



**The Plan for Stafford Borough –  
Publication**

**Examination Statement – Stone Town**

**October 2013**

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## **STONE TOWN (Policies STONE 1 – 2)**

### **1. Key issue:**

**Is the development strategy for Stone 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?**

1.1. The Borough Council considers that the development strategy for Stone Town is soundly based, informed by a robust, credible and proportionate evidence base; by extensive public consultation and engagement carried out from 2008 to 2012, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15); and by assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore the development strategy is considered to be in conformity with national policy through the National Planning Policy Framework (NPPF) (F1), by delivering the overall scale and location of new housing and employment development for Stone town, the strategy for the town centre and the proposed Strategic Development Locations (SDLs) which is sustainable and achieves the key requirements as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).

1.2. The development strategy for Stone Town is considered to be appropriate in supporting the delivery of the Spatial Vision and Key Objectives of the Plan for Stafford Borough – Publication (A1), hereafter “**the Plan (A1)**”, through the delivery of new development at Stone town over the Plan period to 2031. Further details regarding the process of establishing the development strategy for Stone Town through the Spatial Principles is set out in Background Statement (K1) Topic Paper A, whilst the Sustainable Settlement Hierarchy and the distribution of development to Stone Town is set out in Topic Paper D. The evidence base and infrastructure requirements for Stone Town and the proposed SDLs together with the national planning policy context, is set out in Topic Paper E of the Background Statement. The overall scale and location of new housing and employment development at Stone Town is considered to be sustainable and appropriate to achieve the Development Strategy requirements set out through the Spatial Principles, as detailed in Examination Statement 3 and Background Statement Topic Papers A to D. Furthermore based on extensive local evidence the development strategy for Stone Town is soundly based in terms of NPPF (F1) para. 17 by delivering new development in sustainable locations at Stone through a clear vision and strategy for the Borough.

1.3. Justification for the development strategy for Stone Town has been informed from the start of preparing the plan in 2008 and the process of public consultation and engagement with the Plan for Stafford Borough – Borough-wide Development Strategy (G9) through Delivering the Plan for Stafford Borough – Issues & Options (G6), the Plan for Stafford Borough – Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1). Furthermore following representations to the Plan (A1), a further stage of public engagement took place in April and May 2013 to consider a new alternative location at Stone Town through the

Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13) to ensure potential alternative sites to deliver the future development strategy for Stone town could be properly assessed and considered. Details of public consultation and engagement responses are set out in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15) together with the Sustainability Appraisal Addendum Representations Received (A21) and the Planning Strategy Statement Representations Received (A23).

- 1.4. The development strategy for Stone Town is considered to be sustainable, deliverable and appropriate as demonstrated through an extensive evidence base developed through the plan-making process from 2008 to 2013. Further information regarding key aspects of the evidence base to support the development strategy for Stone Town is set out in response to the main policy elements below for Policy Stone 1 – Stone Town. Throughout the plan-making stages the development strategy for Stone Town has been tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 1 (H10), the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 1.5. The Plan (A1) identifies Settlement Boundaries for Stone through the Policies Map (A2) and its Inset (A4). These Settlement Boundaries were established through the Stafford Borough Local Plan 2001 (F14) and adopted in 1998. The Borough Council considers that the Settlement Boundary for Stone should be retained at this stage, but reviewed through the preparation of the Sites and Allocations Development Plan Document, to better reflect the current and appropriate future development area. This approach is preferred to withdrawal of the Settlement Boundary, and reliance on consideration of proposals against Spatial Principle SP7 for the period until the Boundary is replaced in the Sites and Allocations DPD process – which is the intention for the Key Service Villages.
- 1.6. The different approach reflects, in the case of Stone, the importance of securing delivery of the SDLs together with strategic infrastructure provision, as detailed in the Plan (A1). It is essential that priority is given to the delivery of the SDLs, which is critical to the implementation of the **Plan’s Development Strategy. Piecemeal development at Stone would inevitably have less capacity to deliver strategic infrastructure than the SDLs.**

## **2. POLICY STONE 1 – STONE TOWN:**

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

### **a. Housing:**

- i. The overall amount, range, type, deliverability and accessibility of proposed new housing development, including at the proposed Strategic Development Location;**

- 2.1. The overall amount, range, type, delivery and accessibility of new housing development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for Stone Town through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2), having been tested through the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4). The overall amount of new housing development including the provision at the SDL has been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) and the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) in terms of delivery and effectiveness to meet the future requirements of Stone town and achieve infrastructure provision.
- 2.2. In terms of the range and type of new housing the Stafford Borough Strategic Housing Market Assessment (D5) identifies the current dwelling stock and recent housing developments by dwelling type and range, in terms of number of bedrooms, within Stone Town. The evidence identifies that between 2010-2012 a greater proportion of 1 and 2 bedroomed properties have been built in Stone Town compared to elsewhere in the Borough. The SHMA recommends a greater balance in favour of larger family homes and appropriately priced homes for first-time buyers, therefore an increase in 2, 3 and 4 bedroomed properties is likely to be required.
- 2.3. With regards to deliverability and accessibility the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) provides the phasing approach for the proposed SDL for Stone Town, aligned to the provision of strategic infrastructure. The Whole Plan Viability Report (D52) states that the development strategy for Stone town, through the proposed SDL, is viable in the context of the cumulative effects of policy requirements in the Plan (A1). Furthermore the Stafford Borough Council Infrastructure Study Inputs (D56) identifies that the proposed SDL at Stone is within ST15 postcode, which is one of the strongest housing markets in the Borough. This means housing development should be able to deliver viably strategic infrastructure requirements alongside affordable housing at 40%, through a mix of 2, 3 and 4 bedroomed houses. Turning to the issue of accessibility potential, new housing sites within or abutting the existing urban area benefit from proximity to existing infrastructure. The Stafford Borough Integrated Transport Strategy 2013 – 2031 (J15) and the Stafford Borough Council Local Development Framework Accessibility Appraisal (E33) demonstrate the accessibility of potential new housing sites to the existing transport network. Also, these documents set out the infrastructure requirements to ensure future integration of the proposed SDL at Stone Town to deliver the development strategy.
- 2.4. Based on the analysis above the Borough Council considers that the overall amount, range, type, delivery and accessibility of new housing development, including provision at the SDL for Stone Town, is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.
- 2.5. Representations were received from site promoters seeking a greater level of housing provision at Stone, proposing additional sites to be allocated, and arguing that there would be no significant constraints to delivery. The Council rejects these amendments. The Plan identifies a

