



THE PLAN FOR STAFFORD BOROUGH - EXAMINATION IN PUBLIC  
23<sup>rd</sup> OCT – 1<sup>st</sup> NOV 2013

5 STONE TOWN (Policies STONE 1 – 2)

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?***

5.1 POLICY STONE 1 – STONE TOWN

- 1 At every stage of this Plan making process Fradley Estates Limited (FEL) has argued that the development strategy for Stone is not appropriate, effective, sustainable, fully justified or soundly based.
- 2 Limited success has been achieved in amending the approach eg abandonment of an earlier over-complicated approach to triggering housing development at Stone post 2021. Unfortunately however, the Council's unsustainable approach to housing development at Stone remains.
- 3 In para 8.1, Stone is described as "the second key settlement within the Borough's Sustainable Settlement Hierarchy". Of course, for the future, to 2031 it is not second in the hierarchy but rather is relegated to fourth place alongside "Rest of the Rural Area". To not maximise (reasonably) the potential contribution of Stone to sustainable housing development and growth flies in the face of sustainable development principles.
- 4 Consistent with the advice for sustainable development in NPPF, having set a Sustainable Settlement Hierarchy, the Council must, in our view, give appropriate weight to the relative sustainability of the settlements within that hierarchy. It is not logical to allocate development to locations that are less sustainable while rejecting more sustainable locations higher up the Sustainable Settlement Hierarchy.
- 5 FEL support the meeting of housing need by providing a range of development locations. However, it is axiomatic that with an acknowledged lack of brownfield sites within the urban area, by concentrating new housing development in a single location to the West of Stone a range of development locations will not be provided.
- 6 Identification of an SDL to the East of Stone, either in partial substitution or in addition to that to the West of Stone would, in our view, provide the sort of range and choice of development location required by the objectives of the Plan.
- 7 In our view, a greater number of SDL are required and there seems no rational case for holding back development in Stone. The Council's justification for holding back new housing development at Stone to the latter part of the Plan period appears to relate to such factors as outstanding commitments; recent housing growth; impact on Green Belt or prejudice to regeneration in the North Staffordshire Conurbation. In our view all are inadequate. The rejection of this reasoning has been set out elsewhere. In reality, rather than these outcomes, the likelihood is that the deferment will allow the Key Service Villages and the Rest of the Rural Area to suck-in unsustainable development which could otherwise have been focussed on Stone itself.



- 8 An additional SDL East of Stone would not exacerbate assimilation issues (in the manner in which this would occur West of Stone) and (like development West of Stone) would not in our view affect the Green Belt, its boundaries or regeneration in the Potteries.
  - 9 In our view, for the foreseeable future, ie in the Plan period to 2031, the objective must be to stimulate rather than constrain housebuilding and therefore the holding back of housing delivery at Stone (generally to later in the Plan period) runs counter to NPPF and cannot reasonably be justified.
  - 10 However, we acknowledge that some control over the timing of new housing development West of Stone may be justified, ie to allow the new housing development that has taken place in that part of the town in recent years, for example at Whitebridge Lane and at the former Doulton site etc to be absorbed into the community.
  - 11 Any "need for assimilation" does not arise East of Stone as development there took place many years ago and that development is now mature. The appropriate infrastructure necessary to support new housing development in that location is already in place.
  - 12 Also, in affordable housing terms, it makes no sense to suppress housing provision in the second most sustainable location in the Borough which also has the greatest potential for delivery affordable housing. Only in Stone is development viability necessary to support affordable housing described by the Council unequivocally as "Good".
  - 13 In our view, the approach to affordable housing should capitalise on the market potential of the northern part of the Borough (or at least not ignore that potential) to leverage reasonable levels of much needed affordable housing.
  - 14 To plan for affordable housing in diametric opposition to the market in these times of nil public subsidy is, in our view, bound to lead to low delivery of affordable housing.
  - 15 We conclude therefore that the development strategy for Stone over-concentrates development in a single location; does not facilitate housing choice; does not facilitate choice of housing locations; does not maximise the potential for affordable housing; does not take advantage of spare infrastructure capacity; unnecessarily constrains the housebuilding industry and the deferment of development to the latter part of the Plan period is not, and cannot be justified.
  - 16 Instead, we recommend the inclusion of an additional SDL East of Stone with development there taking place prior to or contemporaneously with development at West of Stone.
- (e) OTHER POTENTIAL STRATEGIC DEVELOPMENT LOCATIONS**
- 17 In our view, the SDL East of Stone on land owned by FEL has not been properly assessed by the Council.
  - 18 On behalf of FEL, we have promoted the company's land East of Stone to the Development Plan process since the early 1990's, ie this being the balance of land for which all necessary infrastructure was provided during development there in the 1980's.
  - 19 On our advice that the then Core Strategy was almost certain to be found unsound, FEL withdrew from the Core Strategy EIP in 2005. Consequently, the Council has been aware of FEL's intentions for this land for many years.



