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9 August 2016

Dear Mr Roberts

**THE PLAN FOR STAFFORD BOROUGH PART TWO EXAMINATION –  
RESPONSE TO THE COUNCIL’S NOTE MF1 AND INSPECTOR’S NOTE  
MF2**

We write on behalf of Commercial Estate Group (CEG) in response to Notes MF1 and MF2 prepared by the Council and Inspector respectively. We welcome this opportunity and set out our comments below.

**Uncertainties of delivery rates of Strategic Development Locations at  
Stafford North and Stafford West**

Following a review of the Council’s Response to the Inspector’s Note MF1 (P2-O1); the submissions made by other parties (P2-O1a – P2-O1e) and the Inspector’s Note MF2 (P2-O2) we still have the same concerns relating to the deliverability of the Strategic Development Locations (SDLs) at Stafford North and West which we have expressed through previous representations and also presented evidence on at the Examination.

Stafford West

There are still concerns over the ability of this site to deliver the anticipated number of dwellings over the plan period, in particular, with the level of associated infrastructure required.

During the Examination the Council was unable to give a clear answer as to how the funding gap for the Western Access Road will be addressed. The Council suggested that depending on final land acquisition costs, the gap could be considerably lower than expected.

This is a risky approach as there is no certainty that the land acquisition costs will be lower than expected and there still remains the issue of the funding gap, which at this stage there is no solution for.

In addition, the land for the delivery of the Western Access Road has not yet been secured and the Council is in the process of engaging with all land

owners/interested parties and twin tracking with a CPO.

Securing a deal that is acceptable to all parties is going to take considerable time, so too is a CPO if this route is progressed. Both have the potential to significantly impact upon the delivery timescales of this SDL.

As can be seen from the Inspector's Note MF2 (P2-O2), the Stafford West SDL is not on target to deliver the required number of dwellings within the plan period and given the complexities of the land deals and infrastructure requirements further slippage is inevitable.

#### Stafford North

As discussed at the Examination, there is no recent and up to date agreement/Statement of Common Ground between the landowners/developers which confirms all are still committed to delivering development and the obligations/infrastructure commitments originally agreed at this SDL.

Without this agreement, there is no certainty as how all the necessary infrastructure requirements, such as new primary and secondary school provision and highways capacity improvements will be delivered across the site. Given the level of infrastructure required across the site will mean such an agreement will be complex and take time to negotiate and agree. This will have implications on delivery rates pushing them back further into the plan period.

We re-iterate the concern that the delivery rates assumed by the Council for this SDL are optimistic and too much reliance is being placed on these estimates in the Council's five year housing land supply calculations.

#### **Need for flexibility**

As set out in previous representations and evidenced during the Examination, we do not support the Council's claim that the proposed settlement boundaries as drafted provide sufficient flexibility.

The proposed settlement boundaries, in particular around Stafford Town are too tightly drawn and rely on the Stafford North and West SDLs delivering housing at the rates assumed by the Council, which we have already highlighted is extremely optimistic and not a positively prepared approach.

Given the uncertainties associated with timings of delivery of housing at Stafford North and Stafford West, there should be flexibility incorporated into the settlement boundaries to enable other sustainable sites to come forward that will be able to contribute to the delivery of both market and affordable housing, such as extending the Stafford East SDL.

#### **Extension of Stafford East Strategic Development Location**

Inspector Pratt's Report into the Plan for Stafford Borough Part One (June 2014) referred to the potential of extending the Stafford East SDL at paragraphs

81 – 83. At paragraph 81 Inspector Pratt states:

*“There are suggestions that further land to the east of the proposed SDL could be allocated for development, which could enable the EDR [Eastern Distributor Road] to be reconsidered. However, SBC has thoroughly assessed this possibility, and further land does not need to be identified to deliver the proposed development strategy; this matter could be reconsidered in the future when the Plan is reviewed”.*

Inspector Pratt and the Council did not dismiss the expansion of the Stafford East SDL on technical matters it was purely due to that scale of site not being deemed to be needed. By suggesting this matter could be reconsidered in the future at a Local Plan Review, shows that Inspector Pratt and the Council believe this land has the potential to deliver future housing as it has not been dismissed outright.

Through the Examination for the Part Two Plan, it has been demonstrated that there is a need for additional land to accommodate future housing, meaning additional land, such as the extension to Stafford East should be able to come forward.

The Stafford East SDL is the only SDL to have planning permission across its entirety with homes already being delivered. It has already been recognised as a suitable and sustainable location for housing. The delivery of an increased number of dwellings in this location would assist the Council in achieving its vision for the EDR and significantly improving the local highway in the east of Stafford.

The National Planning Policy Framework (NPPF) is clear at paragraph 47 that in addition to identifying and maintaining a five year supply of housing, Local Planning Authorities (LPAs) will be required to identify a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. Extending the Stafford East SDL will provide a suitable and sustainable site/broad location that can deliver future housing throughout the plan period to assist the Borough in meeting its housing needs.

In order for the Part Two Plan to be sound we recommend that the settlement boundary is re-drawn around Stafford Town to include the extension to the Stafford East SDL.

We trust these comments will be taken into consideration. If you have any queries, or should wish to discuss, then please do not hesitate to contact me.

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Yours sincerely

Amy James

cc: CEG