

Matter	Code	Summary of Response	Representatives	Council Response
<b>Matter 3- Development Strategy</b>				
Matter 3- Development Strategy	M3-2a	Promoting land at Stone. Object to 8% at Stone and unsustainable development of 20% to other areas including Key Service Villages. Object to the moratorium being unworkable, which is proved historically. 500 homes per year is too low, based on low historic outputs. Housing to be linked to economic sector assumptions, not just past delivery. No account should be taken of Ladfordfields new employment provision due to the presence of the existing employer, so not appropriate to meeting future needs. Less affordable housing will be delivered due to settlement distribution of housing proportions. Transport is a key issue for rural sustainability. The Local Plan to be re-drafted with less of a rural focus, and more provision at Stone.	Paul Sharpe Associates for Fradley Estates	Development restricted at Stone to deliver growth at Stafford, support North Staffordshire urban regeneration and in line with Duty to Co-operate. Population and number of household split between Stone and the rural area justifies the approach of 8% to 20%. Moratorium to help deliver the Plan and new development at Stafford, thus avoid unsustainable development. Reject the Ladfordfields employment approach as the existing employer may change. New provision to support rural areas is made. Affordable housing delivery in a number of Key Service Villages is the same as Stone, at 40%. More housing does not directly generate more affordable housing delivery. Transport issues are taken into account for rural sustainability policies.
Matter 3- Development Strategy	M3-3a	Strategic Housing Market Assessment is out of date and fails to address cross-boundary issues at the District level. SHMA is not self contained so joint preparation is required. Housing figures not to be reduced due to 2011 figures because lower figure caused by suppressed through household formation from the economic recession. 10,000 new houses is based on demographic information with no reference to economic assumptions	Home Builders Federation	SHMA is up-to-date and consistent with NPPF requirements. The Plan, based on the available evidence, is making provision for local and migration needs. Duty to Co-operate pro-formas with neighbouring authorities demonstrates meeting objectively assessed needs. No change to 10,000 figure due to 2011 interim

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		<p>and future delivery. NPPF is a new start but 11,000 new homes is not dismissable. Household growth into houses must be provided for. Housing trajectory is out of step with supply because the 20% buffer is not addressed. Object to the housing moratorium approach.</p>		<p>household projections despite the provision reducing by 1,000 over the next 10 years. Noted household growth equals houses, but total demand is being met. The housing trajectory demonstrates robust delivery over the Plan period and there is adequate housing land supply through the Strategic Housing Land Availability Assessment (SHLAA). The moratorium is appropriate to achieve growth at Stafford and implement the development strategy.</p>
<p>Matter 3- Development Strategy</p>	<p>M3-4a</p>	<p>The Northern Strategic Development Location to have an extended boundary to increase housing delivery. The housing target should be a minimum. Must take account of household projections, household formation rates, under-supply, affordability issues, increasing demand, unmet demands by concealed households and other neighbouring local authority needs. Must increase housing figure to address unmet needs and under-delivery, in the first 5 years so increase figure to 11,151 or 10,914 depending on shortfall uptake. Increase housing at Stafford to 8,029 from 7,200. First 5 years to deliver 4,141 houses using the northern Strategic Development Location (SDL). Include the SDLs within the settlement boundary for Stafford. Amend Spatial Principle 7 to focus on SDLs before brownfield options to be delivered.</p>	<p>Jones Lang LaSalle for Azko Nobel</p>	<p>To provide certainty a housing target is given, rather than a minimum. 10,000 new houses includes 70% in-migration and 30% local need so flexibility to meet adjoining areas as well as under-supply and affordability issues etc... New Plan with new evidence, not a delivery mechanism for the West Midlands RSS or addressing historic shortfall. The Plan must demonstrate realistic delivery at the SDLs to meet demands. Stafford and Stone Settlement Boundaries amended to include SDLs through the Sites Development Plan Document (DPD). Amendment to SP7 to clarify the relationship between brownfield and greenfield sites.</p>

