



# THE PLAN FOR STAFFORD BOROUGH EXAMINATION STATEMENT

## DEVELOPMENT STRATEGY ON BEHALF OF J ROSS DEVELOPMENTS

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# QUALITY MANAGEMENT

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# 1 INTRODUCTION

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**Key issue: Is the Development Strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?**

## 1.1 Development Strategy

- 1.1.1 RPS Planning & Development (RPS) is retained by J. Ross Developments to present evidence on the Development Strategy Examination Matter and in relation to their specific land interests at Eccleshall concerning residential development proposals on the site off Cross Butts to the southwest of the settlement. The focus of J Ross Development's concerns in relation to the Development Strategy is within the context of Policies SP1, SP3, SP4 and SP7, alongside the proposed vision of distributing development amongst the identified Key Service Villages (KSVs) meeting the needs of rural settlements such as Eccleshall in particular.
- 1.1.2 The Settlement Hierarchy identified through policy SP3 is recognised as an appropriate approach in principle by classifying settlements by the level of services they provide. It is accepted that development should also be in accordance with a spatial strategy based on sustainable development principles. Further support is given to the reference in paragraph 6.19 to the requirement to allocate greenfield sites in sustainable locations in order to provide for the scale of development that has been identified. The allocation of greenfield sites within the identified settlement hierarchy is considered to be a robust approach to delivering development, which will result in amendments to the settlement boundaries and expansions of villages such as Eccleshall to ensure that the required level of development can be accommodated.
- 1.1.3 J Ross Developments would like to support the inclusion of SP1 – Presumption in Favour of Sustainable Development and reference to the Council adopting a positive approach to considering development proposals in accordance with the National Planning Policy Framework (NPPF). Through such an aspiration it will be possible for development to contribute favourably toward delivering sustainable communities and meeting the housing delivery requirements.

## 2 SCALE & DISTRIBUTION OF DEVELOPMENT

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**Key issue: Is the Development Strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?**

### 2.1 Housing Land Supply

- 2.1.1 The 5 Year Housing Land Statement [D3] published by Stafford BC in March 2013 applies a 20% buffer due to the poor delivery of housing within the Borough and low prospect of delivering the level of supply required. Based upon the housing figures sourced from the West Midlands Regional Spatial Strategy Phase Two Revision, the Borough currently cannot identify a 5 year supply with only 2.23years actually identified and a shortfall of at least 1,158 dwellings. Accordingly it is assumed that the strategic approach of delivering new housing, including housing delivery at KSVs such as Eccleshall, is considered to be the answer to providing the Borough with a reliable 5 year housing land supply.
- 2.1.2 Paragraph 6.10 of the Plan identifies that since March 2012 planning consents have been granted for 2,911 dwellings, representing nearly 6 years of supply. The failure to deliver sites has been based upon the size of sites and phased approach to delivery. There can be no reliance upon these approved developments to actually deliver within the next 6 years and satisfy the 5 year requirements or locally identified needs.
- 2.1.3 J Ross is concerned that over reliance upon large strategic allocations and longstanding consents at Stafford in meeting the Borough's housing needs is ineffectual and will mean that development within the lower settlement hierarchy is curtailed whilst the delivery of larger sites are delayed. As such, the distribution of homes between the identified settlement hierarchies is not considered to be representative of past delivery trends and will not deliver the required level of housing.
- 2.1.4 The distribution of development to KSVs should be increased to reflect the development opportunities that exist at these settlements (as demonstrated through the SHLAA evidence base) and as a result the 1,200 dwellings (12%) should be increased to 1,600 dwellings (16%) as a minimum to reflect the size of the settlement populations and past development delivery. As such, the distribution proposed by Policy SP4 is considered to be unsound as it will prove to be ineffective in delivering the Borough's housing needs and as a result inconsistent with the policy advice of the NPPF.

