

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Natural England (roslyn deeming)
Comment ID	SA1
Response Date	07/05/13 16:15
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Email
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Please give details of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of document, please also use this box to set out your comments.

Natural England concurs with the Addendum to the Revised Sustainability Report that the alternative sites that have been identified (Clarkes Farm, Land to the south west of Stone and Land to the west of M6) would not be considered reasonable alternatives to meeting the Development Strategy for Stafford compared to the other options.

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Staffordshire Police (Mr Gordon Scott)
Comment ID	SA2
Response Date	10/05/13 09:32
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Email
Version	0.4

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Please give details of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of document, please also use this box to set out your comments.

Thank-you for the opportunity to help shape your revised Sustainability Appraisal, Staffordshire Police ask that you consider our comments. Each Statutory Body must comply with the duty within Section 17 of the Crime & Disorder Act 1998 to do everything reasonably possible to prevent crime and disorder, and to consider crime and disorder reduction in the exercise of all their duties and it states: 17(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and (b) the misuse of drugs, alcohol and other substances in its area. In the light of HM Gov's reduced budgets to Public Services and to reduce the impact of the demand for our services and that of Partner Agencies such as Stafford B.C., Staffordshire Police request that Stafford Borough Council adopt as Policy, the Police ACPO CPI Secured by Design (SbyD) UK flagship initiative and "Parkmark" approved car-parking standard for all public car-parks. Sustainability is not just about "green materials", the first thing a victim of crime, particularly burglary wants to do is move house, anti-social behaviour due to poor design impacts negatively on residents lives and the wider community, neither are conducive to maintaining a sustainable community. As a result of the infrastructure needs resulting from growth; proposed increase in housing, employment opportunities and population within the Stafford and Stone areas, Staffordshire Police may in the future, request that developers contribute to mitigate the impact of their development either in kind or through providing monetary assistance to manage the impact and quantum of particular developments, these requests will be made either through the Community Income Levy or Section 106Town & Country Planning Act 1990. Any request for mitigation or funding would be reduced by 50% if the proposed development meets or exceeds Secured by Design accreditation. Can be Secured by Design (SbyD) supports one of the Government's key planning objectives - the creation of sustainable, secure, quality places where people wish to live and work and ties in with your consultation policy and listed documents; SbyD is the UK Police flagship initiative and

utilizes the principles of "**designing out crime**" through the use of effective crime prevention methods and the application of security standards at pre planning application stage of a development. SbyD has been independently proven to have a positive impact on environmental quality, housing, economic vibrancy, community safety and health and well being through the creation of safe, sustainable, secure, quality places where people wish to live and work. Secured by Design costs the Council nothing in either staff hours or expenditure, has a proven track record in reducing burglary by 50% and criminal damage by 25%, is a superb strategic tool to reduce crime and disorder, has been adopted by other Councils with very positive results and attracted positive comments from HM Inspectorate. SbyD is a positive marketing tool, is the minimum security standard for home and business's, has been specified for new PFI build Gov Buildings and overlaps a number of Government Planning Policy Statements, as well as specific documents, e.g. By Design- better places to live, Safer Places, the Planning System and Crime Prevention, Lifetime Homes, Lifetime Neighbourhoods and assists developers to gain credits from the Code for Sustainable Homes. SbyD can not only influence the provision of a sustainable, secure environment for residents, but in conjunction with other documents, provide a positive outcome to the benefit of all but the offender.

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Mr Jonathan Harbottle
Comment ID	SA3
Response Date	29/05/13 13:15
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Please give details of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of document, please also use this box to set out your comments.

We are satisfied that the Revised Sustainability Appraisal Report Addendum demonstrates that the Plan for Stafford Borough has been the subject of suitably comprehensive and satisfactory sustainability appraisal in respect of the choice of strategic site allocations. The Addendum provides a satisfactory assessment of the reasonable alternatives for the strategic site allocations against the Sustainability Appraisal Framework, gives reasons for the selection of and as between alternatives, and records this assessment in a clear and transparent way. It is therefore considered to make the choice of strategic site allocations legally sound.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

No, I do not wish to participate at the examination in public

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	SA4
Response Date	29/05/13 17:01
Consultation Point	3 Sustainability Appraisal of sites west of M6 (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Please give details of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of document, please also use this box to set out your comments.

