



**The Plan for Stafford Borough –
Publication**

Examination Statement – Infrastructure

October 2013

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INFRASTRUCTURE

1. KEY ISSUE:

Does the Plan provide an appropriate, effective and soundly based framework for the delivery of infrastructure, including the costing, funding, viability deliverability and timing of critical infrastructure to deliver the strategy, which is fully justified with evidence and consistent with national policy?

- 1.1. The Borough Council considers that the Plan's approach to the delivery of infrastructure, as set out in Chapter 13 of The Plan for Stafford Borough – Publication (Submission) Document (A1), hereafter "the Plan (A1)", is soundly based. Policy I1, in combination with the Infrastructure Delivery Plan (IDP) parts 1 and 2 (D58 & D57) and the Whole Plan Viability Report (D52), provides an effective framework for the delivery of infrastructure. The approach (summarised in Policy I1, which introduces the supporting Infrastructure Delivery Plan) has been informed by a robust and credible evidence base and has undergone extensive public consultation and engagement from 2009 – 2012, as set out in The Plan for Stafford Borough – Submission Consultation Statement (A14) and appendices (A15). The approach is in conformity with National Planning Policy Statement (NPPF) (F1), paras. 173 and 174, as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4)
- 1.2. This approach supports the delivery of the Strategic Development Locations (SDLs) at both Stafford and Stone Towns. It is integral to achieving the Spatial Vision and Key Objectives of the Plan (A1), through the delivery of infrastructure provision to support the housing and employment development as set out in the Plan.
- 1.3. The justification for the approach to infrastructure has been informed through preparation of the plan since 2009 and the process of public consultation through delivering the Plan for Stafford Borough – Issues and Options (G6), The Plan for Stafford Borough - Draft Publication (G2) and The Plan for Stafford Borough - Strategic Policy Choices (G1). This process has been underpinned by the evidence base through the Infrastructure Delivery Plan (hereafter IDP) Parts 1(D58) and 2 (D57), Whole Plan Viability Report (D52) and Viability and Delivery of Northern and Western Strategic Development Locations, Stafford (D51) which set out the costing, funding, viability, deliverability and timing of critical infrastructure to deliver the strategy and show that the level of infrastructure required is achievable without placing undue burden on the viability of development. As part of the process Policy I1 has been tested through the Sustainability Appraisal Report (H4) and the Revised Sustainability Appraisal Report (A10).
- 1.4. Representations to Policy I1 provided general support for the Policy regarding the level of infrastructure necessary to deliver the Plan (A1). However, some concerns have been raised regarding infrastructure delivery and viability due to the policy burdens being required, although otherwise there was support for the Community Infrastructure Levy and

Section 106 process. Nevertheless, in response, it is considered that Whole Plan Viability Report (D52) has addressed the infrastructure costs for the entire Plan and concluded that development is deliverable when the total policy burdens of the Plan are considered.

2. INFRASTRUCTURE DELIVERY POLICY (Policy I1)

Has the Plan fully considered the infrastructure implications of delivering the Development Strategy, including identifying the critical elements of physical, environmental and social infrastructure required, such as highways, public transport and accessibility, water, power and other utilities, flooding, drainage and flood risk mitigation, and health, education, social, community and other facilities, including costing, means of funding, viability, timescale and delivery, and reflecting the views of infrastructure and utility providers?

- 2.1. The infrastructure planning that supports the delivery of the Plan (A1) has been undertaken in a pro-active manner, in close consultation with a wide range of key infrastructure providers and delivery agencies. The Infrastructure Chapter 13 of the Plan (A1) does not reiterate the information that is contained within the IDP Parts 1 & 2 (D58 & D57), but sets out a summary of the infrastructure necessary to deliver the Plan. Greater detail on the phasing, capital costs, and funding streams for individual infrastructure items is set out in Appendix D of the Plan (A1).
- 2.2. The IDP Part 2 (D57) sets out the timetables, costs, funding streams and means of delivery of the critical physical, social and environmental infrastructure required to deliver the Plan (A1). These key infrastructure requirements have been derived from extensive workshops and consultation with key partners, particularly infrastructure and service providers, including Staffordshire County Council, to deliver major infrastructure requirements set out in the Appendices A – C of the IDP.

Is the approach to securing developer contributions towards infrastructure appropriate, effective, justified with evidence, reasonable and consistent with national policy?