sustainable settlement hierarchy, of which Stafford is at the top. Placing greater levels of housing at Stone would not support the identified hierarchy (See Examination Statement 3 and Background Paper (K1) Topic Paper D).

**b. Employment:**

**i. The overall amount, type, location and deliverability of new employment development;**

- 2.6. The overall amount, type, location and delivery of new employment development is considered to be appropriate, effective, deliverable, sustainable, fully justified and soundly based. The amount and location of new employment development has been considered through the process of public engagement and consultation since 2009, as being appropriate for the development strategy of Stone Town through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). The amount and location of new employment development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 2.7. In terms of the type of new employment development the Employment Land Review (D14) sets out the existing types of business sectors across Stafford Borough within the socio-economic profile of the area as well as detailing the future likely demand to ensure the Development Strategy for Stafford Borough is delivered. Background Statement Topic Paper A introduces the two different approaches within the Employment Land Review (D14) and the Council's growth vision for the future. Stone Town centre and the SDL south of Stone Business Park provide a range of future sites to support a variety of public and private sector businesses over the Plan period.
- 2.8. The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Whole Plan Viability Report (D52) confirm that new employment development, as part of Policy Stone 1, is deliverable and viable alongside the implementation of strategic infrastructure requirements. As set out in Background Statement Topic Paper E, a Statement of Common Ground (E98) was signed in November 2012 by developers for the SDL – Employment, committing to delivering the new allocation. Therefore the Borough Council considers that the overall amount, type, location and delivery of new employment development for Policy Stone 1 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**ii. The approach to providing opportunities for new enterprises and businesses by allocating new employment sites, including at the proposed SDL, and the approach to safeguarding existing employment land.**

- 2.9. The Borough Council considers that the approach to providing opportunities for new enterprises and businesses by allocating new employment sites at Stone, including at the proposed SDL, is soundly based and fully justified. The new employment land allocation South of Stone has been considered through the process of public engagement and consultation since 2009 as being an appropriate SDL within Policy

Stone 1 through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). Furthermore the approach to providing opportunities for new enterprises and businesses has also been assessed through the revised Sustainability Appraisal Report (A10). Delivering new opportunities for enterprises and businesses is a key element of building a strong, competitive economy as required by the NPPF (F1) para 21, and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).

- 2.10. Policy Stone 1 makes reference to safeguarding existing employment land, which has been considered through the process of public engagement and consultation since 2011, as being appropriate for the development strategy of Stone Town through the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore this approach has also been assessed through the revised Sustainability Appraisal process (A10) in the context of Policy Stone 1.
- 2.11. In terms of the evidence base the Employment Land Review (D14) identifies a number of existing employment sites across Stone Town which support the local economy. Alongside other employment sites across the rest of the Borough, in line with building a strong, competitive economy as required by the NPPF (F1) para 21, and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), the Borough Council considers that it is important to safeguard existing employment land, particularly at Stone Town where the housing market is so strong, in order to provide for a vibrant sustainable community in the future.
- 2.12. As set out in Background Statement Topic Papers A to C, a significant level of new housing will be delivered over the Plan period to meet objectively assessed needs, including an element of in-migration. Whilst the NPPF (F1), para 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, this is not the case for the existing employment areas at Stone town, as demonstrated through the Employment Land Review (D14). The Review shows that the existing sites score highly for sustainability, physical and markets factors. The Borough Council considers that existing employment areas will support the sustainable future of the town and therefore considers that the approach to safeguarding existing employment land at Stone town within Policy Stone 1 is appropriate, effective, sustainable, deliverable and soundly based.
- 2.13. There was general support in the representations received for new employment at Stone as well as for waste management on employment land, the Council considers that the Plan (A1) is sound but accepts that Policy Stone 1 should be slightly amended to avoid any (unintentional) restriction on the use of employment land for compatible waste developments. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies a proposed change, listed as M48 and clarified by correspondence with Staffordshire County Council in (J4).

**c. Stone Town Centre:**

**i. Strengthening the role of the town centre as a market town, including enhancing the primary shopping areas and providing additional convenience (1,400 sq m) and comparison (2,200 sq m) retail floorspace, and whether this is supported by the Retail Capacity Studies;**

