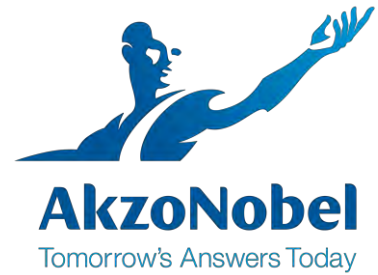




*Real value in a changing world*



# ***Examination*** of the Plan for Stafford Borough

Hearing Statement submitted on behalf of Akzo Nobel UK Ltd

Matter 3

10 October 2013

# Contents

|          |   |          |
|----------|---|----------|
| <b>1</b> | <b>Introduction .....</b>   | <b>2</b> |
| <b>2</b> | <b>Matter 3 – Development Strategy (Spatial Principles SP1-SP7) .....</b> | <b>3</b> |

# 1 Introduction

- 1.1.1 This Hearing Statement has been prepared by Jones Lang LaSalle on behalf of Akzo Nobel UK Limited ('ANUK'). It provides representations in relation to Matter 3 (Spatial Principles SP1-SP7).
- 1.1.2 The Statement identifies where The Plan for Stafford Borough - Publication (Submission) Document ('the Plan') is considered unsound as currently drafted, which Soundness criteria it fails and why it fails. It should be read in conjunction with earlier representations submitted in respect of the Pre Submission Plan, as well as the Hearing Statements that have been submitted on behalf of ANUK in respect of other Matters subject to Examination (Matter 4).
- 1.1.3 ANUK is a leading global supplier of decorative paints, with a global portfolio of strong brands, based in the Netherlands. In the UK, ANUK has around 30 sites and employs approximately 4,900 people. The Company has extensive landholdings at Beaconside in Stafford, as part of its legacy portfolio.
- 1.1.4 ANUK is generally supportive of the Plan and has raised few points of soundness.
- 1.1.5 ANUK is promoting its landholding north of Beaconside Stafford, which includes one of the sites which has been identified as Strategic Development Location for housing to the north of Stafford. ANUK has continued to make representations at all relevant stages of The Plan For Stafford Borough ('The Plan').
- 1.1.6 ANUK endorses the identification and inclusion of a Strategic Development Location for housing in North Stafford on part of its landholding within The Plan, but considers that the boundary of the Strategic Development Location should be extended to include its wider landholding.
- 1.1.7 ANUK is concerned that The Plan does not objectively assess housing need for Stafford Borough or provide sufficient housing to fully meet housing needs in the area.

## 2 Matter 3 – Development Strategy (Spatial Principles SP1-SP7)

***‘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?’***

***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?***

***iv. Have any alternative levels of housing development been considered, having regard to any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Stafford Borough?***

***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?’***

### The Housing Requirement

2.1.1 The National Planning Policy Framework (‘NPPF’) (March 2012) says at paragraph 47:

*‘To boost significantly the supply of housing, local planning authorities should:*

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;<sup>1</sup>*

---

<sup>1</sup> NPPF, DCLG, 2012, Paragraph 47

2.1.2 At paragraph 50 the NPFF also says:

*'...local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);<sup>2</sup>*

2.1.3 National Planning Practice Guidance complements the National Planning Policy Framework and provides advice on how to deliver its policies. The Guidance is still in Beta form nevertheless it provides a useful indication of the Governments current thinking in relation to the methodological approach, which should be used for assessing housing needs. So far as is relevant the draft National Planning Practice Guidance states.

*'Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.*

...

*The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. For example, formation rates may have been suppressed historically by under-supply and worsening affordability of housing. **The assessment will therefore need to reflect the consequences of past under delivery of housing.** As household projections do not reflect unmet housing need, local planning authorities should take a view based on available evidence of the extent to which household formation rates are or have been constrained by supply.<sup>3</sup>*

2.1.4 ANUK has concerns that the housing requirement for the Borough, as proposed by Stafford Borough Council ('The Council') has not objectively assessed the full housing need for Stafford Borough. Accordingly, it is concerned that the Plan does not fully meet the objectively assessed needs for market and affordable housing within Stafford Borough, along with any unmet housing requirements from neighbouring authorities.