The only "Transport" reference within this (or similar) section(s) is, as item 7, "Public Transport access" and so no reference is made / impact assessment drawn on the general traffic levels along the access roads to the (rural) areas under consideration. In terms of Creswell, the only road is the A5103 Creswell Grove, leading to the main Eccleshall Road (also the A5103), which already struggles and its residents suffer from the sheer volume - 10,000 traffic movements per day - along this very ordinary, often narrow and twisting **minor 'A' road** ... which completely bisects the Creswell residential community. A road clearly never designed to cope with such huge daily traffic volumes - a significant proportion of which are (heavily laden) HGV's commuting to the outlying Industrial / Storage Distribution Estates (in Seighford, Ladford Fields and Eccleshall).

Public Transport is indeed "limited" and the physical separation from the urban areas and facilities of Stafford Town is a noticeable feature and daily drawback to local residents who have to travel into Stafford to access even the most basic of services.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? No, I do not wish to participate at the examination in public

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	SA5
Response Date	29/05/13 17:16
Consultation Point	5.1 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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"Beaconside Road could be a barrier to movement to the town centre itself" Agree totally. Furthermore, with the volume of extra traffic that will be generated by the developments already proposed to the North / East of Stafford the inadequacy of the A513 Beaconside Road will be a barrier to traffic movement and access of all / any kind. Peak hour queues are horrendous on a daily basis. Access to / from the A34 North and to/from the M6 (Junction 14) and to the Employment Areas of Prime Point 14, ProLogis Park, Redhill Park and to those of Stone (and beyond) render this road a major congestion area and "pinch point" and one which will rapidly be taken well beyond any theoretical limit with which it can cope ... to the detriment of all concerned ... not just "locally" but to the whole of Stafford Town and the wider Borough. Given the difficulties of commuting across (through) Stafford Town centre ... and getting worse - the failure of the A513 (as the only "out of town" alternative can only spell disaster for the economic viability and social desirability of Stafford (Borough) as a place to live and work. The recently proposed additional 261 residential development beyond the University, at Tixall Road can only compound matters.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? No, I do not wish to participate at the examination in public

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the Examination in Public

If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

Creswell Parish Council has already registered its desire to be represented at the Examination in Public to present its case for improvements to the A513 / to see the building of a fully fledged Eastern Distributor Road (from the A34 North).

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Environment Agency (Miss Jane Field)
Comment ID	SA7
Response Date	30/05/13 15:15
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Email
Version	0.4

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Please give details of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of document, please also use this box to set out your comments.

It is evident from the assessment of site constraints that aside from mapped flood risk issues affecting Area North-west of M6 that have scored as a *negative* impact, all sites have scored as having *uncertain* impacts on Objective 5. Given the information currently available the Environment Agency concur with this conclusion, however it should be noted that most of these sites have watercourses flowing through them which have not been subject to flood risk modelling, and as such if this had been undertaken (either through EA modelling or through Level 2 SFRAs) all sites may have registered as a *negative*.

All sites have registered as having an *uncertain* impact on Objective 14 (water quality) which we agree with as all these sites have the potential to pose a risk of pollution, but this also could be mitigated through the imposition of policy requirements.

When comparing these sites with those proposed as being taken forward and already assessed by the sustainability appraisal, it is noted that the preferred sites mainly score *positive* on Objectives 5 and 14. However this is largely due to the support of policy requirements imposed as a result of the early SA process to mitigate these concerns. These sites all have the potential therefore to score positively on these Objectives should they be taken forward and supported by appropriate policy considerations.

Comments

Addendum SA (19/04/13 to 31/05/13)

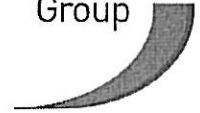
Comment by	Maximus Strategic
Comment ID	SA9
Response Date	30/05/13 17:43
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Pegasus.pdf

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

In order to comply with data protection you are advised **not to sign** any letter or document as it will publicly available.

