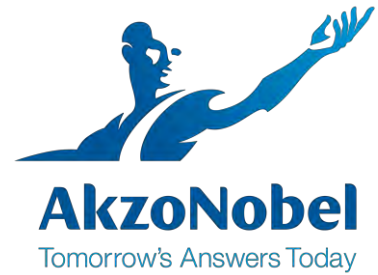




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# ***Examination*** of the Plan for Stafford Borough

Hearing Statement submitted on behalf of Akzo Nobel UK Ltd

Matter 4

11 October 2013

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# 1 Introduction

- 1.1.1 This Hearing Statement has been prepared by Jones Lang LaSalle on behalf of Akzo Nobel UK Limited ('ANUK'). It provides representations in relation to Matter 4 (Stafford Town Polices 1-4).
- 1.1.2 The Statement identifies where the Plan for Stafford Borough - Publication (Submission) Document ('the Plan') is considered unsound as currently drafted, which Soundness criteria it fails and why it fails. It should be read in conjunction with earlier representations submitted in respect of the draft Plan, as well as the Hearing Statements that have been submitted on behalf of ANUK in respect of other Matters subject to Examination (Matter 3).
- 1.1.3 ANUK is a leading global supplier of decorative paints, with a global portfolio of strong brands, based in the Netherlands. In the UK, ANUK has around 30 sites and employs approximately 4,900 people. The Company has extensive landholdings at Beaconside in Stafford, as part of its legacy portfolio.
- 1.1.4 ANUK is promoting its landholding on the north of Beaconside, Stafford ('the Site'), which includes one of the sites which has been identified as a Strategic Development Location for housing, to the north of Stafford. ANUK has continued to make representations at all stages of the Plan.
- 1.1.5 ANUK is generally supportive of the Plan and has raised few points of soundness. In summary, ANUK endorses the identification and inclusion of a Strategic Development Location for housing in north Stafford on part of its Site. However, ANUK disagrees with the Council that the Plan For Stafford Borough – Stafford Area Inset, The Development North of Stafford Town Diagram, the Stafford North Concept Diagram and the Strategic Development Location boundary for Housing around its Site provide the best way of achieving a sustainable mixed use development to meet the supply of new homes within Stafford Borough, Stafford Town and north Stafford.
- 1.1.6 ANUK's case is supported by evidence in the following appendices, which have been prepared by Brock Carmichael Architects, Jones Lang LaSalle, WSP Environmental Limited, Cameron Rose Associates to demonstrate the deliverability and appropriate design solutions for the Site, taking account of the Site constraints and infrastructure requirements and by Pegasus Group Limited to describe the public consultation, which has been carried out:
- 1 Supporting Document for Stafford Local Plan Hearing, Brock Carmichael Associates, Jones Lang LaSalle, WSP Environmental Limited, Cameron Rose Associates, October 2013
  - 2 Consultation Report, Akzo Nobel UK Ltd and Maximus Strategic Land, Beaconside, Stafford, Pegasus Group Limited, Reference: Bir.2908 Date: October 2013
  - 3 Sustainability Statement, Land North of Stafford, WSP, 10 October 2013

## 2 Matter 4 – Stafford Town (Policies Stafford 1 – 4)

***‘Key issue: Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?’***

### **4.1 POLICY STAFFORD 1 – STAFFORD TOWN:**

***Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including:***

#### ***a. Housing:***

***i. The overall amount, range, type, delivery and accessibility of new housing, including provision at the Strategic Development Locations and other locations, and the impact on the surrounding landscape;***

***ii. The amount, location, timing and delivery of the proposed additional provision to meet the housing requirements of the Ministry of Defence (MOD).***

...

#### ***d. Infrastructure:***

***i. Is the scale, nature and timing of proposed infrastructure necessary, justified, deliverable, viable and appropriate, including the Western, Northern and Eastern Access Improvement Schemes, water, sewerage and other utilities, public transport, education, cycling/walking, green infrastructure, waste facilities, leisure, recreation and open space?***

***e. Have other potential Strategic Development Locations been properly assessed, including Clarkes Farm.’***

2.1.1 ANUK supports the development strategy for Stafford Town, subject to the considerations below.

#### Housing

2.1.2 ANUK have identified in our representations the draft Plan, and the Hearing Statement submitted in relation to Matter 3 that the Plan does not provide sufficient housing to meet housing needs within Stafford Borough.