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Matter 3- Development Strategy	M3-5a	Object to the development strategy, with an increased focus on rural areas and the housing proportions to be increased, in order to support market and affordable housing delivery. Promoting previously developed land at Cold Meece.	Wardell Armstrong for Baden Hall Enterprises	The Council considers that the development strategy distribution and proportions are appropriate in the context of the NPPF and sustainable development.
Matter 3- Development Strategy	M3-6a	The distribution of housing development at Stone should be increased, to address the shortfall in housing recently and deliver affordable houses. The Strategic Housing Market Assessment is not robust as it is not jointly prepared. The 2011 interim household projections are weak compared to the 2008 based projections. There is undersupply of land and a weak market in Stafford. It is important to provide a range of sites to boost delivery. Query the delivery of Strategic Development Locations at Stafford. The settlement boundary for Stone to be deleted to increase flexibility, which has a strong market. Reject development restrictions until after 2021 at Stone due to the North Staffordshire conurbation. Stone can address the historic lack of housing delivery.	Wardell Armstrong for David Wilson Homes	The Council considers that the housing distribution at Stone is appropriate to the size of the settlement, recent housing completions and the future strategy, to support North Staffordshire urban regeneration and in line with Duty to Co-operate. The SHMA is up-to-date and consistent with NPPF requirements. The Plan, based on the available evidence, is making provision for local and migration needs. No change to 10,000 figure due to 2011 interim household projections despite the provision reducing by 1,000 over the next 10 years. The housing trajectory demonstrates robust delivery over the Plan period and there is adequate housing land supply through the Strategic Housing Land Availability Assessment (SHLAA). Growth at Stafford can be delivered, shown through viability evidence, to implement the development strategy.

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Matter 3- Development Strategy	M3-7a	Supports rapid adoption of the new Plan to provide certainty and support for % distribution of housing development at Key Service Villages and rural areas. Key Service Villages evidence base to be updated due to changes in services and facilities. Take account of windfalls due to increased completions at Key Service Villages. Support the moratorium.	Ms M Booth	Key Service Village evidence is up-to-date at 2012 but can be revised during preparation of the Sites DPD due to some limited changes occurred with services and facilities. Windfall levels fails to fully meet objectively assessed needs and are not located appropriately to the new development strategy distribution of the new Local Plan.
Matter 3- Development Strategy	M3-8a	No preferred method for meeting housing requirements. Windfall is frequently used to demonstrate housing delivery (see Inspector's reports & NPPF para 37). Reference to 10% reduction in commitments allowance. Council should use a windfall allowance, excluding garden land. Detailed appendices with figures provided.	Mr P Windmill	Windfall not considered as a reliable supply to meet housing requirements at Stafford and Stone. New development focussed on Stafford with insufficient supply to meet the scale of demand. Whilst the Council acknowledge that windfalls occur, more land is required than is deliverable through existing urban areas to meet objectively assessed need.
Matter 3- Development Strategy	M3-9a	Spatial Principle 3 – support Key Service Villages but increase proportions as these settlements are more sustainable than other rural areas, a strategic issue. Object to moratorium restricting growth. Specific figures for each Key Service Village are required. Identify settlement boundaries to give certainty, not to be delegated to Sites DPD or Neighbourhood Plans. Spatial Principle 6 – rural services and facilities to be linked to housing growth at Key Service Villages, set out in Policy. Spatial Principle 7 – Key Service Villages are strategic. Settlement boundaries to be identified. Apportion growth	Barton Willmore on behalf of Taylor Wimpey UK Ltd	Consider that the balance between Key Service Villages and rural areas is correct with 12% and 8%. It is unrealistic to have less than 40 dwellings per year in other rural areas over the Plan period due to infill and agricultural housing. Moratorium is appropriate to deliver new development at Stafford. Key Service Villages with boundaries through Sites DPD with Spatial Principle 7 providing an appropriate policy criteria in the interim. Agree that Key