## 2.2 Spatial Principles 3, 4 & 5: Distribution of Development

***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?***

- 2.2.1 J Ross Developments are seeking for the current distribution of development in Policy SP4 to be revised so that the percentage of development at KSVs is increased in favour of development within the Rural Area and Stone.
- 2.2.2 Policy SP4 should be revised to increase the level of development at KSVs by reducing the share of the 'Rest of the Borough' to around 5% in reflection of the need to focus development in sustainable locations such as recognised settlements where community facilities and services are available. Through the expansion of the KSVs the requirement to deliver homes in the rest of the Rural Area will be reduced. For those rural area dwellings that are specific to their location, such as agricultural workers, there will be sufficient scope to deliver these within the 5% (500 dwellings) available for the Rural Area.
- 2.2.3 Reduction in the share of development to be provided at Stone to 7% in favour of increasing the houses to be delivered at KSVs is based upon documented site opportunities, undelivered Local Plan housing allocations at Stone and policy designation constraints that exist. Furthermore reliance upon the proposed Strategic Development Location (SDL) at Stone to deliver housing (500dw) within the required plan period is questionable given the failure to deliver the previous Housing Allocation that exists on part of the site. Furthermore as the SDL will deliver the majority (63%) of the Town's housing, the scope to accommodate a further 300 dwellings within the settlement limits is questionable. Reliance upon delivering this level of housing at Stone will put considerable pressure on the areas identified for employment as the plan progresses.

## 3 SPATIAL PRINCIPLES

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### 3.2 Spatial Principle 2:

**a. How has the Council undertaken an objective assessment of housing requirements for the relevant housing market area, and does the Plan fully meet the objectively assessed needs for market and affordable housing within Stafford Borough, along with any unmet housing requirements from neighbouring authorities:**

**i. 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);**

**ii. 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?**

**iii. 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?**

The Proposed Plan does not provide an adequate supply of housing to be delivered over the time period, or provide a suitable level of annual housing delivery in order to satisfy identified housing demand. The policy proposed does not seek to encourage development effectively or boost the level of housing provision, with no account of a 20% buffer as required by the NPPF.

On behalf of J. Ross Development RPS maintains that the Proposed Plan is unsound and ineffective in delivering the required level of housing. It does not identify an adequate level of housing provision in accordance with the NPPF whilst housing levels proposed are based upon unaccountable trends and not the most recent evidence.

### 3.1 Housing Requirement

3.1.1 The Plan for Stafford Borough Council Publication Document (the Plan) states that the 2008 Household Projections to 2033 indicated an increase of 11,523 households and although the Plan does not indicate the timeframe for this, it states that the rise results in housing provision of approximately 500 dw/year.

3.1.2 However, the Council appears to be using the WMRSS Panel Report annual requirement of 550dw/year to at least 2026, as the Council's Five Year Housing Land Statement 2013 relies on this rate to determine the housing requirement. It is not clear why the Council has relied on the household projections in the Plan but relies on the WMRSS Panel Report figures in the more up to date five year housing land assessment. The lack of correlation between the Plan's evidence base and its resulting policies questions the validity of the Plan's scale of development and levels of housing to be provided.

3.1.3 It is considered that the Council needs to alter the level of annual housing provision and should work towards delivering a higher annual rate of 550 dw/year to 2026 at least, with the scope to

reduce this to 500 dw/year from 2027 to 2031. The resulting requirement for the plan period would be 10,750 dwellings. This is higher than the 10,000 dwellings currently proposed and demonstrates that the current scale of provision proposed is unsound and inadequately justified. When taking into account the recorded level of shortfall in provision from 2006 to 2011 the level of housing requirement is increased further to 11,539 as demonstrated by Table 1 below.

<b>Table 1</b>	<b>Housing Requirement 2011-2031</b>
WMRSS Panel Report: 550 dw/yr 2011 – 2026	8,250
500 dw/yr 2027 – 2031	2,500
Existing Shortfall 2006 – 2011 [5 Year Report]	789
<b>Total Requirement</b>	<b>11,539</b>

***Shortfall in Provision***

3.1.4 The Plan will run to 2031 with the annual provision of 500 dwellings to deliver a total of 10,000 dwellings. However, the table on Page 24 clearly demonstrates that this level of development has not been consistently delivered since 2004, with an actual shortfall to 2013 of 672 dwellings based upon a 500 dwelling annual requirement. This table is based upon the 2012AMR and is superseded by the 5 year Housing Land Supply report which identifies an under provision of 808 dwellings up to 2012/2013 based upon 500 dw/yr and 1,158 dwellings if 550dw/yr are to be provided.