- 2.3. The growth requirements for Stafford Borough over the Plan period will require the development of new infrastructure and the upgrading of existing infrastructure. A central tenet of the planning system is that the development industry has a central role to play in the delivery of infrastructure through Section 106 Agreements legislation and through the Community Infrastructure Levy (CIL). Policy I1 is clear that new development will be supported by appropriate levels of infrastructure. Therefore it is considered that the Policy is appropriate, effective, justified and consistent with national policy.
- 2.4. In accordance with national planning policy, it is anticipated that S106 agreements will continue to have a role in site specific mitigation proposals such as the infrastructure required to deliver the SDLs at Stafford and Stone. This includes major highway infrastructure items, affordable housing requirements, public open space, on-site Cannock

Chase SAC mitigation requirements and education provision. On smaller sites, pooled financial contributions will be used to mitigate for their cumulative impact until the introduction of CIL. To accord with national policy, all Section 106 agreements must meet all of the three tests set out in NPPF (F1), para 204.

- 2.5. NPPF (F1) para. 205 also makes provision for flexibility in negotiating planning obligations, to take account of market conditions over time and be flexible to prevent development being stalled. Policy I1 clearly states that site viability and feasibility will be taken into account when determining the extent and priority of development contributions. In addition, the Affordable Housing Viability Study (D10, D11 & D12), and the Whole Plan Viability Report (D52) provide evidence that both infrastructure and affordable housing requirements set out in the Plan would not compromise its viability, and are therefore locally appropriate
- 2.6. The process of introducing the Community Infrastructure Levy (CIL) will be commenced after the conclusion of the Local Plan Examination, and a preliminary draft charging Schedule is expected to be completed by Autumn 2014. It is anticipated that CIL will contribute to more strategic infrastructure, which may include educational contributions, or cross-boundary infrastructure requirements such as Cannock Chase Special Area of Conservation (SAC) Mitigation. CIL would also ensure that local neighbourhoods would benefit from the planning gain arising from development in their area. However, to ensure that developers are not charged twice for the same piece of infrastructure it will be necessary to limit S106 agreements to on-site infrastructure requirements whilst CIL will contribute to off-site strategic infrastructure.

Has the Plan fully considered the cumulative implications of developer contributions on the viability and deliverability of the Development Strategy, including the viability implications of the requirements of other policies in the Plan?

- 2.7. The process of preparing the Plan (A1) has fully considered the cumulative impacts of developer contributions on the viability and deliverability of the development strategy. As part of its preparation, a suite of studies has been undertaken to underpin the viability and deliverability of the Plan. For residential sites, the viability of policy requirements has been assessed through the Affordable Housing Viability Study (D10). This study concluded that the housing market in the north of the area could sustain up to 40% affordable housing. Lower sales values experienced in Stafford town would make delivery more challenging under many of the circumstances considered. However it is anticipated that development will gravitate to those sites where values, and viability, are better so consequently a 30% target remains appropriate over the life of the Plan (A1). However across large parts of the Borough, including rural areas, 30% affordable housing is achievable. As part of the strategy to deliver the SDLs, the Viability and Delivery of Northern and Western Strategic Development Locations, Stafford (D51) Study was undertaken to assess the viability and deliverability of these

locations. This Viability and Deliverability Study provided an analysis of the overall development costs to deliver both these SDLs, and concluded that each is deliverable, and that the infrastructure requirements and levels of affordable housing will not result in either site being unviable.

- 2.8. The results from the Viability and Delivery of Northern and Western Strategic Development Locations, Stafford Study (D51) and the Affordable Housing Viability Study (D10) were used as to inform parts of the Whole Plan Viability Study (D52). The Whole Plan Viability Report (D52) was undertaken to ensure that the cumulative impact of all of the infrastructure requirements, affordable requirements and costs generated due to other policies within the Plan, in particular Policies N1, N2 and C2; do not place undue financial burden that would threaten the viability of development. The report concluded that the Plan is viable when the cumulative impacts of the policies are considered. Therefore it is considered that the infrastructure requirements are soundly based, and comply with NPPF (F1), paras 173 and 174.

Is the requirement to prepare Strategic Frameworks/masterplans for the Strategic Development Locations necessary, appropriate, effective and justified, including the delivery of infrastructure, viability and approach to developer contributions?

- 2.9. The Borough Council considers that the requirement for Strategic Frameworks for the delivery of the SDLs at Stafford and Stone is soundly based, and derived from a robust and credible evidence base, extensive public consultation and engagement undertaken as part of the plan preparation process, as set out in The Plan for Stafford Borough Submission Consultation Statement (A14) and the Appendices (A15). In addition, the requirement to produce master plans is considered to be in conformity with national policy through NPPF (F1), paras 52, 162, 173 and 174, as discussed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 2.10. The requirement for the development of master plans is considered to be necessary to make the Plan effective, ensuring that the development strategy, Spatial Vision and Key Objectives of the Plan (A1) are achieved, through the future delivery of the Plan's housing and employment growth aspirations for which the SDL proposals are critically significant. Each master plan prepared for the SDLs will be used as a tool to guide development, provide a phasing mechanism to control the growth and direction of each SDL as well as ensuring that the necessary infrastructure is provided in a timely manner for each SDL. The process of masterplanning gives clarity to the roles and responsibilities of the organisations involved in the delivery of each SDL. Each SDL master plan will set a framework for co-ordinating the activities of different services in an area, for example doctors' surgeries, schools and leisure facilities. As part of this process it will set out the basis for the provision of utilities and other infrastructure elements that are required to deliver the scheme. This could be large road infrastructure or smaller scale infrastructure improvements to address site specific issues, such as flooding. Greater

