

THE PLAN FOR STAFFORD BOROUGH - MATTERS AND ISSUES FOR EXAMINATION

Submission by Wardell Armstrong LLP on behalf of Hallam Land Management and Davidsons Developments

Strategic Development Location – Stone: Policies 1 and 2

Response to City of Stoke-on-Trent Supplementary Statement – N2.45

Introduction

This Statement comprises a brief response to the Supplementary Statement regarding the supposed harm that development in Stone will have on urban regeneration initiatives in Stoke-on-Trent (SoTCC).

Material considerations

The Plan supports the promotion of a Strategic Development Location (SDL) adjacent to Stone's urban area within the total control of the development partners. This site can capably increase the range and types of housing available, including affordable, and is in a sustainable location with good accessibility to public transport, services and facilities. It is a suitable SDL in that the site minimises impact on surrounding landscapes and is aligned well to Stone Town's Green Infrastructure Plan.

Submissions made under Matter 5 (M5-8A), at the Examination in Public and under proposed Main Modifications can be summarised as

- The Stone SDL is appropriate, effective, deliverable, sustainable, viable, fully justified and soundly based
- This is now the subject of an Outline Planning Application (Reference 13/19002/OUT) validated on 25th July 2013. Appropriate consultation commenced on 2nd August 2013 and the target (13 week) determination date was 24th October 2013
- The boundary of the SDL has now been amended to correctly correspond to above application (proposed MOD28, Page 66)
- The arbitrary phasing proposal at Policy Stone 2 is contrary to up to date Governmental planning housing strategy and 'Planning for growth' 2012, and para 15 of the NPPF which states that 'development that is sustainable can be approved without delay'
- The Plan SHMA should have assessed any demonstrable relationship and effects between housing markets. The SHMA was based only on Stafford Borough
- SoTCC had no objections to 250 houses in Yarnfield granted in 2012; and in 2013 itself approved in principle 200 houses within the North Staffordshire green belt at Barlaston 'to provide much needed quality housing'

Response

Stone is a sustainable location for new housing development, the site in question is also considered sustainable, suitable for housing development, and accords with NPPF considerations. The site is both achievable and deliverable, and it is proposed to commence development on site in early 2015.

The question is not whether the site is suitable, but when development should commence. The proposed strategy is to phase development in Stone to the latter 10 years of the Local Plan, i.e. from 2021. The argument for this approach is based around the need for urban regeneration within the North Staffordshire conurbation. The regeneration needs of North Staffordshire are recognised; however, it is considered that the arguments and evidence provided are wholly unjustified for a housing moratorium in the Stone area.

There is a clear and demonstrable demand for housing in this location, and deferring development will artificially suppress the market, and exacerbate pressures in the Stone area including house prices and affordability. The City of Stoke-on-Trent Council acknowledge the demand for such products themselves, and acknowledge a requirement of 5,100 homes in their "outer urban area", including supporting the need at nearby Wedgwood. Stone also forms a part of this "outer urban area", though it happens to be within the adjoining local authority area. The proximity of these two locations illustrates that they are a part of the same functional housing market area, and therefore there is a clear contradiction in policy position.

It is acknowledged that affordability and choice is a big issue facing Stone, and this is the key site to making a significant contribution to tackling these issues. The SDL will deliver both market and affordable housing. Deferring commencement of development until 2021 would clearly exacerbate this issue. Affordable housing budgets at the Homes and Communities Agency (HCA) have diminished in recent times, and there is currently only certainty of funding until 2018, therefore there has been more of focus on delivering against local spatial priorities from a housing strategy perspective. In addition, if any new affordable housing schemes were delivered in Stone via HCA programmes, they would likely to be small scale in nature and would only make a limited impact on the issues facing the town. Therefore there is a greater onus on the market to deliver new affordable homes and this site can deliver on a reasonable scale.

SoTCC's regeneration arguments are based on highly questionable evidence. They state that prior to 2011, they had made in-roads at stemming outward migration, and refer to delivery at key housing-led regeneration sites (Ridgway Road, Slater Street, etc.). However, these sites are delivering a completely different product (in the main affordable, intermediate, and lower mid-market housing), and therefore delivery of such products has proven popular and retained residents. The products on offer on the Stone SDL site would be higher mid-market and higher-end, a completely different offer, and an offer that will not be delivered in the Potteries conurbation. Therefore the argument to suppress housing development in Stone in order to support their targeted regeneration initiatives is not justified, and is unsustainable as it would further distort the market in the Stone area.

SoTCC in making their regeneration case also refer to the marketing of two former HMR sites (both of which are not particularly large). Previous marketing of former HMR sites (e.g. the site adjacent to Bridgewater Pottery in Hanley) did not prove successful, and the proposals received were again underpinned by a lower-end product. They also acknowledge the viability of such sites, but refer to bringing "brownfield housing sites forward through a number of funding sources including the Homes and Communities Agency". Firstly, previous sites such as these came forward at the peak of

the market, and even then required Housing Gap Funding (e.g. Greenhead Street, Burslem, and some of the sites in City Waterside). Secondly, the programme from which Housing Gap Funding came from expires in March 2015, and in any case is now fully committed. Current funding streams from the HCA are designed to tackle affordability (e.g. Affordable Homes Programme 2011-15), or are investment based (e.g. Build to Rent, Get Britain Building) on a loan or equity basis, and repayment is expected to be made, with returns. Clearly such funds are not going to be applicable to sites that are “unviable”. In addition, the Council has recently granted approval for a scheme in a former HMR area (Stanley Pottery, Middleport) where it was demonstrated that existing use value (industrial) was greater than residential use. Therefore it will clearly be some time before delivery occurs on the ground in some of these former HMR areas, and it is not justified to prevent much needed development from commencing in Stone on the basis of delivery uncertainty in the inner urban areas of the nearest city.

Conclusion

There is no evidence of substance to back up any phasing protection measures required for Stone. There are substantial matters like promotive up-to-date Governmental policy, the current significant 5 year land supply deficit and persistent under delivery requiring the higher buffer, lack of any evidence to substantiate any demonstrable harm and a planning application demonstrating clear intentions, all of which point to unrestrained delivery.

Stephen Stoney

Technical Director – Planning

Wardell Armstrong LLP

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