

The Plan for Stafford Borough

Brief responses to relevant items of homework as requested in Programme Officer's email of 11 November 2013.

N2.1 – 2.4

No comments (mainly not within my representations).

N2.5

I agree with the Council that over provision has consistently occurred in the period identified and the longer term (in my evidence and the Examination I referred to a longer term and cited Land for New Homes¹ as providing the evidence (Table 1 shows the Structure Plan requirement of 5,600 dwellings **exceeded** by 1,768 units as at 03/12).

The downturn in completion rates since 2008 is consistent with national and regional experience of housing completions and is due to factors such as the restriction of mortgage finance, the financial difficulties experienced by house-builders and the decline in house prices.

There has been a good supply of land with planning permission over the period in Stafford Borough (see Land for New Homes Table 9) and it is demand rather than supply which has caused the decline in house-building rates.

N2.6 – 2.8

No comments (mainly not within my representations).

N2.9

I totally support this change which was advocated in my representations and at the Examination.

N2.10

No comment

N2.11

I agree with the Council that Option 1 would be preferable, with the retention of existing boundaries and current (Local Plan 2001) until replaced by new boundaries in the Allocation document. This would be consistent with my comments on N2.15

N2.11a

I think that the change would be sensible. The typo in the Policy C should be corrected to read "Extensions of or Alterations."

¹Land for new Homes 2012

<http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/LDF/Land-for-New-Homes-2012.pdf>

N2.12

I do not agree with the Council on this matter, no justification for the Council's negative stance has been given. A really disappointing and inadequately considered response on this matter.

N2.13

I agree with the change - which mainly amounts to a correction.

This change indicates more clearly that it is likely that substantial over-provision of housing will occur when MoD provision, existing commitments, non strategic sites in Stafford, Rural Exception sites, Neighbourhood Plan proposals and new provision in the Sites and Allocations DPD are added. I note that in the Housing Trajectory included in N2.16 that SHLAA sites have also been included.

Acceptable Windfall sites, which I believe are inevitable and in many cases are desirable (e.g. the development of PDL sites in Stafford), would further add to the over-provision.

In my original representations I estimated over-provision as amounting to thousands of new homes. I have not changed this view in the light of the evidence given in the Examination.

N2.14

A sensible clarification.

N2.15

I made reference to Para 6.49 and the idea of a moratorium in my representation. I have read the Council's long response on the issue. I remain of the view that a moratorium is inappropriate.

Paragraph 2 of the Council's Justification (Homework) is accepted, as is the thrust of Paragraph 3, 4, and 5. Almost all of the housing allocations are at the town of Stafford, which is rightly identified as the most sustainable settlement in the Borough. The allocation of all but one strategic housing sites at Stafford clearly demonstrates the Council's intention to focus new housing at the town of Stafford – as does the change proposed in Policy Stafford 1 to refer to 7,200 new homes at Stafford plus provision for MoD Personnel. (See also N2.14 below).

The lack of allocations elsewhere in the Borough (with the exception of the town of Stone with a strategic allocation of 600 new homes) further demonstrates the Council's strategy of allocated growth being focussed on Stafford.

I heard no suggestion in the examination of a 'free for all' and agree that
“...the NPPF does not promote a free for all, nor does it offer unrestrained support for all development – instead it requires development to be sustainable ...”

– justification paragraph 6.

Paragraph 7 of the justification is not disputed; nor are the principles in Paragraph 8 and 9.

In justification paragraphs 9 and 10 we appear to come to the real fears and concerns of the Council.

I appreciate that the Council has concerns relating to development outside Stafford but I remain unconvinced as to the justification, practicality and deliverability of the new policy being put forward.

It seems that the main fear is expressed in paragraph 9

“...there is a very real risk that development proposals may come forward that in aggregate considerably exceed the scale and proportions intended by Spatial Principles SP2 and SP4...”

and

“Although not necessarily expressed at the Hearings, it is known that there are a considerable number of proposals, including submitted applications that are currently being advanced by land-owners and developers for locations related to Stone, the Key Service Villages or the wider other rural areas of the Borough. If submitted immediately, and individually considered against the relevant Plan policies (e.g. SP7 or Policy C5), many such proposals might well be judged sustainable and thus acceptable. However, taken together with the recent past building rates, and consents already granted, as shown in Background Statement (K1) Topic Paper C para. C2.2, it is clear that a situation could rapidly be reached in the lower three levels of the hierarchy that if much further housing is permitted, the scale of development might render the distribution intended in Spatial Principle SP4 impossible to achieve.”

These concerns could be regarded as inappropriate however; Policy SP7 does not provide for development as described - nor does Policy C5. The Council now appears to believe, according to the justification - but without any evidence being presented - that its' policies provide for substantial growth outside Stafford.

It seems to be something of a nonsense to seek to create a new Policy to negate the Council's own proposed policies, particularly when the Council appears to be misinterpreting the words of its own policies.

The evidence of past years, as shown in Land for New Homes 1999 - 2013, suggests that the development of new homes outside Stafford and Stone has not been excessive.

