



**The Plan for Stafford Borough –  
Publication**

**Examination Statement – Communities**

**October 2013**

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## **COMMUNITIES (Policies C1-C7)**

### **1. KEY ISSUE:**

**Does the Plan provide an appropriate, effective and soundly based framework for supporting strong, vibrant and healthy communities, including the provision of a mix of dwellings, including affordable housing, special needs accommodation and provision for gypsies and travellers, clear and effective locational criteria for new and replacement dwellings, and provision of open space, sport and recreational facilities, which is fully justified with evidence and consistent with national policy?**

- 1.1. The Borough Council considers that the policies in the Communities section of the Plan for Stafford Borough (A1), hereafter "the Plan (A1)", are soundly based. They are based on a robust and credible evidence base; on extensive public consultation and engagement undertaken as part of the planning process from 2009 - 2012, as set out in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15); and on significant assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11).
- 1.2. Policies C1 – C7 are considered to be in conformity with national policy through the National Planning Policy Framework (NPPF) (F1), by providing an appropriate a mix of dwellings, including affordable housing, special needs accommodation and provision for gypsies and travellers as well as providing clear and effective locational criteria for new and replacement dwellings, and provision of open space, sport and recreational facilities as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 1.3. These policies are considered to be appropriate because they support the delivery of the Spatial Vision and Key Objectives of the Plan (A1), through the provision of housing, open space and recreation facilities.
- 1.4. Justification for the Communities policies and their appropriateness has been informed through the preparation of the Plan since 2009 and the process of public consultation and engagement through the Plan for Stafford Borough – Draft Publication (G2) and Delivering the Plan for Stafford Borough – Draft Core Policies (G5).

### **2. DWELLING TYPES & SIZES (Policy C1)**

**a. Is the approach to requiring new housing development to provide a mix of dwelling types, tenures and sizes, including a proportion of affordable housing, appropriate, justified with evidence, effective, soundly based and consistent with national policy?**

- 2.1. The requirement to provide a mix of housing types, tenures and sizes as well as an element of affordable housing is considered to be in conformity with national planning policy through the NPPF (F1) para. 50, which supports planning positively for the creation of inclusive mixed

communities. The NPPF (F1) para. 69 also identifies that mixed use communities can play a strong role in facilitating social interaction and creating healthy, inclusive communities. Policy C1 supports the creation of mixed communities through the provision of a mix of dwelling types and sizes as well as affordable and specialist housing, which is consistent with the approach set out in the NPPF.

- 2.2. Policy C1 is supported by an up to date evidence base. It is underpinned by the Strategic Housing Market Assessment (SHMA) 2012 (D5) which examines the levels of affordable housing required over the plan period, the existing public and market sector housing stock, demographic and secondary survey data. The study examines the existing dwelling stock for affordable and market housing, and projects the likely future tenure profile that will be required in the future. The Staffordshire Flexicare Housing Strategy 2010-2015 (E11) examines the needs for specialist housing to provide for a growing elderly population and concludes that there will be an anticipated net need for 954 units by 2030.

**b. Should the range of dwelling types and sizes reflect existing household/dwelling sizes and current waiting lists, or should it reflect market demand, need and viability?**

- 2.3. The Borough Council considers that the Plan (A1) is sound but would benefit from further clarification concerning the criteria for the range of dwelling types and sizes required. Therefore the Council sets out in the Schedule of Further Additional Modifications (A27), listed as FAM28, that criteria a of Policy C1 should be amended to read:

*"New developments should provide an appropriate range of dwelling types and sizes to provide for a mixture of different households having regard to:*

- a. The need for housing sizes and types as identified by the SHMA*
- b. Indicative current waiting list data for the locality"*

