provision in areas outside of Stafford and Stone, based on a range of sites identified at the Key Service Villages. The report concluded that there are no major physical constraints to delivery of new development at Key Service Villages. Nevertheless a range of improvements would be required to facilitate development and manage its impact on sites, requiring developer contributions as well as service provider funding.

A2.19 Clearly there is a diverse range of other smaller settlements not identified as Key Service Villages located across the rural area, with more limited population, level of existing services and facilities, accessibility and environmental constraints. Parts of the rural area have exceptionally high landscape and nature conservation designations. However these locations generally have fewer services and facilities and therefore it is not appropriate for these villages to be included in the Sustainable Settlement Hierarchy. A number of these are constrained by the North Staffordshire or West Midlands Green Belt and the Cannock Chase Area of Outstanding Natural Beauty designations.

A2.20 Accordingly, based on the approach set out above, the Council proposes that the Sustainable Settlement Hierarchy be defined as:

- 1. County Town of Stafford
- 2. Market Town of Stone
- 3. Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

*Spatial Principle 4*

A2.21 Reflecting Spatial Principle 3 (SP3), which establishes the Sustainable Settlement Hierarchy, Spatial Principle 4 (SP4) defines the Borough-wide distribution of development, by setting out how new housing development should be shared between the levels of the hierarchy. SP4 proposes:

Stafford	72%
Stone	8%
Key Service Villages	12%
Rest of Rural Area	8%

A2.22 The reasoning behind, and derivation of the percentages, is explained in Topic Paper D (Section 4). The basic aim is to establish a sustainable balance of development which best reflects the potential of each of the settlements, including the objective of securing major growth in Stafford town. The balance proposed, worked out through the various consultation stages, and taking account of the feasibility of sustainable development opportunities represents a shift from the current balance of population, and also of recent development. In the last decade, house building has been much greater, proportionately, in the rural areas, particularly in comparison with the intentions of the Stafford Borough Local Plan 2001 (F14). The firm direction proposed in the Plan for Stafford Borough (A1) is to achieve a much more sustainable balance of development, focusing more on the settlements with existing or potential facilities and services. It is thus a return towards the former Local Plan strategic approach, but taking account of the aspirations for the growth of Stafford town, and currently feasible solutions.

A2.23 Maintaining the intended balance will clearly be a significant practical concern, in order to ensure that development in Stafford Borough takes place sustainably over the plan period. The Plan for Stafford Borough makes specific provision to secure development, which will help deliver the required balance –

in particular in terms of the three Strategic Development Locations (SDLs) in Stafford, and one in Stone. These are considered in detail in Topic Paper E. In addition, the principle of adopting a moratorium on further planning permissions in certain areas is included in the Plan (A1, para. 6.49), should the proportion of development in SP4 not be sustained over a period. Topic Paper D Section 4 explains how this is intended to work.

### *Spatial Principle 5*

A2.24 Spatial Principle 5 (SP5) – Stafford Borough Employment Growth Distribution within the Plan for Stafford Borough – Publication (A1) details the scale of new employment across Stafford, Stone and the rest of the Borough area as set out below:

- Stafford – 56%
- Stone – 12%
- Rest of Borough Area – 32%

A2.25 It is important to ensure that the development strategy for employment is supportive of new housing developments to avoid an increase in commuting and delivering sustainable communities. Therefore the majority of employment uses need to be concentrated in or adjacent to Stafford and Stone, as these settlements are jointly taking 80% of the new housing growth. There are, however, for historic reasons a number of significant rural employment concentrations, identified on the Policies Map of the Plan for Stafford Borough – Publication (A2) as Recognised Industrial Estates (RIEs) and Major Developed Sites in the Green Belt at Hadleigh Park, Meaford Power Station, and Moorfields Industrial Estate. The reason for the differential in employment distribution compared to housing for Stafford and Stone arises because of the planning permission for 34 hectares of new employment development at the Meaford Power Station site as a Major Developed Site in the Green Belt just north of Stone town.

A2.26 Throughout the Borough there are a number of locations in the rural area where a variety of Class B employment uses are concentrated. The Borough Council recognises that the expansion of the RIE's would support the development strategy and provide valuable growth for the local economy in rural areas, based on national planning policy advice. Furthermore employers within these areas may make an important contribution to the local rural economy. Therefore it is considered that the employment distribution as set out in Spatial Principle 5 is appropriate as the focus for new employment development. Favourable consideration will be given to proposals in these areas for employment uses (Class B uses of the Use Class Order) subject to the existing character of the industrial area and other factors. A number of

industrial estates have capacity for further development which will provide opportunities for new investment as well as enabling existing firms to expand during the plan period.

### *Spatial Principle 6*

A2.27 Spatial Principle 6 – Achieving Rural Sustainability within the Plan for Stafford Borough – Publication (A1) sets out the principles for protecting and enhancing the environment whilst sustaining the social and economic fabric of rural communities. There are extensive rural areas within Stafford Borough where it will be important to enable appropriate new development to ensure local communities can be sustained in the future. Therefore a balanced approach is required between protecting the high quality rural environment with the need to promote rural communities where people can have access to services, facilities and places of work. Spatial Principle 6 is in line with paragraph 28 of the NPPF (F1), by seeking to support a prosperous rural economy. On this basis the Council considers that Spatial Principle 6 is appropriate for inclusion in the Plan for Stafford Borough – Publication (A1).

### *Spatial Principle 7*

A2.28 To achieve the Settlement Hierarchy approach defined in Spatial Principle 3, more practical details concerning the means of achieving the distribution of new development are set out in Spatial Principle 7 (SP7) – Supporting the Location of New Development. This explains how new settlement boundaries will be established, and what development will be acceptable either side of the boundary through a criteria-based approach. In particular for Key Service Villages the Plan for Stafford Borough – Publication (A1) states that the settlement boundaries will be delivered through the Neighbourhood Planning process or through a Site-specific Allocations and Policies document.

A2.29 The Council considered a number of approaches in order to direct the location of new development. One way is to allocate an appropriate number of sustainable sites in the right locations and amounts. Indeed Strategic Development Locations are proposed in the Plan for Stafford Borough – Publication (A1) at Stafford and Stone including associated infrastructure, services and facilities immediately adjacent to the existing built up area. This approach is possible for these settlements, but not, in the Plan's preparation timescale, for the other settlements in the Borough. Another way is by giving guidance on delivering development in and around settlements identified within the sustainable settlement hierarchy, so that sufficient capacity exists and is known to provide for the necessary scale of growth. This could be

through establishing criteria for the acceptance of development, or the definition of boundaries to settlements on the Policies Map (A2). The latter approach is preferred as the deliverable objective, because it provides understanding and certainty for communities and developers alike.

A2.30 The current Stafford Borough Local Plan 2001 (F14) identifies settlement boundaries, known as Residential Development Boundaries, to differentiate between built up areas and the open countryside. On the basis that the principle of Residential Development Boundaries will be retained, to be known as Settlement Boundaries, the new Plan for Stafford Borough needs to re-establish an appropriate approach concerning identification of boundaries and acceptability of development. The purpose of establishing a boundary is that a different approach to development would be implemented on either side. Within the boundary, there would be a presumption in favour of supporting housing and employment development, subject to any other relevant planning considerations. Outside the boundary, this principle would be reversed, and only small scale development would be accepted in exceptional, tightly controlled, cases.

A2.31 For the Key Service Villages, the boundaries will need to be re-established. The simplest option might be for all Residential Development Boundaries (RDBs) to be retained unamended. However over the last 10 years the majority of these settlements have experienced infill development and the Strategic Housing Land Availability Assessment (D2) shows that there is now limited extra capacity in existing Residential Development Boundaries of the Stafford Borough Local Plan 2001 (F14). Therefore it would not be possible to deliver the rural strategy by re-establishing the existing RDBs without any amendments or through a criteria based policy.

A2.32 The Council considers that the most appropriate approach would be to enable local communities to establish their own preferred Settlement Boundaries through the new Neighbourhood Development Plan system – or, should that not be desired, by their identification through the preparation of a Site-specific Allocations and Policies Development Plan Document, which would be subject to full public consultation. Thus the identification of an actual boundary marks out a differential policy approach either side of that boundary. Spatial Principle 7 in the Plan for Stafford Borough – Publication (A1) establishes the criteria for both defining the boundary, and considering development inside and outside the line. For development outside the boundary, the criteria will therefore be established in the Plan for Stafford Borough, and will provide the mechanism for considering small-scale new development outside of Stafford, Stone and the Key Service Villages. The criteria for defining the boundary will provide sufficient guidance to determine proposals for development within or on the edge of those settlements.

### **A3. Conclusion**

A3.1 Having considered the relevant evidence base, the national and regional planning context, the public consultation response through the plan-making process and the various Sustainability Appraisal Reports the Council considers that the Spatial Principles contained within the Plan for Stafford Borough – Publication (A1) provide the most appropriate approach for delivering the vision and key objectives over the Plan period 2011 to 2031.

## **TOPIC PAPER B: ESTABLISHING THE BOROUGH HOUSING REQUIREMENT**

### **B1. Scope and Purpose**

- B1.1 One of the most important tasks for the Plan for Stafford Borough (A1) is to establish the appropriate scale of housing for which provision should be made. This Topic Paper explains the basis for choosing the level of provision proposed, and the derivation of the objective assessment of needs. Spatial Principle 2 sets 500 dwellings per annum (pa). The Paper demonstrates that this level is consistent with national guidance, and more appropriate than any reasonable alternative.
- B1.2 Topic Paper C explains how this requirement will in practice be achieved, in terms of the location and availability of suitable sustainable sites, and the expected rates of development through time.

### **B2. Planning Guidance and Context**

- B2.1 Making provision for the right scale of housing is one of the most important concerns of national guidance. The National Planning Policy Framework (NPPF) (March 2012) (F1) sets the requirement that, in the context of the presumption in favour of sustainable development ...

*“Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *specific policies in this Framework indicate development should be restricted.”* (NPPF para. 14)

- B2.2 This is elaborated, more specifically in the context of “delivering a wide choice of high quality homes”, by indicating that ...

*“To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.*  
(NPPF para. 47).



### **B3. Definitions: The Basis Of “Local Needs”**

- B3.1 How can “objectively assessed needs” be determined? Prior to the NPPF (F1) and the changes introduced in the Localism Act 2011, the housing requirement for each Borough was established by the Regional Spatial Strategy (RSS) (F7), in a top-down manner. The RSS requirement provided both for local demographic changes and needs within each Borough, and for a policy-based element which sought to steer and control migration between authorities to reflect local opportunities and the desirability of growth, and conversely, constraints on development. With the abolition of the RSS (which in the case of the West Midlands RSS, providing the context for Stafford Borough, finally took place in May 2013), the Government has clearly stated it intends that the scale of provision for each authority should now be determined locally.
- B3.2 However, assessing what are “local needs” is not straightforward. Little detail on what this means, or how it can be calculated, is contained in the NPPF (F1) or indeed provided by any other sources. The NPPF (para. 159) advises that a Strategic Housing Market Assessment (SHMA) should be prepared to assist, amongst other matters, in understanding the scale of housing that “the local population is likely to need over the plan period”, which “meets household and population projections, taking account of migration and demographic change”, and “caters for housing demand and the scale of housing supply necessary to meet this demand”. This represents an extension of the role of SHMAs as previously defined (and about which the only extant guidance exists). The SHMA prepared for Stafford Borough will be considered in the next section.
- B3.3 There are a number of complications which need to be identified here:
- i. strictly speaking, local needs equates to natural change: the demographic process by which new households are formed from within an existing resident population, and need to be housed. However, in the case of Stafford Borough, as will be discussed in the next section, such local needs represent only some 30% of recent and current projected household changes (D8). Thus the NPPF requirement to establish “what the local population is likely to need over the plan period” would strictly be achieved by meeting only 30% of current projections. However, the future numbers of those wishing to purchase housing in the Borough may well be different: on the one hand, existing residents or new households arising in the Borough might wish to move out to live elsewhere (out-migration), or others (effectively local needs arising elsewhere) might choose to move in (in-migration). In Stafford’s case, some 70% of the population / household change which has occurred recently has been net in-migration from elsewhere in the surrounding areas and the country as a whole;

- ii. net in-migration has been an expression of personal preferences, but also an outcome of policy decisions: past decisions to provide additional land and housing to accommodate those external pressures;
- iii. as the NPPF indicates, the Plan needs to cater for housing demand. But market demand is an imprecise and complicated basis for future planning. Particularly at the current time, recent demand levels have been influenced by the difficult economic conditions, and potentially by other factors such as the availability and timing of land releases;
- iv. the national Population and Household projections merely extrapolate forwards the situation experienced over the last 5 years: whilst important considerations, they cannot in themselves constitute a full basis for future planning, since this would merely perpetuate what has happened recently (and as such is like steering forwards by using a rear-view mirror).

B3.4 Formerly, the RSS proposed an appropriate resolution of these migration movements (and provision for natural change) in the form of the requirement for each District. It now falls to the Local Plan to determine what levels are appropriate. This means taking account of all the ingredients mentioned above – likely future local demographic change, migration pressures and demand for housing – and two further considerations:

- i. local scope for and desirability of growth, recognising other planning factors, including environmental constraints, as NPPF (F1) para. 14 (above) advises. This would include the availability of sufficient sustainable and viable locations for development; and
- ii. consistency of the proposals with those being advanced by other plans being produced (eg. by neighbouring authorities). This could imply less or more provision should be promoted with the Borough, depending on the other strategies being adopted. In the context of greater provision, it is important to note that the NPPF identifies Under “Examining Local Plans”, that soundness considerations include that the Plan should be (*italics added for emphasis*) ...
  - Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including *unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*; (NPPF para. 182)

## **B4. Past Requirements**

- B4.1 Before considering the appropriate future scale which should be set in this Plan, a brief review of past requirements which have influenced the planning of Stafford Borough will help to set the context.
- B4.2 The current development plan (which will be replaced in its entirety by the Plan for Stafford Borough) is the Stafford Borough Local Plan (F14) (adopted in 2001). The housing requirement for that plan was set by the Staffordshire and Stoke-on-Trent Structure Plan 1996-2011 (F13) – and required the provision of 9,100 houses for the period 1986 to 2001, i.e. 607 dwellings per annum (pa). This represented a clearly growth orientated and policy-led strategy, based on the principle that ... “The Secretary of State for the Environment considered that the requirement would allow the Borough to develop its strategic role within the County; encourage infrastructure investment; and accommodate demands within the Borough, including any which may arise from the diversion of some demand from South Staffordshire.” (Stafford Borough Local Plan 2001 para. 3.11.1) (F14).
- B4.3 However, subsequent to the Stafford Borough Local Plan 2001 (F14), the first West Midlands RSS (adopted, as RPG, in 2004) (F7) determined a new strategic approach to development throughout the region, and set a much lower new annual target of 2,900 dwellings for the whole of Staffordshire County for the period 2001 – 2021, which was apportioned as 280 dwellings pa for Stafford Borough (5,602 in total) by a Ministerial letter sent to the West Midlands Regional Assembly dated 15th June 2004.
- B4.4 Revisions to the RSS, covering housing were published as the RSS Revision Phase 2 in December 2007 (F8), and reached Examination in Public in April 2009. Consideration at that time was in the context of 2006 based population projections. The Panel concluded (in September 2009) that an appropriate figure for Stafford Borough would be 550 dwellings pa. (F4) However, the Government at that time did not endorse that conclusion and the Alterations were never adopted. As the Government had determined to abolish the RSS system, the West Midlands RSS was formally revoked on 20th May 2013.
- B4.5 What is notable from these past figures is that the actual or proposed requirements have differed greatly. This undoubtedly reflects both varying population forecasts over time, but also the strong (but differing) policy intentions about growth around the region. None of these requirements have any longer any statutory significance for the current Plan for Stafford Borough, and the underpinning population and household forecasts have now moved on from those current at each stage. Even though the RSS Phase 2 revision proposals had some credence up until very recently, as the latest debated figures, that debate was now over 4 years ago, and at a time when the

population figures were 2006 based. The time has now clearly come to re-establish afresh the appropriate scale of housing for Stafford Borough.

## **B5. The Appropriate Future Scale For Stafford Borough**

B5.1 This section will consider the implications of each of the factors identified in Section 3 in turn, and its influence on setting the proposed figure of 500 dwellings pa, namely:

- i. demographic change – natural change and migration;
- ii. market demand;
- iii. scope for sustainable and viable development;
- iv. consistency with other plans.

B5.2 There are many factors to take into account, and many are likely to change rapidly in the future. For the purposes of planning for the future of the Borough, there is a clear need to establish a firm basis which will not need immediate review.

### ***i. Demographic change – natural change and migration***

B5.3 During the latter stages of the preparation of the Plan for Stafford Borough (A1), its proposals took account of the 2008 based household forecasts (D8), which projected a need for 461 dwellings pa (totalling 11,523 over the 25 years; 2008 to 2033).