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		to specific Key Service Villages, including land north of Great Haywood.		Service Villages could be referenced in Spatial Principle 6 as an amendment but this is not necessary in terms of soundness. Neighbourhood Plans / Sites DPD to identify percentage at Key Service Villages is appropriate with sufficient commitments to demonstrate delivery.
Matter 3- Development Strategy	M3-10a	Increase the proportion of new housing at Stone as the second sustainable settlement, to meet objectively assessed needs. Maximising development at Stone will support surrounding areas. There is poor housing delivery at Stafford compared to Stone. Reject the North Staffordshire conurbation approach as this is contrary to the NPPF. Increase percentages at Stone will have no impact on the North Staffordshire market, the development strategy nor infrastructure. New development will bring regeneration and support the local community.	Trent Vision Trust	The Council considers that the housing distribution at Stone is appropriate to the size of the settlement, recent housing completions and the future strategy, to support North Staffordshire urban regeneration and in line with Duty to Co-operate. The Plan, based on the available evidence, is making provision for local and migration needs. The housing trajectory demonstrates robust delivery over the Plan period and there is adequate housing land supply through the Strategic Housing Land Availability Assessment (SHLAA). Growth at Stafford can be delivered, shown through viability evidence, to implement the development strategy.
Matter 3- Development Strategy	M3-11a	Support the proposed Settlement Boundaries at Stafford and Stone. However the boundaries should be defined in all sustainable settlement now. The boundaries for Stafford and Stone should be supported by evidence that they have been appropriately defined, provide sufficient scope for anticipated future growth and have adopted	St Modwen Developments	Stafford and Stone Settlement Boundaries included to demonstrate the context for Strategic Development Locations (SDLs) and deliver key strategic infrastructure rather than the potential to be undermined by smaller scale development sites. Council

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		the same criteria as for other settlements set out in the Policy. Stafford's settlement boundary to include the Castleworks site and St Leonards.		will provide another opportunity to define new boundaries for sustainable settlements including Stafford and Stone, to be delivered through the Sites DPD, to ensure sufficient engagement and consideration. Note the two areas suggested for inclusion at Stafford.
Matter 3- Development Strategy	M3-12a	Promoting land at Hixon for new development. Increase figure to 11,000 and provide an extra 1,000 at Key Service Villages. Revise proportion at Stafford to 65% as it has failed to deliver housing provision and ignored greenfield supply of sites available to deliver housing. RSS figures are to be met and it is important not to reduce figures in line with 2011 interim approach. NPPF asks for flexibility in Local Plans. Questions the housing trajectory and reliance on Stafford SDLs to achieve increased completion rates. Strong demand at Key Service Villages which can therefore meet needs. Object to the moratorium as being unworkable. Applications will still be submitted and 5 year supply will still not be met so therefore development will be allowed anyway. The Plan is out of step with the NPPF as promoting brownfield land ahead of greenfield development	JVH Town Planning Consultants Ltd	No change regarding 10,000 figure as meeting fully objectively assessed need. The Council has not reduced the figure downwards despite the 2011 household projections reducing. Plan provides flexibility to deliver housing at SDLs which are viable and deliverable. The housing trajectory shows a 5 year supply will be achieved. Moratorium is appropriate to deliver housing at Stafford, a key part of the Plan's strategy although it is acknowledged through would not be supported by rural developers. A change has been made to the Key Objectives regarding brownfield sites to reflect the NPPF reference and a further change could be made to Spatial Principle 7, although the Plan is not unsound as currently prepared.
Matter 3- Development Strategy	M3-13a	Object to housing figures approach of extrapolating forward the household projections and population. Need to take account of Growth Point aspirations. NPPF calls for ambitious approach to housing delivering to avoid a	George F White on behalf of Grainger Plc.	The Council has used the latest 2008 & 2011 household projections but also other evidence regarding delivery of infrastructure, the environment and other