2.1.3 ANUK has identified that the Plan can be made sound by, inter alia, adding the historic accumulated housing shortfall prior to the start date of the Plan to the overall housing total, giving a minimum housing requirement of either 11,151 (10,000+1,151) or 10,914 (10,000+914) over the Plan period, depending upon the figure relied upon.<sup>1</sup>

2.1.4 The implication of amending the housing target is that housing growth distribution across Stafford Borough will also need to be amended, in line with the sustainable settlement hierarchy in Spatial Principle 3 and the housing growth distribution targets in Spatial Principle 4, which ANUK support. ANUK consider that this could be achieved by a Main Modification to the Housing Provision Table at Paragraph 6.54, Policy Stafford 1 and relevant Plan text.

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<sup>1</sup> The Plan For Stafford Borough Examination Library Ref D3, Stafford Borough Council 5- Year Housing Land Statement 2013, March 2013 suggests a shortfall of 914 dwellings. The Plan For Stafford Borough Examination Library Ref K1, Plan For Stafford Borough Publication Document Background Statement September 2013 identifies a shortfall of 1,151 dwellings.

- 2.1.5 ANUK consider that the total requirement of new homes for the County Town of Stafford (7,200 homes) should be increased to 8,029 or 7,859 (depending upon the shortfall figure relied upon) homes in Stafford Town (72% of the Borough-wide requirement), which would give a new provision requirement of either 6,262 or 6,092 dwellings within Stafford Town, if the current commitments (discounted) and completions listed in the updated housing provision table at Paragraph 6.54 of the Plan<sup>2</sup> are subtracted.
- 2.1.6 It should be noted that ANUK has already queried (within its representations) the assumption that 90% of current commitments will come forward and can be subtracted from the total plan requirement for Stafford Town and the Inspector should consider whether this is sufficiently flexible to adapt to changing circumstances as required by the National Planning Policy Framework, Paragraph 14.
- 2.1.7 ANUK supports the North of Stafford Strategic Development Location (subject to the Main Modifications proposed under Policy Stafford 2 below) and has provided evidence (informed by a technical baseline analysis, including Landscape Visual Appraisal) to support the delivery of the proposed housing development and associated infrastructure on its Site.
- 2.1.8 ANUK note that Policy Stafford 1 has been amended to clarify that provision for Ministry of Defence personnel will be in addition to new housing at Stafford<sup>3</sup>. ANUK supports this clarification. However, it is not clear why the housing requirement for Stafford Town has been omitted from the Policy Stafford 1 text and it is considered that this should be reintroduced to provide clarity for the public and private sector.
- 2.1.9 ANUK note that Paragraph 7.4 of the Plan has been amended with the following new introductory sentence under the Housing section, to read as follows:
- 'As set out previously in Development Strategy section the total housing requirement for Stafford town is 7,200 new homes with 5,433 as new provision and 350 new homes for Ministry of Defence personnel.'*<sup>4</sup>
- 2.1.10 ANUK consider that the total new housing provision requirements in Paragraph 7.4 should be amended in line with our comment above. Further, it is not clear how the 350 homes for Ministry of Defence figure has been arrived at, given that Policy Stafford 1 criterion v includes reference for up to 400 new Service Family Accommodation Units.

#### Infrastructure

- 2.1.11 ANUK agree that the evidence base supports a conclusion that the scale, nature and timing of proposed infrastructure set out in Policy Stafford 1 is necessary, justified, deliverable, viable and appropriate, insofar as it relates to the development of ANUK's Site as part of North of Stafford Strategic Development Location. The Supporting Document for Stafford Local Plan Hearing, Brock Carmichael Associates October 2013 (See Appendix 1) shows how ANUK's Site could be delivered as part of the Strategic Development Location in north Stafford, taking account of the proposed infrastructure requirements, including phase 1 of a Northern Access Improvement scheme, which includes improvements, either through the Site and/or along Beaconside.
- 2.1.12 ANUK has also engaged with Levvel in relation to the preparation of the Report on Viability and Deliverability of Northern and Western Strategic Development Locations<sup>5</sup>, and agree with its conclusions that the North Stafford Strategic Development Location is fundamentally viable.

