#### THE PLAN FOR STAFFORD BOROUGH – MATTERS AND ISSUES FOR EXAMINATION

### Submissions by Wardell Armstrong LLP on behalf of Baden Hall Enterprises Ltd

# Matter 3: Development Strategy (Spatial Principles SP2 – SP7)

#### 1 Introduction

- 1.1 This Hearing Statement contains the submissions of Baden Hall Enterprises Ltd regarding former Ministry of Defence land at Coldmeece near Eccleshall.
- 1.2 Appropriate representations have been made at each relevant stage of Plan making, as set out in the Plan 1.6 'Preparation of the Plan'.
- 1.3 The site has been promoted as SHLAA site reference 257. Copy submission is attached for clarification.
- 1.4 The clear intention is to take forward the development of the site for sustainable mixed-use through promotion as an appropriate site in the Site Allocations DPD and within the Eccleshall Parish Neighbourhood Plan, in conjunction with other adjoining parishes.
- 1.5 This statement is made in the context of:
  - the NPPF which promotes flexibility in Local Plans
  - the NPPF (Para 173 primarily) relating to viability and costs in plan making and decision making, with reference to 'a willing land owner and willing developer to enable the development to be deliverable'
  - Policy SP4 which arbitrarily defines targets for the distribution of housing development without a robust evidence base
  - A Development Strategy (Section 6) that is unclear in the context of flexibility to deliver sustainable development opportunities
  - Policy SP7, which promotes maximisation of use of brownfield development sites (within the Borough's towns and villages) to reduce the need for development on Greenfield sites

• Para 6.6 recognises the Neighbourhood Planning, Site allocations and sitespecific policies process as future intentions.

## 2 The Developer

2.1 The site promoter has agreed in principle that development would be brought forward by a joint venture between two specialist sustainable housing developers, Hab Housing and Czero. Hab and Czero share a vision of developing sustainable houses and communities which go far beyond current regulations. Hab have a strong design philosophy, working with brilliant architects and landscape architects to make places that look great and work well. Czero has strong technical delivery capabilities and an unparalleled understanding of how to deliver energy efficient housing cost effectively.

# 3 Potential development models

- 3.1 Hab Czero is unconstrained by the typical housebuilder development model which pays lip service to community engagement and which delivers identikit developments devoid of local context. The business was established in the belief that there has to be a better way of building houses and delivering communities.
- 3.2 Hab Czero would be looking to bring the site forward with the support of the local parishes and communities, and would engage with those communities from the very start of the process. This would very much be a new small community planned in partnership. Hab Czero's approach is not confrontational it is a fresh innovative approach to development.

# 4 Delivering a Small Community in a Unique Place

4.1 The site provides an opportunity to develop a sustainable community in a unique place. The developers intend to make the most of the combination of natural features such as the woods and watercourses, and the man-made remnants of the former MoD firing ranges including the long straight driveways (one of which is a mile long), bunds, the concrete bunkers and other structures, and the disused former station which brought workers to the wider area.

- 4.2 Hab Czero believes that high-quality landscaping and public spaces are absolutely vital to the creation of successful communities. Hab Czero will work closely with architects and landscape architects to ensure that architecture and landscape are seamlessly linked. The aim is to create a setting that: is as natural as possible; respects and builds on the biodiversity of the site and that supports a wide range of activity including relaxation, socializing, food-growing and play.
- 4.3 While the exact number of houses the site will support is not yet known, the developer sees a broad range of property types. They are committed to creating mixed communities that provide both market housing and significant affordable homes for local people and ensures that the same high standards of design and construction are applied across the scheme. The form of the land naturally lends itself to the establishment of linked neighbourhoods each with a distinctive feel and character, separated by natural characteristics of the land. Development of this nature is currently under construction on the edge of Swynnerton village, 3.5km to the north.

## 5 Renewables

- 5.1 The developer's aspiration is to make the new community as self-sufficient as possible, particularly from the perspective of energy use. Hab Czero adopts the global "One Planet Living" initiative, which introduces 10 principles of sustainability including waste, travel, food, health and happiness. A sustainable development at Coldmeece will seek to minimise its impact on local services.
- 5.2 With a range of natural resources on the site, there will be a number of options for generating power by renewable energy, and with highly energy efficient buildings the expectation would be for power generation to exceed demand. The exact technologies to be used will be decided when a full assessment of the site's potential has been made.