If you would like to submit any additional supporting information please upload files below. [Pegasus.pdf](#)



013MD/tp3113/BIR.2908

30th May 2013

Forward Planning Section
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Dear Sir/Madam

Revised Sustainability Report Appraisal Report - Addendum

I would like to take this opportunity, on behalf of my client, Maximus Strategic Land, to comment on the Revised Sustainability Report Appraisal Report – Addendum. In particular we would wish to register our support to the findings of this additional appraisal work as it supports the case that the growth options identified in The Plan for Stafford, are the most appropriate given the reasonable alternatives, including land at Clarkes Farm which has only recently emerged.

It is quite clear that land west of the M6, and the Clarke's Farm site, would be completely divorced from the Stafford town. Consequently, any development would fail to integrate with existing communities, would be remote from the urban area, and would require significant infrastructure improvements to support any development. On this basis it would fail to achieve the economic, social and environmental dimensions required to deliver sustainable development.

The options for growth identified in The Plan for Stafford on the other hand have emerged following extensive public consultation, and would offer logical extensions to the settlement that are supported by raft of evidence produced by the Borough Council. Their inclusion in The Plan is therefore fully justified. In respect of land north of Stafford in particular; Maximus Strategic Land, have prepared and submitted a range of technical evidence to further underline the sustainability credentials of this part of the northern growth option, and are committed to working with the Borough Council to support this proposed strategic site through the Examination process.

Yours faithfully

MARK DAUNCEY
Principal Planner
mark.dauncey@pegasuspg.co.uk

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Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Network Rail ()
Comment ID	SA10
Response Date	30/05/13 10:13
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Email
Version	0.4

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Please give details of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of document, please also use this box to set out your comments.

With regards to the proposal Network Rail has the following comments to make, which are from a desktop study of the document only.

At this stage without details of methods of access or egress from the various sites being provided, it is difficult to gauge the full impact upon any Network Rail level crossings in the Stafford area.

Network Rail would require to see the detailed plans for the proposals to determine whether they impacted upon our level crossings (i.e. whether there was mention of access or egress from the sites over or toward a level crossing etc, walking routes, public footpaths or bridleways, open spaces).

In light of this Network Rail requests that the council includes a policy in writing within their **Stafford - Plan for the Borough - Publications Options Addendum - Revised Sustainability Appraisal Report** final draft that states the potential for developments to impact upon our level crossings and that developers will be required to contribute financially to upgrading works to the relevant level crossing impacted. The contributions would be in the same way as financial contributions towards highway improvements to make developer's schemes acceptable in light of (**Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010**) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. Developers will be asked to include the level crossings within the traffic and transport assessments.

Stafford Council should be made aware that in the first instance Network Rail would seek closure of a level crossing and either a replacement bridge or diversionary route. Where closure is not possible

the developer contributions (either via S106 or CIL) would be required to fund any necessary enhancements as set out by Network Rail.

It is appropriate to require developer contributions or CIL contributions to fund such railway infrastructure improvements including those to level crossings. A sum of 1500- 2000 per dwelling (in the case of a residential development) would be requested by Network Rail to facilitate mitigation measures on level crossings. Where several proposals may provide a cumulative impact upon a level crossing the council would be requested by Network Rail to receive a sum of 1500- 2000 per dwelling for each development which could then be pooled to fund level crossing mitigation measures. The sum set down by Network Rail is in line with respective sums obtained for works to mitigate highways issues as a result of a development or developments. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by third party commercial development.

There will also be the need to include a policy stating that developer contributions will be required toward enhancements at stations impacted by increased footfall from the additional proposals.

