



**THE PLAN FOR STAFFORD BOROUGH
EXAMINATION STATEMENT**

On behalf of

Grainger Plc.

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Prepared by
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Spatial Principle 2 – Stafford Borough Housing and Employment Requirements
Matter 3.2 ai:

What is the basis, justification and methodology for the level of proposed housing provision (500 dwellings/year), having regard to the supporting evidence (including the SHMA & SHLAA), recent population/household projections (including the 2011-based interim household projections) and Census results, and guidance in the NPPF (¶ 14, 17, 47-55; 159);

- 1.1 The amount of growth the Plan proposes to deliver is key to providing for the Borough's existing and future communities. The justification for and methodology used to devise the housing requirements over the plan period must be based on robust evidence including consideration of the following:
- Objectively assessed housing needs and demands
 - population and household projections,
 - environmental constraints,
 - infrastructure constraints
 - availability of deliverable sites,
- 1.2 There is also the context of the local/political appetite for growth and regard must be had to any requirements to meet the housing needs of other adjoining Local Authority areas through the duty to co-operate. This culminates in the Council's strategic approach reflected in Local Plan policy which sets out the numbers and distribution of new homes to be delivered over the plan period.
- 1.3 The Council's methodology for deriving the housing requirements is not clear, justified or effective. Population and household projections are trend based and extrapolate what has happened over the previous years. Simply utilising these projections to plan for future housing delivery doesn't reflect the application of any strategic policy, or reflect the growth aspirations of the plan (A1: 3.17, 4.1).
- 1.4 Since the RSS Phase 2 review the Government has readily indicated its intention boost the supply of housing. Stafford Borough was designated as a growth point (2008) (A1: 3.16) and the Council has indicated their commitment to the objectives for growth (A1:3.17) '*since these will help to secure major benefits for the town and the borough as a whole delivering sustainable communities*'. The Councils Growth Point Delivery Programme (E100: Table 3 and 5.3.5) indicates that that the predicted net additions from the growth point up to 2016 is 600 dwellings per annum (dpa), 85 dpa above the RSS Phase 2 review figure. The housing provision within the submitted Plan and the Council's more recent background document (K1) does not adequately

indicate how provision for the additional growth in support of the growth point has been accommodated within the 500 dpa proposed.

1.5 As submitted, the plan is unambitious, it will not meet the stated objectives for growth or be consistent with the NPPF in significantly increasing the supply of new homes. It is simply a continuation of past trends. A more positive policy for growth is required reflected by an increase in the housing requirement figures; if this is not met the implications are that:

- demand will outstrip supply, fuelling increasing house prices specifically in accessible rural areas, which impacts on the local populations ability to satisfy their needs in the local housing market
- it will have a negative impact on the areas potential economic growth which is linked to an increase in population and corresponding spending power in the local economy
- house building activity will be reduced with less job creation and reduced economic spin off
- opportunities for investment in infrastructure are reduced
- services and facilities will lack support and will decline, specifically in the rural environment.

1.6 The Plan should be amended to clearly demonstrate how the housing requirement figures have been devised and that they include an allowance to provide for the additional growth envisaged by the Growth Point, previously described as 85 dpa in addition to the RSS review 2 requirements. If the Council is committed to growth as stated in the plan then the housing require should be additional to that required to satisfy local needs. The revised housing figure should be a minimum of 565 dpa.

Matter 3.2 aii

What is the current and future 5, 10 & 15-year housing land supply position, in terms of existing commitments, future proposed provision, allowance for windfalls, and provision identified in the latest SHLAA; and how will the proposed housing provision be effectively delivered in terms of Strategic Development Locations and other allocations?

