

The Plan for Stafford Borough

Examination Hearing Thursday 31 October 2013.

Matter 8 – Communities (Policies C1 and C2).

Dwelling Types and sizes (Policy C1)

8.1 I made no representation on this matter.

Affordable Housing (Policy C2)

8.2 I would not have disputed the evidence of put forward by the Council to demonstrate soundness, justification, deliverability, viability, appropriateness and consistency with National Policy.

- i. I doubt whether the Council can deliver the number of affordable homes needed - 210 p.a. from an annual total of 500. This amounts to 42% so delivery seems mathematically impossible because:-
 - the majority of new allocations are in Stafford where 30% is the target
 - Even in Stone the % is 40% - also below the need identified
 - Unallocated sites are unlikely to deliver 405 – some will be below the threshold for example
 - I doubt whether current commitments would deliver 30% and would expect commitments to deliver in a range of 10% - 15%. I appreciate that there is already some 'homework' to be done on this matter by the Council and hope that I am under-estimating.
 - Rural Exception sites are unlikely to make up the shortfall – Stafford Borough has delivered very few rural exception homes in the last 10 years - I am sure that the Council's officers could provide actual numbers - despite the real commitment and efforts of the main Social Housing Providers; Stafford and Rural Homes and South Staffordshire Housing Association.

- ii. The thresholds appear to be justified by the evidence offered by the Council and explicitly accepted by the site promoters of all the Strategic Locations as expressed in the Stafford Examination sessions which I attended (I am not attending Stone).

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Matter 8 – Communities (Policies C3 and C5).

Specialist Housing (Policy C3)

8.3 In my previous representations I expressed concern about this issue and suggested that the level of Specialist Housing, including extra care and elderly accommodation should be identified in each Strategic Location by the Council.

I am unable to answer the question raised in 8.3a but fear that no provision will be made unless a much more specific requirement is included in the plan. The permissions already granted for the strategic location east of Stafford make no such provision and the other strategic locations appear to be following the same pattern.

Residential Proposals outside the Development Hierarchy (Policy C5)

8.4 I made no representation on this matter.

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Matter 8 – Communities (Policy C6).

Provision for Gypsies and Travellers (Policy C6)

8.5 a. In my previous representation relating to the absence of identified sites in the Plan I questioned its soundness in the light of Government Policy for traveller sites. I am aware that there may have been changes of circumstances since the representation was made and that a site appears to be have identified by the Council (and in its ownership). I welcome the Council's apparent new commitment on this matter.

If I had been able to attend the Examination session on Thursday I would have requested an up-date and a confirmation that new provision was entirely additional (and was not intended to replace any existing site).

If (as I hope) the Council is committed to a site it would be desirable to see its inclusion in the plan – but I appreciate the complications relating to Modification issues -which have been raised several times already in relation to other matters

Planning policy for traveller sites

Department for Communities and Local Government March 2012¹

Plan-making (page 3 – extract with additions in italics)

Policy B: Planning for traveller sites

9. Local planning authorities should, in producing their Local Plan:

a) identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets (*not done?*)

b) identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15 (*not done?*)

c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries) (*probably not relevant in this case*)

d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density (*not done?*)

e) protect local amenity and environment

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Matter 8 – Communities (Policy C7).

Open Space, Sports and Recreation (Policy C7)

8.6 a. Given the scale of growth over the last 15 years – over 7000 new homes in the period 1997 – 2012 an average of over 450 homes per year²; a Borough growth level of more than 10% I believe that it would have been reasonable to expect that, at least in relation to large sites that there would be some new playing field provision.

Unfortunately, despite this level of growth, so far as I am aware there has been no new land for playing fields being provided by new development despite the last Local Plan's requiring such provision (See Policy HOU7 "PUBLIC OPEN SPACE REQUIREMENTS FOR NEW RESIDENTIAL DEVELOPMENT"³ and more detail in Chapter 6⁴).

The total area of playing fields in the Borough may have declined as a result of their development e.g. Tesco on school playing fields on Newport Road, Stafford and housing at Stychfields off Lichfield Road, Stafford where there was a cricket pitch. These may have been 'replaced' by the transfer of privately owned land previously used for playing fields being transferred to the ownership of the Borough Council but has not been 'new land'.

I appreciate that the Council has reduced budgets to maintain playing fields and that this might explain its recent reluctance to seek playing field provision but it could have required initial provision and then subsequent maintenance by another body such as a residents association (as happens for play areas).

In this context if I had been able to attend Thursday's Examination session I would have tried to probe the Council's current position re playing field provision.

I would also have questioned the lack of reference to specific replacement provision such as in the Strategic Housing Area west at Stafford where the Stafford Rugby Club, its main pitch and training pitches are proposed to be deleted from the existing Green Network and developed for Mixed uses. (There may be limited parallels with issues at Westbridge Park, Stone.)

² Land for New Homes 2012 Page 3 Table 2

<http://www.staffordbc.gov.uk/live/Documents/Forward%20Planning/Examination%20Library%202013/E1--THE-HOUSING-MONITOR-LAND-FOR-NEW-HOMES-2012.pdf>

³ Stafford Borough Local Plan 2001

[http://www.staffordbc.gov.uk/live/images/cme_resources/Profiles/Forward%20Planning/Chapter%203%20\(PDF\).pdf](http://www.staffordbc.gov.uk/live/images/cme_resources/Profiles/Forward%20Planning/Chapter%203%20(PDF).pdf)

⁴[http://www.staffordbc.gov.uk/live/images/cme_resources/Profiles/Forward%20Planning/Chapter%206%20\(PDF\).pdf](http://www.staffordbc.gov.uk/live/images/cme_resources/Profiles/Forward%20Planning/Chapter%206%20(PDF).pdf)