detail regarding the deliverability of each SDL is set out in Topic Paper E of the Background Statement (K1).

- 2.11. Justification for the requirement for each SDL to provide a masterplan has been generally supported through the preparation of the plan since 2009 and the process of public consultation through delivering the Plan for Stafford Borough – Issues and Options (G6), The Plan for Stafford Borough - Draft Publication (G2) and The Plan for Stafford Borough - Strategic Policy Choices (G1). Furthermore, the process of delivering the SDL through a master planning framework is consistent with the implications of the extensive evidence base. The IDP Parts 1 & 2 (D57 & D58), specifies the timetables, costs, funding streams and means of delivery of the critical infrastructure required to deliver each SDL and has been derived from extensive workshops and consultation with key partners, particularly infrastructure and service providers, including Staffordshire County Council, to establish and arrange to deliver major infrastructure requirements, of each SDL. In addition, the Viability and Delivery of Northern and Western Strategic Development Locations, Stafford Study (D51) and the Whole Plan Viability Report (D52) have demonstrated that each SDL is deliverable. Master plans will draw together the details of infrastructure requirements and the timing of its delivery in association with the development, and ensure that the schemes will be delivered, and delivered viably.

3. MONITORING AND REVIEW

Are the arrangements for monitoring the policies of the Plan adequate, effective, comprehensive and soundly based, including the Monitoring Framework, indicators, baseline information and targets/milestones used?

- 3.1. The monitoring framework is aligned to and will help to assess whether the Spatial Vision and Key Objectives of the Plan are realised. The Monitoring Framework set out in Appendix E, Chapter 20, of the Plan (A1) identifies indicators and targets to monitor the performance of each Policy within the Plan. The Framework specifies what each Policy will achieve, the information that will be monitored by the Council and other external bodies to monitor the progress achieved, and identifies suitable contingency measures in order to meet the policy outcomes of the Plan.
- 3.2. The indicators set out in the Appendix E of the Plan (A1) are derived from the core output indicators introduced by DCLG in 2005 and updated in 2008, together with a suite of new locally specific indicators. The use of core output indicators facilitates easy time series analysis with data from previous Annual Monitoring Reports (AMRs). It thus enables a comparison over time to monitor the impacts and implementation of policies. The suite of locally specific indicators has been derived to enable comprehensive monitoring the Plan. These were chosen on the basis of relevance, availability of data over time (including issues of cost and reliability), policy target timescales, and ease and cost of collection.

- 3.3. Progress against each of the targets in the Plan will be monitored through the Annual Monitoring Report. The indicators in the current AMR (C1) largely reflect the Core Output Indicators. Whilst the requirement to collect data on these indicators was withdrawn by the Government in 2011, the Council's AMR has retained these to provide consistency with previous AMRs. In addition, the AMR contains an established set of Contextual Indicators to establish the baseline position of the wider social, environmental and economic circumstances. The adoption of the Plan will result in changes to future AMRs to include the full suite of indicators set out in the Plan.

Are the delivery mechanisms, phasing and timescales for the implementation of the policies clearly identified, including critical elements of infrastructure required, including further technical work on highways, drainage, utilities and other critical infrastructure improvements?

- 3.4. Where appropriate to deliver the outcomes of the Plan, each Policy on the SDLs contains a detailed list of the critical infrastructure required for its delivery. Delivery, phasing and timescales for any infrastructure related to each Policy are detailed in Appendix D – Infrastructure, of the Plan (A1) and E provides the detail regarding the infrastructure requirements, capital cost, phasing and funding streams for each of the SDLs at Stafford and Stone, as well as the employment allocations at Raleigh Hall and Ladfordfields.
- 3.5. The Infrastructure required is also set out in the IDP Parts 1 and 2 (D58 & D57). It has been prepared with extensive and continuing communication between infrastructure providers, key partners and delivery agencies to determine the critical infrastructure required to deliver the Plan (A1).
- 3.6. The IDP Parts 1 and 2 (D58 & D57) considered strategic infrastructure required to deliver the development strategy and the SDLs at Stafford and Stone and includes 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. A detailed assessment of the infrastructure requirements is set out in Appendices A-C of the IDP Part 2 (D57). As part of the assessment, the costs, funding mechanisms, partners responsible as well as delivery and timescales are set out for each of the SDL Policies in the Plan. In addition, the Whole Plan Viability Report (D52) highlights that the level of infrastructure required will not place undue burden on the Plan's economic viability.
- 3.7. The IDP (D57) sets out a list of the transport infrastructure necessary for the implementation of the Plan. In addition the Stafford Borough Integrated Transport Strategy (D18) identifies the infrastructure necessary to improve accessibility, promote sustainable travel and address key areas of potential congestion as a result of the development proposed in the Plan.