- 2.14. Policy Stone 1 seeks to strengthen the role, viability and vitality of Stone town centre including enhancing the primary shopping areas identified within the Plan for Stafford Borough – Stone Area Inset (A4). It was considered through the process of public engagement and consultation since 2009, as an integral part of the development strategy of Stone Town developed through consultation on Delivering the Plan for Stafford Borough: Issues and Options (G6), and the Plan for Stafford Borough – Draft Publication (G2), prior to inclusion in the Plan (A1). This approach has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10) in the context of Policy Stone 1. The intention is that the extent of the primary and secondary frontages will be identified within the forthcoming Sites and Allocations Development Plan Document, as identified in the Stafford Borough Local Development Scheme (C7). This is underway and due for adoption in November 2015.
- 2.15. The national planning policy context for town centres is set out in the NPPF (F1) para 23, and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), which indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future. The Borough Council considers that Policy Stone 1 will support the sustainable future of the town and therefore considers that the approach to strengthening the role, viability and vitality of the town centre, including the extent of the Primary Shopping Area, is appropriate, effective, sustainable, deliverable and soundly based.
- 2.16. In terms of the evidence base, the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assesses the current role and capacity of Stone town centre based on existing shopping patterns. It also sets out the future needs for additional comparison and convenience retail floorspace to be met by Stone town centre, recommendations for office and leisure provision alongside recommendations for the town centre boundaries (up to 2026). In addition the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) published in May 2013, provides the most up-to-date position. This report identifies the need for between 400 and 600 sq m additional comparison, and 1,700 and 3,700 sq m convenience retail floorspace to 2031. The floorspace ranges are based on the existing market share being retained over the plan period, these do not allow for any enhancement (or reduction) of market share so are the minimum, or the status quo only. This report was not available prior to publication of the Plan. The figures in the updated report have altered due to a change in the timescales considered; the delivery of the new Aldi store in an out-



of-centre location (i.e. A34) and to account for the fact that the earlier report did not cover the whole plan period. There have also been changes (more suppressed) in expenditure forecasts since 2009 and since (D16) was completed.

2.17. Policy Stone 1 currently makes provision for additional comparison (2,200 sq m) and convenience (1,400 sq m) retail floorspace. These figures are based on the findings of the earlier Town Centre Capacity Report (D16).

2.18. Whilst the Council consider that the Plan (A1) is sound in its current form, the Council is now proposing a modification to update the figures in the Plan to reflect the updated evidence (D15), therefore a modification is listed in the Schedule of Further Additional Modifications (A27) as FAM20.

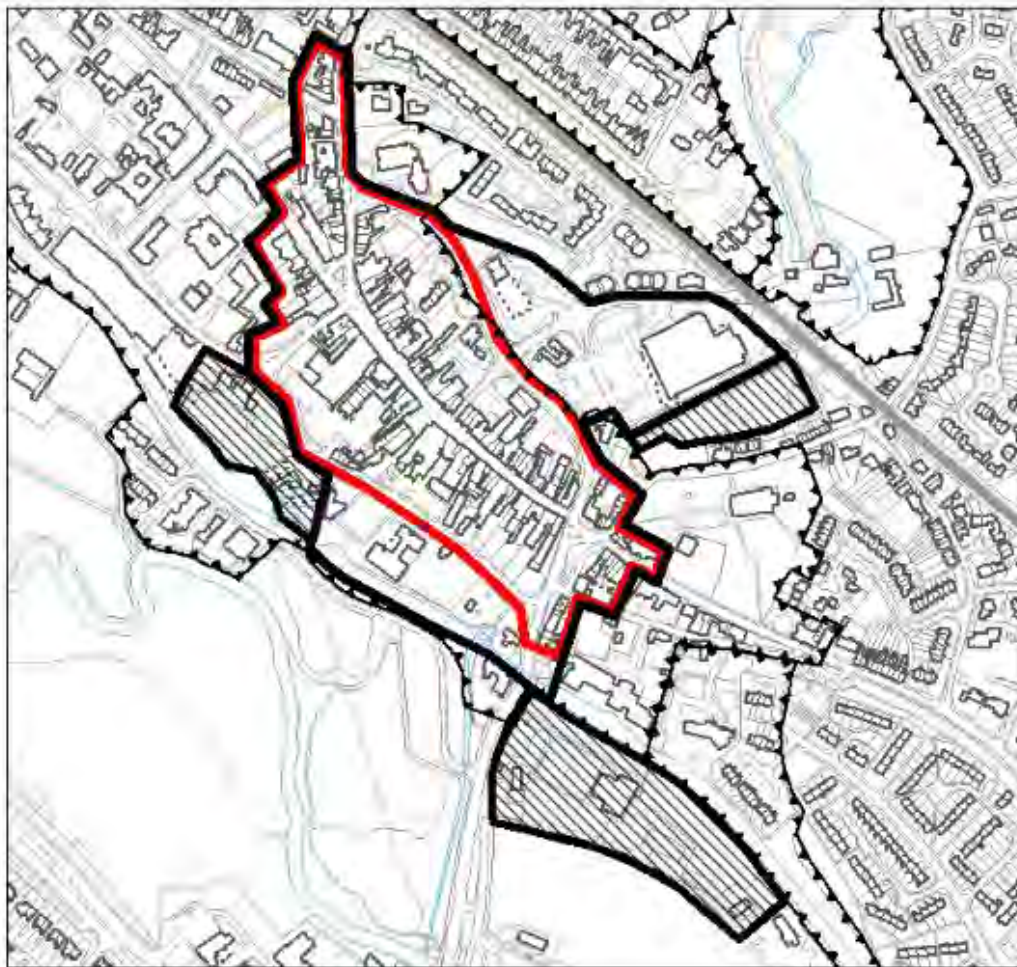
2.19. The updated policy would read as follows (Policy Stone 1: Stone Town Centre):

***b. Provide for 1,700 square metres (net) of new convenience (food) retailing and 400 square metres (net) of new comparison (non-food) retailing at Stone town centre.***

2.20. The capacity over the plan period is mainly driven by the over trading found in existing stores. The lower figure set out in D15 is in line with a Top 5 retailer being promoted in the town. Whilst the Upper range figures set out in D15 is in line with a discount budget (sales density driven) convenience retailing locating in the town. The Council considers that the lower figure is more in line with attempts to secure a Top 5 retailer in Stone town centre.