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<sup>2</sup> The Plan For Stafford Borough Examination Library Ref A26 Plan For Stafford Borough Publication (Submission document) Schedule of Additional (Minor) Modifications, Paragraph 6.54 – Updated Housing Provision Table.

<sup>3</sup> Et seq, Modification M28

<sup>4</sup> Et seq, Modification M34

<sup>5</sup> The Plan For Stafford Borough Examination Library Ref D51, Report on Viability and Deliverability of Northern and Western Strategic Development locations, Stafford, Levvel Ltd, July 2013

### Alternatives

- 2.1.13 The framework against which options for growth have emerged in north Stafford is summarised in Supporting Document for Stafford Local Plan Hearing, Brock Carmichael Associates, October 2013 (See Appendix 1).
- 2.1.14 ANUK considers that potential Strategic Development Locations and growth options have been properly assessed by the Council during the Plan making process. The evidence base and consultation, which has been undertaken supports the case that the growth options which have been identified are the most appropriate, given the reasonable alternatives, including those introduced at Publication Stage.
- 2.1.15 ANUK supports the Council's position in relation to the Plan for Stafford Borough and its identification of growth to the north of Stafford, including its Site. The Council has already granted planning permission for residential development (409 dwellings)<sup>6</sup> and employment development<sup>7</sup> within the North of Stafford Strategic Development Locations, which supports the principle of growth in this location.
- 2.1.16 In relation to Clarkes Farm, the submissions by Lufton and Associates promote a Strategic Allocation North East of Beaconside for the development of around 1,000 dwellings. ANUK does not consider land at Clarkes Farm to be a reasonable alternative to North Stafford for the following reasons:
- The Clarkes Farm Site is located beyond the main Ministry of Defence site and is divorced from the urban area of Stafford away from existing residential communities and will effectively function as a new settlement;
  - The Site is not well-related sustainable transport options;
  - Insufficient detail has been provided to demonstrate that the site would be capable of being delivered based upon a detailed analysis of constraints and infrastructure requirements (including SANGS);
  - The proposals have not been subject to public consultation or favourable sustainability appraisal;
  - The site is located within a Zone 1 Flood Risk Area, according to the Environment Agencies website. However, it is not known whether any of the watercourses through the Clarkes Farm Site will cause it to flood.
  - Adverse impacts on landscape quality could be generated owing to the prominence of the Beacon Hill Wood, located on the eastern boundary of the Site.
  - There are acknowledged unresolved access constraints (including the need for third party land). Further the implementation of the new spine road across a large area of undeveloped MOD land, just to access the site, would be contrary to the strategy and desires outlined within Staffordshire's Local Transport Plan to provide value for money schemes without recourse to building wholly new infrastructure.
- 2.1.17 ANUK has prepared an independent Sustainability Appraisal to support the delivery housing led development on its Site as part of growth to the North of Stafford<sup>8</sup>. In carrying out this work ANUK has also considered other potential Strategic Location options. The Sustainability Appraisal work supports the Council's conclusions (including within its Sustainability Appraisal) insofar as it relates to the preferred locations for strategic growth.

#### **'POLICY STAFFORD 2 – NORTH OF STAFFORD**

***a. Is the Strategic Development Location at North of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:***

***i. The overall amount, mix, location, deliverability, viability and timing of new housing development (3,100 houses), including affordable housing;***

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<sup>6</sup> 10/13362/OUT

<sup>7</sup> 12/07083/OUT

<sup>8</sup> Appendix 3 – Sustainability Statement Land North of Stafford, WSP 07/10/2013

**ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (36ha);**

**iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Northern Access Improvement Scheme), drainage and flood management works, utility and telecommunication services, education and health facilities, and mitigation of the impact of development on Cannock Chase SAC (including SANGS);**

**iv. The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health and other facilities, integration with the rest of Stafford, and provision of on-site renewable/low carbon energy solutions;**

**v. Impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services;**

**b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?**

**c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and the associated infrastructure?’**

2.1.18 ANUK supports the North of Stafford Strategic Development Location, which will deliver at least 3,100 new homes and 36 hectares of employment land to meet Stafford Boroughs requirements. ANUK has made representations at all relevant stages of the Plan to promote and support the residential led development of its Site.