The National Planning Policy Framework states that councils should, " *work with...transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development...or transport investment necessary to support strategies for the growth of ...other major generators of travel demand in their areas.* " Also, " *encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plan, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport .* "

Comments

Addendum SA (19/04/13 to 31/05/13)

Comment by	Castle Homes and Properties Ltd ()
Comment ID	SA11
Response Date	30/05/13 12:51
Consultation Point	Revised Sustainability Appraisal Report Addendum (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Castle Homes Properties - Consultation response form.pdf

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

Part A

I. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Castle Homes & Properties Limited	Mr
First Name		Frank
Last Name		Hayes
Job Title (if applicable)		Associate Director
Organisation (if applicable)		Wardell-Armstrong
Address Line 1		Sir Henry Doulton House
Address Line 2		Forge Lane,
Address Line 3		Etruria
Address Line 4		Stoke on Trent
Postcode		ST1 5BD
Telephone Number		(0)845 111 7777
E-mail address		fhayes@wardell-armstrong.com

Part B – Please use a separate sheet for each representation

Please note: At this stage of the process, we are gathering representations on the ‘soundness’ of The Plan for Stafford Borough regarding the Addendum to the Revised Sustainability Appraisal Report and Planning Strategy Statement only. **We are not inviting further representations on the Plan for Stafford Borough – Publication**

Name or Organisation	Castle Homes & Properties Limited
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3. What part of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement does your comment relate to?

e.g. Section Reference, Paragraph	
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If your comment does not relate to a specific part of the document, or it relates to a different document, please make this clear in your response.

4. Do you consider that the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is:

- a. Legally compliant*?**
 Yes No
- b. Sound*?**
 Yes No

*To check a box when completing this form electronically, double click on it and select ‘checked’ under default value. *Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

5. Do you consider Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is unsound because it is not:

- a. Positively Prepared
- b. Justified
- c. Effective
- d. Consistent with national policy

6. Please give details of why you consider Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is not legally compliant, or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement , please also use this box to set out your comments.

Submission made on behalf of Castle Homes & Properties Ltd – Land Owner in Stone – Land at Walton Heath (SHLAA site reference 44)

The NPPF (para. 182) sets out test of soundness that a local plan should be considered against. The test include that plans should be;

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

What follows is a review of the Sustainability Appraisal and the Plan for Stafford Borough. The review focuses on options for housing growth and the distribution of housing growth within the borough. Other policy areas are not considered as part of this representation but future representations may be provided on other policies as part of the future Examination In Public.

Is the Plan Positively Prepared and Justified?

Clearly, the emerging plans should be based on a robust and credible evidence base and the choices in the plan should be backed up by fact. The plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.

As commented previously, the proposed target of 500 dwelling per year is insufficient to meet identified housing need within the Borough. The proposed target is below with the 2008 based sub-national household projections. It is also below with the housing requirements outlined in the Phase II revision of the West Midlands Regional Spatial Strategy which indicated a requirement of at least 550 dwellings per year. The policy approach is therefore an attempt to constrain housing development rather than encourage it.

It is noted that the purpose of the Stafford Borough Planning Strategy Statement and the supporting sustainability appraisal focuses exclusively on what is considered 'Reasonable' Alternative Locations for growth in Stafford and Stone. However, 'Reasonable' Alternatives to the distribution of housing growth between the different settlements has not been adequately tested and this is a highly significant planning decision of the emerging plan a major part of its spatial strategy. In particular, Spatial Principle 4 (SP4) – Stafford Borough Housing Growth Distribution proposes the following annual targets for the distribution of housing development;

- *Stafford 72%*
- *Stone 8%*
- *Key Service Villages 12% (Eccleshall, Gnosall, Haughton, Hixon, Great Haywood, Little Haywood and Colwich)*
- *Rest of Rural Area 8%*

It is evident from the previous sustainability appraisals and planning documents that other reasonable alternatives to this proposed distribution have not been properly tested. While 6 broad development

strategy options were assessed these were simply high level strategic approaches rather than reasonable policy alternatives to that outlined in policy (SP4) that are founded in a clear evidence base.

Paragraph 6.39 of *The Plan for Stafford Borough Publication [Pre-Submission]* indicates that the rationale behind the policy seeks to “ensure that the right proposition of development is directed to the most appropriate settlements with access to sufficient services and facilities to support development”. Paragraph 6.45 indicates that the new “Plan for Stafford Borough is proposing to ensure that the distribution of development is delivered to reflect the level of services and facilities available through the Sustainable Settlement Hierarchy. However, the planning policy choice above (SP4) is not backed up by fact and a credible robust evidence base and does not respond to the principles above. Both the Stafford Borough Planning Strategy Statement and the supporting sustainability appraisal does not address this gap in the plan preparation.