- 1.7 The background paper (K1 B6.6) suggests that the undersupply of new homes in the years preceding the start of the plan (2011) does not need to be addressed. This has an impact on the housing land position specifically years 1-5.
- 1.8 The Council has now acknowledged in its revised Five Year Housing Land Supply Statement 2013, (5YHLSS) (D3) that the Borough has consistently under delivered against housing requirements and as such has now correctly applied a 20% buffer to ensure choice and competition in the market for housing land. The Council now recognises that it has a housing land supply of only 2.23 years (D3: 1.13). It also acknowledges that this shortfall cannot be met through the current deliverable planning permissions and allocated sites.
- 1.9 Having regard to this lack of supply the Plan needs to be positively focused on stimulating new housing delivery in sustainable locations, it needs to be sufficiently flexible to accommodate this and have an appropriate housing requirement phased over the plan period; this should plan for an increase in development over the first five years of the plan, and to accommodate the deficit from previous years. A proportion of this increase in supply can be met within the rural areas where it has already been demonstrated that a significant amount of demand exists and developable sites are available.
- 1.10 It is accepted that the impact of the economic climate (the availability of mortgages and finances) has had negative effect on house building. From Q2 of 2008 Britain experienced the deepest recession since the Second World War, which lasted until Q3 in 2009. The economy has struggled to come out of this recession, indeed over the past 21 quarters 9 have been in recession. The latent demand that has built up during this period will need to be satisfied. As the economy starts to pick up, and initiatives to ease financial burdens such as providing 95% mortgages and financial incentives to stimulate the house building sector come into effect, there will be an increased demand for new homes. The Plan should recognise this and be sufficiently flexible to accommodate it.

- 1.11 The Plan places great emphasis on providing for a significant proportion of new development in the town of Stafford (72%) (A1:SP4) being delivered in a number of Strategic Development Locations (SDL). Much of this will require substantial investment in physical infrastructure which will take a considerable amount of time before the anticipated levels of delivery can be achieved. The Plan, in its housing requirement does not acknowledge this with phased development periods, and as such will fail to deliver annual targets. There is a finite amount of new housing development that the market in any settlement can adequately absorb at any one time; this naturally restricts the number of units a single site can deliver in any given year. This is also influenced by the availability of other sites and choice within the area. Only through providing a number of different sites across the Borough, can a mix of dwellings in terms of size, design and tenure be adequately delivered to meet the housing needs and demands.
- 1.12 The housing requirement at SP2 should identify a realistic phased housing requirement over the plan period, in five year periods. This should plan for an increase in development as the area starts to recover from recession in recognition that there will be latent demand built up within the market to be satisfied, and having regard to the timing implications of infrastructure provision and bringing strategic development locations to the market.

Matter 3.2 aiii

How does the Plan address the need for a 5/20% buffer to 5-year housing land supply, as required by the NPPF (47) to significantly boost housing supply, and address past shortfalls in provision of housing?

- 1.13 The background paper (K1 B6.6) suggests that the undersupply of new homes in the years preceding the start of the plan (2011) does not need to be addressed. This has an impact on the housing land position specifically years 1-5.
- 1.14 Council has now acknowledged in its revised Five Year Housing Land Supply Statement 2013, (5YHLSS) (D3) that the Borough has consistently under delivered against housing requirements and as such has now correctly applied a 20% buffer to ensure choice and competition in the market for housing land. The Council now recognises that it has a housing land supply of only 2.23 years (D3: 1.13) It also acknowledges that this shortfall cannot be met through the current deliverable planning permissions and allocated sites.

