

THE PLAN FOR STAFFORD BOROUGH – EXAMINATION

SPATIAL PRINCIPLES SP3-SP5

STATEMENT BY TRENT VISION TRUST

This Statement is concerned principally with Spatial Principles 3 (SP3) and 4 (SP4).

The Representor considers the Submission draft Plan to be unsound because the housing development distribution encompassed by SP3 is defective, specifically because it makes inadequate provision for development at the Market Town of Stone, which is the second settlement in the Sustainable Settlement Hierarchy set out in SP3 and is clearly an intrinsically sustainable settlement in its own right, capable of accommodating major development over and above that which is provided for in the Plan. The Representor submits that the implications of the distributional strategy in the Plan is to deprive Stone of housing development required: to meet the full objectively assessed needs for housing in the Town (a discrete geographical element of the local housing market in Stafford Borough), contrary to (Paragraphs 47 and 159) of the Framework; to meet the legitimate expectations of house-builders and house buyers; and to facilitate needed economic and social regeneration in the Town.

The Inspector will be familiar with the Government's clearly-stated underlying intention in formulating both the Framework and Paragraph 47 thereof. Moreover, since the Framework has been published there have been a number of Planning Appeals and Judgements by the Courts which have emphasized the central importance of the Paragraph 47 requirement for development plans to provide for meeting the full objectively assessed housing needs of the area. (See, for example, most recently, Hunston Properties Limited v. Secretary of State for CLG and St Albans City and District Council [2013] EWHC 2678 [Admin], issued on 5 September [to which further reference will be made below]). The Representor considers that meeting this needs to be demonstrated not only at the (aggregate) HMA/Administrative Authority level, but also within the major identifiable sub area components of that area – which would, in the case of Stafford Borough, include Stone.

As the Evidence Base (and the Spatial Portrait of the Plan) demonstrates, Stone accounts for 11% of the population of the District (Stafford representing 46%). The 2012 Strategic Policy Choices document (Chapter 5) records that the 2001 Local Plan allocated 17% of the housing provision to Stone (compared to 78% to Stafford and 5% to Key Service Villages). The same document demonstrates however that, over the 10 years or so of the 2001 LP, whilst Stone has maintained exactly the same proportion of completions as LP allocations, Stafford delivered only 48% of completions, whereas 35% of completions were in the Rural Area. Commitments are currently split 10% at Stone, 55% at Stafford and 35% in the Rural areas tone (see Para 6.44 of the Plan).

On all measures of historical performance, therefore, the proposed distribution of housing in accordance with SP4, which allocates 8% of new housing to Stone 'under provides' for development here. The rationale for this provision is stated to be the need (in the first part of the plan period) not to deflect investment in brownfield sites in the North Staffordshire Conurbation (NSC) and, infrastructure/capacity constraints in and around Stone. As the judgement by HHJ Pelling QC in the previously cited Hunston Properties case demonstrates, objective housing needs assessments under Paragraph 47 of the Framework should not be premised on constraints. The proper plan-making approach involves first assessing need, considering how that need could or should be best met in the development plan and only then coming to a view as to whether fulfilling will, on balance, result in harm to other recognised spatial planning interests of acknowledged importance.

An increase in the proportion of the new housing provision accommodated in Stone to 12.5% (say 850 houses) or 15% (say 1000 houses) of the District-wide provision, by a marginal increase in the overall Plan Area-wide provision (which is, in any event, a minimum figure, not a ceiling or a target), by up to 5% and/or by a small proportionate reduction in the allocation to Stafford, the Key Service Villages and the rest of the Borough will have no significant impact on investment in PDL sites in the NSC in the short term, on the Plan's development strategy, or significantly increase infrastructure liabilities in and around the Town. In any event, any harmful impacts, such as they are, would be offset by the contribution that an increased provision in Stone would make to meeting the Town's objective housing needs and by the significant investment/ regeneration benefits of additional development for the Town.

In this context it is important to have regard both to the Spatial Vision and Key Objectives in the Plan and, specifically, the provisions of Policy Stone 1, and to the fact – including the aims of enhancing the Town’s services and facilities and, thereby, improving its sustainability, and of enhancing its attraction as a tourist/visitor destination. It should also be noted that only recently the Town was identified (in the national Market Town Healthcheck) as being “at serious risk of economic decline”

Notwithstanding the benefits cited above, it is clear that there are available and deliverable candidate development sites, promoted by other representors at this Examination that are demonstrably capable of accommodating modest additional provision on the scale contemplated by the Representor.

Antony Aspbury Associates Limited