- 20 Appropriate and duly made representations have been submitted to each and every stage of the Plan making process. Accordingly, and reasonably in our view, approaches were made to the Local Plans section of the Council for a meeting to discuss FEL's proposals. The Officers refused to meet, arguing that Members were not keen on development on the East side of Stone because of a need to construct a new bridge crossing of the West Coast mainline railway.
- 21 In response to the Draft Publication a TA was submitted on behalf of FEL which demonstrated why a new bridge crossing was not required for the scale of development contemplated by FEL. A meeting with the Council officers was again sought and again refused. The submitted TA has not been challenged by the Council.
- 22 The "Planning Strategy" (May 13) purported "*to bring together and explain the analysis of the major development potential of land around Stafford and Stone in a concise statement*". In our view, this appeared merely to be attempting to pick up the late submission regarding Clarke's Farm.
- 23 A copy of our mail to the Borough Council dated 21<sup>st</sup> May 2013 and the Council's reply is attached.
- 24 It is clear from this that whilst the Council may have considered an SDL for 1400 houses East of Stone they have not made an appropriate assessment of my client's reasonable alternative development proposal. Consequently, in our view, the Plan is not positively prepared and is unsound.
- 25 We do not seek to argue that land West of Stone is not suitable or not sustainable. However, land East of Stone is in fact much more sustainable because existing infrastructure is already in place. It is a highly successful residential location, ie where people want to live; a site there would provide the choice of housing site locations sought by the key objectives of the Plan; development there would not impact on the Green Belt or any site of nature conservation value; the location has an equally good relationship with Stone Business Park; it can be developed without major calls on public sector investment and, contrary to the inference in para 8.2 of the Submission Draft, would not be constrained by the Uttoxeter Road crossing of the West Coast mainline or indeed the need for a bridge crossing.
- 26 An SDL East of Stone would extend to about 6 ha and is recorded as site 269 in the SHLAA. The site would have a capacity of circa 100 dwellings.
- 27 Access to the site would be available from the existing highway network within the Aston Lodge Park Estate at two points, ie using existing highway infrastructure.
- 28 Connection to the existing foul and surface water drainage system is available without the need for capacity improvements, ie again using existing infrastructure.
- 29 The land is not identified as being of any particular nature conservation value and its landscape quality, whilst pleasant, is of no greater quality than that West of Stone or South of Stone. The land is not located in an Area of Outstanding Natural Beauty nor within the North Staffordshire Green Belt or any conservation area.
- 30 A Transport Assessment by BSP Consulting was submitted with representations to the Draft Publication and thus it is assumed has been seen by the Inspector.



- 31 That document analyses the potential impact of traffic likely to be generated by development of the land for housing on the Uttoxeter Road crossing of the West Coast mainline and on the traffic light
- 32 That Assessment demonstrates that the location is a highly accessible and sustainable one with a frequent bus service and with other transport infrastructure available, facilitating journeys by non-car modes.
- 33 The additional traffic likely to be generated on Uttoxeter Road west of the proposed development at peak times would be less than 9% and therefore not significant.
- 34 Traffic queues at the level crossing were observed and analysed. Barrier closure times (and thus queue lengths) vary but the analysis shows that, on average, the proposed development would add only 1 vehicle to the queue. Consequently, it can be concluded that the proposed development would not have a significant impact on queuing at the level crossing.
- 35 The percentage increase in traffic at the Uttoxeter Road/Lichfield Road signal junction at peak times was calculated at 4.2 – 4.9% and the junction appears to work well with a large amount of spare capacity. Therefore traffic arising as a result of the development proposals would have an insignificant impact on the junction.
- 36 The clear conclusion therefore is that an SDL of about 100 dwellings East of Stone would not be unacceptably constrained by the presence of the West Coast mainline. A new bridge crossing of the line is not a pre-requisite for the scale of development now put forward East of Stone.
- 37 In conclusion, in our view, the Council has not assessed the reasonable alternative put forward by FEL and a SDL East of Stone based on SHLAA site 269 would be a reasonable alternative, either:-
  - (i) in addition to the SDL identified to the West of Stone (because total housing provision in Stone should, in our view, be increased in any event) or
  - (ii) partly in lieu of provision West of Stone thereby making the community impact of new housing on the town overall more easily absorbed.

Statement-StoneTown

**Paul Sharpe Associates LLP**

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**From:** Alex Yendole  
**Sent:** 23 May 2013 10:57  
**To:** Paul Sharpe Associates LLP; ForwardPlanning  
**Subject:** RE: FRADLEY ESTATES : LAND AT STONE - ADDENDUM SA

Dear Mr Sharpe

Thank you for your message and good speaking to you on the telephone about the Sustainability Appraisal for the Aston Lodge area of Stone for a total of 1,400 new houses.

Kind regards

Alex

**From:** Paul Sharpe Associates LLP  
**Sent:** 21 May 2013 11:11  
**To:** ForwardPlanning  
**Subject:** FRADLEY ESTATES : LAND AT STONE - ADDENDUM SA

For the attention of Mr Alex Yendol

Dear Sir

I refer to the above consultation on the Addendum SA which closes on 31<sup>st</sup> May.

I note that the updated SA has been produced to include an assessment of a recently submitted proposal to ensure that the Appraisal has assessed all "reasonable alternatives". Likewise the Planning Strategy Statement is intended "to bring together and explain the analysis of the major development potential of land around Stafford and Stone in a concise statement".

You will be aware that on behalf of Fradley Estates we have put forward an alternative strategic combination of sites at Stone and I cannot find any assessment of this "reasonable alternative" in this or any of the previous SA documents.

Before submitting comments on the current document I would be grateful if you would confirm my understanding or otherwise.

I would be grateful for an urgent response.

Kind Regards

Paul H Sharpe  
Paul Sharpe Associates LLP  
The Old Rectory, Broad Blunston, Swindon SN26 7DQ  
Em6/21.5.13



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