- 1.15 Having regard to this lack of supply the Plan needs to be positively focused on stimulating new housing delivery in sustainable locations across the Borough, it needs to be sufficiently flexible to accommodate this and have a housing requirement phased to increase development over the first five years of the plan to accommodate the deficit from previous years and take into account latent demand as the housing market starts to recover from recession. A proportion of this increase in supply can be met within the rural areas where it has already been demonstrated that a significant amount of demand exists and where developable sites are available.
- 1.16 However the Plan and the Council in its background statement (K1) suggest that this under provision is marginal and does not need to be accounted for. This is at odds with the 5YHLSS which includes a housing shortfall of 1,158 from the period 2006-2013. Even if a base date of 2011 and a Council target of 500 dpa is accepted, the Plan is already 27% (269) dwellings behind its stated target of 500 dpa in the first two years when applying the 'Sedgefield approach'.
- 1.17 Whilst guidance on how to calculate a five year housing land supply has not been directed by Government, recent appeal decisions have increasingly given credence to a methodology known as the 'Sedgefield approach', which the Council adopt in their 5YHLSS (D3), yet this has not been taken forward in the Council's approach to its housing trajectory (K1:C5.5). The Sedgefield approach takes into account any shortfall of homes delivered from the beginning of the plan period to current date, this is compared to the original requirement, and then added to or subtracted from the total for the next five years. The Sedgefield approach has gained favour because it is considered to be more in line with the spirit of the NPPF to significantly boost housing supply. The Council indicate in (K1:C5.4) and the Housing Trajectory utilises a 'residual method'. This method starts with the cumulative local plan requirement adds or minuses the cumulative rate of completions which is then divided by the number of years a plan strategy has left to run. This is not consistent with the emphasis of the NPPF (F1:47).
- 1.18 The policies within the plan need to be sufficiently flexible to be consistent with the requirements of the NPPF (F1:47) to boost significantly the supply of new homes, as currently submitted it fails to do this and exacerbates this by seeking to impose a moratorium on development once development levels have been exceeded.
- 1.19 The Plan and the Housing trajectory should be amended to reflect the approach of the 5YHLSS and encompass policies to be sufficiently flexible to adapt to future change.

Matter 3.2 C

Does SP2 effectively address cross-boundary housing and employment issues, including the relationship with Stoke-on-Trent/Newcastle-under-Lyme and other authorities in north Staffordshire; South Staffordshire, Cannock Chase, Birmingham and the West Midlands conurbation; other adjoining districts and rural areas, in line with national policy (NPPF; ¶ 178-181); and has it taken account of the strategies, plans, priorities and projects of adjoining local authorities and other bodies/agencies?

1.20 Information indicates that adjoining LPAs have reached various stages in the preparation of their local plans, not all of which are seeking to provide for the level of housing delivery proposed by the WMRSS (West Midlands Regional Spatial Strategy Phase II review) acknowledged as the most recently tested evidence base. It is important to ensure the needs and demands not being met in certain locations are, where practicable, met in adjoining areas.

1.21 The Duty to Co-operate (B3) does not satisfactorily demonstrate that the issues of housing supply across local authority boundaries have been adequately addressed. Cannock Chase and East Staffordshire along with Stafford BC are proposing less housing delivery than that envisaged by the RSS Phase 2 review. Further details to demonstrate how this has adequately been addressed are required.

Spatial Principle 3 – Sustainable Settlement Hierarchy

2 Matter 3.3 a:

Does SP3 establish an appropriate, effective, sustainable and soundly based settlement hierarchy, reflecting the existing and future role of settlements, including the County Town of Stafford, Market town of Stone and Key Service Villages, and is this approach fully justified with relevant and up-to-date evidence?