- 2.4. Policy C1 (as amended) specifies that the range of dwelling types and sizes to be provided on site should be consistent with existing and forecast needs as set out in the SHMA, and with the evidence of immediate actual needs provided by current waiting lists. Policy C1 is considered to provide an appropriate, soundly based framework to meet the challenge of providing mixed communities as set out in the NPPF (F1), para 50. The revised wording set out in criterion a is consistent with the approach set out in para 50 which requires identification of a mix of housing based on current and future demographic trends, market trends and the needs for different groups within the community.
- 2.5. Policy C1 (as amended) is underpinned by an up to date evidence base, in the form of the 2012 SHMA (D5), which examines the existing dwelling stock and future demographic trends. From this review, the likely future requirements are assessed for housing types. The SHMA recognises that there is currently a significant over supply of larger detached and semi-

detached three and four bedroomed properties outside of Stafford and Stone. It suggests that in the future there will be a need for smaller 2 and 3 bedroomed properties to take account of demographic trends, such as elderly population increases, smaller households and market demand, particularly from first time buyers and those looking to downsize. The Staffordshire Flexicare Housing Strategy 2010-2015 (E11) examines the needs for specialist housing to provide for a growing elderly population and concludes that there will be an anticipated net need for 954 units by 2030.

- 2.6. As part of the strategy to provide mixed communities, it is essential that developments provide affordable housing of sufficient size and type to meet local needs. The 2012 SHMA (D5) examines existing affordable housing waiting lists to provide a key measure of demand for the level of affordable housing along with property size. However, it is considered that current waiting lists will provide a more up to date analysis of the level and type of affordable housing.
- 2.7. Representations to Policy C1 from Housing Plus and Tetlow King recommended that dwellings should have a minimum of three habitable rooms and be in line with local needs. The Borough Council considers that the Plan (A1) is sound but would benefit from further clarification on this point. Therefore the Council sets out in the Schedule of Further Additional (Minor) Modifications (A26) an additional criteria to Policy C1, listed as M72, to read: *Housing developments will be required to provide a mix of dwelling types on site, with a minimum of three habitable rooms. However, the final mix will be determined in line with local needs, Government policy and linked to design issues.*
- 2.8. Other representations expressed concern about existing housing being used to establish proportions rather than market demand, need and viability. This has been addressed through the proposed modification set out above.

### **3. AFFORDABLE HOUSING (Policy C2)**

**a. Is the approach to providing affordable housing soundly based, justified with evidence, effective, deliverable, viable, appropriate for Stafford Borough and consistent with national policy, particularly in terms of:**

**i. The latest Strategic Housing Market Assessment indicates a need for 210 new affordable homes/year. How will this amount of affordable housing be delivered, including the size, type and tenure of affordable housing and the means of meeting the objectively assessed need for affordable housing?**

- 3.1. The approach of Policy C2 is considered to be appropriate in securing affordable housing within Stafford Borough. It is based on evidence of need and viability, and is locally distinct taking into account the specific housing need within Stafford Borough.