2.1.5 The scale of housing development proposed, as set out in Spatial Policy 2 and Paragraph 6.5 (as amended)<sup>4</sup> of the Plan (500 dwellings per annum over the Plan period 2011-2031) is based upon demographic forecasting and an approach towards growth within the Borough, which ANUK broadly supports, subject to the considerations below.

2.1.6 ANUK consider that the housing target should be expressed as minimum, to ensure that the Plan can robustly deal with changing circumstances as new information on demographic trends and objectively assessed need is prepared over the lifetime of the Plan.

2.1.7 ANUK is also concerned that the proposed housing requirement does not appear to make any allowance for under provision of housing between 2006 and 2011 (the start of the Plan period), when measured against the relevant RSS Phase 2 Revision Panel Report<sup>5</sup> requirements over the period.

2.1.8 Stafford Borough has seen a consistent under delivery of housing against needs since 2006. The table below is reproduced from the Stafford Borough Council 5- Year Housing Land Statement 2013<sup>6</sup> and sets out the total completions for the past 7 years:

---

<sup>2</sup> Et seq, Paragraph 50

<sup>3</sup> National Planning Practice Guidance (BETA), 28 August 2013 - <http://planningguidance.planningportal.gov.uk/blog/guidance/assessment-of-housing-and-economic-development-needs/what-methodological-approach-should-be-used/> (emphasis added)

<sup>4</sup> The Plan For Stafford Borough Examination Library Ref A26 Plan For Stafford Borough Publication (Submission document) Schedule of Additional (Minor) Modifications

<sup>5</sup> West Midlands Regional Spatial Strategy Phase Two Revision Report of the Panel, September 2009

**Table: Stafford Borough Council –Housing Completions for the Past 7 years**

| Year         | Completions  | Target       | Shortfall    |
|--------------|--------------|--------------|--------------|
| 2006/07      | 449          | 550          | 101          |
| 2007/08      | 581          | 550          | -31          |
| 2008/09      | 518          | 550          | 32           |
| 2009/10      | 193          | 550          | 357          |
| 2010/11      | 220          | 550          | 330          |
| 2011/12      | 425          | 550          | 125          |
| 2012/13      | 306          | 550          | 244          |
| <b>Total</b> | <b>2,692</b> | <b>3,850</b> | <b>1,158</b> |
| Average      | 385          | 550          | 165          |

Source: Stafford Borough Council 5- Year Housing Land Statement 2013

- 2.1.9 The figures provided above suggest a shortfall of 914 dwellings from 2006/07-2011/12. This figure was also accepted by the Inspector in the appeal decision for the former Castle Works Site (APP/Y3425/A/12/2172698).
- 2.1.10 More recently, the Plan For Stafford Borough Publication Background Statement identifies that in the 6 years for the proposed RSS Revision period 2006 up to 2011 (the start of the Plan period) actual completions in Stafford Borough averaged only 320 dwellings, causing a shortfall of 1,151 dwellings (1,961 against a requirement for 2,750 dwellings over the period).<sup>7</sup> It is not clear how the Council has arrived at this figure.
- 2.1.11 By adopting a start date of 2011, the Local Plan effectively writes off the shortfall prior to that date. The Plan For Stafford Borough Publication Background Paper identifies (Paragraph B6.5) that there is no need to add on this provision, because *‘during this period, provision certainly exceeded the needs arising from natural change, which could be regarded as truly locally based need. What in fact has happened to unresolved in-migration? Households did not move, or moved elsewhere. Provision for that level of growth had not at that time been agreed or planned for and the opportunity to provide extra growth (even if the market would have sustained it) for that period has now gone.’*<sup>8</sup>

<sup>6</sup> The Plan For Stafford Borough Examination Library Ref D3, Stafford Borough Council 5- Year Housing Land Statement 2013, March 2013