2.21. The Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) considers that future capacity for comparison (non-food) goods will be absorbed in Stone town centre, based on the existing market share being retained. However, for convenience (food) retailing there are limited opportunities within the existing town centre to accommodate the level of floorspace now estimated likely to be required. Accordingly, the Council is proposing a modification to the Stone Area Inset map (A4) to alter the boundary of the town centre, as shown on the following plan, listed as FAM22 in the Schedule of Further Additional Modifications (A27). The modification will add approximately 3.36 hectares to the town centre in three different locations (Westbridge Park, **Morrison’s Car Park and** Crown wharf). This modification will ensure that there is adequate capacity for convenience floorspace within the town centre boundary and ensure opportunity and flexibility. The retail evidence identifies and supports the delivery of convenience retailing at Westbridge Park to meet the future requirements of Stone (D15, D16). The Council considers that other land submitted throughout the production of the Plan for consideration as retail land at stone is sequentially less desirable than the areas identified in this modification.

## Stone Town Centre Inset



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Not to scale

2.22. Nevertheless, no allocations are being made for convenience retailing in the Plan (A1) as this will be covered in the Site & Allocations Development Plan Document.

## **ii. Increasing the provision of new office and commercial development;**

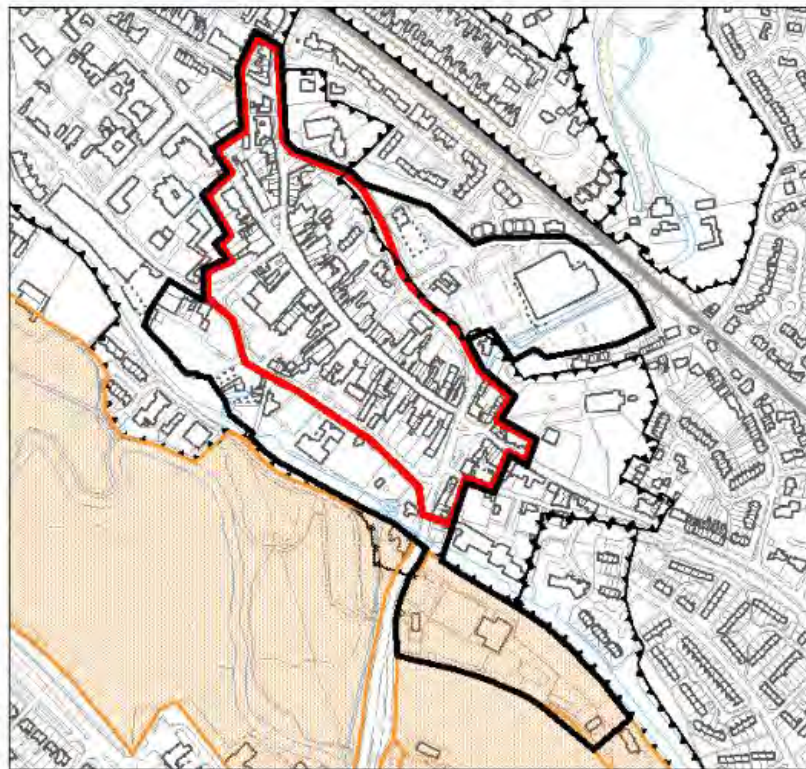
- 2.23. Policy Stone 1 makes provision for new office and commercial development to support strengthening the role, viability and vitality of Stone town centre, which has been considered through the process of public engagement and consultation since 2009, in formulating the development strategy for Stone Town through Delivering the Plan for Stafford Borough: Issues and Options (G6), the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore this approach has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10) in the context of Policy Stone 1.
- 2.24. The national planning policy context for town centres is set out in the NPPF (F1) para 23 and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), which indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future. The Borough Council considers that Policy Stone 1 supports the sustainable future of the town and therefore considers that the approach of providing the new office and commercial development strengthens the role, viability and vitality of the town centre, which is appropriate, effective, sustainable, deliverable and soundly based.
- 2.25. In terms of the evidence base, the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assesses the current role and capacity of Stone town centre, as well as setting out the future needs for new office and commercial development to be met by Stone town centre. The Report (D16) sets out that there is nominal vacant office space available at Stone town centre although there is greater capacity at the out of town employment sites. It is considered appropriate to support Stone town centre by encouraging the provision of new office and commercial development in line with the sustainable settlement hierarchy. The type and location will be determined by the market and guided by Spatial Principle 3.
- 2.26. Staffordshire County Council, Stoke on Trent City Council and Newcastle under Lyme Borough Council called for Policy Stone 1 to provide clarification that that Council will follow a sequential approach in terms of office development on employment sites outside of town centres. Sustainability Matters called for Policy Stone 1 to provide the option for upper floors to be brought back into use particularly in terms of **residential for “Living over the Shop”**. The Borough Council considers that the Plan (A1) is sound but would benefit from the above amendments. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the changes, listed as M48 and M49.

**iii. Justification and details of the proposed mixed-use development at Westbridge Park, and its likely impact on recreational/green-space assets, canal and flooding.**

- 2.27. Policy Stone 1 includes proposals for mixed-use development at Westbridge Park, which has been considered through the process of public engagement and consultation since 2011, in formulating the development strategy of Stone Town through the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore Policy Stone 1 has been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 2.28. In terms of the evidence base the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assess the current role and capacity of Stone town centre based on existing shopping patterns as well as setting out the future needs to be met by Stone town centre for retail provision alongside recommendations for the town centre boundaries. In addition the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) published in May 2013, provides the most up-to-date position. The retail capacity reports identified Westbridge Park as the most appropriate location for new retail development to help meet the future requirements of Stone, compared to other reasonable alternative sites. However, increased convenience floorspace could be provided through an expansion of the existing **Morrison’s food store and/or through a site at Crown Wharf.**
- 2.29. As detailed above the Council is proposing a modification of the town centre boundary at Westbridge Park. This will involve an alteration to the green infrastructure boundary identified on the Stone Area Inset map (A4). The land which will be removed from the green infrastructure boundary is currently a leisure centre, tennis courts and car park all of which is previously developed land.