3.1.5 The proposed Plan does not provide for the shortfall in any way, either by increasing the total housing level or the annual rate of delivery. By accounting for the clearly identifiable shortfall in provision, which should be rightly added to the Plan's housing target and delivered within the next five years, the Council should be making provision for 11,158 dwellings up to 2031. This is further evidence that the current proposed level of housing to be delivered over the plan period is deficient. Taking into account the shortfall to 2013, this should provide a housing requirement of at least 10,808 dwellings for the remainder of the Plan period, Table 2).

<b>Table 2</b>	<b>Housing Requirement 2013-2031</b>
WMRSS Panel Report requirement 550 dw/yr 2013 – 2026	7,150
500 dw/yr 2027 – 2031	2,500
Shortfall to 2013	1,158
<b>Total Requirement</b>	<b>10,808</b>



3.1.6 With the current supply of only 1,991 dwellings, it is evident that the Council cannot meet their five-year housing requirement and will need to find additional suitable sites for at least 8,817 dwellings. The required increase in housing provision should result in increased levels of provision across the Borough and specifically within the KSVs where capacity exists for modest expansion of settlements to accommodate this additional scale of development. Sustainable locations within KSVs, such as at Eccleshall, should be used to help meet the requirement of additional sites without putting further strain upon the capacity of Stafford or Stone and making use of sites that have been assessed to be suitable through the SHLAA. This strategy of increasing KSV allocations will ensure that the necessary levels of housing development can be delivered.

## **3.2 Housing Delivery**

3.2.1 The Plan wrongly indicates that the Council is working towards the provision of 10,000 dwellings across the Borough from 2011 to 2031 (500 dwellings/year). RPS does not consider this provision to be sufficient as it does not appropriately reflect housing needs. The SHMA 2013 identifies that over the period 2008-2031, the total number of households is expected to increase by 12,000, made up of 11,000 aged 65 or over whilst the number aged under 65 is expected to measure 1,000. Therefore the objectively assessed total need for new homes should be set at 12,000 taking into account the supporting evidence base of the SHMA, population projection increases, the documented level of shortfall and under-provision of annual housing delivery. The level of housing provision that should be delivered post adoption should be set closer to 11,000 taking into account the shortfall in housing provision.

3.2.2 RPS Planning objects to the proposed Plan on behalf of J Ross Developments on the basis that the scale of housing provision identified is not soundly based or justified and will certainly not satisfy the identified housing land requirements for the Borough or meet the evident shortfall in housing provision. The resulting housing strategy will be ineffective in delivering the required level of housing in accordance with the advice of the NPPF and the requirement to be able to identify a continual 5-year housing land supply whilst also providing for past shortfalls in housing provision and an acceptable buffer of 20%.

3.2.3 The resulting policies of the Plan, SP2 and SP4 are unsound as they have not been positively prepared to provide for the increased housing delivery requirements, are inconsistent with the NPPF, has inadequate justification for the level of housing supply and will be demonstrably ineffective in terms of delivering for housing needs across the Borough extent. Further analysis of the current housing position and the failure of the Plan to respond to the housing issues identified by the supporting evidence is set out in the section below.

## **3.3 5 Year Housing Supply**

3.3.1 The WMRSS Phase 2 Panel Report to Examination stated a minimum of 7,000 dwellings should be delivered within Stafford Borough, plus the requirement to deliver a further 3,000 dwellings between 2006 and 2026 at a combined rate of 550 dwellings/year. The annual delivery of 550 dwellings over a twenty year period totals 11,000 dwellings, which is higher than the Plan's current housing figure and demonstrates that the Plan's proposed housing figure is arbitrary and has been based upon past trends rather than a credible evidence base.