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		<p>weak economy. Increase numbers to 565 per annum. Must address past unmet needs of 1,169 and 5 year supply, to be rectified in the first 5 years. This is not demonstrated by the Housing Trajectory so rural areas should have more development. Mix of sites across the Borough is required to achieve housing delivery, not just saturating growth at Stafford town. Strategic Development Locations will have long lead-in times due to infrastructure. Phased periods of housing development to be applied in order to demonstrate delivery, focus on rural areas. The Housing Trajectory is currently short by 269 houses and does not follow the Sedgefield approach of meeting unmet provision within the first 5 years. Less housing delivery than set out in the RSS Revision. Object to settlement hierarchy as not delivering affordable housing effectively, not taking account of villages working together and efficient transport links. Object to services and facilities assessment by not joining village's services together. Promoting land at Ranton and Great Bridgeford.</p>		<p>factors. Growth Point aspirations are being met and are subject to the planning process now being progressed. Meeting full objectively assessed local need (30%) and in-migration (70%), so therefore NPPF compliant. New Plan to release land for housing so will meet the 5 year housing land supply target and 20% buffer, demonstrated through the housing trajectory looking to the future. West Midlands RSS is revoked so no applicable. Key Service Villages focus is appropriate with distribution, supported by the NPPF and rural sustainability. Rural areas are less sustainable than Stafford town so therefore growth is appropriate and not phasing is applied to ensure the market is not restricted. Not appropriate to add other small-scale settlements simply due to location on transport routes but without services.</p>
Matter 3- Development Strategy	M3-14a	<p>5 year supply needs to be delivered through sites at Key Service Villages to achieve provision. Promoting land at Cross Butts, Eccleshall. Support for settlement hierarchy and greenfield delivery through Spatial Principle 7. Site delivery failure in the past due to insufficient range of sites and locations. Question the delivery of Stafford SDLs. Increase provision at Key Service Villages to 16% or 1,600 new houses as a minimum. Reduce level of provision at Stone and rest of the rural areas, based on</p>	RPS Planning & Development for J Ross Developments	<p>SHMA evidence refers to 12,000 over a period 2008 to 2033 new households so 500 per year. Land at Cross Butts, Eccleshall could be delivered through the criteria of Spatial Principle 7. Council considers that the Stafford SDLs will be achieved so no increase in Key Service Village proportion is necessary. Stone is the next most sustainable settlement and some provision</p>

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		<p>commitments and lack of existing housing site delivery. No account is taken to meet the 20% buffer requirement and need to deliver new housing quickly. Mis-match between West Midlands RSS figures and household projections. Must address the shortfall and therefore increase numbers of 11,539 new homes of which 8,807 will be new provision. The SHMA stated that 12,000 should be provided to meet local needs so as this is not being achieved the Plan is unsound with its housing strategy. 5 year delivery based on Sedgefield approach leads to 872 per year to overcome the shortfall. There will be a continued failure to meet need even if 500 new houses are delivered each year. Bring forward land at Eccleshall to meet local housing needs, with a nearby site showing a precedent for delivery of 80+ new houses. There are no constraints on development at this location.</p>		<p>is needed in the rest of the rural area. Development will occur as previously demonstrated through completions. The housing trajectory does make allowance for 20% buffer in the first 5 year period. 872 new homes per annum is unrealistic as a target. 500 new homes per year is achievable through the distribution set out in Spatial Principle 4.</p>
Matter 3-Development Strategy	M3-15a	(See M3-12a. This is a repeat)	JVH Town Planning Consultants Ltd	
Matter 3-Development Strategy	M3-16a	<p>Increase proportion at Stone to 15%. Developments of new housing, infrastructure and support for the economy needed. 1,500 new houses over the Plan period including affordable housing. Delivery of Stafford's SDLs questioned as new housing levels not previously achieved at Stafford. Object to Stone delay until after 2021. The significant under-delivery of new housing for the Borough can be assisted by the strong market at Stone.</p>	Planning Prospects for Taylor Wimpey UK Ltd at Stone	<p>Council considers that the Stafford Strategic Development Locations (SDLs) are deliverable and viable. Development until after 2021 supported through the Duty to Co-operate in terms of North Staffordshire authorities and support growth at Stafford. Affordable housing is achievable in other areas to contribute to the need across the Borough, including at Stafford town. 15%</p>