Housing and Population Growth

Paragraph 6.24 of *The Plan for Stafford Borough Publication [Pre-Submission]* correctly indicates that Stone is the second most sustainable settlement within the Borough. However, it goes on to state that Stone has “experienced significant housing development in recent years”.

The Stafford Borough Strategic Housing Market Assessment (2012) (SHMA) examines recent profile of newbuild dwellings across the Borough. Over the three year period between 2010 to 2012 a total of 825 dwellings were completed within Stafford Borough. What is evident is that the majority of housing growth in the borough has occurred outside the towns Stafford and Stone. In particular, limited housing growth has occurred in Stone. Therefore the evidence indicates that housing growth within Stone has been restricted in recent years. Overall, a dispersed housing development patterns has continued to occur within the borough.

Table 1: Housing Growth in Stafford Borough

	Housing Growth 2010-2012 (a)
Stafford	42.5%
Stone	14.2%
Other Areas	43.2%

(Sources: (a) Stafford Borough 2012 Strategic Housing Market Assessment – Page 40)

While Stone remains the second largest settlement within the borough population growth within the town between 2001 and 2011 has been more limited.

Table 2: Housing Growth in Stafford Borough

	2001 Population (a)		2011 Population (b)		Population Increase 2001-2011
Stafford	60,493	50%	65,716	50%	5,223
Stone	14,555	12%	16,385	13%	1,830
Other Areas	45,622	38%	48,768	37%	3,146
Total	120,670	100%	130,869	100%	10,199

(Sources: (a) Census 2001 and (b) Census 2011)

Settlements and Services

A Revised Settlement and Assessment of Services and Facilities was carried out in June 2012. The assessment did not collect information for Stafford and Stone but simply focused on smaller settlements. The table below focuses on the five basic services for each settlement. What is demonstrated is that Stone, behind Stafford, can be considered the second most sustainable settlement within the borough with a concentration of primary and secondary schools, medical facilities and retail provision. Both Stafford and Stone provide the only railway stations within the borough.

Table 3: Services in Settlements

	Medical Facility	Educational Facility	Retail Net Floorspace (sqm)	Railway Station
Stafford	20 (a)	31 (a)	19,055 (b)	1 (a)
Stone	6 (a)	9 (a)	4,118 (b)	1 (a)
Key Service Villages (d) 11 villages	7(c)	12 (c)	5,993 (b)	0 (a)
Rest of Rural Area	2 (c)	19 (c)		0 (a)

The policy approach (SP4) is unsound as it would promote unsustainable dispersed development. Stafford and Stone are the two major settlements within the Borough. Stone is the second most sustainable settlement within the Borough.

The current proposed distribution of housing growth within these different areas would see housing provision prioritised in other less sustainable locations such as Key Service Villages and in Rural Areas (20%) over and above that specified for Stone (8%). The proposed policy should seek to prioritise more sustainable locations such as Stone where housing market conditions can assist housing development delivery and where strong environmental constraints are not evident to the south and west of the town. Therefore an opportunity to promote positive change within Stone is not being effectively and reasonably pursued.

Overall, realistic alternatives to housing distribution have not been considered and therefore there is no clear audit trail showing how and why the preferred distribution and scale of growth above was arrived at. Options for a higher distribution and level of housing growth at Stone should be subject to a sustainability appraisal prior to an Examination in Public.

Is the Plan Consistent with National Policy?

The NPPF now calls for the planning system to do everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. The NPPF seeks to boost significantly housing supply ensuring local authorities meet the full, objectively assessed needs for market and affordable housing. The NPPF refers to the need to ensure that 'sufficient land of the right type is available in the right places and at the right time'. Finally, the NPPF requires the maintenance of a 5 year land supply in the form of specific, deliverable sites, with an additional 5% buffer in all cases, raised to 20% in instances of past poor performance, in order to 'provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'.