B5.4 Within these projections, natural change is estimated to account for only 30.7% of the new households, whilst net in-migration accounts for 69.3% of the addition based on 3,535 of local need compared to 11,523 total household requirements (D8). Data from Staffordshire County Council on migration population inflows and outflows (D6 A-F) on the origins and destinations of migrants suggests that the current situation (between 2004 to 2009) is that net flows are greatest into the Borough from the City of Stoke on Trent, Cannock Chase and South Staffordshire authorities.

B5.5 The latest available projections (supplied in April 2013), are the 2011 based interim household projections, (D9) which project a need for 400 dwellings pa (totalling 4,000 for the 10 years 2011 – 2021). More detailed 2011 projections covering the period to 2036 are not expected to be available before November 2014, following production of further sub-national population projections.

B5.6 The Borough Council's Strategic Housing Market Assessment was first published in 2008 (E13), and updated in September 2012 (D5). It has been prepared in the context of the extant Government guidance published in April 2007.

B5.7 The SHMA (2012) reflects the 2008 based projections in estimating the likely increase in households:

*“Core Output 3: Future households*

*Household projections*

*4.71 Estimates of the number of future households have been derived from CLG 2008-based household projections. These suggest that the number of households across Stafford Borough is expected to increase from 53,000 in 2008 to 65,000 by 2033 (an increase of 2.6%). This equates to an average annual increase of around 500 households to 2033.”*

**What Homes Where?**

B5.8 One helpful toolkit guide, which has apparently proved useful to some Examinations, is that produced by The Local Housing Requirement Assessment Working Group (LHRAWG) – an informal grouping of major professional and representative bodies with an interest in planning for housing in England, formed in 2011. The latest version of this is a spreadsheet entitled “What Homes Where” (J14). This synthesizes population and household projections to provide contextual figures, including numbers of new households expected for each Local Planning Authority. Based on the 2008 projections, it indicates for Stafford Borough a total number of extra households of 11,855 between 2006 and 2031, i.e. an average of 474 dwellings pa. This is simply a more precise version of the rounded figure contained in the SHMA 2012 (D5). The LHRAWG is currently considering the 2011 interim household projections, and is expected shortly to announce the implications for its toolkit. Based on the conclusions in para. 5.5 above, it might be anticipated that the toolkit’s annual average figure will fall slightly if the latest interim projections are taken into account.

B5.9 As has been evident from both this section and that preceding, annual requirements based on population and household projections change frequently and often by significant amounts. The Plan for Stafford Borough (A1) proposes a level of 500 dwellings pa., which is slightly in excess of that suggested by current (and recent projections), provides a clear and understandable benchmark, and co-incidentally is similar to that proposed by the RSS Phase 2 Revision (550 pa), even though based on much later information. Being consistent with current projections, but nonetheless slightly higher, it sustains the approach based on relative growth in this part of the West Midlands – the continued validity of which will be demonstrated under points iii. and iv. below.

**ii. Market demand**

B5.10 The NPPF (F1) indicates that provision should be made to cater for market demand. One expression of actual market demand in the past is given by data on recent completions. The Plan for Stafford Borough – Publication (A1) includes details of completions since 2001/2 (para. 6.9): 4,997 dwellings over the 12 year period, averaging 442 dwellings pa. The figures are reproduced in the first row of the following table:

	2001/2	2002/3	2003/4	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13
Completions	677	567	604	321	442	449	581	518	193	220	425	306
Regional house building (000s)	13.4	13.9	13.8	14.2	16.2	15.1	13.8	11.3	9.2	8.5	8.6	n/a
Housing permissions, Stafford Borough at 31 March	1669	1884	1564	1998	2285	3275	3141	2730	3167	3077	2911	2781

B5.11 How far is past market activity likely to provide a suitable basis for future planning? Clearly past completions are significantly influenced by contemporary national and local economic conditions – for example reflecting house prices, the availability of mortgage finance, and the willingness of house builders to build in the economic climate. For example in the two years 2009/10 and 2010/11 completions were drastically reduced from those of previous years, and very clearly influenced by the recession. Indeed the overall level of activity in the Borough over this whole period is similar to that experienced in the West Midlands as a whole (row 2 in the above table).

B5.12 It may also be argued that the availability of land acceptable for development has been a constraint on development. A measure of this might be the scale of contemporary permissions – shown on row 3 of the above table. Whether or not the availability of land with permissions proved to be an overall constraint, it clearly has not been the full determinant of the level of output, as the slump in building during the recession period, whilst available permissions remained high, demonstrates.

B5.13 In terms of the split between market and affordable housing, the SHMA (2012) concludes:

*“Core Output 6: Future households requiring market housing*

*4.79 The total number of households is expected to increase at a rate of around 500 each year and the Local Plan is seeking to secure an additional 500 dwellings each year.*

*4.80 Assuming that 30% of new development is affordable (around 150 dwellings), around 350 new market dwellings should be built each year. On the basis of discussions with estate agents and an analysis of new build trends, a variety of dwellings should be built across the Borough. It is not unreasonable to suggest that the current profile of dwelling construction should be maintained, although an increased emphasis on the development of family homes (with 2 to 4 bedrooms) in urban areas may be appropriate.”*

B5.14 Planning for future provision based on recent market evidence, in the current economic climate, is clearly not a sensible and sustainable basis for determining the appropriate scale of housing. The scale proposed (500 dwellings pa), based on demographic forecasting, and an approach towards growth within the Borough, should nonetheless adequately provide for demand similar to that experienced over the last twelve years or so, which averages 442 dwellings pa.

***iii. Scope for sustainable and viable development***

B5.15 The NPPF (F1) makes clear that establishing the need to be met in the Borough needs to take account of any adverse impacts, and result in development which is sustainable (para. 14). Similarly, the NPPF is clear that plans must be deliverable, which includes that proposals will be viable during the plan period. In order to conclude that the level proposed, 500 dwellings pa., is appropriate for the Borough, it is necessary to demonstrate that this scale is feasible, and that sustainable and viable solutions will be found to deliver it. There are a number of strands to this argument, which will be summarised here – but are explained more fully in Topic Paper C.

B5.16 The Plan continues the overall approach of supporting sustainable growth, recognised as appropriate for the Borough in the regional context by the emerging RSS Phase 2 Review (F8). This is particularly reflected in the continued intention of promoting Stafford town as a Growth Point, first proposed under the previous Government. The desirability and feasibility of this objective considered in Topic Paper D.

- B5.17 The practical means of delivering growth is in particular through the four large Strategic Development Locations identified in the Plan (three in Stafford town, and one in the second settlement of Stone) – and separate evidence explains the nature and viability of these proposals. This reflects the guidance in NPPF (F1) para. 47 concerning the identification of key sites.
- B5.18 The feasibility and sustainability of the overall strategy for the distribution of growth throughout the Borough is considered in Topic Paper D, concerned with the Settlement Hierarchy. The availability of individual sites which are sustainable, capable of development and individually viable, is demonstrated in the supporting Strategic Housing Land Availability Assessment (SHLAA) (D2), which shows that there are sufficient deliverable and developable sites to meet identified needs. The overall deliverability of the Plan in terms of financial viability (given the requirements placed on development), is addressed in the Whole Plan Viability evidence (D52). Both the SHLAA, and the Whole Plan Viability evidence, are considered more fully in Topic Paper C.
- B5.19 Finally, the capability of consistent delivery of the Plan throughout the plan period is considered in the evidence supporting the supply of housing, specifically relating to the housing trajectory and five year land supply contained within the submitted Plan. This is also addressed in Topic Paper C.
- B5.20 These pieces of evidence support the potential to achieve sustainably the delivery of 500 dwellings pa. – and demonstrates that this scale of development will not result in adverse impacts. This argument needs to be extended however. Whilst it is shown that there are feasible and sustainable solutions to deliver this scale of growth throughout the settlement hierarchy, and in Stafford town in particular, there are clear environmental limits to significant further development. This is considered by the Sustainability Appraisal Commentary Volume 2 (H7), for example in relation to the scope for different directions of growth around Stafford town – and formed an important element of the discussion around the appropriate scale of growth in the Council's Strategic Policy Choices consultation (G1) (June – July 2012). This latter document, which received broad and informed support, considered the advantages of growth less than, greater than or equal to 500 dwellings pa. – and concluded that 500 dwellings pa. was the most appropriate level.
- B5.21 In this context, it is relevant to note that the debate in 2009 around the RSS Phase 2 Review (F8), whilst proposing a slightly higher figure of 550 dwellings pa, or a total of around 11,000 for the plan period under consideration, also considered scenarios for growth up to 13,000 dwellings in Stafford Borough. The conclusion reached by the Panel at that time was that a figure above 11,000 dwellings would be problematic in terms both of delivery and impact on neighbouring authorities, not least in North Staffordshire (F4).



B5.22 The main conclusion under this heading is that the scope for growth in Stafford is recognised: the identification of local objectively assessed needs therefore takes these into account, and sustains the previous analysis and objectives of the emerging RSS review. As an explicit policy choice, the intention is to maximise opportunities for sustainable development, but being mindful of sustainable and viable limits to growth. This implies a conscious recognition that future housing will be provided to meet continued net in-migration. It is thus critically important to ensure that this approach is consistent with the strategy of Stafford Borough's neighbours and any other affected authority, considered under the next heading.

#### ***iv. Consistency with other plans***

B5.23 With the revocation of the West Midlands RSS, the context for each separate Local Plan is no longer predetermined, and the consistency of each Local Plan to each other Plan needs to be achieved by other means. The Government has established the Duty to Co-operate under the Localism Act 2011, to provide a statutory requirement for engagement between authorities, and their individual Examinations provide opportunities to establish that plan strategies are sound in terms of their consistency.

B5.24 The separate Duty to Co-operate Statement (B3) explains both the nature of co-operation and the extent to which agreement has been reached on all those matters of wider than local significance. As discussed in that Statement, there is general accord with the scale of growth (500 dwellings pa) proposed in the Plan for Stafford Borough (A1), and thus for the continued role of the Borough to accept in-migration, and be a location of relative growth, in the sub-regional and regional context. Specifically there is general support for sustaining Stafford as a growth point, from all those likely to be affected.

B5.25 More specific cross-boundary relationships are also addressed in the Duty to Co-operate Statement (B3), including the relationship between the Stafford Borough strategy and that for the North Staffordshire authorities, intent on achieving urban regeneration. Provided that significant growth is restrained in Stafford Borough locations close to those northern authorities (and particularly for the early part of the plan period), there is considered to be consistency and complementarity between strategic approaches. Similarly, a dialogue with authorities in the wider region (e.g. Birmingham, its neighbours and the Black Country) indicates that, apart from the general growth strategy envisaged in the Borough, there is no suggestion that there are any substantial unmet needs from those authorities which could sensibly be met within Stafford Borough.

B5.26 Further support for this conclusion is provided by a report recently prepared by the Stoke-on-Trent and Staffordshire Local Enterprise Partnership (LEP) as a baseline for their development of a Housing Investment Strategy. This draws together the current position on plans being prepared within the LEP area. Comparing current Local Plans' proposals with requirements estimated using the 'What Homes Where' methodology (J14) (see para. B5.8 above), this analysis shows that around 70,200 houses are currently proposed by the Staffordshire and Stoke-on-Trent Boroughs, compared with an overall projected need of 64,400, i.e. an excess of some 5,800 houses. Figures 2 and 3 taken from that report, reproduced on the next page, compare the rate of house building proposed for each local authority area with the projected rates required, based on the household projections for the Local Plan period.

## **B6. Other Considerations**

B6.1 Two further matters need to be discussed, before reaching final conclusions: the extent to which any past "shortfall" in provision now needs to be rectified, and the implications of the objective of meeting the need for affordable housing.

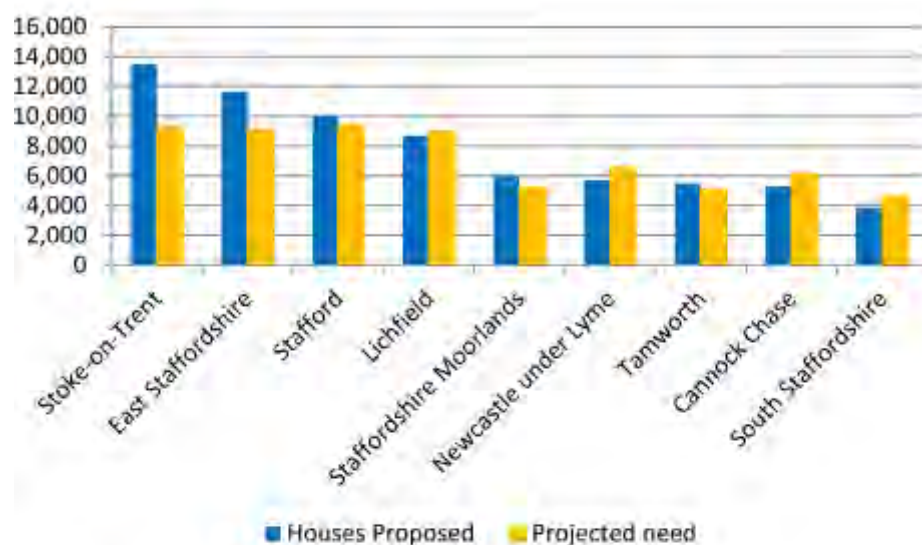
### ***Potential "shortfall" to be remedied***

B6.2 Under the previous RSS system, and particularly in the context of planning appeals concerned with establishing whether there was a 5 year supply of housing land, it was common to assess the extent to which under-achievement against regional targets as set by the RSS should be rectified in making future provision. However, with the demise of the RSS, this situation is much less clear.

B6.3 In the case of Stafford Borough, the only formally approved RSS (F7) (2004) set a rate of 280 dwellings pa, which has comfortably been exceeded, even during these difficult economic times.

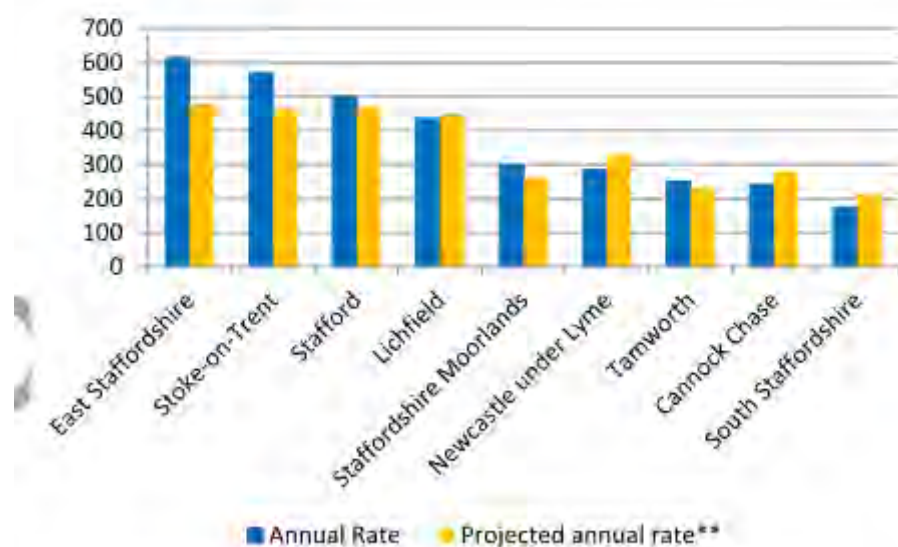
B6.4 The proposed RSS Revision Phase 2 (F8) (Examination 2009), never received the necessary Government endorsement – and thus had limited formal status then, and now, none at all. But, against the emerging figure for Stafford Borough (550 dwellings pa), for the proposed RSS Revision period of 2006 up to 2011 (the start of the Plan for Stafford Borough period) actual completions in Stafford Borough averaged only 320 dwellings pa (being undoubtedly affected by the recession). This resulted in total of 1,151 below the RSS Revision's proposed total requirement for that 5 year period (D3).

**Figure 2: Total number of houses proposed over Local Plan period\***



Note that each Local Plan period covers a different number of years

**Figure 3: Annual proposed and projected rates of house build for Local Plan period**



Source: "What Homes Where?", produced with data provided by ONS and DCLG and local authority Local Plans

\*\* Note that the projected rate is based on the Local Plan period, which is different for each local authority area

- B6.5 However during this period, provision certainly exceeded the needs arising from natural change, which could be regarded as true locally based need. The real implication is that in-migration did not proceed at the rate that the Phase 2 Revision was anticipating and intending to promote. What in fact has happened to that unresolved in-migration? Households did not move, or moved elsewhere. Provision for that level of growth had not at that time been agreed or planned for, and the opportunity to provide for extra growth (even if the market would have sustained it) for that period has now gone. But looking forwards, provision for planned growth (at 500 dwellings pa) can now be made.
- B6.6 Thus there is no need to add on provision for what is in any case a very small component. The future annual need – against which the 5 year supply (D3) should be calculated, will be established by the new Plan for Stafford Borough, which proposes 500 dwellings pa.