## Stone Town Centre Inset

	Town Centre Boundary
	Primary Shopping Area Boundary
	Conservation Area Boundary
	Green Infrastructure



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Not to scale

2.30. With regards to likely impacts on recreation and green space, the proposed area for mixed use development is predominantly not green space, consisting of the existing leisure centre, tennis courts and car park. The green space used for events and football has been retained and is not included within the boundary, resulting in limited impacts on recreation and green space.

2.31. The Council does not consider that development at Westbridge Park would have negative impact on the canal. The canal is part of a conservation area and has protection as part of this designation. Any proposed development would have to be sensitive of the surrounding environment in line with clauses "Environment ii and iii" of Policy Stone 1. The canal is a living environment and its status does not preclude development from taking place in its vicinity. Furthermore, two recent

residential developments have been permitted closer to the canal than the proposed site.

- 2.32. The section of Westbridge Park that is proposed for development is partly within flood zone 2 (between 1% and 0.1% chance of flooding or within the 1 in 1000 year return period for flood outline) and flood zone 3 (>1% or within the 1 in 100 year return period flood outline). Flood zone status does not prevent development from happening in a location, but it does require that certain avoidance and mitigation measures must be employed prior to and as part of any development. The Council has engaged with the Environment Agency who have stated that subject to appropriate flood mitigation measures they would not object in principle to development in this location.
- 2.33. Proposals for a new food store and leisure facilities at Westbridge Park have been subject to public engagement and consultation in February 2013 with details set out in the public exhibition leaflets (appendices of J19). These indicative proposals included proposed flood mitigation and were produced in liaison with the Environment Agency.
- 2.34. For Policy Stone 1 – Stone Town a significant number of the representations were concerned about the future of Westbridge Park and part of the area being used for retail and leisure, raising issues including the loss of some open space and canal side and flooding implications. Whilst some representations objected to the proposals due to lack of retail evidence and loss of open space other representations supported the scheme to deliver new leisure capacity at Stone.
- 2.35. The Borough Council considers that the Plan (A1) is sound but accepts that the policy wording could be amended to make clear the type of development that would be acceptable and to clarify that housing development is not appropriate on this site. Therefore the Schedule of Further Additional Modifications (A27) identifies a proposed change, listed as FAM21.
- 2.36. As set out above, these identified issues do not undermine the strategy for mixed use development at Westbridge Park. The Borough Council considers that the proposal will support the sustainable future of the town and therefore considers this aspect of Policy Stone 1 to be appropriate, effective, sustainable, deliverable and soundly based. The national planning policy context for town centres as set out in the NPPF (F1) para 23 and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future.
- 2.37. **A representation from Morrison’s supermarket requested** amendments to the Primary Shopping Area and town centre boundary. The Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) discusses this representation in para 7.14.:

*"a view must be taken as to whether or not the areas within which the stores operate are predominantly occupied by main town centre uses or they are adjacent the primary shopping area. WYG do not believe that the location of either store [Morrison's] adjoins the primary or secondary frontages (i.e. is contiguous with other retail frontages) or is adjacent to the established primary shopping area and therefore should be considered edge of centre."*

2.38. In line with the findings of this report the Council does not propose to add Morrison's to the Primary Shopping Area Boundary.

**d. Infrastructure:**

**i. Is the scale, nature and timing of proposed transport infrastructure necessary, justified, deliverable, viable and appropriate, including improving public transport accessibility, reducing road congestion, extending cycling/walking paths, improving access to the railway station and ensuring adequate provision for taxis;**

2.39. The scale, nature and timing of proposed transport infrastructure requirements for Policy Stone 1 is detailed in the Stafford Borough Integrated Transport Strategy 2013 – 2031 (ITS) (J15). The ITS sets out the future transport infrastructure requirements to be delivered through the development strategy for Stone Town, including the following:

- Deliver the access requirements at Meaford development site
- Improved accessibility to the town centre particularly by walking, cycling and public transport
- Ongoing consultations with the rail industry to maintain services at Stone rail station
- Delivery of NCN5 through Stone completing the link to North Staffordshire
- Review Stone town centre traffic management arrangements
- Potential junction improvements on the A34/A51 to increase safety and capacity
- Potential safety improvements along the A34 at The Fillybrooks
- Potential new junction on A34 to serve the extension to Stone Business Park

2.40. The Borough Council considers that the proposed transport infrastructure is necessary, justified, deliverable, viable and appropriate for meeting the future development needs for Stone. With regards to deliverability and accessibility the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) provides the phasing approach for the proposed SDLs for Stone Town aligned to other strategic infrastructure. Furthermore the Whole Plan Viability Report (D52) demonstrates that the development strategy for Stone town, including the proposed SDLs, is viable in the context of the cumulative effects of policy requirements in the Plan (A1). This evidence base was prepared and completed following significant engagement with key statutory agencies and other stakeholders to ensure that the proposed infrastructure requirements were appropriate and effective for the proposed SDLs.