Is the Plan Effective?

For a plan to be effective it needs to be both deliverable, provide flexibility and have delivery partners which are signed up to it.

Housing Land Supply and Flexibility

The Plan for Stafford Borough Publication [Pre-Submission] Policy Stone 1 – Stone Town indicates that new housing development at Stone should be delivered after 2021.

As indicated by a recent Planning Appeal Decision (APP/Y3425/A/12/2172968) Stafford Borough cannot demonstrate a full 5 year supply of deliverable sites. Also emphasised within that appeal decision is the fact that there has been a continued shortfall of housing provision within the Borough over a considerable period of time. This accumulated shortfall is also not recognised within the proposed policy. The Inspector as part of Inquiry has made it clear that this housing shortfall should be met sooner rather than later.

"Using these figures would give a requirement of 550 dwellings per year. In the 6 years since 2006, an accumulated shortfall would have been created of some 914 dwellings. To be consistent with Planning for Growth and paragraph 47 of the Framework, I consider that it would not be reasonable to ignore any shortfall already created.

Also it would be preferable to meet the shortfall sooner rather than later, by adding it to the 5 year requirement, giving a 5 year requirement of 3664. The Council has not demonstrated that this could be achieved, even if their supply figures were adopted, over which there is some question as to their robustness, and therefore even without the addition of buffers, the Council does not have a five year land

supply.”

Overall, therefore there been continued and persistent under delivery of housing within the Borough. At present, the plan does not propose any substantive housing delivery for Stone until after 2021. The policy would not enable earlier development of sites at Stone despite the urgent local need, and past poor performance in the Borough. It is therefore essential that changes are made to this policy position to make it clear that planning applications on approved sites can be brought forward without conflict to policy relating to housing delivery.

Housing Market Conditions

The SHMA examines the difference in house prices (see map below) throughout the Borough. What is evident is that lower houses prices are evident within Stafford Town with higher house prices existing within Stone Town and wider rural areas. While this is just one indicator of housing market demand, it does suggest that Stafford Town has a more challenging housing market than Stone Town or other rural locations.

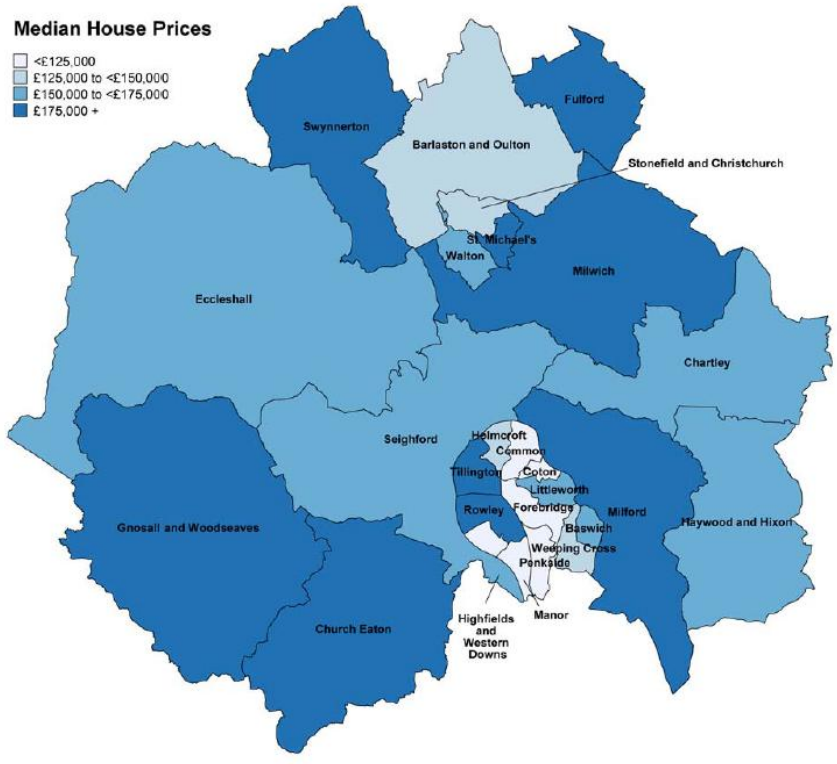
Paragraph 6.24 of *The Plan for Stafford Borough Publication [Pre-Submission]* indicates that “major development at Stone could have implications for the North Staffordshire urban regeneration initiatives and therefore it will be necessary both to constrain the overall quantity of new development, and to phase it until after 2021”.