- 3.8. The IDP is based on the most up to date information derived from extensive consultation with infrastructure and service providers to identify the critical infrastructure required to deliver the Plan. However, it is accepted that further technical work may be required to take account of site-specific implications such as drainage, utilities or additional critical infrastructure requirements. To achieve this, the IDP will be a live document that is regularly updated, thus providing a framework that enables key infrastructure partners and delivery agencies to work together to programme and monitor infrastructure delivery. This enables the IDP to function as a business plan for infrastructure planning and delivery, with regular updates as part of the annual monitoring process.

Do the policies in the Plan include sufficient flexibility and contingencies to take account of unexpected changes in circumstances, indicate when the plan will need to be reviewed, and identify the remedial actions to be taken if policies are not being successfully implemented?

- 3.9. The policies within the Plan (A1) have been worded to provide sufficient flexibility for applicants and the ability to accommodate changes that may be imposed. Within the policies there is flexibility and room for negotiation, to take into account site viability and market conditions in line with the NPPF (F1).
- 3.10. The approach of setting an apportionment for the delivery of housing to the levels of the settlement hierarchy, as set out in Spatial Principle 4 (SP4), provides a robust approach for the delivery of housing – even if the total scale of housing or employment related developments were to deviate, for whatever reason, from the annual targets set in Spatial Principle SP3. The majority of development within Stafford and Stone will be accounted for by the delivery of the SDLs, but the strategy provides sufficient flexibility to allow small scale development at Stafford and Stone subject to the criteria set out in Spatial Principle 7 (SP7). The strategy for housing delivery to the Key Service Villages (KSVs) provides significant flexibility to deliver the required level of housing given the large quantity of available sites contained within the Strategic Housing Land Availability Assessment (SHLAA). As part of this approach, Spatial Principle 7 (SP7) provides a suite of broad criteria based principles that will be used to determine whether individual proposals for housing developments will be acceptable.
- 3.11. By way of example, for flexibility within individual policies Policy C5 of the Plan (A1) allows rural housing outside the settlement hierarchy, provided the applicants meet the criteria set out in the policy. Policy N2 requires new development to generate a proportion of their energy from on-site renewable resources or low carbon energy equipment. However, there is flexibility that allows energy to be generated off-site where a viability assessment considers it environmentally or technically impractical. In addition, many of the policies are criteria based policies that allow a high degree of flexibility.

- 3.12. Chapter 14 of the Plan (A1), concerning Local Monitoring and Review, proposes a 'plan, monitor, manage' approach to policy evaluation. Appendix E details the monitoring and reviewing framework and sets out contingencies to deal with unexpected changes in circumstances.
- 3.13. The Annual Monitoring Report (AMR) will be updated at the end of each financial year to evaluate how effective the policies have been, and to identify any extraneous reasons as to why the policies have been more or less successful. It will make recommendations for remedial action in future AMRs. Policies will be assessed against policy milestones, targets and indicators, set out in Appendix E of the Plan, thus enabling early indications of issues that will need to be addressed. Where the Policy milestones within the Plan are not being met either through changed circumstances at local or national level (e.g. a change in policy at national level, or a further deterioration in the housing market resulting in reduced levels of affordable housing), this will be assessed through findings within the AMR. Where the AMR demonstrates that the policy objectives are not being delivered, contingency mechanisms will be undertaken as set out in Appendix E of the Plan to address barriers to the delivery of the Policy. Failing that, it may be necessary to review a Policy or how it is being implemented.

Do the amendments to the Infrastructure schedules (Appendix D) and Performance Indicators & Targets (Appendix E) fully address the concerns of infrastructure providers and other bodies?

- 3.14. Consultation and dialogue has been undertaken with infrastructure providers throughout the preparation of the Plan (A1), and has continued since submission to the Secretary of State. As part of these discussions, a series of minor modifications are being proposed, as set out the schedule of minor modifications (A26), to ensure inclusion of the most up to date information from infrastructure providers, listed as M99 to M110 for the Infrastructure Chapter and M116 to M124 of Appendix D.