### ***Delivering affordable housing***

- B6.7 A separate statement will be prepared to address the scale of need and viability of provision of affordable housing. The SHMA (2012) (D5) identifies the need for 210 dwellings pa to be affordable – which would amount to 42% of total annual provision based on 500 dwellings pa.
- B6.8 In reality, the scope for provision of the full extent of identified affordable housing needs is largely dependent on viability considerations, and is thus also significantly influenced by the extent of current and likely future external Government grant support.
- B6.9 In the context of this Statement's objective of justifying the proposed scale of new housing, the need to generate scope to achieve affordable housing (as a proportion of total new housing) is an argument which supports a degree of growth in the Borough, beyond that providing solely for natural change. It is thus consistent with the level of 500 dwelling pa. It would not however be sensible to extend this argument by seeking to allocate what might amount to vast numbers of houses, in order to achieve, through application of a policy requirement for a proportion to be affordable, the identified absolute quantities of affordable housing required. This would not be sustainable or deliverable. There are clear limits to the capability of the planning system alone to deliver fully identified affordable housing needs.

## **B7. Conclusion**

- B7.1 Taking account of, and balancing, all the above factors, the Plan for Stafford Borough proposes a robust solution based on 500 dwellings pa. This scale is broadly consistent (and in general slightly above) that estimated by current projections, which themselves embody a continuation of net in-migration. This is consistent with sustaining the strategy of growth for the Borough, evident in the previous RSS, and in the Council's approval as a New Growth Point under the previous Government (E100 – E102).
- B7.2 Views on this scale of provision were fully tested through consultation on the preparation of the Plan. Apart from those committed to justifications based solely on population projections (which have in any case changed recently, downwards), it has received general support.
- B7.3 The level of 500 dwellings pa has been demonstrated to be achievable – through solutions which are both viable and sustainable, and which are consistent with those of neighbours. Nevertheless, this scale of growth will be challenging, and depends in particular on the action of many parties to secure the early delivery of the major schemes proposed for Stafford and Stone.
- B7.4 The overall scale of provision will need to be reviewed as delivery proceeds, and future forecasts are produced – but at this point what is needed is a firm, resilient and deliverable starting point. 500 dwellings pa represents this.

## **TOPIC PAPER C: MEETING THE BOROUGH HOUSING REQUIREMENTS**

### **C1. Scope and Purpose**

C1.1 One of the most important tasks for the Plan for Stafford Borough is to secure the delivery of the appropriate scale of housing during the Plan period. The Plan establishes through Spatial Principle 2 that provision should on average be 500 dwellings pa – and Topic Paper B explains in detail the derivation of that figure. The Plan also proposes through Spatial Principles 3 and 4 that this development should be distributed in certain proportions between the levels of the identified Sustainable Settlement Hierarchy. The reasoning behind this approach is explained in Topic Paper D.

C1.2 It is the intended scale and distribution feasible in practice? This Topic Paper C addresses this fundamentally important matter, and explains how the requirement (discussed in Topic Paper B) will in practice be achieved, in terms of the location and availability of suitable sustainable sites, and the expected rates of development through time. This has a number of different dimensions:

1. can sufficient sites be identified in sustainable locations, in accordance with the strategy, and which meet all the requirements of national policy and of the other policies of the Plan? Section 2 explains how the Strategic Housing Land Availability Assessment (SHLAA) (D2) demonstrates that suitable sites exist;
2. will there be sufficient infrastructure in place to ensure that this development can be achieved? Section 3 explains how the Infrastructure Development Plan (D57) demonstrates the practical requirements necessary to deliver this development, and how it will be achieved;
3. will the development of these sites be viable, taking account of the policy requirements on the site, giving sufficient financial returns to make development possible and likely? Section 4 explains the approach to Plan viability, and the technical work undertaken to demonstrate the viability of housing development in particular;
4. in the light of these answers, is it likely that land owners and house builders will bring forward such land, in the quantities required, throughout the Plan period? Section 5 explains the Housing Trajectory, which provides an indication (and a basis for monitoring in practice) of how land is expected to be brought forward;

5. finally, as required by national guidance, can it be demonstrated that a five year supply of housing land (plus a safety buffer) exists and can be maintained throughout the Plan period? Section 6 explains the appropriate calculation for Stafford Borough, and demonstrates how this will be achieved.

## **C2. The Supply of Suitable Sites:**

### **The Strategic Housing Land Availability Assessment (SHLAA)**

- C2.1 The proposed development strategy sets out an overall housing requirement of 10,000 homes over the period 2011 – 2031. To establish how much new development will be required, existing completions and commitments (with a 10% discount applied to smaller sites) are subtracted from the total plan requirement. Therefore, the net number of new homes required at each location in the sustainable settlement hierarchy is set out in the Table on the following page.
- C2.2 Having established the net housing requirements, a key consideration in the formulation of the Plan is thus to establish whether it is likely that sufficient sustainable sites in suitable locations will be capable of being identified and brought forward over the plan period. During 2008 the Borough Council consulted upon and subsequently established the Strategic Housing Land Availability Assessment Methodology (E8) which led to the first Strategic Housing Land Availability Assessment (E7) being published in 2009. It has been prepared in accordance with the former Government's Strategic Housing Land Availability Assessment: Practice Guidance and has been updated on an annual basis to take account of the most up to information, with the most recent being published in 2013 (D2). Its principal role is to identify all potential land available for housing development within Stafford Borough that is suitable for development to provide a palette of choice for the plan making process and to demonstrate feasibility of the strategy selected.

Housing Provision	
Housing Requirement for Stafford Borough	10,000
Housing Completions 2011/12 – 12/13	731
Potential Number of new homes - Sustainable Settlement Hierarchy	
<b>Stafford Town</b> Total requirement	7,200
Completions 2011/12 – 12/13	262
Current Commitments at 31/03/13 (With discount applied)	1,505
New Provision	5,433
<b>Stone Town</b> Total requirement	800
Completions 2011/12 – 12/13	109
Current Commitments at 31/03/13 (With discount applied)	291
New Provision	400
<b>Key Service Villages</b> Total requirement	1,200
Completions 2011/12 – 12/13	134
Current Commitments at 31/03/13 (With discount applied)	529
New Provision	537
<b>Other Borough Areas-</b> Total requirement	800
Completions 2011/12 – 12/13	226
Current Commitments at 31/03/13 (With discount applied)	358
New Provision	216

C2.3 As part of the process of assessing each site, a Partnership was set up with local stakeholders, including development industry representatives, to assist in determining which sites are likely to deliver future housing and the timescales for delivery. As part of the site assessment process set up and overseen through the partnership, sites were divided into three categories. Reflecting national guidance (including the current NPPF), the SHLAA defines these three categories for the purposes of the assessment, as follows. *Deliverable* sites are defined as those that are available now, are in a suitable location for housing and there is reasonable prospect that housing will be delivered on site within the next 5 years. *Developable* sites are defined as those that are, or are likely to become available for housing development, which satisfy the broad criteria established by the SHLAA, and where there is a reasonable prospect they could be developed in the future if constraints can be overcome. *Not developable sites* represent the third category, which are not considered to be part of the potential supply.



C2.4 As part of the process a significant amount of potential land has been identified within the SHLAA 2013 (D2) as being likely to be available in locations related to the Settlement Hierarchy. The total potential yield from deliverable sites for the locations within the settlement hierarchy is set out in the table below. Furthermore, the SHLAA is updated annually to take account of new sites submitted, thus providing an increased pool of deliverable sites. Thus there will be more than sufficient choice to permit the future planning process to identify and bring forward sites which meet the overall requirements in locations proposed by the strategy (as defined by Spatial Principles SP2, SP3 and SP4). Further considerations relating to the timing of the release of land are discussed in Section 5 (concerning the Housing Trajectory) and Section 6 (concerning the 5 Year Supply).

<b>Location</b>	<b>SHLAA 2013 potential sites</b>	<b>Net new housing requirement (from para. C2.1 table)</b>
<b>STAFFORD</b>	<b>7,080</b>	<b>5,433</b>
<b>STONE</b>	<b>11,866</b>	<b>400</b>
<b>KEY SERVICE VILLAGES<sup>1</sup></b>	<b>6,947</b>	<b>537</b>
Eccleshall	1,435	
Gnosall	1,517	
Great Haywood	600	
Little Haywood	890	
Haughton	410	
Hixon	770	
Weston	158	
Woodseaves	1,167	

### C3. Infrastructure Requirements: The Infrastructure Development Plan

C3.1 The Plan for Stafford Borough – Publication (Submission) Document (A1) Chapter 13 outlines a summary of the key infrastructure requirements and delivery framework, with more information presented in Appendix D. Greater detail on infrastructure delivery is set out in the Infrastructure Delivery Plan (IDP) Stage 1 (D58) and Stage 2 (D57). The IDP sets out the critical infrastructure requirements to support the delivery of the 'The Plan for Stafford Borough'. It has been prepared in close consultation with key infrastructure delivery organisations, such as the Local Highway and Transportation Authority, the Local Education Authority, the Environment Agency, utility companies, Primary Care Trust and private sector partners.

<sup>1</sup> The Key Service Villages of Yarnfield, Tittensor and Barlaston have been omitted, as they are all located in the North Staffordshire Green Belt.

- C3.2 As an integral part of the IDP process, the report considered the strategic infrastructure required to deliver the Strategic Development Locations (SDLs), its cost and detailed delivery, as well as its phasing and delivery partners. From this process, it concluded that the critical infrastructure necessary to deliver each of the SDLs is achievable. Additional work with stakeholders and infrastructure as part of the master planning process for each SDL has also been completed to demonstrate that each SDL is economically viable.
- C3.3 The IDP is based on the most up to date information derived from extensive consultation with infrastructure and service providers and is kept up to date as a live document, with regular updates as an integral part of the annual monitoring process.
- C3.4 Therefore, the main infrastructure needs have become known and documented through the IDP process, and funding is either identified or likely to be identifiable. Thus the scale of housing, in the locations proposed, can be practically accommodated and serviced, without detriment to existing communities.

#### **C4. Viability of Housing Development**

- C4.1 A key requirement on The Plan for Stafford Borough – Publication (Submission) Document (A1) is to ensure that level of affordable housing, standards and infrastructure proposed as part of the Plan does not compromise the viability of development. The affordable housing viability study undertaken by Level (D10) assessed a range of housing developments across the Borough using a residual valuation tool. Based on the residual valuations, it concluded that the housing market in the north of the area could potentially sustain 40% affordable housing whilst parts of Stafford town would find delivering more than 30% affordable housing challenging. However across large parts of the Borough, including rural areas, 30% affordable housing should be achievable in the current market. Costs of achieving the Code for Sustainable Homes and Lifetime Homes Standards have also been incorporated into the valuation assumptions. Therefore, the level of affordable housing sought from development is concluded to be achievable and should not compromise development viability.
- C4.2 A key requirement of the NPPF (F1) is to assess the whole plan to ensure that the cumulative impact of policies does not make the plan unviable. However, before considering the Plan in total, it is relevant to focus on the Strategic Development Locations (SDLs), which will provide the backbone of the housing supply to meet the needs as set out in The Plan for Stafford Borough – Publication (Submission) Document (A1). Therefore, it is essential to ensure that they are deliverable taking account of the burdens that will be placed on the sites. The Report on the Viability and Deliverability of Northern and Western SDL (D51) by Level assessed that deliverability of the SDLs concluded that on present values the sites are deliverable. The results of this study were used to inform the Plan for Stafford Borough: Whole Plan Viability

Report (D52). The overall conclusion of the Whole Plan Viability Report (D52) was that the plan is viable and is capable of delivering the level new development included in the Plan for Stafford Borough – Publication (A1) in the context of meeting the cumulative standards and policies in the Plan.

## **C5. Delivery Over Time: The Housing Trajectory**

C5.1 The Housing Trajectory demonstrates the potential delivery of housing in Stafford Borough over the Plan period between 2011 and 2031, and provides a broad estimate of timescales. Separate housing trajectories have been prepared for Stafford and Stone Town. These have been informed by discussions with agents and landowners of key sites and analysis of historical delivery rates and potential future trends. The following data sources have been used to calculate the supply of housing likely to come forward in Stafford Borough between 2011 and 2031, based on the strategy set out in the Local Plan:

- Completions
- Outstanding Commitments
- SHLAA Sites

C5.2 **Completions** – the housing trajectory includes dwellings already completed between 2011/12 and 2012 (2 financial years, i.e. from 1st April 2011 to 31st March 2013). This data has been taken from the Housing Monitor: Land for New Homes 2013 (D1).

C5.3 **Commitments** – this source relates to sites with outstanding planning permission. These sites are divided into two subsets: commitments on smaller sites up to 9 dwellings with the vast majority being below 5 dwellings, and larger sites capable of accommodating 10+ dwellings or more. Delivery rates are those estimated by developers and owners, or estimated by the Council where this information has not been provided to inform the housing trajectory. Development of smaller sites are not subject to significant infrastructure constraints, and thus are assumed to be completed within the first five years of the plan period. Development of larger sites are expected to provide a smaller proportion of new housing in the first 5 years of the Plan period, but housing provision will increase on these sites in years 6 to 15.

C5.4 **SHLAA Sites** – sites in the SHLAA (D2) include those promoted to the authority by land owners, developers and agents and sites which have been identified by the Council. Each site has been assessed in terms of its suitability, availability and achievability for residential development. The SHLAA contains a large reservoir of sites, including previous Local Plan Allocations and the proposed SDLs. The delivery and phasing rates for these sites will be informed by the production of site-specific master plans, but the

currently expected rates are identified here. These have been primarily based on information provided by developers / agents. Where this is absent phasing rates have been estimated by the Council.

- C5.5 The housing trajectory itself is a tool that draws together various strands of information on the Borough's position on the supply of new housing, both in terms of previous performance and projected performance against the Local Plan target. The trajectory, shown for the Borough below in both chart and diagram form, provides the basis for analysing housing performance and allows the application of a plan, monitor and manage approach. The Trajectory has a number of principal components:

***Projected Completions*** (identified by the blue columns within the Trajectory and generated by the identified for completion row of the table)

*The projected completions over the first five year period (2013/14 – 2017/18) start from a low base and gradually increase over the period. The principal component of the first five years is made up of the existing committed supply. This comprises sites that are under construction or sites not started. Large quantities of sites with permission are due for completion either within the first five years or shortly after. In addition, within the first five years the existing commitments will diminish as the primary source of new housing and build rates from the Northern, Western and Eastern Strategic Development Locations (SDLs) around Stafford town will provide significant contributions to the delivery of new housing. Delivery timescales for the Western and Eastern SDLs at Stafford have been primarily based on information provided by detailed discussions supplied by the development industry, whilst build rates for the Northern SDL at Stafford have been estimated by the Council.*

*The 6 - 15 year element of the plan period extends from 2018/19 – 2030/31. Within this period the pool of committed sites will provide a diminishing source of new housing. SHLAA sites (D2) that are considered developable (reflecting the assessment undertaken by the SHLAA Partnership) will provide a source of new housing from 2018/19 onwards. The quantum of housing to be delivered on SHLAA sites reflects the potential for new provision, taking account of the overall historic delivery rates and expected future trends. The delivery of housing from SHLAA sites has been approximately averaged across the period as it is not possible to accurately predict when certain sites will come forward. Also, within this period the Strategic Development Locations (SDLs) will deliver the majority of the housing requirements.*

*Delivery timescales for the Western and Eastern SDLs at Stafford has been primarily based on information provided by detailed discussions supplied by the development industry, whilst build rates for the Northern SDL at Stafford and the Eastern SDL at Stone have been estimated by the Council.*

**Housing Target** (identified by the yellow target line generated by the target row of the table). The Housing target is the annualised dwelling requirement over the plan period. The Plan for Stafford Borough (A1) sets an annual dwelling requirement of 500 dwellings per annum (as discussed in Topic Paper B).

**Manage Line:** the blue manage line (generated by the identified for completion row of the table) is used to monitor under supply or over supply of housing at any one point. It thus enables assessment of whether past shortfalls or surpluses need to be addressed. It is calculated using a residual method and is derived from the total Local Plan requirement less the cumulative rate of completions divided by the number of years a plan strategy has left to run.

- C5.6 Whilst the Housing Trajectory will provide a monitoring and management device for future control of delivery, in this context it provides a clear demonstration that the required scale of housing can be brought forward for completion within the Plan period, and at levels which broadly approximate to the target of 500 per annum over the plan period.