The SHMA recognises that “Stafford Borough is part of a broader functional market which extends sub-regionally and particularly into Stoke on Trent”. However there is no reference in the SHMA to any negative relationship between housing development within Stone and its impact on North Staffordshire urban regeneration initiative.

Furthermore, the SHMA does provide a breakdown of the workplaces of Stafford residents by ward area. Using this data, (See Table 4) what is evident is that there is a higher percentage of residents living in Northern Rural Wards which commute to Stoke-On-Trent than Stone Town Wards. In addition, Stone Town Wards have a much higher level of self containment than Northern Rural Wards in that a high percentage of people that live in Stone work in Stone. In consideration of the above it is unlikely that additional housing growth above that currently proposed for Stone would undermine the North Staffordshire urban regeneration initiative.

It is also significant to note that three Key Service Villages Barlaston, Tittensor and Yarnfield are located within Northern Rural Wards.

Map 3.1 Stafford Borough median house prices by ward Feb 12 to May 12



Source: Land Registry Feb 2012 to May 2012

This data covers the transactions received at land Registry in the period 1 Feb 12 the month to 25 May 2012 © Crown copyright 2012."

Table 4: Workplace of Stafford residents by ward

Residence	Workplace (Row %)		
	Stafford	Stoke-on-Trent	Newcastle-under-Lyme
Northern Rural Wards			
Fulford	35.8	41.1	4.8
Barlaston and Oulton	51.3	31.1	5.9
Swynnerton	48.0	25.3	9.9
Stone Town Wards			
Stonefield and Chirstchurch	67.7	13.5	3.7
St Michael's	60.0	15.5	5.3
Walton	74.6	11.3	3.9
Stafford Borough	68.2	8.5	2.3

(Sources: (a) Stafford Borough 2012 Strategic Housing Market Assessment – Page 31 / Census 2001)

Paragraph 4.3 of *The Plan for Stafford Borough Planning Strategy Statement* correctly indicates that following “an assessment of infrastructure and environmental constraints, new development to the south and west (of Stone) were identified as deliverable in planning terms for large-scale new development. On that basis we would recommend that SHLAA site reference 44 is included within the plan as a residential development opportunity. This will provide flexibility within the plan and ensure delivery of housing growth within a sustainable settlement.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Consideration of ‘Reasonable’ Alternatives

Overall, realistic alternatives to housing distribution and housing growth have not been considered and therefore there is no clear audit trail showing how and why the preferred distribution outlined in SP4 was arrived at. Options for a higher distribution and level of housing growth at Stone should be subject to a sustainability appraisal prior to an Examination in Public.

Policy SP2

Revise the housing growth figures in line with the guidance of the NPPF, Planning for Growth and previous housing market trends within the borough.

Policy SP4

Put simply, policy should seek to increase level and proportion of housing growth assigned to Stone in the interest of sustainable development, identified housing need, deliverability and plan flexibility.

Policy Stone 2 – West & South of Stone

Increase the proportion of housing growth assigned to Stone over and above 500 additional dwellings. Provide flexibility within the policy by specifying that additional housing growth over and above the agreed dwelling requirement would be encourage in Stone, particularly to the West of the Settlement.

We would recommend that SHLAA site reference 44 is included within the plan as a residential development opportunity. This will provide flexibility within the plan and ensure delivery of housing growth within a sustainable settlement.

(attach separate sheets as necessary)

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.*

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

- a. **Yes** I wish to participate at the Examination in Public
- b. **No** I do not wish to participate at the Examination in Public

9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

To present the representation in an open and transparent manner for the Inspector’s proper consideration.

Please could I be notified of whether it is intended to and when the Plan has been submitted to the Secretary of State for Independent Examination.