<sup>7</sup> The Plan For Stafford Borough Examination Library Ref K1, Plan For Stafford Borough Publication Document Background Statement September 2013, paragraph B6.4

<sup>8</sup> Et seq, paragraph B6.5

- 2.1.12 The Council has not previously contested the shortfall arising over the period 2006-2011 within its 5 Year Housing Land Statement and should have done so if it considers that provision for natural change has been exceeded and that there is no accumulated demand arising from in-migration.
- 2.1.13 The assumption at paragraph B6.5 of The Plan For Stafford Borough Publication Background Paper also conflicts with Paragraph C6.3 of the same document, where the Council accept that there has been a persistent under delivery of housing. Is the Council basing this assessment solely on its record of delivery since the start date of the Plan (2 years)? If not, then the Council is accepting that there is a historic accumulated shortfall prior to the start date of the Plan. This shortfall cannot be ignored.
- 2.1.14 ANUK is not aware of any evidence that has been prepared to demonstrate that housing needs arising from natural change have been met and exceeded or that the accumulated un-met needs arising from in-migration have simply disappeared.
- 2.1.15 Even if (which ANUK does not accept) there are no accumulated un-met needs arising from in-migration, housing provision over the period 2006 -2011 may have been taken up by in-migration, as opposed to fully meeting the 'truly based local need' arising from natural change (as the Council imply). Indeed the 'Stafford Borough Publication Background Paper identifies *'In Stafford's case, some 70% of the population/household change which has occurred recently has been net in-migration from elsewhere in the surrounding areas and the country as a whole.'*<sup>9</sup> This is also reflected within the What Homes Where document which suggests that internal migration was one of the main factors driving population change over the period 2001 to 2009.<sup>10</sup>
- 2.1.16 Accordingly, ANUK maintains that the decision to ignore the historic accumulated shortfall in delivery is unsound and that the Plan has not been positively prepared in this regard. The Plan should address the shortfall from 2006, giving a minimum housing requirement of either 11,151 (10,000+1,151) or 10,914 (10,000+914) depending upon the figure relied upon and a total requirement of 8029 or 7859 homes in Stafford Town, based upon the sustainable settlement hierarchy and annual housing growth distribution targets set out in Spatial Principle 3 and Spatial Principle 4, which ANUK supports. This can be achieved by a 'Main Modification' to Spatial Principle 2, Table 6.54 and the Plan relevant Plan text.
- 2.1.17 ANUK considers that the accumulated shortfall of housing from previous years should be added within the first 5 years of The Plan Period in accordance with the 'Sedgefield' method of calculating land supply, which has been widely accepted by Planning Inspectors. This approach is consistent with the NPPF which is clear that housing supply is to be boosted significantly<sup>11</sup>. It would be inconsistent with the objectives of the NPPF to postpone the delivery of under supply to later within the Plan Period by spreading the requirement across the remaining timeframe to 2031.
- 2.1.18 The five year housing requirement currently presented by the Council is 3,000 dwellings<sup>12</sup>. By adding the shortfall, the five year housing requirement will be either 4,151 or 3,914, further emphasising the need (which the Council already accept<sup>13</sup>) for delivery from the Stafford Strategic Development Locations in the first five years of the Plan period.

**'Spatial Principle 7:**

**a. SP7 indicates that one of the key elements to deliver the proposed scale and distribution of housing and employment development is the establishment of Settlement Boundaries for each of the settlements in the Sustainable Settlement Hierarchy, either in this Plan (for Stafford and Stone) or in neighbourhood**

---

<sup>9</sup> Et seq, paragraph B3.3

<sup>10</sup> The Plan For Stafford Borough Examination Library Ref J14, What Homes Where, Chart CD1

<sup>11</sup> NPPF, Paragraph 47

<sup>12</sup> The Plan For Stafford Borough Examination Library Ref K1, Plan For Stafford Borough Publication Background Statement, Paragraph C6.3

<sup>13</sup> The Plan For Stafford Borough Examination Library Ref K1, Plan For Stafford Borough Publication Background Statement, Paragraph C5.5