**ii. Is the scale, nature and timing of other proposed infrastructure necessary, justified, deliverable, viable and appropriate, including new allotments, green infrastructure, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and leisure, recreation and open space facilities?**

- 2.41. The scale, nature and timing of other proposed infrastructure requirements for Policy Stone 1 is considered to be necessary, justified, deliverable, viable and appropriate for meeting the future development needs for Stone. Evidence relating to water, sewerage and other utilities as well as waste management is detailed in the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57). Proposed infrastructure for education provision is set out in the Plan for Stafford Borough: Spatial Plan for Education report (D53). With regards to new allotments and green infrastructure, evidence is included within the Green Infrastructure Strategy for Stafford – The Strategic Plan (D34), including the Stone Local Area Framework which sets out the scale, nature and appropriateness of green infrastructure necessary to be delivered. This evidence is supported by the Green Infrastructure, Green Space and Sport and Recreation Provision Strategy (D28) and the Open Space, Sports and Recreation Assessment Update (D29) which specifies infrastructure requirements for Stone Town and the proposed SDL.
- 2.42. Representations from Natural England called for Policy Stone 1 to refer to the Cannock Chase Special Area of Conservation. The Borough Council considers that the Plan (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M50. Taking into account the evidence base the Borough Council considers that scale, nature, and timing of proposed infrastructure requirements for Policy Stone 1 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**e. Have other potential SDLs been properly assessed?**

- 2.43. Justification for the development strategy at Stone Town and the appropriateness of the proposed SDLs has been informed through the preparation of the plan since 2009 and through the successive process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues & Options (G6), the Plan for Stafford Borough – Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1). Furthermore following representations to the Plan (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative locations at Stone through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13). This supplementary consultation stage confirmed that the choices set out in the Plan (A1) were the correct choices, no better development opportunities were found as a result of the revised Sustainability Appraisal.
- 2.44. Full Details of public consultation and engagement responses are set out in the Plan for Stafford Borough - Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15) alongside the Sustainability Appraisal Addendum



Representations Received (A21) and the Planning Strategy Statement Representations Received (A23).

- 2.45. The Borough Council considers that all other potential SDLs at Stone Town have been properly assessed through extensive public engagement and consultation as part of the plan-making process. In addition all reasonable alternatives and proposals have been thoroughly tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7), the Sustainability Appraisal Report (H4), recorded in the Revised Sustainability Appraisal Report (A10) and subsequently by the Revised Sustainability Appraisal Report – Addendum (A12). Therefore the development strategy for Stone Town is considered to be appropriate, effective, deliverable, sustainable, fully justified and soundly based as demonstrated through an extensive evidence base developed through the plan-making process from 2009 to 2013.

### **3. POLICY STONE 2 – WEST & SOUTH OF STONE**

#### **a. Is the SDL at West & South of Stone appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based, including:**

- 3.1. The Borough Council considers that Policy Stone 2 – West & South of Stone is soundly based, informed by a robust, credible and proportionate evidence base, extensive public consultation and engagement carried out from 2009 to 2012, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15), and assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore Policy Stone 2 is considered to be in conformity with national policy through the NPPF (F1), by delivering new development for Stone town which is sustainable and achieves the key requirements as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 3.2. Policy Stone 2 is considered to be appropriate as it supports the delivery of the Spatial Vision and Key Objectives of the Plan (A1) through the delivery of new development at Stone town over the Plan period to 2031. Further details regarding the site selection process, the evidence base and infrastructure requirements for new development west and south of Stone, together with the national planning policy context, are set out in Background Statement Topic Paper E. The scale of new development through Policy Stone 2 is considered to be sustainable and appropriate to achieve the Development Strategy requirements set out through the Spatial Principles, as detailed in Examination Statement 3 and Background Statement Topic Papers A to D. Policy Stone 2 is soundly based in terms of NPPF (F1) para 17, by delivering new development in sustainable locations at Stone in support of a clear vision and strategy for the Borough to encourage growth.
- 3.3. Justification for Policy Stone 2 and the appropriateness of new development at this location has been informed through the preparation of the plan since 2009 and the process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues &

Options (G6), the Plan for Stafford Borough – Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1). Furthermore following representations to the Plan (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative location at Stone through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13). Details of public consultation and engagement responses are set out in the Plan for Stafford Borough - Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15).

- 3.4. Policy Stone 2 is considered to be sustainable, deliverable and viable as demonstrated through an extensive evidence base developed through the plan-making process from 2009 to 2012, as detailed in Background Statement Topic Paper E. Further information regarding key aspects of the evidence base to support Policy Stone 2 is set out in response to the main policy elements below. Throughout the plan-making stages the SDL south and west of Stone has been tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 3.5. In light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Policy Stone 2 is appropriate, effective and soundly based in terms of delivering sustainable and viable new development for Stone over the Plan period. Further information as a response to the representations received is set out below through the detailed matters for Policy Stone 2, in the context of Background Statement Topic Paper E.
- 3.6. To provide the most up-to-date context for Policy Stone 2 it should be noted that a planning application was submitted on 25 July 2013 for up to 500 new houses at land west of Stone, the SDL – Housing element of Policy Stone 2. Currently no planning application has been submitted for land south of Stone, the SDL – Employment element of Policy Stone 2.

**i. The overall amount, mix, location, deliverability, viability and timing of new housing development (500 houses), including affordable housing;**

- 3.7. The amount and location of new housing development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for west of Stone through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new housing development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 3.8. The evidence base establishes that the scale of housing development necessary, taking the form of a mix of 2, 3 and 4 bedroomed houses (based on the SHMA), (D5), can be achieved. This is further emphasised by the outline planning application for up to 500 new homes on the SDL – Housing for Policy Stone 2, which meets the mix requirements set out in the Plan (A1).