- 3.2. The approach to delivering affordable housing is considered to be justified in terms of the NPPF (F1) para 50 which seeks to deliver sustainable mixed communities and through paras 173-174, which indicate that the cumulative impact of policies should not compromise site viability.
- 3.3. The Council's Strategic Housing Market Assessment 2012 (D5) was completed in 2012 and followed guidance set out by the DCLG. The Stafford Borough SHMA showed that the Borough had an objectively assessed need of 210 affordable homes per annum to provide for existing and newly forming households. Therefore based on the total provision of 500 new homes per year, as detailed above, the affordable housing requirement would be 42%.
- 3.4. The Stafford Borough Affordable Housing Viability Study (D10) for sites of up to 150 new homes, undertaken by Level, reviewed the impact of differing levels of affordable housing on the viability. The study analysed a range of housing sites across the Borough using a residual valuation appraisal across a number of different affordable housing thresholds. The study concluded that different proportions of affordable housing are deliverable across different parts of Stafford Borough. The housing market in the Stone and the Rural Areas would be able to sustain 40% affordable housing whilst a target of up to 30% affordable housing would be deliverable throughout the rest of the Borough. This level of provision would clearly be insufficient to meet the overall requirements set out in the SHMA (42%), without significant grant support.
- 3.5. The conclusions set out in the Affordable Housing Viability Study (D10) highlight that the objectively assessed need for affordable housing detailed in the SHMA (D5) cannot be delivered fully when viability considerations are taken into account.
- 3.6. However, whilst it is acknowledged that the Council cannot meet all of the assessed need for additional affordable homes through the mechanism of planning gain, it is scarcely alone in this and other mechanisms, such as the delivery of 100% affordable housing sites or future schemes backed by additional funding sources, may also play a role. Nevertheless, it is important to ensure that all of the sites identified in the Plan (A1) should make the maximum possible contribution and the role played by the Strategic Development Locations (SDLs) will be crucial. Smaller scale developments above the threshold may deliver a high proportion of affordable housing but, without the SDLs, are unlikely to deliver sufficient volumes to address the overall scale of need.
- 3.7. Consequently, the majority of the new affordable housing will be delivered by the SDLs around Stafford and Stone. The SDL to the east of Stafford has already received outline planning consent for a residential scheme which includes 30% affordable housing, equating to 190 new affordable homes, whilst the developers for the Stone SDL have submitted an application which includes 40% affordable housing, equating to 200 new affordable homes. The report on Viability and Deliverability of Northern and Western SDLs (D51) made an assessment of the total infrastructure costs, including affordable housing costs, under

a number of scenarios and concluded that the sites were deliverable, and that the likely infrastructure costs were compatible with significant levels of affordable housing and potentially as much as 30% could be delivered under the correct conditions. Therefore, whilst it may not be possible to meet the objectively assessed need for affordable housing in full, the delivery of the SDLs is essential to maximise delivery.

**ii. Policy C2 sets a target for affordable housing of either 30/40%, with a site size threshold of 0.1/0.4.ha (3/12 dwellings). Are these thresholds and targets, along with the approach to seeking developer contributions to facilitate the provision of affordable housing either on-site or off-site, fully justified and supported by an informed robust assessment of economic viability?**

- 3.8. The policy approach in the Plan (A1) is justified as it meets the requirements of the NPPF (F1), its principal aim being to secure the greatest possible increase in the level of affordable housing throughout the plan period (within the context of the overall need assessment discussed above).
- 3.9. There is considerable variation in house prices across the Borough but in general, values are higher in rural areas and in Stone but these values co-exist with relatively low average household incomes. As a consequence, the issue of affordability and the continued supply of high quality, affordable homes remains an overriding issue for the Borough.
- 3.10. Policy C2 is considered justified as it is underpinned by an up to date evidence base. The Affordable Housing Viability Study (D10) analyses the thresholds and affordable housing targets to ensure that the targets and thresholds are deliverable without threatening the viability of residential sites. The study, undertaken by Levvel, examines a range of sites representative of the types of development likely to come forward across the Stafford Borough area over the Plan period in order to assess their ability to deliver affordable housing.
- 3.11. The study used a residual valuation tool for testing future cost and value scenarios using upside, middle and downside housing market growth scenarios and concluded that a target of 30 % was achievable across the Borough with 40% achievable in Stone, Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor and Yarnfield. The study also concluded that the proposed 12 unit threshold in Stafford, Stone and Key Service Villages and the lower threshold of 3 dwellings or more in rural areas would be viable in most circumstances.
- 3.12. The Council considers that the Plan (A1) would benefit by expressing the thresholds and the level of affordable housing percentages for different areas through a table rather than the current policy wording. Therefore the Council sets out in the Schedule of Further Additional Modifications (A27), listed as FAM29 that the first paragraphs of Policy C2 should be amended to read as follows:

## Affordable Housing

*Residential proposals must provide affordable housing on development sites according to the thresholds set out below:*