## **C6. Five Year Supply Requirements**

- C6.1 The NPPF (F1) seeks to ensure that the planning system delivers flexible responsive supply of housing development land to meet the objectively assessed needs. To achieve this NPPF (para. 47) states that Local Planning Authorities should:

*“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;”*

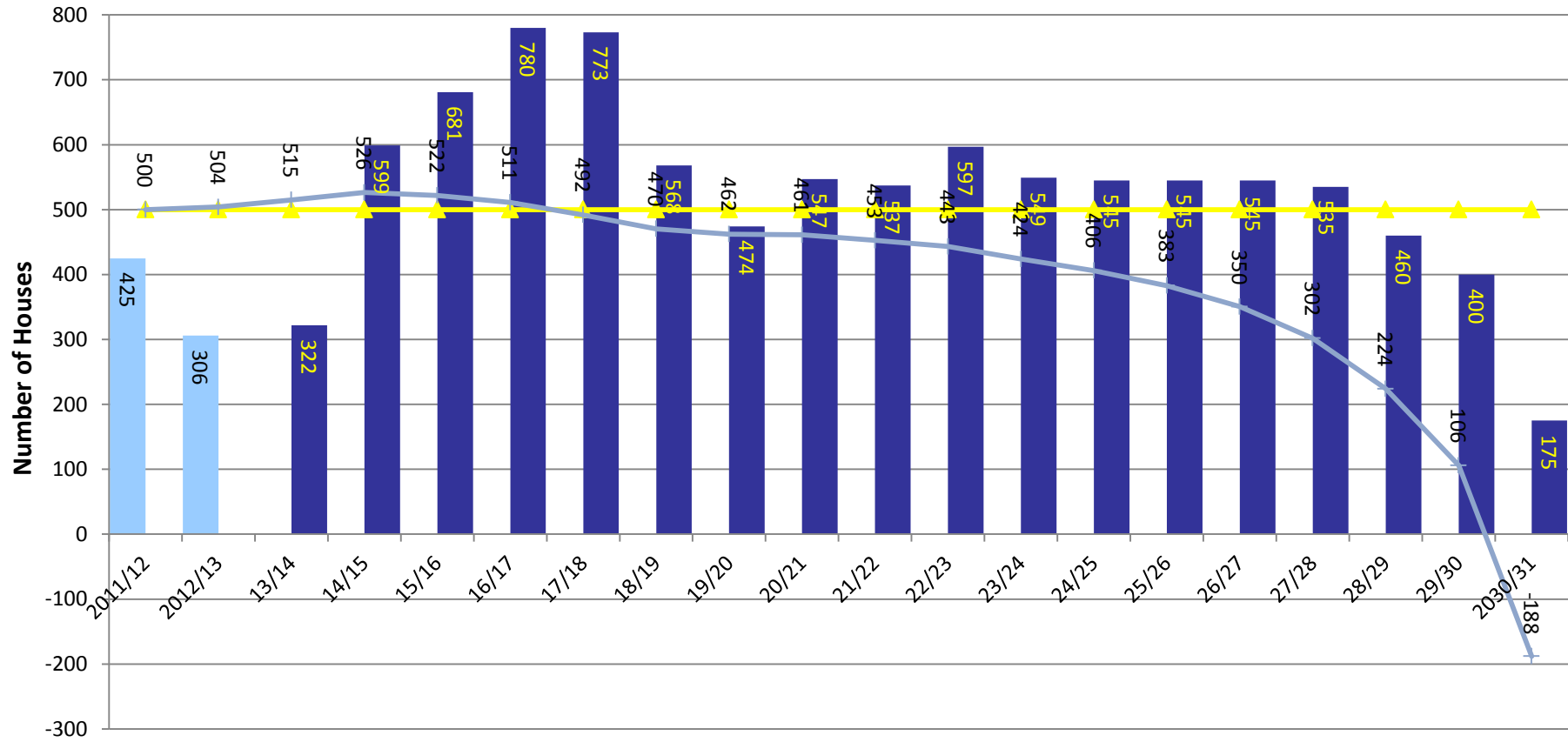
### Stafford Borough Housing Trajectory Chart

Yr 1      Yr 2      Yr 3      Yr 4      Yr 5      Yr 6      Yr 7      Yr 8      Yr 9      Yr 10      Yr 11      Yr 12      Yr 13      Yr 14      Yr 15      Yr 16      Yr 17      Yr 18      Yr 19      Yr 20

	2011/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	2030/31
Dwellings Completed	425	306																		
Identified for completion			322	599	681	780	773	568	474	547	537	597	549	545	545	545	535	460	400	175
Cumulative Completions	425	731	1,053	1,652	2,333	3,113	3,886	4,454	4,928	5,475	6,012	6,609	7,158	7,703	8,248	8,793	9,328	9,788	10,188	10,363
Target	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
Cumulative Target	500	1,000	1,500	2,000	2,500	3,000	3,500	4,000	4,500	5,000	5,500	6,000	6,500	7,000	7,500	8,000	8,500	9,000	9,500	10,000
Managed Delivery Target - Residual Target taking into account actual completions and expected supply	500	504	515	526	522	511	492	470	462	461	453	443	424	406	383	350	302	224	106	-188

Number of years left in Plan(s)	20	19	18	17	16	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
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### Stafford Borough Housing Trajectory



- Dwellings Completed
- Identified for completion
- ▲ Target
- Managed Delivery Target - Residual Target taking into account actual completions and expected supply

- C6.2 The existing 5 year land statement indicates that the Borough only has 2.23 years deliverable housing land supply (D3). However, fundamentally, this calculation was based on the evidence set out in the now revoked West Midlands Regional Spatial Strategy (RSS) Panel Report (F4), which indicated the intention (albeit one never formally ratified by Government) to provide 550 new homes per year over the Plan period 2006 to 2026.
- C6.3 However, the West Midland RSS was revoked on the 20th May 2013. It now falls legally and practically for the current Plan to determine the correct level of housing provision based on the most up to date evidence base. In the case of Stafford Borough, the requirement is thus considered to be 5 times the Plan's annual requirement of 500 dwellings (discussed in Topic Paper B), which yields a total five year requirement of 2,500. To this, in accordance with the NPPF, should be added a buffer. The NPPF states that Local Authorities should apply a 5% buffer to ensure choice and competition in the land market. It further states that where there has been persistent under delivery of housing, local authorities should increase the buffer to 20%. As with most of the country, there has been a dramatic reduction in the number of house completions in Stafford Borough due to the economic recession; so it is considered that the buffer should be 20%, and thus the requirement in adopting the new Plan for Stafford Borough (A1) should be 3,000. Topic Paper B (Section 6) contains some further comments on this matter, in relation to the issue of any potential "shortfall" against past requirements.
- C6.4 The planning process based on the estimate of likely land availability discussed in this Paper, will ensure that at least 3,000 houses are available throughout the plan period. Thus the Trajectory, backed by the SHLAA analysis (and the SDLs supporting work and master planning) shows that the five year supply (plus buffer) can be achieved, and should not present any problems through the 20 year period.

## **C7. Conclusion**

- C7.1 Having considered all of the above evidence, including the SHLAA (D2), IDP (D57), the Whole Plan Viability study (D52) and the average delivery set out in the Housing Trajectory, it can be demonstrated that the proposed scale and distribution of development, its infrastructure requirements and the level of housing growth is achievable over the Plan period.



## **TOPIC PAPER D: THE SUSTAINABLE SETTLEMENT HIERARCHY AND THE DISTRIBUTION OF DEVELOPMENT**

### **D1. Scope and Purpose**

- D1.1 Topic Paper B considers the establishment of the scale of new housing for which provision should be made in the Borough as a whole. This Topic Paper considers how that scale of development should be distributed around the Borough: which settlements should grow, and by how much - and what should be the relative balance of growth between settlements and different parts of the Borough. It therefore provides background to the establishment of Spatial Principle 3 (SP3), which defines the Sustainable Settlement Hierarchy, and Spatial Principle 4 (SP4) and Spatial Principle 5 (SP5), which shares out housing and employment growth between levels of this Settlement Hierarchy.
- D1.2 This Topic Paper concerns one of the most complex parts of the planning process. It involves ensuring that new development is directed to the most sustainable locations, taking account of existing and potential infrastructure and service provision, and the existence of suitable sites in locations which take the best account of environmental and other constraints. It is also one of the most controversial, and on which most parties - particularly communities, developers and interest groups - have strong views. It has therefore been one of the key aspects of the Plan on which views have been sought from the earliest stages onwards. This Topic Paper will explain the background to this debate, and how the proposed solution has evolved.
- D1.3 One of the most commonly used approaches to these problems, which is consistent with the Government's priority to secure sustainable development (considered in Section D2 following), is to identify which of the settlements in the area are the most sustainable locations to accommodate more development - and thus define a Sustainable Settlement Hierarchy, whereby most development is directed to the higher order settlements with the most existing or future potential (in terms of capacity and facilities) to grow. Section D3 of this Topic Paper explains how the Council has undertaken a debate, informed by evidence, to establish the broad balance of future growth in the Borough, and which settlements should be included in the Hierarchy. Section D4 considers how precision on the quantities of growth has been achieved, i.e. the justification for the figures contained in Spatial Principle 4 (SP4) and Spatial Principle 5 (SP5).

## **D2. National Policy Context**

D2.1 The Plan for Stafford Borough must meet the all requirements set out in the National Planning Policy Framework (NPPF) (F1), published in March 2012. This includes an overarching presumption in favour of sustainable development. Throughout the NPPF achieving sustainable development is emphasised in all sections. NPPF (F1) para. 17 is particularly relevant to this Topic Paper regarding the Proposed Development Strategy:

*“Local Authorities should:*

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;*
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as wildlife, recreation, flood risk mitigation, carbon storage, or food production);*
- conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;*
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and*
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”*

D2.2 In the context of the rural settlements in the Sustainable Settlement Hierarchy, NPPF para. 28, relating to the need to support a prosperous rural economy, is particularly relevant:

*“Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”*

D2.3 The matters raised in these NPPF extracts are key concerns or threads which run through the vision, key objectives and spatial principles of the Plan for Stafford Borough (A1). Spatial Principle 6 is concerned directly with rural sustainability, and other matters are addressed by specific policies in the Plan, such as Policy E2, which seeks to promote a sustainable rural economy. However, it is the identification of the Sustainable Settlement Hierarchy, as the basis to focus growth, and future service and infrastructure provision, which is the clearest practical way in which the NPPF's objectives to secure sustainable development will be delivered by the Plan.

### **D3. Developing the Development Strategy and defining the Sustainable Settlement Hierarchy: Spatial Principle SP3**

D3.1 This Section describes the Plan's strategy to direct the future Borough-wide balance of development – and how its approach has been established through consultation, informed by the evidence base.

D3.2 The proposed Development Strategy has been developed throughout the plan making process from the Borough-wide Development Strategy (G9) produced and consulted upon in 2008 through to the Plan for Stafford Borough – Strategic Policy Choices (G1) produced and consulted upon in 2012 prior to the publication of the Plan for Stafford Borough – Publication (A1) in January 2013.

D3.3 An understanding the gestation of the development strategy needs to take into account the context under which it has been developed, and in particular the significance of the West Midlands Regional Spatial Strategy (WMRSS) (F7). At the start of the process, in 2008, the wider planning context for the alternative Borough strategies was the emerging WMRSS Phase 2 Revision Preferred Option 2006 – 2026 (F8), which set out the scale of development requirements as 10,100 new houses for Stafford Borough of which 7,000 new houses were to be at Stafford town, together with 40 hectares of new

employment land as a rolling five-year reservoir and 120 hectares as indicative long-term requirements, 50,000 m<sup>2</sup> of retail floorspace requirements and 45,000 m<sup>2</sup> of office development requirements. The concept of having a settlement hierarchy which directed the majority of growth to sustainable settlements supporting the retention of a range of services and facilities was a key principle of the West Midlands Regional Spatial Strategy Preferred Option 2007 (F8, page 73, Policy CF - B and C and para 6.21).

- D3.4 Although relevant during much of the preparation of the Plan, the West Midlands Regional Spatial Strategy (WMRSS) (F7) (2004) has now been revoked. Without the direction of the WMRSS, the Plan for Stafford Borough has had to establish locally what the appropriate scale of housing and employment should be since 2012, as is considered in Topic Papers A and B. Similarly, the WMRSS sought to distribute development in particular locations, and this has also had to be reconsidered. The WMRSS sought to focus most new development into the Major Urban Areas of the West Midlands and North Staffordshire conurbations through a balance of urban and rural renaissance.
- D3.5 The WMRSS (F7) identified the County Town of Stafford as a settlement of significant development and a strategic centre, which should be the main focus for growth and new infrastructure. The WMRSS set out the role of Market Towns as helping to regenerate rural areas and act as a focus for sustainable economic and housing development, and providing services and other facilities to their rural hinterlands. Based on these characteristics it was considered that Stone should be identified as a market town capable of creating balanced housing and employment opportunities, and the town already benefits from a range of local service provision. Within rural locations the WMRSS considered that development within smaller village settlements would be appropriate where this could help meet local housing requirements and promote local regeneration, or support local services. Priority was intended to those villages which already have the benefit of an existing service base such as a shop, school, doctor's surgery and bank. The adopted WMRSS (F7) did not provide for a new settlement to be built in Stafford Borough, and there have been no suggestions throughout the current plan-making process, including after the revocation of the RSS, that such a proposal would be feasible or appropriate, and thus relevant of consideration.
- D3.6 It is the Council's position that much of these intentions remain valid through the Plan for Stafford Borough, but the distribution of development is now a matter to be determined locally. In particular, the aspiration for the growth of Stafford town remains fundamentally important, and is a key element of the Plan. It is discussed further at the end of this Section (paras. D3.23 to 3.25).

- D3.7 However without the WMRSS (F7), it is essential that the approach taken in the Plan for Stafford Borough is consistent and complementary with that of its neighbours – and that is a matter explicitly highlighted by the Government in establishing the new Duty to Co-operate. The Council’s approach to this is addressed in the Duty to Co-operate Statement (B3).
- D3.8 Returning to the process of developing the distribution strategy, the following comments describe how the approach taken in the Plan has been derived and how it is locally appropriate, independent of any steer from the now-revoked WMRSS (F7).
- D3.9 In formulating the proposed development strategy the Borough Council considered a variety of alternative options and different combinations of spatially distributing growth, through the process of preparing the Plan. From the start, it has been important to recognise the environmental sensitivities of the Borough. Of particular importance is land in the Cannock Chase Special Area of Conservation (SAC), which is of international significance covering an area of influence beyond Stafford Borough, and the Cannock Chase Area of Outstanding Natural Beauty. In addition, Stafford Borough has two areas of Green Belt, to the north of the Borough around the North Staffordshire conurbation and in the south east of the Borough as part of the West Midlands Green Belt area, both designed as strategic constraints on expansion of urban areas, and which remain important objectives in the NPPF (F1, para 80). Similarly, green infrastructure areas of open space and flooding were considered to be areas of development constraint and should be largely protected. Therefore the emerging Development Strategy inevitably focused most development for the future at the developed urban areas of the Borough including Stafford, Stone and the Key Service Villages. The early development of the strategy also took into account the intent to focus on brownfield land first, and to phase the release of greenfield land, and to contemplate only very limited releases of Green Belt (consistent at the time with the approach of the WMRSS).
- D3.10 The Borough-wide Development Strategy 2008 (G9) suggested that the following alternative development strategies provided an exhaustive range of choices for guiding where new development could be provided in Stafford Borough’s area, and accordingly canvassed views between these approaches:
- A New Development focused on the County Town of Stafford only
  - B New Development focused on the County Town of Stafford and the market town of Stone only

- C New Development focused on the County Town of Stafford, the market town of Stone and either one or more of the principal settlements
- D New Development at Stafford and one or more of the principal settlements but not at the market town of Stone
- E New Development distributed to a selected number of settlements within the Stafford Borough area, as listed below
- F New Development distributed widely across the Borough to each of the principal settlements, cross border settlements and other identified settlements across the Borough area listed below as well as at Stafford and the market town of Stone:

Primary settlement	County Town of Stafford
Secondary settlement	Market Town of Stone
Principal settlements	Gnosall, Eccleshall, Hixon, Barlaston*, Great Haywood Little Haywood and Colwich

Cross border settlements Blythe Bridge\* Meir Heath and Rough Close\*

Other identified settlements in the existing Development Plan, the Stafford Borough Local Plan 2001, with Residential Development Boundaries. (i.e. boundaries around settlements within which housing development will generally be permitted.):

Adbaston Aston by Stone Barlaston Park\* Bradley Brocton\*  
 Brocton A34\* Church Eaton Clayton\* Cotes Heath\* Creswell  
 Croxton Derrington Fulford\* Great Bridgeford Haughton  
 Hilderstone\* Hopton Hyde Lea Milford\* Milwich Norbury  
 Oulton\* Ranton Salt Seighford Swynnerton\* Tittensor\*  
 Trentham/Dairyfields\* Weston Woodseaves Yarnfield\*

\* These settlements are either located within or adjacent to the Green Belt. Options for development of peripheral expansion may be limited by national planning policies on Green Belt designations.

D3.11 Of the 480 responses received to the Borough-wide Development Strategy, detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and also in Appendix 2 of the Plan for Stafford Borough – Consultation Statement Appendices (A15), whilst a number of respondents

made reference to favouring each of the six options there was no clear consensus on any individual option.