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				would be over 30% increase is new households for existing villages.
Matter 3- Development Strategy	M3-17a	<p>Spatial Principle (SP) 2: housing figures insufficient account of demographics, economic factors and achieving affordable housing. Increase figure to 600-650 per year. Evidence base of Strategic Housing Market Assessment (SHMA) is lacking due to cross-border co-operation. Backlog of housing to be addressed through under-supply. Question the delivery of Stafford SDLs, with a wider range of sites needed at Key Service Villages. Development strategy is not effective due to housing requirements directed to 4 SDLs. SP3: Supported but link housing to be identified to individual Key Service Villages and lower order settlements. SP4: Concern regarding Stafford focus and not meeting needs of other areas. Strongly oppose the moratorium. SP6: Housing to support services and facilities in rural areas. Stronger links to Policy E2 and C5 for housing delivery. Affordable housing at 40% to be achieved through increased numbers of new houses. SP7: Object to settlement boundaries as too restrictive, should be assessed site by site through criteria in SP7. Object to previously developed land being a first priority.</p>	Gladman Developments Ltd	<p>Housing provision includes 70% in-migration and 30% local needs so cross-border issues are addressed. Economic considerations covered through the provision of 160 hectares of new employment land but delivering the backlog / shortfall in housing from the revoked West Midlands RSS is not appropriate. SP3: Neighbourhood Plans and Sites DPD to consider numbers at Key Service Villages and individual allocations, not a strategic issue. SP4: A moratorium type mechanism is needed to ensure delivery at Stafford, and not to undermine the development strategy, as historically witnessed by past completions. Evidence of infrastructure and viability at Stafford so delivery is achievable. SP6: Housing provision in rural areas is addressed by the strategy so no need to incorporate into rural sustainability. The approach is NPPF compliant. SP7: Settlement boundaries to aid future housing delivery and will not undermine sustainability. An amendment to Spatial Principle 7 could be made to provide clarification on brownfield sites.</p>

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Matter 3- Development Strategy	M3-18a	A number of projections have been run in order to establish the Borough housing requirement for the new Local Plan. The projection linked to past migration trends is consistent with the NPPF with total housing numbers of 12, 972. The projection linked to 10% employment growth using past trends and future forecasts provide a target of 13,856 new houses over the Plan period. The target of 500 new homes per year is too low to meet demands from demographic trends and economically active populations. The housing figure should increase to 650 – 700 new homes per year. The target of 72% at Stafford is supported as being most sustainable. The Strategic Housing Market Assessment identifies 71% need at Stafford town.	Commercial Estates Group	The Council considers that the housing target in the Plan is appropriate, based on the Government’s published household projections. The Council has used the latest 2008 & 2011 household projections but also other evidence regarding delivery of infrastructure, the environment and other factors. Meeting full objectively assessed local need (30%) and in-migration (70%), so therefore NPPF compliant. Note the support for new development at Stafford.
Matter 3- Development Strategy		Concern about the distribution of growth within Spatial Principle 4. Increase development at Key Service Villages. Remove the settlement boundary approach to enable more development to be delivered. Question the delivery at Stafford’s SDLs. Allocate land at Little Haywood as a viable and deliverable site to support housing provision.	Les Stephan Planning Ltd	Council considers that the Stafford SDLs are deliverable and viable, currently demonstrated by site commencements. Spatial Principle 7 is appropriate to bring forward development at the Key Service Villages including Little Haywood, with settlement boundaries to provide certainty in due course.