I appreciate that the Council has concerns relating to development outside Stafford and I share these - but I remain unconvinced both of the justification put forward and the practicality and deliverability of the policy.

Looking at the commitments outside Stafford it is difficult to see a case for the refusal of permission for similar development proposals in the future either under NPPF or the policies of the Plan under Examination.

Rather than to introduce a new Moratorium policy as a Main Modification it would seem to be preferable to strengthen the relevant policies, possibly as a Minor Modification - for example, to add as the first paragraph in Policy C5:-

“Existing residential development boundaries, as defined in the statutory Stafford Borough Local Plan 2001, shall remain in force until they are replaced by boundaries which have been subject to adoption either through a Neighbourhood Plan or in a Sites and Allocations Development Plan Document.”

This approach would preclude greenfield sites outside Key Service Villages such as Gnosall - which seems to be at the root of the Council's current concern - until new boundaries have been appropriately considered.

N2.16

Helpful breakdown; unclear whether SHLAA is intended to include windfall sites, Neighbourhood Plans, Sites and Allocations DPD etc. Currently it appears not.

It is appreciated that the Trajectory is a 'best guess' and needs re-evaluation at given stages e.g. every 3 – 5 years to see how accurate it has proved and to roll forward in the light of experience and outstanding commitments.

I consider that the first 6 year period may be over optimistic in the light of recent although this is primarily due to market factors rather than supply which will substantially exceed NPPF requirements once the Plan is adopted.

N2.17

No adverse comments.

N2.18

No comment

N2.19

I remain of the view expressed in my initial representations that the numbers of homes should be expressed as a maximum rather than approximately. Such a change would not be in conflict with the evidence given at the examination where none of the promoters were seeking additional numbers of new homes.

Housing numbers on allocated sites in Stafford Borough have, in the past, consistently exceeded the Local Plan allocations by over 20% and this continues today e.g. a) the first part of the Akzo Nobel site exceeds the allocation in Stafford Borough Local Plan 2001 by more than 100 (allocation of 300 - permission for over 400) b) the outline permissions for the first two parts of the Eastern Strategic Location already exceed the total of 600 new homes and part of the site has not yet been the subject of a planning application.

N2.20

Reporting of facts, no comment.

N2.21

No comment (I was unable to attend the Stone Housing Session of the Examination).

N2.22

I do not consider that the case was made for site extension at the examination. I see no reason why SANG should not be provided adjacent to the allocation and would oppose housing being built on a northward extension of the site.

I remain of the view expressed in my initial representations that the numbers of homes in the Strategic Locations should be expressed as a maximum rather than approximately. Such a change would not be in conflict with the evidence given at the examination where none of the promoters were seeking additional numbers of new homes, it would, however potentially avoid further over-provision. See also the last comment paragraph in 2.19 (above) for amplification on this point.

N2.23

No comment (I was unable to attend the Stone Housing Session of the Examination).

N2.24

This confirms what was said at the Examination.

N.25

Not within my representations.

N2.26 – N2.32

Not within my representations or appearance.

N2.33 and N2.34

The change is to be welcomed but it is still regretted that permissions (e.g. the Strategic Location to the East of Stafford have been for individual sites without a Master Plan either for the whole location for housing or for the individual sites. The problems caused by this were apparent at the Examination and will be exacerbated if the Council continues (as it has already in two cases) not insisting on this 'requirement' being met. (See also my original representation re Masterplans, CABE and current guidance)

N2.35

Fact, no comment.

N2.36

I see no purpose in commenting on these changes.

N2.37

No comment

N2.38

No comment (I was unable to attend the Stone Housing Session of the Examination).

N2.39

Nothing to add to my original and subsequent representations on this issue.

N2.40

The figures indicate really poor performance in the delivery of affordable housing. In the period housing completions shown on Land for New Homes² comprised:-

2010 - 2011	220
2011 - 2012	425
2012 - 2013	306
Total	951

Only a total of 36 of these homes were affordable houses through Section 106 Agreements in the same period – less than 5% of market housing numbers.

The other sources identified - of affordable housing on sites with 100% grant aid from the Homes and Communities Agency, mortgage rescue, First Buy and Existing Satisfactory Dwellings are of limited relevance to the overall issue and generally do not add to overall stock.

N2.41

No comment.

N2.42

No comment on the change (I was unable to attend the Stone Housing Session of the Examination to hear the argument for change).

I note from the Council's homework that there is a current application for the development of the site but I am not aware of whether the Council has agreed a Master Plan (as it has done in other cases to date) and also intends to set both this set aside its own policy on phasing. Perhaps a decision will be made by the Council as the Inspector prepares his report which will indicate whether the Council is now prepared to stand by the Policies which were the subject of Examination. I hope that the Council will have the courtesy to provide a copy of the Committee Report and Decision Notice to the Inspector.

N2.43 and N2.44

I was not a participant in this part of the Examination.

Paul F Windmill
Friday, 15 November 2013

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<http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/Examination%20Library%202013/D1--THE-HOUSING-MONITOR-2013--LAND-FOR-NEW-HOMES.pdf>