D3.12 Alongside the Borough-wide Development Strategy (G9), the six alternative spatial options consulted upon were assessed through the Sustainability Appraisal Volume 1 (H10). Importantly the findings of the Sustainability Appraisal of these six alternative spatial options showed that no one option would address all of the sustainability framework objectives for the Borough, but a combination of two options would be more likely to best address sustainability issues and meet the sustainability framework objectives. A summary of the review of each of the six alternative spatial options is detailed in the Sustainability Appraisal Volume (H10, pages 27 – 28). As a conclusion, the Sustainability Appraisal found most support for a combination of Options C and D, i.e. a focus on Stafford, Stone and a number of principal settlements.

D3.13 At this point, the development of the broad strategy turned to consider the detailed evidence about the potential of individual settlements. To inform the overall approach for the development strategy the services and facilities available within the different settlements across the Stafford Borough area were recorded and consulted upon through the Principles of Settlement Development (G8) document in July 2008.

D3.14 Across Stafford Borough's area there is a range of settlements with locally distinctive characteristics. The role that settlements could play in delivering new development for Stafford Borough through the new Development Plan varies widely. Important evidence to support the selection of settlements was therefore gathered from the Settlement Assessment of Services and Facilities (D55). The Settlement Assessment provided a detailed record of the services and facilities in each of Stafford Borough's towns and villages, and has been updated since its earliest version, in 2012 (D54), to ensure that this key information is up-to-date. Separate assessments for Stafford and Stone were also carried out, but these settlements are clearly much better provided with services and facilities than the others. The methodology for selecting settlements was based on a scoring system of services and facilities, and is set out in Appendix 1 of this Topic Paper.

D3.15 This process identified the principal settlements in Stafford Borough with sufficient services and facilities to be capable of supporting future development, as listed in Appendix 2 of this Topic Paper, through the following categories:

### First Group

Settlements where boundaries could be adjusted to accommodate significant Greenfield development and new housing allocations provided they are not in the Green Belt. In addition Stafford and Stone were included, as clearly the Principal and Secondary Settlements within Stafford Borough.

### Second Group

Settlements where boundaries could be adjusted to accommodate a less significant amount of Greenfield development, but nevertheless could comprise some Greenfield releases on the edge of the settlement if not in the Green Belt.

### Third Group

Settlements where boundaries should be retained to provide for development in the future but it was not envisaged that expansion would be appropriate other than for Rural Exception Sites to deliver affordable housing.

*Settlements either located within or adjacent to the Green Belt where peripheral development expansion would be limited by national planning policies on Green Belt designations are identified by the \* symbol.*

Group 1			
Barlaston*	Blythe Bridge*	Eccleshall	Gnosall
Great & Little Haywood	Meir Heath & Rough Close*		
Group 2			
Brocton & Brocton A34*	Derrington	Great Bridgeford	Haughton
Hixon	Oulton*	Swynnerton*	Tittensor*
Trentham/Dairyfields*	Weston	Woodseaves	Yarnfield*
Group 3			
Adbaston	Aston by Stone	Barlaston Park*	Bradley
Church Eaton	Clayton*	Cotes Heath*	Creswell
Hyde Lea	Milford*	Milwich	Norbury
Ranton	Salt	Seighford	Stowe by Chartley



- D3.16 Having advanced the overall spatial approach for Stafford Borough through the debate on the Borough-wide Development Strategy (G9), and distinguished between the principal settlements through the Principles of Settlement Development (G8) process, further elaboration of the emerging strategic choices was achieved through consultation on the document 'Delivering the Plan for Stafford Borough – Issues and Options' (G6) in February and March 2009. This provided a range of development scenarios and location options for Stafford, Stone and a number of the principal settlements across the Borough.
- D3.17 A further word is necessary at this point to explain the contemporary national and regional policy context. This was set out in 'Delivering the Plan for Stafford Borough – Issues and Options' (G6, pages 24 - 25). Under the WMRSS Phase 2 Revision (F8), Stafford was identified as a strategic centre, a local regeneration centre outside of Regeneration Zones and as an 'Other Large Settlement'. At least 7,000 new homes were proposed for Stafford, representing a growth of more than a 25% above the existing housing stock in the town. It was further proposed that the remaining 3,000 new homes then intended for Stafford Borough would need to be provided in other parts of the Borough area. However, following Ministerial intervention early in 2008 with regard to housing numbers, Nathaniel Lichfield and Partners were commissioned by the Government Office for the West Midlands to consider further options to provide for greater numbers of houses. The consultant's final report was published in October 2008, and included a series of scenarios. Scenario 1 suggested no change to Stafford Borough's housing requirement but in Scenario 2 the consultants suggested increasing housing numbers in Stafford Borough by 1,500 and in Scenario 3 by 3,000 (above the RSS submission of 10,300 new homes).
- D3.18 That contemporary debate was covered in the 'Delivering the Plan for Stafford Borough – Issues and Options' (G6) document, which canvassed views on two development scenarios: a Minimum Growth Scenario to deliver 10,100 new homes (net) and 120 hectares of new employment land, and a Higher Growth Scenario to deliver 12,100 new homes (net) and 120 hectares of new employment land. Based on these scenarios a range of spatial options for new development and growth were set out for Stafford, Stone and each of a number of significant villages.
- D3.19 The significant villages singled out were the highest scoring rural settlements under the Assessment of Services and Facilities (D55), with associated higher populations (which were thus likely to be able to support higher levels of services and facilities) – and were determined to be the most sustainable and therefore the most appropriate to accommodate a larger proportion of the housing growth than other rural settlements. Identified in these terms were Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood & Colwich,

Woodseaves, Weston, Barlaston, Tittensor and Yarnfield, as set out in the Plan for Stafford Borough – Principles for Settlement Development – Appendix 2 (G8). The following table, taken from ‘Delivering the Plan for Stafford Borough – Issues & Options’ (G6), page 36, describes the choices being considered (at that time within the context of the WMRSS-led debate which involved appraising two levels of growth):

	Settlement / Locality	Minimum Growth Scenario 10,100 new homes (net) & 120 hectares of new employment land	Higher Growth Scenario 12,100 new homes (net) & 120 hectares of new employment land
Housing Numbers	Stafford	7,000 - set in RSS document	8,000 - 9,000
	Stone	1,000 - 2,000	1,000 - 2,750
	Eccleshall, Hixon Gnosall, Great & Little Haywood	700 - 1,600	700 - 1,750
	Haughton, Weston & Woodseaves	100 - 300	100 - 350
	Yarnfield & Tittensor Major Developed Sites in the Green Belt	250 - 300	250 - 300
	Remaining Villages	100 - 300	100 - 350
Employment Numbers	Stafford	50 - 70 hectares	50 - 70 hectares
	Stone	10 - 20 hectares	10 - 20 hectares
	Recognised Industrial Estates at Hixon, Raleigh Hall & Ladfordfields	10 - 20 hectares	10 - 20 hectares
	<b>TOTAL REQUIRED</b>	<b>10,100 new homes &amp; 120 hectares of employment land</b>	<b>12,100 new homes &amp; 120 hectares of employment land</b>

D3.20 The Delivering the Plan for Stafford Borough - Issues and Options (G6) document was assessed through the Sustainability Appraisal Volume 2 (H7). Furthermore as part of the evidence base work the Borough Council commissioned the Stafford Borough Infrastructure Strategy in 2009 (D58) which assessed the development scenarios and the location options. The process helped to inform the refinement of the proposed development strategy, by helping to identify the preferred locations for new development based on key factors and constraints.

D3.21 As a result of representations made to the 'Delivering the Plan for Stafford Borough – Issues and Options' (G6) as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and detailed in Appendix 3 of the Plan for Stafford Borough – Consultation Statement Appendices (A15), consideration was given to the inclusion of Barlaston, Tittensor and Yarnfield as identified villages due to the location of a Major Developed Site on the edge of Yarnfield together with evidence through the Strategic Housing Land Availability Assessment (E7) of housing potential in these settlements. Notwithstanding their inclusion, it remains the Council's position that their designation does not justify Green Belt releases, and that there is capacity within their existing built up areas for further housing development.

D3.22 The preferred development strategy was subsequently advanced through the Plan for Stafford Borough – Draft Publication (G2), and the Plan for Stafford Borough – Strategic Policy Choices (G1). The finalised strategy is set out in the Plan for Stafford Borough – Publication (A1), which identifies the proposed settlement hierarchy for the Borough, and preferred Strategic Development Locations at Stafford and Stone, to deliver the vision and key objectives.

### ***The growth strategy for Stafford Town***

D3.23 A common thread in the evolution of the development strategy has been general support for significant growth of Stafford town. The sustainability, and feasibility, of this aspiration has been tested throughout the plan-making process. Whilst originally promoted by the now-revoked WMRSS (F7), and endorsed by the previous Government through its designation of Stafford as a New Growth Point, its rationale is independent of those former sources, and stands as a major objective of the Plan for Stafford Borough subject of this Examination.

D3.24 As the top of the Sustainable Settlement Hierarchy, Stafford town is undoubtedly the most sustainable location for development in the Borough – a principle which has been confirmed by the Sustainability Appraisal, and strongly endorsed by comments throughout the plan-making process. The feasibility of delivering major growth (and the exact scale and location of this growth in relation to the town itself) has been a major issue to resolve. Topic Paper E explains the major development solutions (three Strategic Development Locations), and this is underpinned by a substantial evidence base addressing viability and infrastructure provision.

D3.25 The strategy for Stafford town will provide much needed new infrastructure, improving the existing key services and facilities as well as contributing to reducing the need to travel and providing better opportunities for travel by

public transport. The approach for Stafford town will assist in meeting the vision and key objectives of the Plan for Stafford Borough as a whole. The plan-making process has demonstrated the merits of this strategy, compared with alternatives such as a more dispersed spatial housing distribution, with greater housing growth in Stone and / or the Key Service Villages. Both Stafford Borough Council and Staffordshire County Council remain committed to these objectives for growth to support Stafford town's future, which will maximise the potential for continued inward investment and sustainable development, as well as resolve existing pressures through the delivery of key infrastructure.

**D4. Determining the distribution between levels in the Hierarchy:  
Spatial Principle SP4**

D4.1 As Topic Paper A indicated, the intention of Spatial Principle 4 (SP4) is to give structure and quantification to the sustainable development strategy, by indicating the proportions of development which should be directed to each level of the Hierarchy defined in Spatial Principle 3 (SP3). The outcome of the debate through the plan-making process, and the reconciliation of strategic objectives to promote the growth of Stafford town, and achieve a sustainable pattern of distribution which best matches available or potential facilities, services and infrastructure, is reflected in the housing proportions contained in SP4, namely:

Stafford	72%
Stone	8%
Key Service Villages	12%
Rest of Rural Area	8%

D4.2 The supporting text in the Publication Plan (A1), paras. 6.41 – 6.45 sets these proportions in the wider context of the existing population distribution, recent past differential rates of development in the Borough, and past policy approaches. In terms of the population shares existing at the time of the previous Stafford Borough Local Plan 2001 (F14), the overall balance was less clearly weighted towards Stafford:

Stafford	52%
Stone	12%
Key Service Villages	16%
Rest of Rural Area	20%

D4.3 The Stafford Borough Local Plan 2001 (F14) sought to influence future development in a more sustainable direction, by focusing more growth towards the main settlements, and proposing that new development be distributed in a more concentrated manner:

Stafford	78%
Stone	17%
Key Service Villages	5%

D4.4 However, the reality of the outcome over the last ten years has not matched the Local Plan's intentions. The actual balance of development in the period, as set out in the Land for New Homes: Housing Monitors (D1, E1 and E2), was approximately:

Stafford	48%
Stone	17%
Rural Area	35%

D4.5 This outcome resulted largely because a significant number of housing completions have taken place, unrestrained, on infill sites within village boundaries, together with barn conversions in locations across the rural area, which in comparison with the existing large settlements, must be regarded as distinctly less sustainable. Moreover this position seems, prior to the introduction of the Plan for Stafford Borough (A1), largely set to continue. At the moment, the Land for New Homes 2013 monitor (D1) identifies that current housing commitments are distributed:

Stafford	55%
Stone	10%
Rural Area	35%

D4.6 The debate about the merits of alternative development strategies was considered in the previous section of this Topic Paper. A range of choices for distributing new development across the Stafford Borough's area were canvassed, and evaluated through the accompanying Sustainability Appraisal, most notably through the Borough-wide Development Strategy (G9) and Delivering the Plan for Stafford Borough – Issues and Options (G6). As discussed above, there has been a general level of support, backed by the NPPF (F1) and the Revised Sustainability Appraisal Report (A10), for the merits of distributing development proportionately to reflect access to and

availability of services and facilities – and accordingly a primary practical objective of the new Plan for Stafford Borough (A1) is to ensure that development is directed towards the Sustainable Settlement Hierarchy in more sustainable proportions than has previously been achieved through the Stafford Borough Local Plan 2001 (F14).

- D4.7 The Plan for Stafford Borough (A1) para. 6.54 sets out the implications in terms of new provision required in each location, of the SP4 proportions of the overall Borough requirement (based on 500 dwellings per annum, as discussed in Topic Paper B), taking account of existing commitments. Evidence prepared through the Strategic Housing Land Availability Assessment (D2) demonstrates that there is more than a sufficient supply of housing land available across the Stafford Borough area, including around Stafford, Stone and the Key Service Villages, to deliver the absolute quantities required of this strategy.
- D4.8 In terms more specifically of the strategy for the rural areas outside Stafford and Stone, previous consultations have considered the feasibility and desirability of a range of options for the scale of new housing development in various locations around Key Service Villages. The most recent consultation 'The Plan for Stafford Borough - Draft Publication' (G1) proposed 5,500 new homes at Stafford, 500 new homes at Stone and over 1,000 new homes in the rural areas outside of Stafford and Stone (i.e. the net housing requirements identified in the table in the Plan for Stafford Borough (A1) para. 6.54, reproduced in para. C2.2 of Topic Paper C). These are proposed to be delivered through the Neighbourhood Planning process or a subsequent Site-specific Allocations and Policies document. There was a general level of support for this approach from the responses, particularly from developers and landowners, although some responses objected to development in any location due to the loss of greenfield land and environmental impacts. These responses are detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and in Appendix 7 of the Plan for Stafford Borough – Consultation Statement Appendices (A15).
- D4.9 As set out above it is proposed that 12% of new housing development outside of Stafford and Stone should take place at Key Service Villages, with the proportion of development at each village considered through established planning criteria, including the size of the settlement, level of existing services and facilities, accessibility and environmental constraints – as set out in Spatial Principle 7 (SP7) within the Plan for Stafford Borough – Publication (A1). It is important to recognise that the Key Service Villages will have an important role in meeting the service needs of other smaller villages in the locality, to reduce travel. For these villages, and indeed all the rural areas outside the Key Service Villages, Spatial Principle SP7 also sets criteria to guide where other small-scale development, likely to amount

to 8% of the total, is expected to occur. The intention is that development should be very small in scale, will need to meet stringent environmental considerations, and be well-related to an existing settlement. This approach is designed to deliver new development through sustainable locations in rural areas whilst protecting, conserving and enhancing the existing high quality environment.

D4.10 However, not least given the recent past failure to direct development according to an intended sustainable distribution, how will the new Plan be more successful in securing the intended distribution, in this case that proposed by Spatial Principle SP4? There are two main answers to this – one positive, and one negative. The positive approach is that, certainly in comparison with the Stafford Borough Local Plan 2001 (F14), land is specifically proposed to be allocated and brought forward in locations which will deliver the intended solutions. Prime amongst these will be the Strategic Development Locations (SDLs), three in Stafford, one in Stone – described in detail in Topic Paper E.

D4.11 Nevertheless it may be that a more negative control mechanism will also be necessary. Such a mechanism is defined in the Plan for Stafford Borough – Publication (A1), para. 6.49, proposing that a moratorium in the grant of planning permission be triggered if new development takes place 25% above the housing distribution set out in Spatial Principle 4 over a 4 year period. The purpose of this housing moratorium would be to restrict the scale of housing growth if necessary in order to ensure that the correct balance is achieved, and in particular to ensure that new housing at Stafford Town is delivered. By way of example, taking Stone Town which has a total requirement of 800 new homes over the Plan period, meaning that over a 4 year period the requirement is completion of 160 new homes. Therefore if more than 200 new homes have been completed (160 plus 25%, i.e. an extra 40) over the previous 4 year period, then the moratorium would be triggered. The moratorium would stay in place until the projected number of completions over the next 4 year period reduced back to below 200 new homes.

## **D5. Conclusion**

D5.1 Having considered the relevant evidence base and the plan-making process, including the Sustainability Appraisal Reports the Council considers that this is the most appropriate distribution of development within the settlement hierarchy and the delivery of that development for inclusion in the Plan for Stafford Borough – Publication (A1).