# 6 The Stafford Borough Development Strategy

- 6.1 The site promoter wishes to request supportive policy to support achieving this sustainable high quality mixed-use development with a strong emphasis on affordability and local choice. There are strong concerns over the proposed delivery strategy for Stafford Borough which it is felt should offer greater flexibility and have a stronger and more effective evidence base to support a robust delivery strategy.
- As an example, related to policies SP3 and 4 the sustainable settlement hierarchy, there is no evidence to demonstrate this reflects market-led demand. This will reduce housing delivery, which is an acute matter as recently highlighted by the Inspector in an appeal decision (APP/Y.3425/A/12/2172968) made in December 2012 which states 'there is persistent under delivery of housing (in five of the last six years)'.
- 6.3 Policy SP4 offers only limited potential to deliver new housing in 'the rest of the rural area' by apportionment of only 629 houses (see table at 6.54) during the Plan period across twelve main service villages. The 8% apportionment, set against a delivery rate of 35% monitored delivery rates (para 6.43) is unreasonable and should be increased significantly to allow the requisite accelerated delivery promoted by the NPPF and 'Planning for Growth'. In this context the moratorium period is not realistic in that it could arbitrarily restrict suitable development opportunities.
- 6.4 The site promoted is definitely brown field and previously developed through military usage and therefore meets one of the core planning principles set out in paragraph 17 of the NPPF as it is not of high environmental value. It is considered that there should be sufficient Plan flexibility and a more accurate policy to reflect the potential of such brownfield redevelopment opportunities than Policy SP7.
- 6.5 Further considerations which could be applied to assess the potential of high quality sustainable development include:
  - Deliver demonstrable benefits to the area
  - Providing substantial green infrastructure
  - Re-enforcing less sustainable villages

- Strengthening the main service centre
- Integrating with well-located surrounding rural employment sites
- Taking pressure off releasing more sensitive green field sites from development
- Potential for sustainable live-work
- Deliver community-led development

6.6 In the context of the Schedule of Matters – Spatial Principle 7 c – the criteria for considering development in other locations required 'more headroom' in terms of proportion of housing growth, say 30%, and also the 12 service centres should be properly evaluated and ranked in terms of sustainability and potential for growth rather than 'thrown in to an overall small pot'. Further headroom should also be created for potential being brought forward through Neighbourhood Planning.

# 7 The Development

7.1 The principle aim of this promoted development is to achieve an appropriate supportive policy framework within the Local Plan to support delivery of an innovative form of development that in this instance will 'repair' a despoiled but interesting environment in a strategically important place. The promoter and the developer are committed to taking proposals forward as an exemplar of sustainable development, including the key axioms of sustainable consumption; climate change and energy; natural resources and sustainable communities. This requires flexibility with the Local Plan which is not clear and demonstrable in *Polices SP4 and SP7*.