- 3.3.2 The Council relies on the WMRSS Panel Report delivery rate of 550 dwellings/year in its Five Year Housing Land Statement 2013, which indicates that there was a need for 3,850 dwellings over the period from 2006 to 2013. However, this has not taken into account the shortfall in housing provision of dwellings up to 2013, which needs to be accommodated and accounted for in the early part of the proposed Plan. Currently there is no reference to such provision being accounted for.
- 3.3.3 The five-year housing need from 2013 to 2018 is identified in the 5 Year Housing Report as 2,750 dwellings, but this has not been adequately accounted for in the Plan, or the provision of a 20% buffer to compensate for the previous levels of under provision. Including the shortfall of 1,158 dwellings and 20% buffer of 550 dwellings due to the persistent under-delivery to 2013, the current five year housing requirement is 4,458 dwellings at a rate of 892 dwellings/year. This is not reflected in the policies of the Plan and as such the annual rate of housing delivery needs to be suitably increased to be able to deliver a housing strategy in accordance with national guidance of the NPPF. Without such an amendment the proposed housing strategy is demonstrated to be unsound.
- 3.3.4 The 5-year housing report indicates that as of March 2013, the Council has a supply of 3,440 dwellings. However, the delivery of all of these dwellings in the next five years is questionable, as this figure includes historic planning permissions, sites subject to complex S106 agreements, proposals which have been granted continual extensions of time and past Local Plan allocations. Therefore, it is concluded that the Council's identified supply of 1,991 dwellings or 2,23 years, is based solely upon sites with planning permissions.
- 3.3.5 Using the most up to date information it is evident that the identified housing land supply would provide less than five years supply even using the inadequate annual delivery rate of 500 dwellings. Accordingly the Plan does not provide an adequate level of housing to be allocated over its plan period and fails to be effective in meeting the identified housing needs of the Borough.
- 3.3.6 On behalf of J. Ross Developments, RPS Planning & Development would also like to support the representations of the House Builder's Federation on this matter, specifically in respect of their criticism of the Council's calculation of the housing figures reliant upon trend based information and the lack of accountability of the 20% housing buffer that the NPPF advises is necessary to consider.

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## 4 ECCLESHALL'S CAPACITY

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### 4.1 SHLAA Results

- 4.1.1 The SHLAA Review identifies approximately 1,500 developable dwellings at Eccleshall, the majority of which would be located beyond the existing settlement boundary. With only 84 dwellings being able to be developed within the settlement boundary to provide the required level of dwellings the extension of existing settlement boundaries is the only solution. This is clearly demonstrated by the results of the SHLAA Review.
- 4.1.2 J. Ross Developments is currently promoting a site at Eccleshall that was considered through the SHLAA and is identified by the plan at Appendix 1. This site reference 300 'Land Adjacent to Cross Butts and Romford Meadow' has been assessed as achievable, available and its only restriction to suitability is its location beyond the existing settlement boundary. There are no identified constraints to development as the site is beyond any policy designations such as Green Belt, does not affect any cultural or heritage designations, is not within an area of flood risk whilst also having good access to local services and facilities.
- 4.1.3 The methodology of the 2013 SHLAA review identifies that only sites adjacent to settlement boundaries should be considered to be appropriate for residential development and that locations, even brownfield sites, detached from settlements do not represent sustainable extensions. Therefore the policy advice of the Plan should reflect the same position as the evidence base that it relies upon in terms of only developing sustainable locations for housing that are within or immediately adjacent to settlement boundaries and suitable for new housing.

### 4.2 Shaw Lane Development

- 4.2.1 Indeed the recognition of the requirement to extend beyond the existing settlement boundaries of KSVs is demonstrated by the recent planning application proposal to develop a residential development off Shaw Lane at Eccleshall. The development of 82 dwellings on the site through application 10/14168/OUT was approved by Planning Committee on 29 June 2011.
- 4.2.2 Shaw Lane is located adjacent to the promoted site off Cross Butts so its approval is demonstration of the location's suitability for housing development. As identified by the plan at Appendix 2 the development of the Shaw Lane site and the identified area off Cross Butts will serve to provide a modest extension to Eccleshall that will provide a defensible boundary that avoids policy designations, wildlife areas and heritage sites.

### 4.3 Land South of Cross Butts

- 4.3.1 Eccleshall has correctly been categorised as a KSV and identified as a Category 1 settlement [K1], which allows for its settlement boundary to be adjusted to accommodate significant Greenfield development and new housing allocations provided they are not in the Green Belt. As demonstrated through the SHLAA development sites at Eccleshall do exist, and from Plan RPS2 it is evident that Eccleshall has a specific development opportunity to its southwest, where the settlement boundary could be extended without interference with the Green Belt designation and Historic Record sites.