## APPENDIX 1 (Extract from pages 10-11 of the Principles for Settlement Assessment – Examination Library Document G8)

Set out below is the proposed scoring system for assessing settlements:

Schools	Score = 3 Primary School
	Score = 4 More than single Primary School Provision
Medical Facility	Score = 3 (permanent Doctor's surgery)
	Score = 2 (permanent Dentist's surgery)
	Score = 1 (Doctor visit to community facility at least weekly)
	Score = 5 (Both Doctor's surgery & Dentist's surgery)
Retail Provision	Score = 1 (Local Convenience Store / Post Office)
	Score 2 (2 - 5 Local Convenience Stores)
	Score = 3 (More than Local Convenience Stores)
Community Facilities	Score = 1 (Village Hall / Community Hall)
	Score = 2 (More than 1 Village Hall / Community Hall)
Church	Score = 1 (Church / chapel)
	Score = 2 (more than 1 Church / chapel)
Public House	Score = 1 (Public House)
	Score 2 (More than 1 Public House)
Library	Score = 1 (Mobile Service)
	Score = 2 (Permanent Building)
Public Transport	Score = 4 (1/2 hourly bus service)
	Score = 3 (hourly bus service)
	Score = 2 (2 - 3 hourly bus service)
	Score = 1 (daily service)
	<small>Rail services not included as only relates to Barnaston &amp; Blythe Bridge.</small>
Fire / Police Facility	Score = 1



Other Facilities such as petrol station / garage, bank, vet, restaurant / café, take-away, opticians	Score = 1 (Single Other Facility)
	Score = 2 (2-5 Other Facilities)
	Score = 3 (More than 5 Other Facilities)
Population	Score = 4 (More than 1,500)
	Score = 3 (1,000 – 1,500)
	Score = 2 (500 – 1,000)
	Score = 1 (Less than 500)
Access to 'A' Road	Score = 2 (passes through settlement)
	Score = 1 (within 300 metres of settlement)
Open Space, Sport & Recreation such as playing field, children's play area. Public footpaths and incidental areas of open space have been excluded.	Score = 1 (Single sport and recreation resource)
	Score = 2 (2-3 sport and recreation resources)
	Score = 3 (More than 5 sport and recreation resources)

**APPENDIX 2 (Extract from pages 12-13 of the Principles for Settlement Assessment – Examination Library Document G8)**

Set out below are the scores achieved for each settlement within Stafford Borough:

Gnosall	33
Eccleshall	31
Great Haywood	27
Meir Heath & Rough Close	22
Blythe Bridge	21
Barlaston	21
Weston	20
Little Haywood and Colwich	20
Hixon	19
Haughton	18
Brocton & Brocton A34	18
Trentham / Dairyfields	17
Tittensor	15
Swynnerton	15
Woodseaves	14
Oulton	13
Yarnfield	13
Great Bridgeford	13
Derrington	13
Milford	12
Cotes Heath	12
Aston by Stone	12
Fulford	11
Clayton	10

Church Eaton	10
Hopton	9
Adbaston	9
Milwich	9
Seighford	9
Croxton	9
Norbury	9
Hilderstone	9
Bradley	9
Creswell	8
Stowe by Chartley	8
Salt	7
Hyde Lea	7
Barlaston Park	7
Ranton	7

## **TOPIC PAPER E: STRATEGIC DEVELOPMENT LOCATIONS AT STAFFORD & STONE**

### **E1. Scope and Purpose**

E1.1 The purpose of this Topic Paper is to provide an explanation for the strategic sites (defined as Strategic Development Locations) at Stafford and Stone contained within the Plan for Stafford Borough – Publication (A1), including justification for the site-selection process, details of the delivery of the proposed development, infrastructure requirements and alternative sites considered as part of the plan making process.

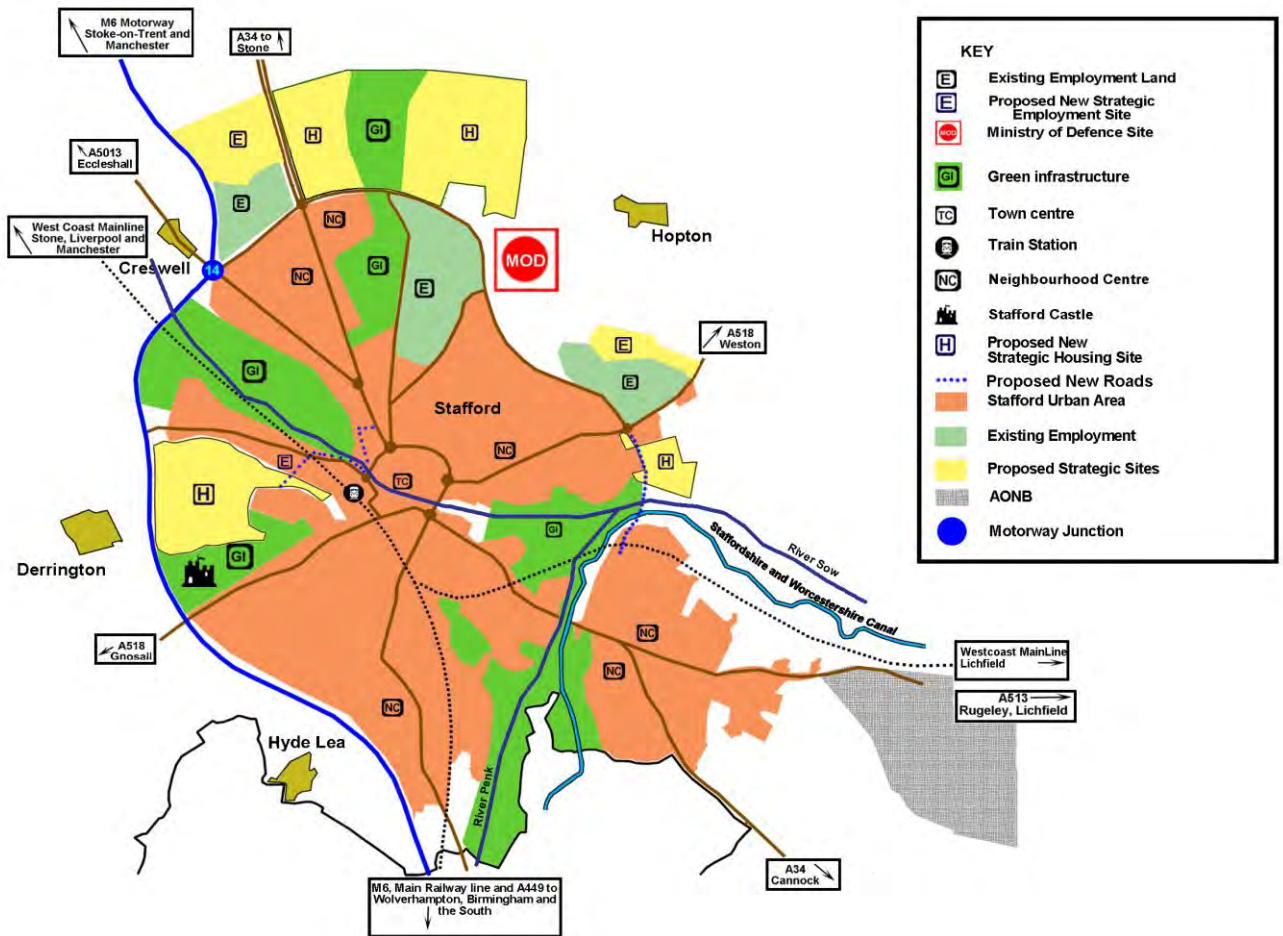
### **E2. Site-selection process and Alternative Sites considered**

E2.1 The Strategic Development Locations (SDLs) at Stafford and Stone are set out in the Chapters for Stafford and Stone within the Plan for Stafford Borough (A1), and shown on the following diagrams, extracted from the Plan. The Council considers that these are the most appropriate strategic sites to deliver the vision for the Borough and the key objectives when judged against the reasonable alternative sites detailed later in this paper. The SDLs at Stafford and Stone have been developed throughout the plan making process from Delivering the Plan for Stafford Borough – Issues and Options (G6), produced and consulted upon in 2009, through to the publication of the Plan for Stafford Borough – Publication (A1). Furthermore the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13) published in April and May 2013 ensured that all reasonable alternatives were considered as part of the plan-making process including those introduced at the Publication stage.

E2.2 A brief review of the historic planning context for Stafford Borough is necessary, to set the scene for the development of these proposals. In 2008, at the start of the plan-making process for the strategic sites at Stafford and Stone, the emerging West Midlands Regional Spatial Strategy (WMRSS) Phase 2 Revision Preferred Option 2006 – 2026 (F8) set out the scale of development requirements as 10,100 new houses for Stafford Borough of which 7,000 new houses were to be located at Stafford town, together with 40 hectares of new employment land as a rolling five-year reservoir, and 120 hectares as indicative long-term requirements. Furthermore the concept of having a settlement hierarchy which directed the majority of growth to sustainable settlements supporting the retention of creation of a range of services and facilities was a key principle of the West Midlands Regional Spatial Strategy Preferred Option 2007 (F8, page 73, Policy CF - B and C and para 6.21).

- E2.3 From the start of the process, it has been important also to recognise the environmental sensitivities of the Borough. Of particular importance is land in the Cannock Chase Special Area of Conservation (SAC), which is of international importance covering an area of influence beyond Stafford Borough, and the Cannock Chase Area of Outstanding Natural Beauty. In addition Stafford Borough has two areas of Green Belt, to the north of the Borough around the North Staffordshire conurbation and in the south east of the Borough as part of the West Midlands Green Belt area. A number of green infrastructure areas of open space and flooding were considered to be areas of development constraint which should also be largely protected. Therefore the identification of the SDLs at Stafford and Stone has been considered in this context, as shown in the Stafford Town Key Diagram below.
- E2.4 In July 2008 Stafford was announced as a Growth Point by the previous Government. Stafford Borough was designated as a New Growth Point by the Government because of its location, its potential for regeneration, its need for substantial affordable housing and the need for new infrastructure improvements such as transport and communications, healthcare, education, recreation and leisure. In supporting Stafford Borough as a Growth Point, the Government at that time committed to a long-term partnership with Stafford Borough Council and Staffordshire County Council by recognising their ambitions for growth, subject to the statutory regional and local planning processes. Therefore from that point delivery of new development at Stafford town has been viewed as a key part of the Plan for Stafford Borough. The continued relevance of this objective is considered more fully in Topic Paper D. The fundamental aim is to achieve thriving communities in the future through the most sustainable development based on existing infrastructure, services and facilities
- E2.5 Having established the overall spatial approach for Stafford Borough through the Borough-wide Development Strategy (G9) and identified the principal settlements through the Principles of Settlement Development (G8) process, further detail was consulted upon through the 'Delivering the Plan for Stafford Borough – Issues and Options' (G6) in February and March 2009 providing a range of development scenarios and location options for Stafford, Stone and a number of the principal settlements across the Borough. At that time the national and regional policy context was set out in pages 24 & 25 of Delivering the Plan for Stafford Borough – Issues and Options' (G6).

## Stafford Town Key Diagram



E2.6 In the West Midlands RSS (F7) adopted at that time, Stafford was identified as a strategic centre, a local regeneration centre outside of Regeneration Zones and as an 'Other Large Settlement'. With at least 7,000 new homes in Stafford this would have represented a growth of more than a 25% above the existing housing stock in the town. The West Midland Regional Spatial Strategy Phase Two Revision (F8) proposed that the remaining 3,000 new homes should be provided in other parts of the Borough area.

E2.7 Delivering the Plan for Stafford Borough – Issues and Options' (G6) (February / March 2009) set out two development scenarios for consideration, together with the potential scale of new development for particular settlements within Stafford Borough. A number of potential location options were identified (G6, pages 38 to 66) for new developments, including Stafford and Stone as well as each of the principal settlements.

- E2.8 Delivering the Plan for Stafford Borough - Issues and Options (G6) was assessed through the Sustainability Appraisal Volume 2 ((H7), summary pages 36 – 42 and further details pages 45 – 73), which considered each of the potential location options for new development in turn.
- E2.9 A significant number of responses were made to the ‘Delivering the Plan for Stafford Borough – Issues and Options’ (G6) as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14), and in Appendix 3 of the Plan for Stafford Borough – Consultation Statement Appendices (A15). Although there was no overall consensus in terms of supporting or rejecting the potential location options at Stafford and Stone, a number of site-related issues were raised for consideration.
- E2.10 Based on the responses received to the ‘Delivering the Plan for Stafford Borough – Issues and Options’ (G6), the Sustainability Appraisal Commentary Volume 2 (H7) and the evidence based reports, detailed later in this Topic Paper, a number of preferred SDLs at Stafford and Stone were subsequently advanced through the Plan for Stafford Borough – Draft Publication (G2) in September and October 2011. That document contained a Core Policy setting out key requirements for each SDL together with a site designation map and justification text regarding the location and key issues. The selection of strategic sites at Stafford and Stone was identified as key to delivering the new development strategy for the Borough with the focus on Stafford and Stone, together with development requirements of 500 new homes per year and 8 hectares of new employment land as set out in Core Policy 2 of the Plan for Stafford Borough – Draft Publication (G2). A key part of the overall approach for new development at Stafford town and Stone was identified as to support delivery of a number of Strategic Development Locations delivering new housing, employment, key infrastructure, services and facilities as well as green infrastructure.
- E2.11 As in the case of the previous consultation stage, a number of responses were made to the ‘Plan for Stafford Borough – Draft Publication (G2) as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and detailed in Appendix 3 of the Plan for Stafford Borough – Consultation Statement Appendices (A15) – although there was no overall consensus in terms of supporting or rejecting the SDLs at Stafford and Stone.
- E2.12 Based on the responses received to the ‘Plan for Stafford Borough – Draft Publication (G2), the Sustainability Appraisal Report (H4) and the evidence based reports, detailed later in this Topic Paper, the preferred SDLs at Stafford and Stone were confirmed through the Plan for Stafford Borough – Publication (A1) in January and February 2013. That document contains a Policy setting out updated key requirements for each SDL, together with a



site designation map, illustrative concept plan and justification text regarding the proposed development, requirements and implementation. Furthermore Appendix D – Infrastructure of the Plan for Stafford Borough – Publication (A1) details the infrastructure requirements, phasing, costs and funding. The Plan for Stafford Borough – Publication (A1) was accompanied by the Revised Sustainability Appraisal Report (A10) and the technical appendix (A11) which assessed the strategic sites at Stafford and Stone in the context of the alternatives proposed through the Delivering the Plan for Stafford Borough – Issues and Options document (G6).

E2.13 In terms of sites rejected as possible SDLs, two areas should be mentioned specifically. Firstly, the potential of land south of Stafford has been considered from early in the plan making process (reflecting its identification as an issue in the then RSS). The context and the reasoning for its exclusion is explained further in para. E3.7 below. Secondly, following the receipt of representations to the Plan for Stafford Borough – Publication (A1) a further strategic site was put forward as a potential reasonable alternative at Stafford town, at Clarkes Farm. The detailed representations are contained within the Plan for Stafford Borough – Representations Received (A18), included in the Plan for Stafford Borough Publication – Summary of Representations Received (A17) as well as the Plan for Stafford Borough – Submission Consultation Statement (A14). As a result of this representation the Borough Council undertook a further period of seeking representations, during April and May 2013, regarding the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13), with representations received to the Addendum detailed in Examination Document A21 and representations received to the Planning Strategy Statement in Examination Document A23. Three locations as reasonable alternatives were considered as part of this process, at Clarkes Farm north east of Stafford, land west of the M6 at Stafford and land south west of Stone.

E2.14 Having considered the responses and representations received throughout the plan making process, the relevant evidence base and the various Sustainability Appraisal Reports the Council considers that the SDLs at Stafford and Stone are the most appropriate for inclusion in the Plan for Stafford Borough – Publication (A1) based on the site-selection process and the alternative sites considered.



### **E3. National Policy Context and Cross Boundary Issues**

E3.1 The Government published the National Planning Policy Framework (NPPF) (F1) on 27th March 2012, which has been taken into account in progressing the Plan for Stafford Borough. The Government is committed to ensuring that the planning system delivers sustainable development by balancing economic, social and environmental roles. Furthermore the NPPF states that there should be a presumption in favour of sustainable development running through plan making and decision making, ensuring that local planning authorities meet the development needs of their areas when assessed against specific policies in the Framework.

