

1 SUMMARY

1.1 Overview

- 1.1.1 This statement has been prepared by Wardell Armstrong (WA) on behalf of David Wilson Homes. David Wilson Homes have an interest in the land to the west of Stone at Spode Close as identified in the attached plan. The site is included in the Council's Strategic Housing Land Availability Assessment (site reference 44). The SHLAA states that the site is currently suitable for residential development, available, achievable and deliverable, between 2018-2023. We have made representations throughout the plan making process in support of promoting this site for residential development. However, we recognise that the plan approach seeks to identify only Strategic Development Locations rather than smaller residential development opportunities.
- 1.1.2 Whilst we support sections of the emerging Plan for Stafford Borough, the plan should direct additional housing growth toward Stone (well in excess of the 800 dwellings for the plan period) in recognition of it being correctly identified as the second most sustainable settlement within the Borough and in light of its ability to deliver additional housing. We support the plans position that the west of Stone is an appropriate location for housing growth. However we would encourage greater policy flexibility encouraging housing growth to general areas to the west of sustainable settlement. This would reduce the plan dependency on identified Strategic Development Locations.
- 1.1.3 In light of the continued shortfall of housing provision (both market and affordable housing) within Stafford Borough to meet identified need, the emerging planning policy should ensure that greater housing provision occurs earlier in the plan. This would attempt to address the previous under provision of housing that has occurred in the past, along with the future housing need within the borough and therefore boost significantly the supply of housing in line with the NPPF.

2 RESPONSE TO MAIN MATTER 1 – LEGAL REQUIREMENTS AND PROCEDURAL MATTERS

2.1 Sustainability Appraisal

2.1.1 (*Key Issue 1.2*) It is recognised that an iterative process of Sustainability Appraisal (SA) has been undertaken by Stafford Borough Council beginning with the Sustainability Appraisal Scoping Report carried out October 2007 and following the respective stages of the plan preparation. It is also recognised that the main role of the SA helps to identify the most sustainable options to be taken forward but that the SA does not decide which options are finally taken forward. However, it is considered that it has not been demonstrated that the Council has properly identified and assessed reasonable alternatives in particular with regard to housing growth.

2.1.2 The Plan for Stafford - Strategic Policy Choices (Consultation June and July 2012) outlines the policy choices or alternatives. The accompanying Sustainability Appraisal (Strategic Policy Choices: Sustainability Appraisal) considers and identifies the likely significant effect of these policy choices on the environment. With regard the scale of housing development, The Plan for Stafford Strategic Policy Choices outlines three main options outlined in the table below.

Option 1	Remaining at 500 dwellings per year
Option 2	Reduction of provision to 250 dwellings per year
Option 3	Increase provision to 750 dwellings per year

2.1.3 Option 2 above is clearly not considered a “reasonable alternative” as the Government is seeking to significantly boost housing provision.

2.1.4 What is evident from the above is that, the Local Planning Authority has not considered the level of housing growth proposed within the Phase Two Revision of the West Midlands Regional Spatial. While the Phase Two Revision of the RSS does not form part of the development plan is has been subject to an Examination in Public and therefore represent the most recent objectively assessed figures available. It therefore constitutes a “reasonable alternative” which should be considered by the SA. The Phase II Revision of the RSS recommended for Stafford a

requirement between 2006 and 2026 of 11,000 dwellings which would equate to 550 dwellings per year. Therefore the plan has adopted a preferred level of housing growth without the reasonable alternative of the Phase II Revision of the RSS being considered by the SA.

2.1.5 With regard the distribution of housing growth, the current Stafford Borough Local Plan 2001 provided a number of housing allocations at Stafford, Stone and at the Key Service Villages across the borough with the following development distribution;

- Stafford 78%
- Stone 17%
- Key Service Villages 5%

2.1.6 The Plan (para. 6.43) indicates that having monitored the number of housing completions and commitments since 2001 to the present the following distribution has occurred;

- Stafford 48%
- Stone 17%
- Key Service Villages 35%

2.1.7 Despite the above, the following options for housing distribution were put forward in the Plan for Stafford Strategic Policy Choices (Consultation June and July 2012).

- Option A - New Development focused on the County Town of Stafford only
- Option B - New Development focused on the County Town of Stafford and the market town of Stone only
- Option C - New Development focused on the County Town of Stafford, the market town of Stone and either one or more of the principal settlements
- Option D - New Development distributed to a selected number of settlements within the Stafford Borough area
- Option E - New Development distributed widely across the Borough to each of the principal settlements, cross border settlements and other identified settlements across the Borough area as well as at Stafford and the market town of Stone

- 2.1.8 In light of the housing needs associated with Stafford Borough, Option A and Option E do not represent reasonable feasible policy alternatives and are not based on any available evidence. Apart for Option A, none of the options above define the level of housing growth than should occur within each settlement. Therefore the SA has been limited in its assessment and reasonable alternatives to housing distribution as set out in the proposed policy SP4 (Stafford 72%, Stone 8%, Key Service Villages 12% Rest of Rural Area 8%) have not been considered by the SA. In particular, the sustainability merits of proposing a higher level of housing growth within Stone with a lower level of housing growth within the rest of the rural area and/or lower levels of housing growth within Stafford Town has not been tested by the SA.
- 2.1.9 In addition, it is significant to note that the housing distribution as proposed in the existing local plan has not been tested (Stafford 78% and Stone 17%). Overall therefore, the opportunity to identify more sustainable proposed housing distributions throughout the Borough through the SA process has not been utilised.
- 2.1.10 Given the nature of the options that have been put forward in terms of housing growth and housing distribution, the SA has not been able to identify the most sustainable options available with regard to housing growth within the borough.

APPENDIX 1 – SITE LOCATION PLAN

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