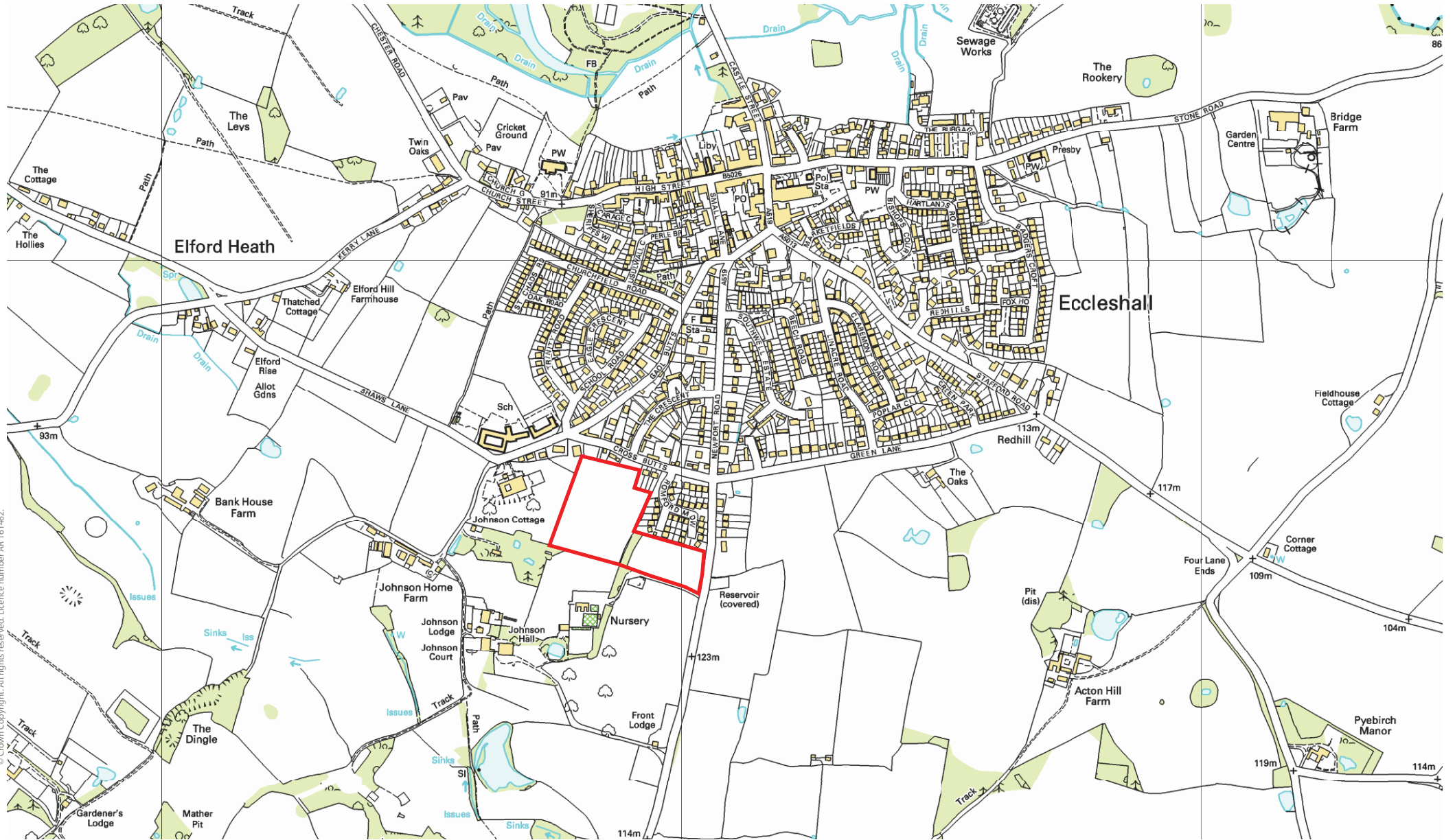
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4.3.2 J Ross Developments would like to identify to the Inspector that Eccleshall has the opportunity to accommodate a small scale extension to its southwest (including Shaw Lane site), contributing to the village's housing needs over the plan period. A development of this scale will contribute significantly toward local infrastructure such as education and health care provision, as well as contributing toward meeting the Borough's housing needs and delivering new homes at Eccleshall.