E3.2 With particular regard to delivering strategic sites at Stafford and Stone, the NPPF (F1) states that policies in new Local Plans should follow the approach of the presumption in favour of sustainable development in order to bring forward development without delay. Furthermore paragraph 17 of the NPPF – Core planning principles includes the following bullet points which are relevant for delivering significant new development at Stafford and Stone:

- *Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it:*
- *contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;*
- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;*
- *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and*
- *take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.*

E3.3 Throughout the NPPF (F1) the theme of achieving sustainable development through development strategies is re-iterated. Paragraphs 18 to 22 aim to secure economic growth for jobs and prosperity through a pro-active strategy to meet development needs and deliver investment by identifying strategic

sites, supporting business sectors and expanding technology networks / clusters. Paragraphs 23 to 27 seek to ensure the vitality of town centres by encouraging new development to key elements of the network and the hierarchy of centres. Paragraphs 29 to 38 seek to promote sustainable travel through the appropriate location of new developments to minimise movements and maximise the use of public transport. Paragraph 47 states that local planning authorities should significantly boost the housing supply to meet objectively assessed needs, including identifying key deliverable and developable sites over the Plan period. Furthermore paragraphs 69 to 70 promote healthy communities through new and existing facilities provision. In particular paragraph 156 states:

*156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:*

- *the homes and jobs needed in the area;*
- *the provision of retail, leisure and other commercial development;*
- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *the provision of health, security, community and cultural infrastructure and other local facilities; and*
- *climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.*

E3.4 Finally in line with the NPPF (F1, para 173) development must not be subject to a scale of obligations and policy burdens which would undermine the ability to implement the plan. For this reason, policies are worded to ensure viability matters are taken into account at any particular time during the economic cycle. Viability testing has taken these matters into account and shows that, currently, all Strategic Development Locations are viable at Code for Sustainable Homes Level 3, as detailed in the following section.

E3.5 Throughout the process of preparing the Plan for Stafford Borough pro-active engagement has taken place with other local authorities and key stakeholders to ensure cross-border implications have been taken into account and consistent approaches followed. With particular regard to Stafford Town the scale of new development is supported by neighbouring authorities in order to meet objectively assessed needs, demonstrated through Duty to Co-operate pro-formas signed at a political level and included in the Duty to Co-operate Statement (B3).

- E3.6 The key cross-border issue concerning the delivery of SDLs is their impact on the Cannock Chase Special Area of Conservation, which is addressed in Topic Paper F. Stafford Borough Council has been working alongside neighbouring local authorities and Natural England to establish effective mitigation mechanisms for new developments through the provision of on-site Suitable Alternative Natural Greenspace (SANGs) and financial contributions.
- E3.7 As part of the West Midlands Regional Spatial Strategy (WMRSS) process land south of Stafford was identified as a cross border issue to be considered by Stafford Borough Council and South Staffordshire Borough Council when preparing their new Plans. The WMRSS stated that “dependant upon the outcome of local studies, some of the Stafford town allocation could be made, adjacent to the settlement, in South Staffordshire Borough.” Both Councils have been in dialogue concerning future development south of Stafford and a number of evidence based studies have been carried out as well as meetings with relevant landowners and developers. The general conclusion is that development in this location is both less practical and less sustainable than at other locations around Stafford town, and therefore significant development south of Stafford is not proposed in the new Plan.

#### **E4. Delivery of Proposed Development and Infrastructure Requirements**

- E4.1 A key consideration at the start of the process for site-selection and considering alternatives sites is the adequacy of the potential land supply. During 2008 the Borough Council consulted upon and subsequently established the Strategic Housing Land Availability Assessment Methodology (E8) which led to the first Strategic Housing Land Availability Assessment (E7) being published in 2009. This has been subsequently updated on an annual basis through to the most recent Strategic Housing Land Availability Assessment 2013 (D2). The key role for these documents is to identify all potential land available for housing development within Stafford Borough and was prepared using information provided by landowners and developers since 2001 seeking sites for inclusion in the new Local Plan for the area. The Strategic Housing Land Availability Assessment (SHLAA) classifies sites as ‘Deliverable’, ‘Developable’ and ‘Not Developable’. The SHLAA defines these three categories for the purposes of the assessment. *Deliverable* sites are defined as “those that are available now, are in a suitable location for housing and there is reasonable prospect that housing will be delivered on site within the next 5 years”. *Developable* sites are defined as “those that are, or are likely to become available for housing development, which satisfy the broad criteria established by the SHLAA, and where there is a reasonable prospect they could be developed in the future if constraints can be overcome”. The Strategic Housing Land Availability Assessment 2009 (E7) identified a significant amount of potential land available across the Borough including at Stafford and Stone. This

information was used as the starting point for selecting potential strategic sites for Stafford and Stone, together with other factors such as environmental sensitivities to inform the Delivering the Plan for Stafford Borough – Issues and Options (G6) document consultation process in February & March 2009.

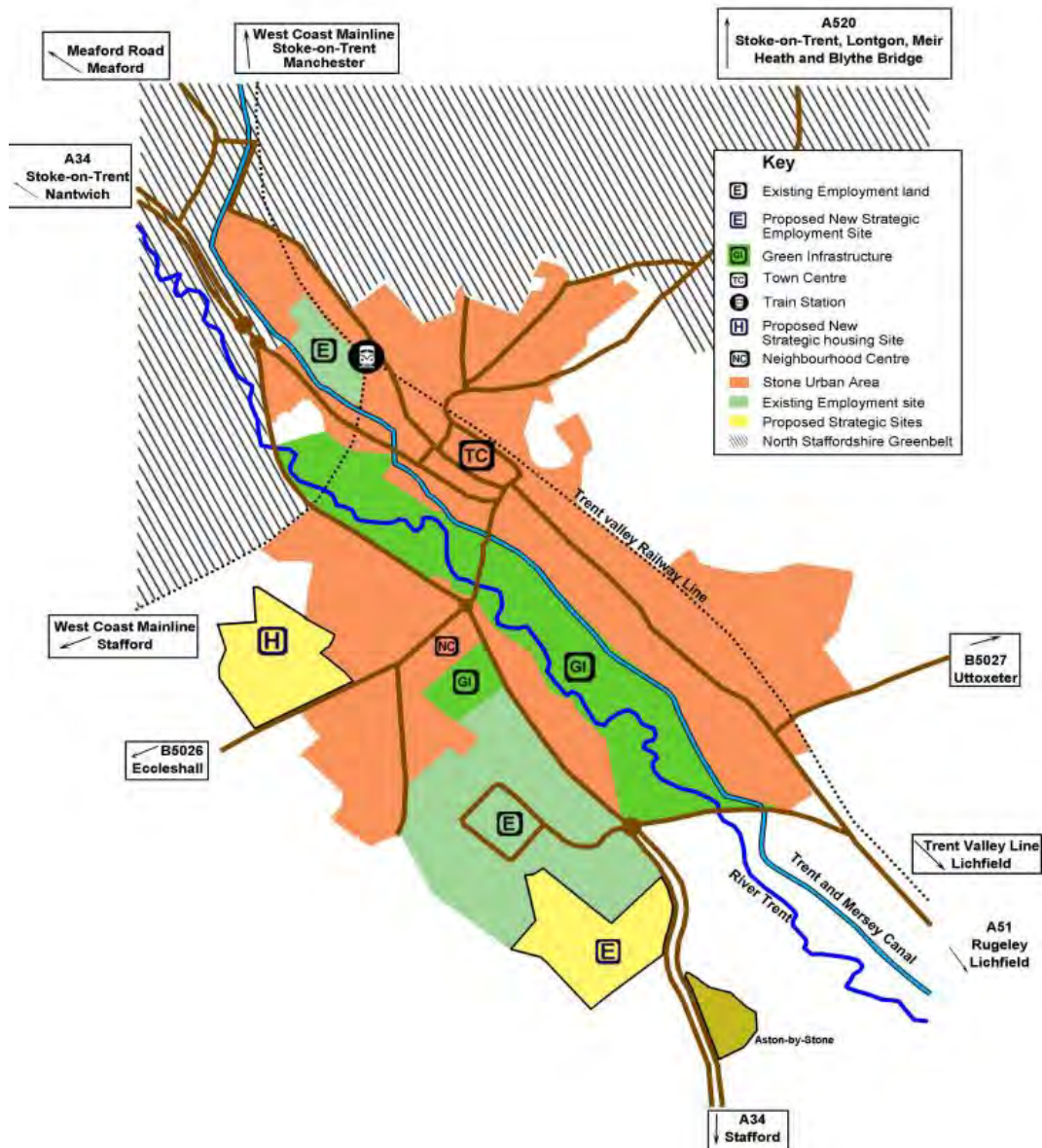
E4.2 As part of the evidence base work, during 2009 the Borough Council commissioned the Stafford Borough Infrastructure Strategy (D58) which assessed, in detail, each of the potential location options as part of groupings, identified in the Delivering the Plan for Stafford Borough – Issues and Options (G6), including for Stafford and Stone. The report considered strategic infrastructure required to deliver the development strategy options as well as the potential location options including strategic transport issues, gas supply, electricity supply, clean water supply, waste water treatment, green infrastructure and flooding, and community and social infrastructure including education and health. In addition affordable housing viability was assessed. This key element of the evidence base was informed by the following studies and reports being prepared at that time:

- Annual Monitoring Report 2008 / 2009 (C5)
- The Housing Monitor 2009: Land for New Homes (J13)
- Strategic Housing Land Availability Assessment 2009 (E7)
- Stafford Borough Local Development Framework Ecological Desk Study 2008 (D35)
- Strategic Flood Risk Assessment Level 1 Volume 1 Final (D46) together with the associated Strategic Flood Risk Plans (D47 – D50)
- Settlement Assessment of Services and Facilities (D55)
- West Midlands North Housing Market Area – Strategic Housing Market Area Assessment (E13)
- Employment Land Review 2007 (E24 – E26)
- Stafford Growth Options Study Addendum to Initial Option Assessment Report (E33), the Growth Options Addendum (E34) and the Further Initial Option Assessment and Additional Information Report (E35)
- Historic Environment Character Assessment for Stafford (E80), the Historic Environment Character Assessment for Stone (E81), for the Haywoods (E82), for Eccleshall (E83) and for Gnosall (E84)
- Staffordshire County Council and Stafford Borough Council New Growth Point – Stafford. Programme of Development (E100), the Expression of Interest (E101) and associated Appendices (E102).

E4.3 The Stafford Borough Infrastructure Strategy (D58), pages 30 and 31 concluded that at Stafford the most deliverable, in planning terms, were directions of growth to the north, west and east with phasing based on the

programming of physical infrastructure works. For Stone the most deliverable housing sites is located to the west of the town to be delivered via local transport improvements alongside employment sites to the south of Stone. This process helped to inform the development of the proposed development strategy to identify the preferred locations for new development based on key factors and constraints, as set out in the Stone Town Key Diagram below.

Stone Town Key Diagram



E4.4 Following the public consultation on the Plan for Stafford Borough – Draft Publication (G2) and in progressing the evidence base work the Borough Council commissioned a second element on key infrastructure and affordable housing viability through the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) which assessed, in detail, each of the preferred development locations at Stafford and Stone,

identified in the Plan for Stafford Borough – Draft Publication (G2). The report considered the detailed strategic infrastructure requirements to deliver the preferred development locations including transport, utilities, social infrastructure, environmental infrastructure together with a delivery strategy and funding sources as well as specific infrastructure provision for each SDL. This second report was informed by the following studies and reports being prepared at that time:

- Annual Monitoring Report 2010 / 2011 (C3)
- The Housing Monitor 2011: Land for New Homes (E2)
- Strategic Housing Land Availability Assessment 2011 (E3)
- Economic Viability of Housing Land in Stafford Borough (D10)
- Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17)
- The Green Infrastructure Strategy for Stafford – The Strategic Plan (D34), the evidence base (D35) and the appendices (D36)
- Southern Staffordshire Surface Water Management Plan Phase 2 (D40), the Addendum (D41), the Southern Staffordshire Surface Water Management Plan Phase 1 (D42)
- Southern Staffordshire Outline Water Cycle Study – Final Report (D44) and the Addendum (D43)
- Employment Land Review 2010 (E21 – E23)
- Draft Stafford Borough Integrated Transport Strategy 2011-2026 (E31)
- Stafford Western Access Improvements Major Scheme Business Case Main Report (E32)
- Stafford Borough Council Assessment and Open Space, Sport and Recreation Facilities Strategy (E54), the Appendices (E55) and maps (E56)
- West Midlands Renewable Energy Capacity Study: Implications for Stafford (E66)
- Assessment of Facilities and Services Stafford (E68)
- Assessment of Facilities and Services Stone (E69)

E4.5 A further key area of evidence to consider reflects the Harman Report: Viability Testing Local Plans (J11) (page 11) recommendation that *‘Viability testing of Local Plans does not require a detailed viability appraisal of every site anticipated to come forward over the Plan period. Because of the potential widely different economic profiles of sites within a local area, this advice suggests a more proportionate and practical approach in which local authorities create and test a range of appropriate site typologies reflecting the mix of sites upon which the plan relies’*.

- E4.6 As part of the evidence base an economic viability study was prepared regarding the delivery of affordable housing in 2010 which tested a range of notional residential schemes up to 150 units, as detailed in Examination Documents D10 to D12. Subsequently in December 2012 further viability testing took place on a notional 500 unit housing site which demonstrated viability for the SDLs, as detailed in Examination Document D51.
- E4.7 During the period of time in progressing the Plan for Stafford Borough – Draft Publication (G2) through to the Plan for Stafford Borough – Publication (A1) a significant amount of progress was made in completing the evidence base and detailed liaison with key developers and landowners for the SDLs at Stafford.
- E4.8 For the housing development elements of the SDL east of Stafford a series of meetings took place between 2 March 2012 to 20 June 2013. A Memorandum of Agreement for the SDL East of Stafford (E99) was signed in November 2012 prior to the Plan for Stafford Borough – Publication (A1) being approved by Full Council. Furthermore the developers promoting the housing schemes east of Stafford held a public exhibition in February 2013 prior to submitting two planning applications amounting to a total of 634 new homes which were granted planning permission in August 2013 following the signed of a Section 106 agreement. For the employment development elements of the SDL east of Stafford planning consent was granted for 21.9 hectares in March 2013.
- E4.9 For the housing development elements of the SDL north of Stafford a series of meetings took place between 26 April 2012 to 26 February 2013. A Statement of Common Ground for the SDL North of Stafford Town (E97) was signed in November 2012 prior to the Plan for Stafford Borough – Publication (A1) being approved by Full Council. In addition the developers promoting the housing schemes north of Stafford held a public exhibition in December 2012 and January 2013 with material including the Northern Strategic Development Location – Illustrative Framework Plan (E91), a Concept Plan (E92) alongside the Beaconside Stafford Public Consultation Document (E93). Subsequently, the Plan for Stafford Borough: Transport Evidence to Support a Northern Direction of Growth (D25) was produced by Staffordshire County Council in June 2013. It should be noted that an element of the housing developments at the SDL north of Stafford has received outline planning consent for 409 new homes in August 2012 and full consent for 257 new homes 19 August 2013 on land identified in the Stafford Borough Local Plan 2001 Housing Proposal HP13. For the employment development elements of the SDL north of Stafford planning consent was granted for 28.19 hectares on 12 October 2012.

- E4.10 For the housing development of the SDL west of Stafford a series of meetings took place between 14 September 2011 and 6 June 2013. During this period the developers for land west of Stafford produced the Burleyfields Evidence Report on behalf of Taylor Wimpey / Bellway / St Modwen (E87) in December 2011 and more recently the Burleyfields Historic Environment Assessment – EDP Report (E86) which is subject to final changes and will be included in the evidence base when received. This was further supported by the Plan for Stafford Borough: Transport Evidence to Support a Western Direction of Growth (D26) produced by Staffordshire County Council in October 2012. In addition the developers promoting the housing schemes west of Stafford held a public exhibition in July 2013 with material including the Burleyfields Development Concept Plan (E88), the Burleyfields Development Character Areas – Plan (E89), and existing site sections (E90). It should be noted that an element of the housing developments at the SDL west of Stafford received planning consent on appeal for 80 new homes in December 2012 on previously developed land at Castleworks.
- E4.11 For the SDL south and west of Stone a Statement of Common Ground (E98) was signed in November 2012 prior to the Plan for Stafford Borough – Publication (A1) being approved by Full Council. Furthermore the developers promoting the housing schemes west of Stone held a public exhibition in June 2013 prior to submitting a planning application which was validated on 25 July 2013 for up to 500 new homes. Planning permission is yet to be determined for this application but it should be noted that the decision will need to consider the Duty to Co-operate / cross border position as set out in the Duty to Co-operate Statement (B3) with the North Staffordshire authorities and phasing development at Stone post 2021.
- E4.12 Following the period of seeking representations on the Plan for Stafford Borough – Publication (A1) and subsequently the Revised Sustainability Appraisal Report (A12) a number of evidence based reports have been finalised, as described below, to confirm the delivery and viability of the SDLs based on the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57). In August 2013 the Plan for Stafford Borough: Spatial Plan for Education (D53) was published setting out the education provision required for Stafford and Stone over the Plan period based on natural change and the scale of development proposed through the SDLs together with funding implications. This report was used to inform the Plan for Stafford Borough: Whole Plan Viability Report (D52) and the specific report on the Viability and Delivery of Northern and Western SDLs, Stafford (D51). The overall conclusion through the Whole Plan Viability Report (D52) was that the plan is viable for delivering new development in the context of meeting the cumulative standards and policies included in the Plan for Stafford Borough – Publication (A1). In addition during August 2013 the Stafford Borough



Integrated Transport Strategy 2013 – 2031 (J15) was published by Staffordshire County Council, which supports the SDL proposals.