	<i>3 dwellings or more</i>	<i>12 dwellings or more</i>
<i>Stafford</i>	<i>n/a</i>	<i>30%</i>
<i>Stone</i>	<i>n/a</i>	<i>40%</i>
<i>Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor and Yarnfield</i>	<i>n/a</i>	<i>40%</i>
<i>Hixon, Great Haywood, Little Haywood, Haughton, Weston</i>	<i>n/a</i>	<i>30%</i>
<i>Rural areas</i>	<i>30%</i>	<i>30%</i>

*Developers will be expected to provide an independent economic viability assessment if a lower figure is being advocated. Affordable housing must be made available for people on lower incomes, who are unable to afford housing at the prevailing market price or who need to live within the area.*

- 3.13. This modification does not alter the % requirements or the thresholds set out in Policy C2 but it is proposed to simplify the wording of the policy and aid understanding.
- 3.14. The cumulative impact of all of the policies within the plan were assessed through the Whole Plan Viability Study (D52). It concluded that the Plan (A1), including the level of affordable housing proposed, is deliverable without threatening the viability of residential sites.
- 3.15. Policy C2 seeks to ensure that provision for affordable housing is made on site, whilst in exceptional circumstances off site provision or a commuted sum may be considered. This approach is considered to accord with the aim to produce mixed communities and the requirement to provide affordable housing on site unless there is robust justification, as set out in the NPPF (F1) para 50.
- 3.16. Representations made at the submission stage of the Plan supported affordable housing targets, but considered that there should be higher housing provision at Stone and rural areas to achieve greater delivery of affordable housing. However, it is considered that it would not be sustainable or deliverable to allocate a vast number of dwellings simply to seek to meet the objectively assessed needs for affordable housing – and even if more housing were to be allocated, the viability evidence suggests that achieving the overall requirement for affordable housing (42%) could never be viable, Borough-wide. Other respondents suggested that the Affordable Housing Viability Study is out of date and that the level of affordable housing required should be reduced as it is unjustified and unviable whilst other infrastructure needed to be considered for the SDLs. However, the levels of affordable housing has been considered through the Affordable Housing Viability Study (D10) in 2011 and through more up to date assessments carried out in 2012 through the Report on



Viability and Deliverability of Northern and Western SDLs (D51) and the Whole Plan Viability Study (D52) in 2013. Therefore the Council considers that the affordable housing evidence is robust and up to date; thus the approach set out in Policy C2 of the Plan (A1) complies with the NPPF (F1) and is sound, justified and sustainable.

#### **4. SPECIALIST HOUSING (Policy C3)**

**a. How will the measures proposed in Policy C3 effectively meet the anticipated need for extra-care accommodation in Stafford Borough, including the locational requirements and access to existing services, facilities and public transport, and is the need for such provision justified with evidence?**

- 4.1. Policy C3 – Specialist Housing is consistent with the NPPF (F1) para. 50, which encourages planning positively for the creation of sustainable, inclusive and mixed communities. It sets out a delivery framework through which housing developments, and in particular the SDLs in Stafford and Stone, will deliver a proportion of housing development to meet the needs of an aging population. However the final proportion will be determined through market demand.
- 4.2. The Policy sets out the broad principles for delivering specialist housing within the Borough. In particular, it prioritises the delivery of specialist housing within the settlement hierarchy close to existing services and facilities and public transport, whilst also resisting development that reduces the number of Extra Care units. In addition the Policy is supportive of extensions to existing facilities, subject to specific criteria, to meet the identified need for additional Extra Care facilities.
- 4.3. Policy C3 is underpinned by the Staffordshire Flexi-care Housing Strategy 2010 – 2015 (E11). The study indicates that, for the whole of Stafford Borough in 2010, there were 24,800 people aged 65 and over. Within the next 20 years, Stafford Borough’s older population is forecast to increase by 57%. Statistics contained in the study show that over this period there will be net need for 954 units. Current programmes anticipate that Staffordshire County Council in conjunction with Registered Providers will develop 200 units over the next five years.
- 4.4. The delivery of specialist housing, including any further programmes, will be undertaken by Staffordshire County Council in conjunction with or supplemented by the development industry, Stafford Borough Council and through partnerships with registered private sector partners.
- 4.5. Representations made at the submission stage of the Plan (A1) to Policy C3, supported the provision of additional extra care units. However, other respondents queried whether access to services and facilities in existing settlements was required rather than stand alone developments outside the settlement hierarchy. It is considered that allowing stand alone developments outside the settlement hierarchy would be contrary to the Development Strategy as set out in Spatial Principles SP3, SP4 and SP6, which seek to achieve sustainable development by directing development to the most sustainable locations. Also, allowing stand alone