2.1.19 The North of Stafford Strategic Development Location is controlled (as ANUK understands) by the following landowners/developers:

- Employment (36ha) (west of A34):
  - Staffordshire County Council (Redhill Employment Park)
  - Cantrill Family – Land north of Redhill Employment Park
- Housing (3,100 dwellings) – Land north of Beaconside
  - ANUK
  - Taylor Wimpey - HP13 Adopted Stafford Borough Local Plan, 2001 housing allocation
  - Maximus Strategic Land

2.1.20 The Council has already granted planning permission for the employment development of Staffordshire County Council’s land and the residential development of Taylor Wimpey’s land for 409 dwellings. Maximus Strategic Land is promoting a development of 2,000 houses on the land it controls, which means that at least approximately 700 homes are proposed on ANUK’s land.

2.1.21 ANUK has been working with the Council, Maximus Strategic Land and stakeholders on the evidence base to support the delivery the Strategic Development Location in a way which is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based. This has included:

- Meetings with the Council, Maximus Strategic Land, Staffordshire County Council and other relevant stakeholders, over the period 2 March 2012 to 20 June 2013.

- Agreement of Statement of Common Ground.<sup>9</sup>
- Development of initial constraints analysis and masterplan for north Stafford Strategic Development Location.
- Public Consultation on constraints analysis and masterplan for north Stafford Strategic Development Location.
- Detailed baseline analysis of the ANUK Site.
- Development of Masterplan Option Proposals For ANUK Site.

2.1.22 The evidence base collated by both ANUK and the Council suggests that there are no insurmountable constraints to the development of the Strategic Development Location, subject to the considerations below.

2.1.23 ANUK disagrees with the Council in relation to the extent of its Site to be allocated, as shown on the Plan For Stafford Borough – Stafford Area Inset Map, Development North of Stafford Town Diagram, The Stafford Town Key Diagram and the Stafford North Concept Diagram. ANUK considers that its land proposed to be allocated is not capable of accommodating the level of housing proposed on the Site (approximately 700 dwellings) taking account of infrastructure requirements and the work which it has carried out to consider site constraints. This means that the Plan will not be effective.

2.1.24 The Supporting Document for Stafford Local Plan Hearing (Appendix 1)<sup>10</sup>, Consultation Report (Appendix 2)<sup>11</sup>, and Sustainability Statement (Appendix 3)<sup>12</sup>, which have been submitted with this Hearing Statement describe the work carried out by ANUK and its consultants, with specific reference to public consultation and baseline evidence, and assess the deliverability of ANUK's Site taking into account housing need, site constraints and the infrastructure, open space, Suitable Alternative Natural Green Space ('SANGS'), community facilities etc, which the Plan identifies as being required to support housing development in this location.

2.1.25 ANUK has assessed the capacity of the area of its land currently proposed to be allocated. Masterplan Proposal Option A in the Supporting Document for Stafford Local Plan Hearing shows that this area would only be capable of delivering circa 473 dwellings, taking account of the infrastructure requirements set out within Policy Stafford 2 (including SANGS and open space) and site constraints.

2.1.26 Masterplan Proposal Option B within the Supporting Document for Stafford Local Plan Hearing provides a better and more considered masterplan which shows that the development of circa 700 dwellings can be delivered on its wider Site, taking into account the infrastructure requirements set out within Policy Stafford 2 (including SANGS and open space) and site constraints. In addition to providing for the level of housing proposed for the Site, ANUK considers that Masterplan Proposal Option B also provides a better and more considered masterplan solution, which utilises existing topographic features and ownership boundaries with increased amenity, open space and SANGS provision, including a Green Corridor extending north from Stafford Common. Masterplan Proposal Option B will also make full use of the existing infrastructure provided by the planning permission at HP13 and round off the settlement.