- 3.9. In terms of the timing, Para 3.32 **below provides detail on the Council's** current position with regards to the timing of the delivery of development at Stone, including the SDLs.
- 3.10. The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) provides the phasing approach for Policy Stone 2 beyond 2021, in the context of infrastructure requirements. The Stafford Borough Infrastructure Study Inputs (D56) published in 2012 together with the Economic Viability of Housing Land in Stafford Borough (D10), its Results (D11) and Appendices (D12) sets the context for Policy Stone 2, showing that it is deliverable and viable for housing development, and demonstrating the strength of the housing market at Stone to deliver strategic infrastructure requirements alongside affordable housing. This is further supported by the submission of the outline planning application.
- 3.11. The Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new housing development, including affordable housing, for Policy Stone 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**ii. The overall amount, nature, location, deliverability, viability and timing of new employment development (18ha);**

- 3.12. The amount and location of new employment development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for the SDL of Policy Stone 2 through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new employment development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 3.13. Para 3.32 below provides detail regarding the timing of development at Stone. In terms of the specific timing of new employment development the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and its Appendices provides the general phasing approach for Policy Stone 2 in the context of infrastructure requirements. Furthermore the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) confirms that new employment development as part of Policy Stone 2 is deliverable and viable alongside the implementation of strategic infrastructure requirements. As set out in Background Statement Topic Paper E, this has been demonstrated by the developers for land south of Stone signing the Statement of Common Ground for Stafford Borough SDLs Land South and West of Stone (E98) in November 2012.
- 3.14. Therefore the Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new employment development for Policy Stone 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**iii. The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including local highway and utilities improvements, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and education facilities;**

- 3.15. The scale, nature, delivery, funding and timing of proposed infrastructure requirements for Policy Stone 2 is detailed in the Appendices of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) as well as Appendix D of the Plan (A1). Furthermore the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Whole Plan Viability Report (D52) confirm that the new development south and west of Stone is viable and able to deliver the proposed infrastructure requirements. This evidence base was prepared and completed following significant engagement with key statutory agencies and other stakeholders to ensure that the proposed infrastructure requirements were appropriate and effective for the SDL south and west of Stone.
- 3.16. Evidence concerning the impact of development on the Cannock Chase Special Area of Conservation (SAC) is detailed in Background Statement Topic Paper F, and Matters Paper 9. The mitigation measures for Policy Stone 2 are included in Policy N6 of the Plan (A1), assessed through the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Footprint Ecology Cannock Chase Visitor Impacts Mitigation Report (D32).
- 3.17. In terms of the provision for utilities improvements, education, health and other facilities this has been established in the context of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) with detailed engagement with education, health and other key infrastructure providers. Furthermore the Plan for Stafford Borough: Spatial Plan for Education (D53) specifies the education requirements for the SDL south and west of Stone as part of the proposed development.
- 3.18. With regards to local highway capacity and public transport improvements implications for Policy Stone 2, the Stafford Borough Integrated Transport Strategy 2013 – 2031 (J15), prepared by Staffordshire County Council, includes specific provisions for Stone, (see para 2.39 above).
- 3.19. The developers and promoters of the SDLs have signed a Statement of Common Ground for the Land South and West of Stone (E98) in November 2012. This demonstrates the intent and commitment to deliver new development. Subsequently the developers promoting the SDL – Housing element of Policy Stone 2 held a public exhibition event in May 2013 prior to submitting the planning application on 24 June 2013. Therefore the Borough Council considers that scale, nature, delivery, funding, and viability of proposed infrastructure requirements for Policy Stone 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.
- 3.20. Natural England called for Policy Stone 2 to be amended to refer to the Cannock Chase Special Area of Conservation (SAC) and Severn Trent Water called for Policy Stone 2 to be amended to provide the most up-to-date position regarding potable water reinforcement. The Borough Council considers that the Plan (A1) is sound but would benefit from

these amendments, therefore the Schedule of Additional (Minor) Modifications (A26) identifies the changes, listed as M57 and M58.

**iv. The design of the proposed development, including the impact on the surrounding area and landscape and the provision of on-site renewable/low carbon energy solutions;**

- 3.21. The design of the proposed development, including the impact on the surrounding area and landscape, and the provision of on-site renewable / low carbon energy solutions has been considered through the process of public engagement and consultation since 2011 as being appropriate for land south and west of Stone through the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan for Stafford Borough – Publication (A1). Both of these documents contained a policy and map for the SDL south and west of Stone, together with a concept diagram included in the Plan (A1). The development of Policy Stone 2 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 3.22. In terms of the impact of proposed development on the environment, a number of evidence based reports have informed Policy Stone 2 and the scale of provision. The Stafford Borough Local Development Framework Ecological Desk Study 2008 (D37) sets out that the evidence of protected species on land south and west of Stone. It states that further evidence should be collected as part of the proposed development west of Stone to ensure appropriate mitigation for ecological implications. The Study indicates that there are minimal ecological implications for land south of Stone. The Green Infrastructure Strategy for Stafford – The Strategic Plan (D34) sets out key actions in terms of new green infrastructure through the Stone Town Local Area Framework: Key Recommendations. In addition the Strategic Flood Risk Assessment Level 1 Volume 1 Final (D46) together with the associated Strategic Flood Risk Plans (D47 & D49) provides the flooding management issues for Policy Stone 2.
- 3.23. The landscape and the historic environment implications for land around Stone are set out in the Historic Environment Character Assessment for Stone (E81). This document records that development on land east of Stone is likely to have significant impact on the historic environment. Land to the west and south contains well preserved early field systems, but scores an average overall value score, lower than land to the East.
- 3.24. The Staffordshire County Wide Renewable / Low Carbon Energy Study (D45) assess the provision of on-site renewable / low carbon energy solutions as viable and deliverable. The policy will also be implemented in the context of Policy N2 (see Matters Paper 9).
- 3.25. Through the plan-making process the developers and promoters signed the Statement of Common Ground for Stafford Borough SDLs Land South and West of Stone (E98) in November 2012. This demonstrates the intent and commitment to deliver new development. Subsequently the developers promoting the SDL – Housing element of Policy Stone 2 held a public exhibition event in May 2013 prior to submitting the planning application on 24 June 2013. Therefore the Borough Council considers that the design of the proposed development through Policy Stone 2 is

appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**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?**