developments outside the settlement hierarchy would be inconsistent with the NPPF (F1), para 50. The Borough Council considers that the Plan (A1) is sound but would benefit from further clarification. Therefore the Council sets out in the Schedule of Further Additional (Minor) Modifications (A26) modification M73 to read "*Ensuring that any new developments are located in accordance with Spatial Principle 7 at a settlement within the settlement hierarchy in a sustainable location close to services and facilities, are self contained, and are accessible by both public and private transport*".

## **5. RESIDENTIAL PROPOSALS OUTSIDE THE SETTLEMENT HIERARCHY (Policy C5)**

### **a. Are the locational and other criteria for new development, replacement dwellings and extensions/alterations to existing dwellings outside settlement boundaries appropriate, effective, justified, soundly based and consistent with the spatial principles of the development strategy and national policy?**

- 5.1. The approach set out in Policy C5 seeks to complement the settlement hierarchy approach set out in Spatial Principle (SP3). Since the Development Strategy's intention is to direct most development to sustainable locations within the defined sustainable settlement hierarchy, the converse must apply outside those areas: only limited development is intended to be accepted outside settlement boundaries, where it meets stringent criteria.
- 5.2. The criteria set out in Policy C5 accord with national policy as set out in the NPPF (F1) para 55. The criteria 1-3 and a to d for new housing and rural exceptions development support the overall spatial objective that development should be accommodated within the Settlement Hierarchy as set out in SP3. However, it also recognises that in exceptional circumstances subject to specific criteria, for example where it has supporting justification from a parish based local needs assessment and is sympathetically designed, new housing development will be allowed outside the settlement hierarchy.
- 5.3. Criteria a to i for replacement dwellings are appropriate development management criteria that seek to deliver the re-use of redundant or disused buildings in accordance with the NPPF (F1), para 55. The criteria set out for extensions and alterations seek to ensure that redevelopment of existing properties does not undermine the character, appearance and size of the existing dwelling, consistent with NPPF (F1), paras 17 and 58 - 61.
- 5.4. The approach set out in Policy C5 for the consideration of residential proposals outside the sustainable settlement hierarchy is justified by an up to date evidence base in the form of the Assessment of Facilities and Services Stafford (E68) and Stone (E69), and the Revised Settlement Assessment of Services and Facilities (D54), and the Strategic Housing Land Availability Assessment (D2). These sources demonstrate that there is sufficient scope for sustainable development within the settlements identified in the sustainable settlement hierarchy.

- 5.5. Representations to Policy C5 called for unrestricted brownfield development and infill development in the Green Belt as well as unrestricted rural housing development to meet full objectively assessed needs. However, this approach is not considered to be sustainable in the context of the overall approach set out in Spatial Principle SP3 or the requirement to achieve sustainable development established by the NPPF (F1).