## **E5. Conclusion**

- E5.1 Having considered the relevant evidence base and the various Sustainability Appraisal Reports the Council considers that SDLs at Stafford and Stone are the most appropriate for inclusion in the Plan for Stafford Borough – Publication (A1), and can deliver the proposed developments alongside the necessary infrastructure requirements.

## **TOPIC PAPER F: HABITAT REGULATIONS ASSESSMENT IMPLICATIONS FOR CANNOCK CHASE SPECIAL AREA OF CONSERVATION (SAC)**

### **F1. Scope and purpose**

- F1.1 This Topic Paper explains the Habitat Regulations Assessment (HRA) recommendations for Cannock Chase Special Area of Conservation (SAC) including the nature, extent and means of implementing mitigation measures and the approach of neighbouring authorities.
- F1.2 By carrying out an HRA, under the Habitats Directive, Stafford Borough Council has sought to assess potential impacts positively and, reflecting the HRA recommendations, make sound proposals to address these by mitigation measures in an appropriate way, based on effective cross boundary working in accordance with national policy. Overall it has been undertaken to the satisfaction of Natural England as confirmed in the Statement of Common Ground (J4, Appendix 5).
- F1.3 A Habitats Regulations Assessment (HRA) is the requirement that Local Authorities should consider whether projects or plans, as part of land use planning documents, will have adverse effects on Natura 2000 Sites (also known as European Sites). Natura 2000 Sites are nature conservation sites designated as Special Protection Areas (SPAs), or Special Areas of Conservation (SACs).
- F1.4 An HRA has been carried out to assist Stafford Borough Council in meeting the requirements of the European Directive 92/43/EEC (The Habitats Directive).
- F1.5 There are several SACs within the Borough, as listed below:
- Cannock Chase SAC
  - Chartley Moss SAC
  - Pasturefields Salt Marsh SAC
  - Cop Mere RAMSAR
  - Aqualate Mere RAMSAR
- F1.6 Apart from Cannock Chase SAC, the other European sites in the Borough were subject to a screening opinion (A24) which deemed that implementing the Plan for Stafford Borough alongside other plans, policies and programmes will not result in likely significant effects on these sites. However the implications for Cannock Chase SAC are more significant, and have therefore been considered separately to the other European sites within the Borough. This Topic Paper will focus solely on the HRA carried out with regard to Cannock Chase SAC.

## **F2. Background and evidence base**

- F2.1 In 2007 the West Midlands Regional Spatial Strategy (WMRSS) raised concerns that additional housing near Cannock Chase SAC could lead to increased visitors, which could adversely affect the SAC, and further HRA work was needed. A joint HRA Screening Report (for Cannock Chase Borough Council and Stafford Borough Council) (J7) was produced but was inconclusive, and it was recommended that the next stage of the HRA, the Appropriate Assessment, be carried out.
- F2.2 A consortium of local authorities met to consider the potential impacts of their Local Plans on the Cannock Chase SAC. The consortium included Stafford Borough Council, Cannock Chase Borough Council, Lichfield Borough Council, South Staffordshire Borough Council and Staffordshire County Council. Natural England supported this wider approach. An updated screening report was produced to cover all authorities in the consortium (J8).
- F2.3 In 2009, Footprint Ecology was commissioned to produce an evidence base report (E52). This report was then used by Footprint Ecology to produce a Visitor Impact Management Strategy (E53). The same evidence base was used in house by the Council to produce the Cannock Chase SAC Appropriate Assessment (A25).
- F2.4 In November 2009 the Footprint Ecology Cannock Chase SAC evidence report (E52) and the Visitor Impact Management Strategy (E53) were published, with a number of recommendations. These concluded that visitor and recreation pressure is likely to adversely affect the SAC; that a 12 mile Zone of Influence should be established around the SAC and that further work was required to consider visitor travel distances, traffic, and the ecological condition of the SAC. It also recommended the need for neighbouring authorities to be involved, the setting up of a SAC Partnership, a review and guidance on SANGS (Suitable Alternative Natural Green Space) and the preparation of an Implementation Plan to cover mitigation measures.
- F2.5 After publication of these reports, local authorities in the commissioning group drafted similar Local Plan policies for their respective Core Strategies, with the aim of a consistent approach across the area affected. This was supported by Natural England who also provided advice on next steps for the SAC HRA.
- F2.6 A workshop was held in April 2010 to explain the report findings to a number of bodies including the original commissioning group; neighbouring authorities; the Cannock Chase Area of Outstanding Natural Beauty (AONB) Unit, the Forestry Commission, Government Office West Midlands (GOWM), Staffordshire County Council - Transport and Natural England. As a result of this, in June 2010, a wider SAC Partnership was formed with a formal Memorandum of Understanding (later 'Statement of Intent') agreed. At this time, Natural England commissioned an independent review of the SAC reports produced by Footprint Ecology. This supported the findings of the

reports and requested additional work be carried out, in particular an up to date visitor survey as the previous study dated from 2000.

F2.7 The SAC Partnership, which is still in place to date, consists of:

- Birmingham City Council
- Cannock Chase AONB Unit
- Cannock Chase Borough Council
- Dudley Metropolitan Borough Council (MBC)
- East Staffordshire Borough Council
- Forestry Commission
- Lichfield Borough Council
- Natural England
- Sandwell and Dudley MBC
- South Staffordshire Borough Council
- Stafford Borough Council
- Staffordshire County Council
- Walsall MBC
- Wolverhampton MBC

F2.8 In order to move the HRA project forward, in November 2010 the SAC Partnership agreed that a Cannock Chase SAC habitat survey would be carried out and that the AONB Unit would carry out a new Cannock Chase visitor survey - required for the AONB Management Plan. Footprint Ecology were appointed by the SAC Partnership produce the following reports which were published in late 2012 / early 2013:

- Cannock Chase Visitor Observation Study (E51)
- Impacts of Recreation to SAC – habitat condition survey (D33)
- Visitor Survey Report– analysis of the visitor survey and report on impacts (based on the results provided from the AONB Unit) (D30 & D31) supported by a Visitor Observation Study (J10)
- Mitigation Report – strategy for potential impacts, including policy for planning (D32)

F2.9 The Mitigation Report shows that Cannock Chase SAC is already suffering significant damage from existing visitor levels and additional visiting created from new development will add to this. Such additional visiting is likely to increase levels of damage to the SAC without mitigation.

F2.10 Based on the Visitor Survey, it was found that cyclists come from a wide area, with horse riders and walkers (with or without dogs) coming from areas closer to the SAC. Cyclist numbers seem to be increasing more rapidly than other groups. Most visitors come by car with some 75% of all visitors coming from a zone 15km or less from the edge of the SAC.

F2.11 The Visitor Survey and Mitigation Report summarises future new housing (land with planning permission, allocations in adopted plans and SHLAA sites) with a projected increase of some 78,000 new homes, an increase of

10%, with the largest percentage increases in housing within 1km bands at 1km, 5km, 8km-10km, 13km, 16km and 19km. The increase in new housing may result in an increase in access levels of around 15% over the next 15 years, with the greatest numbers originating from north and south of the SAC but the highest visiting rates originating from housing to the north, east and west.

F2.12 The main mitigation measures recommended to offset these expected increases in the number of visitors are:

- No new housing development should be permitted within 400m of the SAC;
- Increasing the size of the heathland and improving connectivity between the different blocks of the SAC;
- Continuing current management practices and introducing extensive grazing by cattle and ponies or possibly sheep;
- Reviewing track, path and firebreak systems;
- Carrying out a comprehensive public consultation, education, awareness and information campaign, supported by additional staff;
- Progressively closing lay-bys over a five year period;
- Staffordshire County Council, the Forestry Commission and AONB Unit jointly reviewing the size, location and distribution of car parks across Cannock Chase with the aim of reducing pressure on sensitive areas together with a review of car park charges as a revenue stream;
- Providing Suitable Alternative Natural Green Space (SANGS), largely for walkers and dog walkers, in the form of a minimum size of 30 hectares in four locations around the SAC;
- Examining the provision of a hopper bus service and the introduction of traffic calming measures on some roads;
- Review the possibility of traffic calming on some roads close to the SAC;
- Undertake a comprehensive biological, habitat condition and visitor monitoring programme.

F2.13 The Mitigation Report (D32) concludes that funding for such mitigation measures will need to come from developer contributions. The Report contains some indicative costing for implementing a range of mitigation measures, which across the whole partnership could cost £2.32-3.73million.

F2.14 Footprint Ecology has recommended that developer contributions should be established within a 15km radius of the SAC, the “zone of influence”.

### **F3. Partnership and mitigation measures**

- F3.1 The SAC partnership recognises the importance for adequate mitigation measures to be put in place. There is agreement between the members of the Partnership that these measures should be consistent between all authorities.
- F3.2 A long term arrangement will be the adoption of an Supplementary Planning Document (SPD) covering developer contributions to mitigate the potential impacts on the SAC arising from new development (by all Partnership authorities). The development of this SPD is currently an on-going piece of work that the Partnership is pursuing.
- F3.3 Due to the time required to prepare an Implementation Plan (with identified costs) and subsequent SPD the Partnership member authorities are adopting interim policies with the aim of ensuring that they comply with their statutory obligations under the Habitats Directive without having to impose a moratorium on housing development within the zone of influence. The interim policy will cover 1-3 years whilst the SPD is developed.
- F3.4 The proposed interim policy states that an applicant proposing any additional residential development involving a net increase of one or more units within the 15 km zone must show how the impact of their proposals will be mitigated, taking into account the recommendations from the impact mitigation report (D32). However it is recognised that requiring small scale developments to produce bespoke mitigation solutions is in most cases impracticable. The interim policy therefore provides the option for small scale developments to make a financial contribution at a rate per dwelling via a standard form of planning obligation to be complete before the grant of a planning permission.
- F3.5 The Black Country authorities are currently not prepared to commit to this process and further discussions are on-going within the Partnership. Therefore the interim policy is only being adopted by the Staffordshire Boroughs. Stafford Borough Council is currently in the process of adopting this interim policy, with a Cabinet report setting out the policy prepared and currently progressing through the democratic system.

### **F4. Proposed modification**

- F4.1 In response to the publication of the Plan for Stafford Borough (pre-submission) an objection was lodged by Natural England with regards to Policy N6 (Cannock Chase SAC). Following a meeting with Natural England a Statement of Common Ground was produced (J4, Appendix 5). Since then further discussions have been carried out via email and a full proposed modification will be set out in the Council's Examination Statement, and addressed later in the Examination process. Natural England will be engaged in the re-wording of Policy N6.

## **F5. Neighbouring authority approaches**

F5.1 The Council notes that as part of the Lichfield District Local Plan Examination a main modification has been proposed by Lichfield Council to its Cannock Chase SAC Policy NR7.

F5.2 The Council also recognises that the approaching Cannock Chase Local Plan Examination to be held in late September 2013 will also consider these matters. In particular Matter 7 of the Cannock Chase Examination regarding the SAC, on which the Black Country authorities have submitted a statement. That statement highlights concerns that the Black Country authorities have over the evidence used and the resulting mitigation solutions based on a zone of influence. This matter will be discussed further at the Cannock Chase Examination on the 26 September 2013. Results of the discussions held at the Examination will be noted by Stafford Borough Council in the forthcoming Examination Statement.

## **F6. Conclusion**

F6.1 In conclusion, the Council recognises the evolving nature of this particular aspect of the Plan and the need for a consistent approach to the Cannock Chase SAC between the authorities involved. The Council will continue to liaise with the SAC partnership, in particular the neighbouring authorities of Cannock Chase District Council and Lichfield District Council.

F6.2 Anticipated changes will involve updates to policy wording which better reflect the progress of the Partnership, and which would ensure consistency with other authorities' approaches to the Cannock Chase SAC.

## **TOPIC PAPER G: WEST MIDLANDS REGIONAL SPATIAL STRATEGY (WMRSS) REVOCATION**

### **G1. Scope and purpose**

G1.1 The purpose of this Topic Paper is to explain the implications of the revocation of the West Midlands Regional Spatial Strategy (WMRSS) (F7) for the Plan for Stafford Borough (A1).

### **G2. Background**

G2.1 Regional Spatial Strategies (RSSs) were introduced as part of the substantial reform of the planning system by the Planning and Compulsory Purchase Act 2004 to form part of the development plan, together with Development Plan Documents (DPDs) as part of the Local Development Framework (LDF). They differed from Regional Planning Guidance (RPG) which preceded them as they had more weight, rather than providing 'guidance', which was the purpose of the RPG.

G2.2 The full West Midlands Regional Spatial Strategy (formerly RPG 11) was initially published in June 2004. Following the publication of the Phase One Revision in respect of the Black Country sub-region (which did not concern the Stafford Borough) a revised WMRSS (F7) was issued in January 2008.

G2.3 Revisions to the RSS which did have implications for Stafford Borough, covering housing, were published as the draft RSS Revision Phase 2 in December 2007 (F8), and reached Examination in Public in April 2009. However, the Government at that time did not endorse the Panel's conclusions (F4), and that Revision was never adopted.

### **G3. Revocation of the strategy**

G3.1 The Government set out its formal intention to revoke the WMRSS (F7) in May 2010, so in recent years the Plan for Stafford Borough has been prepared in the full understanding that the WMRSS would eventually no longer exist. On the 20th May 2013 the WMRSS was formally revoked through the Regional Strategy for the West Midlands (Revocation) Order 2013.

### **G4. Main implications for the Plan for Stafford Borough**

G4.1 Clearly the WMRSS no longer has any legal significance, and its former provisions are no longer of any relevance to, or binding on, the proposals of the Plan for Stafford Borough. However, it must be recognised that from 2008 until May 2013, the Plan for Stafford Borough was being prepared in the context of the WMRSS, which thus provided a significant influence in shaping the new Plan. In these terms, the proposals of the RSS (both those



approved and those being advanced, but never concluded, in the Review Phase 2), were considered in formulating the strategy for Stafford Borough – together with all other reasonable options, as the other Topic Papers have demonstrated.

G4.2 In addition, through the WMRSS process a significant body of evidence was developed which had some relevance in the local context. However as the majority of this evidence was produced between 2006 and 2009 it has become increasingly outdated, to the point now where this has, of necessity, largely been replaced by new evidence collected in the preparation of the Plan for Stafford Borough – Publication (A1).

G4.3 Against this context, there are therefore three primary implications of the revocation on the Plan for Stafford Borough. Firstly, there are areas of policy which are no longer pre-determined by higher level policy, and require to be resolved at the local, Stafford Borough, level. The scale of growth is perhaps the major matter, but the regional context also established a role and relationships for Stafford in relation to its neighbours, including for relative growth in the Borough, focused on Stafford town. The Plan for Stafford Borough subject of Examination thus seeks to re-establish these matters at the local, non-regional level, through its development strategy – the derivation of which is explained in Topic Papers A, B and C. The Borough Council undertook a number of consultations in developing the Plan for Stafford Borough to publication stage, to establish these matters, in particular through the following documents: Delivering the Plan for Stafford Borough – Local Choices (G4) in November 2010 to January 2011, the Plan for Stafford Borough – Draft Publication (G2) in September and October 2011, and the Plan for Stafford Borough – Strategic Policy Choices (G1) in May to July 2012.

G4.4 Secondly, reliance can no longer be placed on the information base provided through the regional planning process. There has been a clear imperative for the establishment of an up-to-date locally relevant evidence base. This relates particularly to the Borough's housing and employment requirements, discussed above, but also to a wide range of other information. Consequently, a number of key pieces of evidence were commissioned or completed by Stafford Borough Council to update the evidence base, including:

- The Housing Monitor: Land for New Homes (D1)
- Gypsy and Traveller Accommodation Needs Assessment for Stafford Borough (D4)
- Strategic Housing Market Assessment Update (D5)
- Employment Land Review (D14)
- Stafford and Stone Town Centre Retail Capacity – update (D15)
- Stafford and Stone Town Centre Capacity Assessment (D16)
- Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57)

G4.5 The third main implication of the revocation of the WMRSS concerns what has now effectively replaced the mechanism of regional planning: the emphasis now placed on cross boundary co-operation, which is reflected in the Duty to Co-operate process. The Council's compliance with the Duty to Co-operate is explained in detail in the separate statement prepared by the Council: the Duty to Co-operate Statement (B3), as well as referenced in the Plan for Stafford Borough – Publication (A1).

## **G5. Conclusion**

G5.1 The Council considers that in terms of the three main implications of the formal revocation of the West Midlands Regional Spatial Strategy (F7), an appropriate response has been made in both the process of preparing and the content of the Plan for Stafford Borough. Reflecting the actual date of revocation, it is nevertheless necessary to proposed some minor additional textual modifications to the Publication Plan (A1), contained in document A26, to reflect the formal revocation of the WMRSS.