**plans or the Site Allocations & Policies Document (for Key Service Villages). Is this an appropriate, effective, justified and soundly based way of delivering the scale and distribution of proposed development?**

**b. Are the criteria for establishing Settlement Boundaries appropriate, justified, effective, soundly based and consistent with national policy?**

**c. Are the criteria set out for considering development in other locations appropriate, justified, effective, soundly based and consistent with Policies E2, E5 & C5 and national policy, including the balance between brownfield and greenfield sites?’**

2.1.19 ANUK agrees that the establishment of Settlement Boundaries can provide an appropriate, effective, justified and soundly based way of delivering the scale and distribution of proposed development. However, ANUK is concerned that The Strategic Development Locations for Stafford are not identified within the Settlement Boundaries<sup>14</sup>, given the important role which they will play in delivering the Council’s Housing requirement and the restrictive provisions of Policy C5, which apply to residential proposals outside of the Settlement Boundaries. This is unsound and could introduce issues of deliverability into the Strategic Development Locations.

2.1.20 In order to make the Plan sound the Strategic Development Locations for Stafford should be identified within the Settlement Boundaries on The Plan for Stafford Borough - Stafford Area Inset Map.

2.1.21 Spatial Principle 7 states (last sentence): ‘*Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield land be released.*’

2.1.22 ANUK is concerned that Policy SP7 could, as drafted, prevent the Strategic Development Locations being brought forward in the early part of the Plan period even if they provide the best way of achieving sustainable development and the supply of new homes.

2.1.23 Paragraph 52 of the National Planning Policy Framework, states:

*‘The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development....’<sup>15</sup>*

2.1.24 The Strategic Development Locations will meet a significant part of the housing requirement within the Plan and the Council already accept<sup>16</sup>) the need for housing delivery from the Stafford Strategic Development Locations in the first five years of the Plan period.

2.1.25 In order to be make Spatial Principle 7 sound and effective it should be redrafted, to acknowledge that ‘Save for the Strategic Development Locations:- *Only where sufficient sites on previously developed land in sustainable locations, are available to meet new development requirements should greenfield sites be released*’.

**‘General:**

**a. Is the Development Strategy sufficiently flexible to respond to a variety of unexpected or changing circumstances in the future, and when will the Plan be reviewed?**

**b. Does the Development Strategy give sufficient strategic guidance and spatial direction about the scale, location, timing and implementation of new development, in order to guide subsequent Local Plan Documents and development decisions?**

---

<sup>14</sup> The Plan For Stafford Borough Examination Library Ref A3, The Plan for Stafford Borough - Stafford Area Inset Map

<sup>15</sup> NPPF, paragraph 52

<sup>16</sup> The Plan For Stafford Borough Examination Library Ref K1, Plan For Stafford Borough Publication Background Statement, Paragraph C5.5



***c. Various alternative strategies were considered during the preparation of the Plan. Is the proposed Development Strategy the most appropriate, effective and sustainable strategy for Stafford Borough, having considered reasonable alternatives?***

***d. Does the Key Diagram properly illustrate the main elements of the Development Strategy, including the future pattern of development (including proposed housing and economic development), the settlement hierarchy and role of centres?'***

2.1.26 Yes, subject to the changes above and in relation to Matter 4.



*Real value in a changing world*

Jones Lang LaSalle  
One Piccadilly Gardens  
Manchester  
M11RG

+ 44 (0)161 236 8793

---

COPYRIGHT © JONES LANG LASALLE IP, INC. 2013.

This publication is the sole property of Jones Lang LaSalle IP, Inc. and must not be copied, reproduced or transmitted in any form or by any means, either in whole or in part, without the prior written consent of Jones Lang LaSalle IP, Inc.

The information contained in this publication has been obtained from sources generally regarded to be reliable. However, no representation is made, or warranty given, in respect of the accuracy of this information. We would like to be informed of any inaccuracies so that we may correct them.

Jones Lang LaSalle does not accept any liability in negligence or otherwise for any loss or damage suffered by any party resulting from reliance on this publication.