**b. Is the approach to residential development outside settlement boundaries unduly restrictive, including the need for a Parish-based Local Housing Needs Assessment and the approach to Rural Exception Sites?**

- 5.6. The Development Strategy proposes that the needs of communities throughout the Borough can and should be appropriately met within the sustainable settlement hierarchy. It follows that development outside the settlement hierarchy should necessarily be restricted, to help support the creation of sustainable communities, in accordance with the NPPF, para 17.
- 5.7. The approach set out in Policy C5 seeks to support the settlement hierarchy set out in Spatial Principle SP3, which directs new development to sustainable settlements, with a scale and form appropriate to their level in the hierarchy. The approach is not considered unduly restrictive as it is fundamental to the support and delivery of Spatial Principle SP3, and will enable the needs of local communities in rural areas to be met in nearby sustainable locations – with no parts of the rural area being far from a Key Service Village.
- 5.8. Some representations suggest that the requirement for Parish Needs Assessments should be deleted. However, it is considered that the requirement for parish based assessments would provide an essential means of checking that any acceptable housing was actually going to meet specific very local needs. The requirement for Parish based Local Housing Needs Assessments and the approach to rural exception sites allows for rural exceptions where specific local need can be evidenced.
- 5.9. Therefore, taking into account the NPPF (F1) which requires local planning authorities to build sustainable communities, it is considered that the approach set out in Policy C5 is appropriate.

## **6. PROVISION FOR GYPSIES AND TRAVELLERS (Policy C6)**

**a. How will Policy C6 make adequate provision for gypsy and traveller accommodation, having regard to the latest national policy on Traveller Sites<sup>1</sup>, particularly in terms of:**

- 6.1. Policy C6 is considered to be in conformity with national policy as set out in the Planning Policy for Traveller Sites (F2), by ensuring the needs of the travellers have been assessed, and sites to meet this need planned for, as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).

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<sup>1</sup> *Planning Policy for Traveller Sites* [DCLG; March 2012]

- 6.2. Policy C6 is considered to be appropriate in supporting the delivery of the Spatial Vision and Key Objectives of the Plan (A1) through the future planning of traveller sites, setting out criteria for suitability and ensuring the protection of green belt land.

**i. Setting pitch/plot targets for gypsies, travellers and travelling showpeople which meet the likely permanent and transit site accommodation needs of travellers in the Borough, supported by evidence (including the implications of the latest GTAA) and in collaboration with neighbouring local planning authorities;**

- 6.3. Planning Policy for Traveller Sites (F2) states that Local Authorities should establish local needs for gypsies and travellers and show how these needs will be met, through the identification of appropriate, deliverable sites.

- 6.4. Evidence of local gypsies and travellers needs has been established through the production of a Gypsies and Travellers Accommodation Needs Assessment (D4). This document estimates that 44 additional pitches will be required across the borough in the period 2011 to 2031. It updates the North Housing Market Area Gypsy and Traveller Accommodation Needs Assessment (E14). Although the latest evidence was prepared solely for the Stafford Borough area, adjoining authorities were engaged in the study and through the Duty to Co-operate process, as detailed in the Duty to Co-operate Statement (B3) and the Duty to Co-operate Statement Update (K2).

**ii. Identifying a supply of specific deliverable sites sufficient to provide 5-years of sites against locally set targets, along with a supply of specific, deliverable sites or broad locations for years 6-15 of the plan period, and effectively ensuring such provision is made;**

- 6.5. The requirement for 44 permanent pitches across the Borough between 2011 and 2031 results in a five year requirement for additional pitches across the Borough of approximately 11. The Council is seeking to bring forward a new site at St Albans Road for 36 new pitches with the application (13/19256/FUL) having been submitted to the Council. A decision is expected to be made before the end of the year.

- 6.6. The identification of future pitches to meet the target set out in the GTAA and address outstanding requirements will be determined through the forthcoming Sites and Allocations Development Plan Document, if there is an identified need which has not been met through the grant of permission previously.

**iii. Setting out clear, specific and relevant criteria to guide site allocations and decisions on planning applications where there is an identified unmet need;**

- 6.7. Policy C6 is a criteria based policy which will guide decisions on sites proposed for gypsies and travellers accommodation. The criteria have been developed from Planning Policy for Traveller Sites (F2) and the Government guidance Designing gypsy and traveller sites (J31). The criteria cover design, location and onsite facilities provision, with the aim of ensuring the development of appropriate, considerate mixed communities.