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# APPENDIX 1 – CROSS BUTTS SITE

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SCALE: 1:10,000 @ A4

REF:	JBB8130	CHECKED BY:	KE
CLIENT:	J Ross Developments	DATE CHECKED:	09/10/13
DATE:	October 2013	REVISION:	00
STATUS:	Final	PREPARED BY:	JP

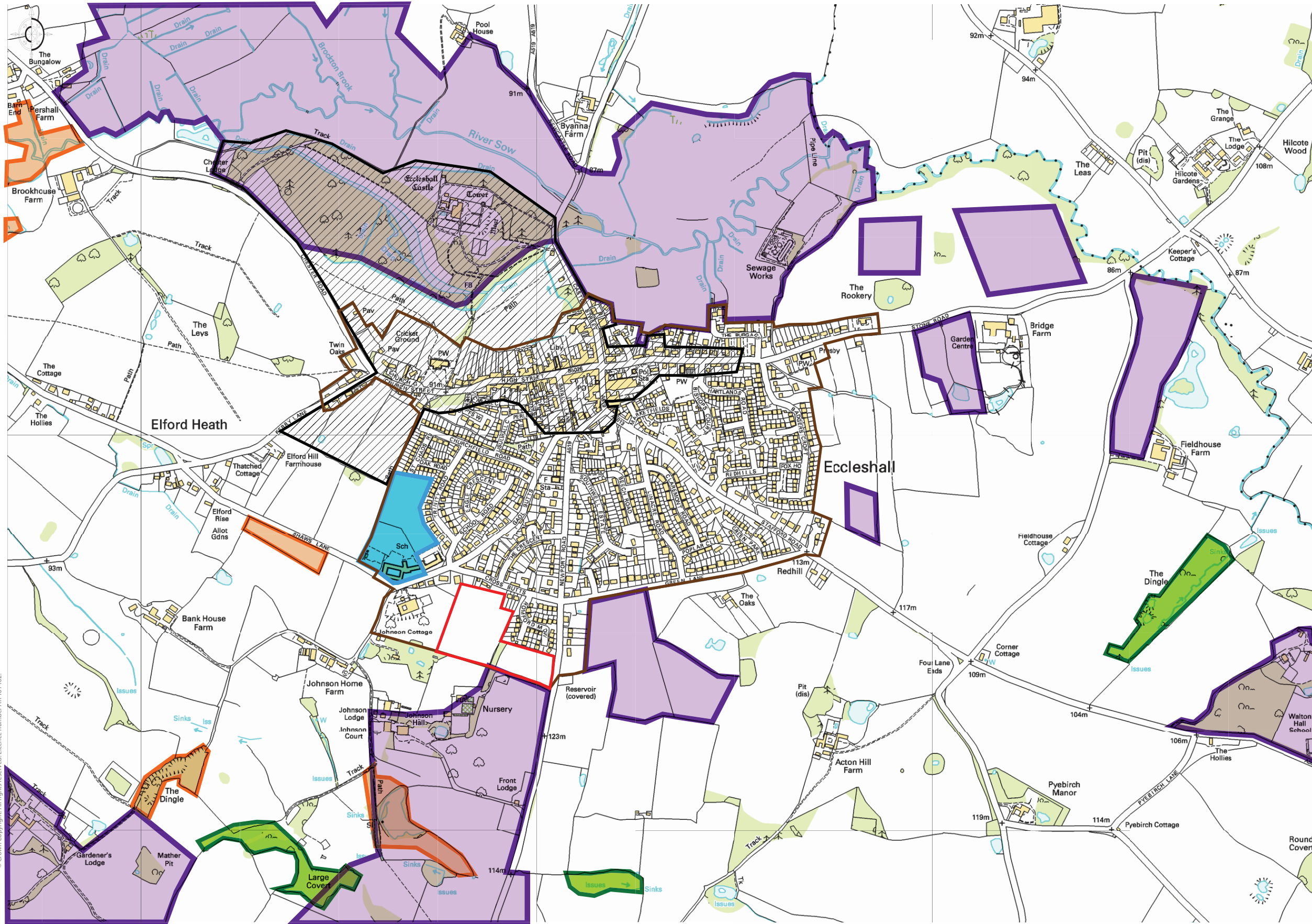


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**APPENDIX 2 – ECCLESHALL CONTEXT**

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**Key**

-  The Site
-  Historic Environment Record
-  Biodiversity Alert Site
-  Sites of Biological Importance
-  Conservation Area
-  Proposed Settlement Boundary
-  Shaw Lane Development

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SCALE: 1:10,000 @ A3

REF: JBB8130	CHECKED BY: KE
CLIENT: J Ross Developments	DATE CHECKED: 08/10/13
DATE: October 2013	REVISION: 00
STATUS: Final	PREPARED BY: JP



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