2.1.27 ANUK considers that Masterplan Proposal Option B is capable of being delivered on a stand-alone basis, without prejudicing the overall strategy for north Stafford or the subsequent development of adjacent land. We therefore question the requirement within Policy Stafford 2 that *'any application for development on a part or the whole of this area must be preceded by, and consistent with, a Master Plan for the whole Strategic Development Location which has been submitted and agreed by the Council'*. This could introduce unnecessary delay and place onerous restrictions on the delivery of the ANUK's Site, given the work which has been carried out. ANUK will

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<sup>9</sup> The Plan For Stafford Borough Examination Library, Ref E97, Statement of Common Ground For Stafford Borough Strategic Development Locations Land North of Stafford Town

<sup>10</sup> Appendix 1 - Supporting Document for Stafford Local Plan Hearing, Brock Carmichael Associates October 2013

<sup>11</sup> Appendix 2 - Consultation Report, Akzo Nobel UK Ltd and Maximus Strategic Land, Beaconside, Stafford, Reference: Bir.2908 Date: October 2013

<sup>12</sup> Appendix 3 – Sustainability Statement Land North of Stafford, WSP 10/10/2013



proceed to a planning application for its Site immediately, if a Modification to the Strategic Development Location boundary, which reflects Masterplan Proposals Option B, is confirmed within the Plan. ANUK request that Policy Stafford 2 is amended to allow its Site to come forward, without the need for a subsequent overall Masterplan to be approved.

- 2.1.28 ANUK has engaged with Levvel in relation to the preparation of the Report on Viability and Deliverability of Northern and Western Strategic Development Locations<sup>13</sup>, and agree with its conclusions that the north Stafford Strategic Development Locations is fundamentally viable.
- 2.1.29 Both Masterplan Proposal Option A and Masterplan Proposal Option B within the Supporting Document for Stafford Local Plan Hearing have been subjected to a sustainability appraisal (See Appendix 3). The findings of the sustainability appraisal support the Council's case that the land north of Stafford is a sustainable location for new housing development. The sustainability appraisal indicates that there are no significant differences between the sustainability of the current proposed site boundary and the modified site boundary, insofar as it relates to ANUKs land. However, the revised boundary performs better against the housing related objectives through its provision of a higher number of dwellings to meet local need.
- 2.1.30 In conclusion, ANUK considers that the Plan For Stafford Borough - Stafford Area Inset Map, Development North of Stafford Town Diagram, The Stafford Town Key Diagram and the Stafford North Concept Diagram should be amended by a Main Modification to include the whole of ANUKs Site within the Strategic Development Location Boundary for housing, in accordance with the boundary proposed by Masterplan Proposal Option B.

#### **'POLICY STAFFORD 3 – WEST OF STAFFORD**

**a. Is the Strategic Development Location at West of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:**

**i. The overall amount, mix, location, deliverability, viability and timing of new housing development (2,200 houses), including affordable housing;**

**ii. The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health and other facilities, and provision of small-scale employment areas (5ha) and on-site renewable/low carbon energy solutions;**

**iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements, (including Western Access Improvement Scheme) drainage works, utility and telecommunication services, education facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), open space and green infrastructure;**

**iv. Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, including the setting of Stafford Castle and St Mary's Church, nature conservation, flooding, and existing services;**

**b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing and other development in terms of infrastructure requirements and impact of the proposed development?**

**c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and associated infrastructure?'**

- 2.1.31 ANUK supports the Strategic Development Location in West of Stafford as proposed in Policy Stafford 3 if this is deliverable. ANUK has nothing further to add to its previous representations.

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<sup>13</sup> The Plan For Stafford Borough Examination Library Ref D51, Report on Viability and Deliverability of Northern and Western Strategic Development locations, Stafford, Levvel Ltd, July 2013

**‘POLICY STAFFORD 4 – EAST OF STAFFORD**

**a. Is the Strategic Development Location at East of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:**

**i. The overall amount, mix, location, deliverability, viability and timing of new housing development (600 houses), including affordable housing;**

**ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (20ha);**

**iii. The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health, cemetery, other facilities and on-site renewable/low carbon energy solutions;**

**iv. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Eastern Access Improvement Scheme, Eastern Distributor Road and other road improvements), drainage works, utility services, education and health facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and green infrastructure;**

**v. Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, nature conservation and existing services;**

**b. Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?**

**c. Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and associated infrastructure; or should other additional/alternative sites be allocated to ensure the delivery of the proposed development?’**

2.1.32 ANUK supports the principle of the Strategic Development Location East of Stafford if this is deliverable. ANUK has nothing further to add to its previous representations.



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