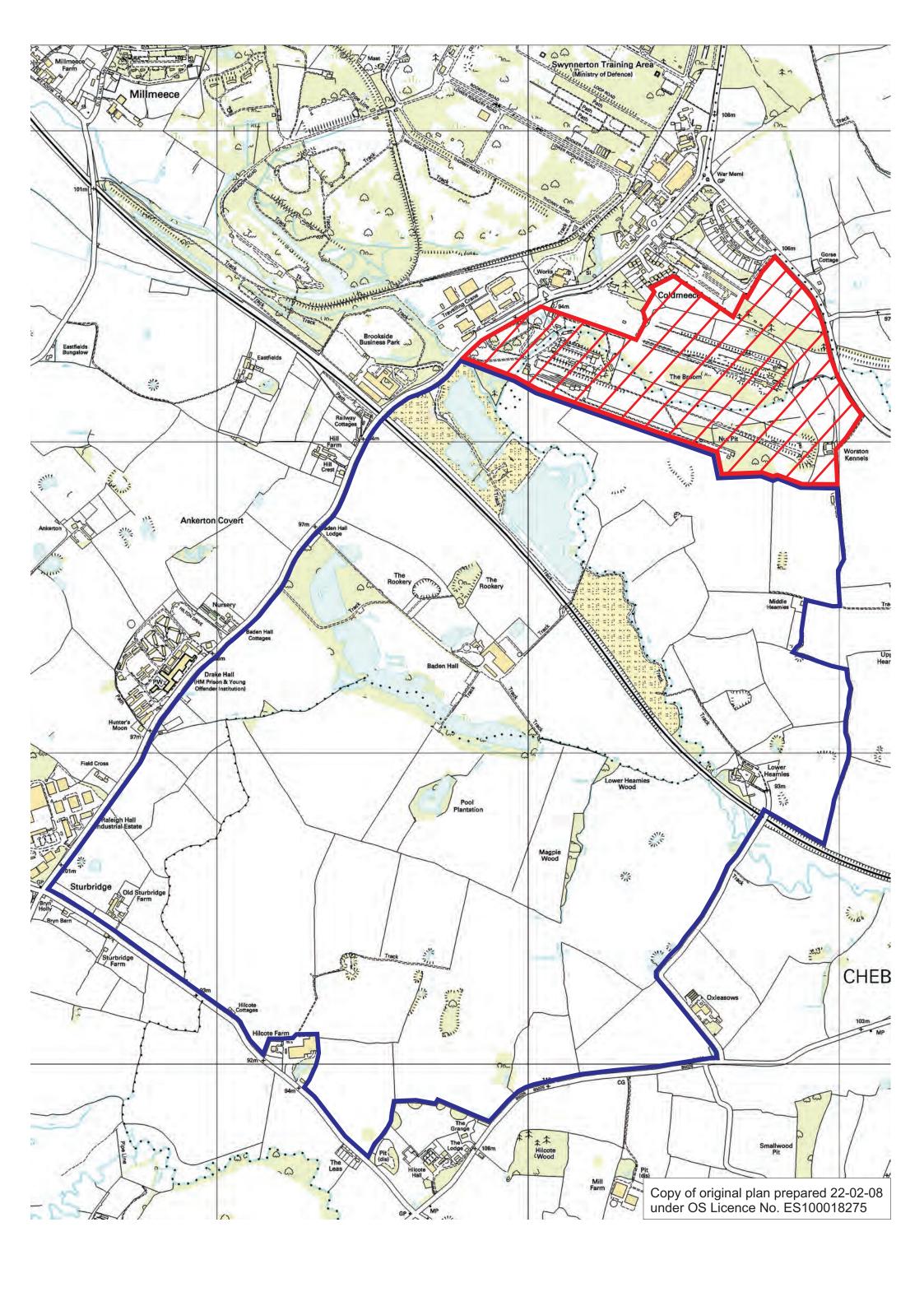
#### 7.2 Plans

- Site Plan
- SBC SHLAA Site 257 Land at Coldmeece

Stephen Stoney

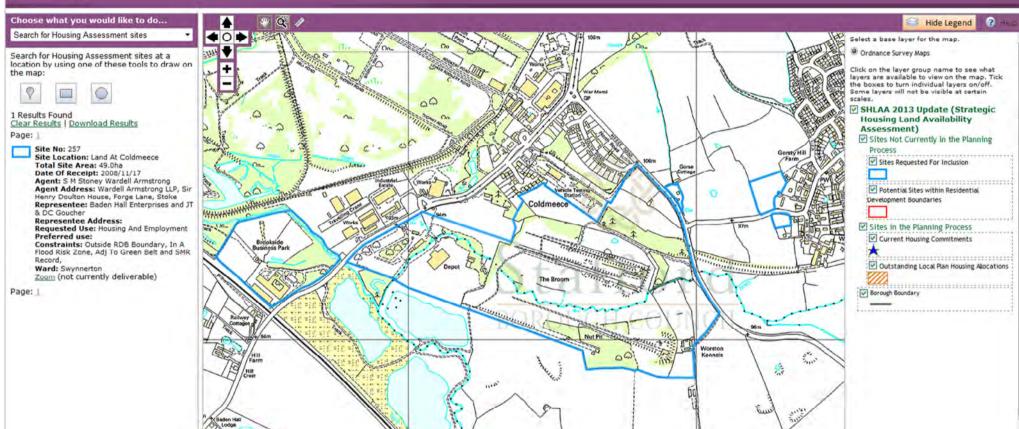
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Wardell Armstrong LLP October 2013





### Strategic Housing Land Availability Assessment (SHLAA) 2013



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