**iv. Meeting the other policy requirements set out in the latest national policy on Traveller Sites (paras 7-19), including the recent Ministerial statement<sup>2</sup>.**

- 6.8. In accordance with the recent Ministerial statement on planning and travellers, there is no provision being made for Green Belt amendments in the Plan (A1). Policy C6 part d (Page 96) sets out the criteria regarding sites within the Green Belt, stating that they are considered unacceptable.
- 6.9. For Policy C6 representations objected to recycling facilities being required on gypsy sites, with new gypsy sites to be identified as a percentage of new development. Concern was raised by neighbouring authorities in terms of updated studies reducing gypsy provision in Stafford Borough leading to pressure for delivery in other adjoining areas. One representation stated that gypsy and traveller sites should be allocated at Strategic Development Locations.
- 6.10. The NPPF (F1) and Planning Policy for Traveller Sites (F2) set out considerations for gypsies and traveller accommodation. Considering these policies alongside the SHLAA, which identifies a supply of deliverable sites including those suitable for gypsies and travellers, and taking account of the recent application at St. Albans Road, the Council does not consider it is necessary to allocate land for gypsies and travellers within the SDLs.
- 6.11. In terms of recycling provision at gypsies and travellers sites, the Council does not agree to remove this clause of Policy C6 as increasing recycling is prioritised in the Staffordshire & Stoke on Trent Joint Waste Local Plan (F10).
- 6.12. Concern was also raised by neighbouring authorities (City of Stoke on Trent and Newcastle-under-Lyme) with regard to the updated GTAA study's conclusion that there would be a reduced level of gypsy provision required in Stafford Borough (compared with the previous study), which was suggested likely to lead to pressure for delivery in other adjoining areas. However, there is no evidence to suggest that increased pressure could be placed on neighbouring authorities as the study did not identify any cross border migration. The update was required to ensure Policy C6 was based on robust up to date evidence. However, the Council agrees that it would be appropriate to remove the reference to "successor documents" listed as M74 in the Schedule of Additional (Minor)

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<sup>2</sup> Written Ministerial Statement on Planning & Travellers [DCLG; 1 July 2013]

Modifications (A26). A Duty to Co-operate pro-forma has since been signed by both authorities (K2), which sets out the current agreement position.

## **7. OPEN SPACE, SPORT & RECREATION (Policy C7)**

### **a. Does Policy C7 set out an appropriate, effective and soundly based framework for providing open space, sport and recreation facilities, which is justified with robust and up-to-date evidence, reflecting the views of Sport England and consistent with national policy?**

- 7.1. Policy C7 is considered to be appropriate in supporting the delivery of the Spatial Vision and Key Objectives of the Plan (A1) through the provision of open space, sport and recreation to meet the needs of local communities over the Plan period to 2031. Policy C7 is considered to be appropriate and consistent with national policy through NPPF (F1) para 70 by planning positively for the provision and use of shared space, community facilities and other local services. In particular Policy C7 supports the retention of existing and the provision of new community facilities, and requiring justification for their loss as well as ensuring new facilities are accessible. The NPPF (F1) para 73 indicates that policies should be based on up-to-date assessments which identify specific needs and quantitative and qualitative deficits or surpluses together with locally derived standards. This is delivered through Policy C7, and the associated Appendix G of the Plan (A1).
- 7.2. Policy C7 is supported by the Stafford Borough Council Assessment and Open Space, Sport and Recreation Facilities Strategy (E54), associated Appendices (E55) and Maps (E56) published in 2009, together with the updated Green Infrastructure, Green Space and Sport and Recreation Provision Strategy (D28) with the detailed evidence Update (D29) published in June 2013. Despite this latest piece of evidence unfortunately not being available in time to inform those making representations on the Plan (A1), the Borough Council considers that the most up-to-date evidence base should be available through the Examination process.
- 7.3. Sport England's representations on Policy C7 called for specific open space, sport and recreation proposals to be identified in the Infrastructure Delivery Plan (IDP). The IDP is a live document that will be updated on a regular basis and therefore future iterations of the IDP will take account of the need for specific open space, sport and recreation facilities. Natural England also suggested that off-site contributions for strategic sports facilities should be acceptable alongside SDLs. However, given that the SDLs are providing on-site recreation facilities, it is considered that an off-site contribution is not required. They also suggest that Policy C7 should be amended to better reflect the wording of NPPF (F1) para. 74i. Other representations stated that if on-site provision is being made, financial contributions should not be required, and this approach is accepted.
- 7.4. The Borough Council considers that the Plan (A1) is sound but would benefit from an update in terms of the latest evidence base. Following the completion of the Green Infrastructure, Open Space, Sport and

