N2.5 – Annual Housing Completions

The information provided by the Council lists completions since 2006/7. The completions are set against the requirement within the 2004 RSS Annual Dwelling with an apportionment as set out in the Ministerial Letter of the 15th June 2004. A shortfall is shown in only 2 of the seven year period to 2012/13.

The Plan for Stafford plan period begins in 2011. It is appropriate to consider what was the most up to date and objectively tested requirement for housing for the period from 2006. The Castleworks Appeal decision which has been referred to by a number of parties, concluded that the most up to date and tested requirement for that period was the RSS Phase 2 Revision Panel Report figure of 550 dwelling per annum. It would be appropriate for the Council to set out their annual completions against this most up to date and tested figure. In doing so it would demonstrate that only the year 2006/7 exceeded the requirement, with all other years in the 6 year since then under delivering. There is a clear record of past persistent under delivery against this most up to date and tested requirement for that period. This was the conclusion within the Castleworks decision.

N2.11 – Settlement Boundaries

The Council have confirmed here with withdrawal of Settlement Boundaries and given the points of our objections to those as included in the Plan, this is supported. However our preferred approach would have been to appropriately define new Boundaries within the Plan. The position as now proposed within the Plan for Stafford means an absence of any defining Settlement Boundaries for what is likely to be a considerable period as the Council prepare the Allocations DPD. The Council's track record in Plan delivery suggests that the timeframe for preparing the Allocations DPD is likely to be considerable. The Plan needs to make clear the approach to determining planning applications for development on the edge of settlements in absence of any defined boundaries.

N2.42 – Review of Stone SDL Boundary

The proposed change to the Plan by allocating new land for development as part of the Stone SDL is a significant and Major change to the plan and should be treated as such. The change admits the inadequacy of the current definition of the SDL area. The change however has been made without careful and due consideration of alternatives as put forward by Taylor Wimpey for the land south of Eccleshall Road. The Council's reasoning for the change as set out in this statement is fraught with errors and miss-understanding which results for such decision making on the hoof. Evidence was presented to the Examination by Taylor Wimpey which has explored a detailed assessment of landscape issues. The Council have undertaken no such work to inform their decision.

Justification for the northerly extension seemingly rests upon "close proximity to the local School", have "fewer transport implications" and "would deliver an integrated new neighbourhood with the existing adjacent residential areas" and would require "additional access points". The reasoning here must be tested further as it is fundamentally without substance on the basis that;

- Manor School is not the only First school in Stone and the land south of Eccleshall Road is within a much easier walking distance of Pirehill First and Walton Priory Middle Schools than the SDL.
- The land south of Eccleshall Road has excellent sustainable travel connections to local shops and services and is at least as equally accessible to the town centre. The site has pedestrian and cycle access onto Common Lane
- There are no transport implications at all which prevent its development
- The site south of Eccleshall Road directly adjoins existing housing and integrates with the existing community
- There are no impediments to the site's access from Eccleshall Road and this has been agreed with the Highway Authority.