- 2.1 The NPPF advises that plans should be based on and reflect the presumption in favour of sustainable development (F1:15). They should deliver a wide choice of high quality homes and create sustainable and mixed communities (F1:50). Specifically in rural areas consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs (F1: 54), and promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities, recognising that development in one village may support services in villages nearby (F1:55)
- 2.2 The proposed settlement hierarchy is not appropriate or effective in meeting the objectively assessed needs of the Borough as it will not provide for a wide range and choice of high quality homes or create sustainable and mixed communities throughout the Borough, many rural settlements will be disadvantaged by the Plan's approach.
- 2.3 The settlement hierarchy has been derived from a points system attributed to services and facilities within settlements as set out in the Principles for Settlement Development (G8)(D54) and (D55). It proposes that there is a basic list of services which are generally accepted as necessary to encourage sustainable living in rural areas. The list includes: Shop, Post Office, Pub, Community Hall, Primary School, Transport access. The Plan incorporates the majority of settlements which have these services excluding Meir Heath and Rough Close and including Woodseaves, Yarnfield and Weston. Neither the Plan nor the background documentation provides sufficient evidence to indicate why these settlements have been included and other similar scoring settlements have been excluded such as Great Bridgeford.
- 2.4 The Council's back ground paper (K1 D3.19) suggests that significant villages singled out were the highest scoring rural settlements in the Assessment of Services and Facilities (D55), with associated higher populations and were determined as the most sustainable. The Plan in justifying the inclusion of Woodseaves makes reference to it being well related to Eccleshall with links through to both Stafford and Stone. This approach could be equally applicable to a number of villages with similar scores for

example Great Bridgeford, which is almost equal distance from Eccleshall on a main transport route and is actually situated closer to Stafford and Stone than Woodseaves.

- 2.5 The approach to KSV is inconsistent with the NPPF (F1: 55) which allows for development in one village which may support the services in a village nearby. The Plan requires villages to have all of the services lists to score sufficient points to be considered as a KSV. The Plan does not provide any evidence that a clustering approach has been considered whereby development in one settlement may support the services and facilities of a nearby settlement, for example development in the village of Ranton would support the local school, which has capacity to accommodate further pupil intake, and would also support the services present in nearby settlements of Woodseaves, Haughton and Gnosall.
- 2.6 As submitted the Plans approach to the settlement hierarchy is inappropriate and unjustified coupled with an overly restrictive approach to development in settlements not named in the settlement hierarchy in Policy C5 the policy approach is effectively planning for decline in the rural areas.

Spatial Policy SP4 – Housing Growth Distribution

3 Matter 3.3 b

Does SP4 establish an appropriate, effective, justified, sustainable and soundly based distribution of housing growth within Stafford Borough, including the target levels of housing and balance between Stafford (72%; 7,200), Stone (8%; 800), Key Service Villages (12%; 1,200) and other areas (8%; 800)? Is the approach to a moratorium period realistic, appropriate, effective, fully justified and soundly based?

- 3.1 SP4 seeks to distribute the Borough's housing requirements across four defined groups, Stafford, Stone, KSV, and rest of the rural area. The Plan seeks to concentrate the majority of development (72%) in Stafford in line with stated growth objectives. This perpetuates the past policy approach which also sought to direct 78% of development to Stafford Town. The reality is somewhat different in that since the adoption of the Local Plan only 47% of completions have been in the Town of Stafford. Conversely policy sought to resist development in rural areas but actually delivered 38% of the Borough's completions (Land for New Homes) (D1: 3.3).
- 3.2 There remains strong demand in rural areas for new housing where there is the capacity to deliver meaningful development. Simply constraining development in rural areas will not generate the planned delivery in Stafford as has been demonstrated in the application of the existing Local Plan. In order to deliver the housing requirement

for the Borough, sites with capacity to deliver must be in places that are attractive to the market, financially viable and in a range of locations which provide for a mix of housing and a range of tenures at a scale that the housing market can deliver (paragraph 1.11). Delivery in KSV and supporting villages in the rural area will contribute towards meeting the areas housing needs and supporting the rural community. The proportion of the housing requirements to the KSV and Rural areas cannot be reduced, this would affect the plans ability to deliver the housing requirements and would be contrary to the NPPF (F1:17) principle of supporting thriving rural communities within the countryside.

3.3 The Plan proposes a moratorium on development once delivery exceeds 25% of the distribution set out in SP4. This is inconsistent with NPPF (F1:47). The plans policies should be sufficiently robust and based on justified evidence to manage sustainable rates of housing delivery over the plan period without resorting to a moratorium on housing development.

3.4 Paragraph 6.49 of the plan and the proposed moratorium should be deleted.