- 3.26. As set out above and within Background Statement Topic Paper E, the Council considers that the infrastructure and other evidence (including the transport assessment) has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development. In particular the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) provides the evidence base within Appendix D of the Plan (A1) regarding infrastructure requirements and the impact of the proposed development.
- 3.27. The assessment of proposed development to deliver the infrastructure requirements is detailed in the Whole Plan Viability Report (D52) which establishes the viability of SDLs against the cumulative effect of all policies within the Plan (A1) as required by NPPF (F1) para. 173.

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

- 3.28. As part of the Whole Plan Viability Report (D52) and the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) delivery of the scale of development proposed on the areas identified through the Plan (A1) were considered and assessed. The Stafford Borough Infrastructure Study Inputs (D56) published in 2012 together with the Economic Viability of Housing Land in Stafford Borough (D10), its Results (D11) and Appendices (D12) sets the context for Policy Stone 2 as being deliverable and viable for housing development, demonstrating the strength of the housing market at Stone to deliver strategic infrastructure requirements alongside affordable housing. This is further emphasised by the outline planning application for up to 500 new homes on the SDL – Housing for Policy Stone 2.
- 3.29. For Policy Stone 2 representations raised concerns about the traffic impacts on Eccleshall Road and loss of open countryside whilst alternative site promoters opposed the development, arguing that new housing could be accommodated elsewhere with no constraints to achieving requirements. These modifications are not accepted, since the traffic impacts of the SDLs have been considered as part of the Integrated Transport Strategy (J15) and section 3.32 above explains the suitability of the site in landscape and ecological terms.
- 3.30. The site promoter argued that new development should not be delayed until 2021 (see response below) whilst Natural England made reference to the Cannock Chase Special Area of Conservation. The Council considers that the Plan (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M48.

3.31. Taking into account the details regarding the submitted planning application, the evidence base and extensive public engagement, the Council considers that Policy Stone 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**d. Should the proposed development be delivered after 2021, in order to provide an opportunity to deliver brownfield development as part of the urban regeneration of the North Staffordshire conurbation?**

3.32. Background Statement Topic Paper A, the Duty to Co-operate Statement (B3) and the Development Strategy within the Plan (A1) recognise the need to provide an opportunity to deliver brownfield development as part of the urban regeneration of the North Staffordshire conurbation by holding back delivery of new development at Stone until after 2021. It should be noted that there are outstanding consents which will be delivered on the ground prior to this.

3.33. The Duty to Co-operate Statement Update (K2) includes a recently signed Duty to Co-operate pro-forma with the City of Stoke-on-Trent Council further supporting this approach.

3.34. One of the strategic aims (10) of the joint Newcastle-under-Lyme and Stoke on Trent Core Spatial Strategy is to facilitate development within identified priority regeneration areas of the North Staffordshire conurbation.

3.35. Throughout production of the Plan for Stafford Borough, City of Stoke on Trent Council and the North Staffordshire Regeneration Partnership have been keen to ensure that proposed development in neighbouring authority plans does not have an adverse impact on the regeneration strategy set out in their joint Core Strategy.

3.36. To this end they have supported the phasing of development at Stone, to ensure that this does not compromise the regeneration of the North Staffordshire conurbation.

3.37. The recent duty to cooperate statement with City of Stoke on Trent Council sets out the agreement reached over development north of Stafford which may impact on the north Staffordshire regeneration initiatives, in particular development at Stone. This specifically states residential development at Stone will be delayed until 2021.

3.38. As detailed above, the Council received a planning application for a housing development on the Housing SDL west of Stone on the 24 June 2013. A decision has yet to be made on this application.

3.39. However, permitting early development at the SDL at Stone would undermine the development strategy of the North Staffordshire joint Core Spatial Strategy, and renege on the signed duty to cooperate statement.

3.40. There are two further, and compelling, reasons for resisting the early release of land at Stone. The first is that it would seriously undermine the balance of development set out in Spatial Principle 4 (SP4), Under SP4, which establishes a balanced and sustainable scale and distribution of development to the settlements in the hierarchy, as a result of recent

completions and extant permissions there is no need to permit further housing at Stone for at least the next 6 years (as shown in the modification to para 6.54 (A26)). Examination Statement 3 uses Stone, for this reason, as an example to show how a moratorium on development may well need to be introduced immediately to support the delivery of SP4.

3.41. Secondly, immediate or early release of the Stone SDLs is likely to seriously threaten the progression of the Stafford Town SDLs. Stone has a much stronger housing market than Stafford, and there must be clear concerns that early release of this land could threaten the marketability and delivery of the Stafford SDLs. Whilst ultimately the contribution from the Stone SDLs to the overall provision of land in the Borough will be important, it is far less significant to meeting overall housing needs than the delivery of the three SDLs in Stafford, which together will contribute 56% of total Borough supply. Delivery of the three Stafford SDLs, which involves securing critical infrastructure investment at the appropriate time, must be regarded as amongst the main priorities of the Plan.

3.42. For all of these reasons the Council considers that the SDLs at Stone should be delivered after 2021, and not before.