Recreation Provision Strategy an update is proposed to paragraphs 11.22 & 11.23 of the Plan (A1). Therefore the Schedule of Additional (Minor) Modifications (A26) identifies proposed changes, listed as M77 & M78. Modification M76 provides greater clarity in terms of developer contributions within Policy C7.

- 7.5. Taking into account the NPPF (F1), which encourages local planning authorities to promote healthy communities including the access to high quality open spaces and opportunities for sport and recreation, the Borough Council considers that the approach in Policy C7 of the Plan (A1) is justified. Furthermore in light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Policy C7 appropriate, effective and soundly based to meet the open space, sport and recreation requirements of local communities over the Plan period.

**b. Does the policy require increased standards of open space, in addition to any provision needed to mitigate any adverse impact of development on the integrity of the Cannock Chase SAC?**

- 7.6. Policy C7 sets out the approach for open space, sport and recreation across Stafford Borough for the Plan period to 2031, including reference to the standards of open space within Appendix G of the Plan (A1). Whilst Policy C7 does not make reference to the provision needed to mitigate any adverse impact of development on the integrity of the Cannock Chase Special Area of Conservation (SAC), Policy N6 refers to targeted alternative green space provision.
- 7.7. The open space requirements are based on the Assessment and Open Space, Sport and Recreation Facilities Strategy (E54), associated Appendices (E55) and Maps (E56) and are considered adequate for meeting local needs.
- 7.8. A number of representations raised concerns about local standards for open space, sport and recreation being in addition to Suitable Accessible Natural Greenspace. During meetings with the SDL developers, Natural England made the position clear that local standards of open space should be considered in addition to the provision needed to mitigate any adverse impact of development on the integrity of the Cannock Chase Special Area of Conservation (SAC). This approach has been confirmed by Natural England on a number of occasions, as recorded on 16 August 2012 in the Plan for Stafford Borough Land West of Stafford SDL Meeting Notes 2011-2013 (E95) as well as on 5 March 2013 in the Plan for Stafford Borough Land North of Stafford SDL Meeting Notes 2011-2013 (E94).
- 7.9. Additionally, the provision of Suitable Alternative Natural Greenspace (SANGS) may change as the finalised mitigation approach has yet to be agreed by the SAC partnership. Therefore the Borough Council considers that the provision of SANGS is a separate issue that will be advanced through the implementation of Policy N6 as part of the Plan (A1), as part of the decision-making process for planning applications in conjunction with advice from Natural England.

**c. Should the policy indicate specific open space, sports and recreation facilities to be provided at the SDLs?**

- 7.10. The approach taken regarding the provision of open space, sports and recreation is for each SDL to provide sufficient on site facilities to cater for the needs of the development. The on site facilities that each SDL will be required to provide are set out in the detail in the individual SDL policies in Chapters 7 and 8 of the Plan (A1). Therefore, it is considered unnecessary to set out the detailed provision of onsite open space, sports and recreation requirements within Policy C7.