



Gladman Developments Limited

Examination of The Plan for Stafford Part 2

Issue 3 Proposed Settlement Boundaries Policy SB1

1. Criteria for determining the proposed settlement boundaries:

- (i) Are the criteria set out in paragraphs 2.11 -2.23 appropriate to define the extent of the areas within the settlement boundaries to accommodate the necessary development, so as to enable the delivery of the objectively assessed housing requirement for Stafford Borough, as set out in PSB1?**

1.1 Gladman considers that the criteria set out in paragraphs 2.11 to 2.23 are generally appropriate to guide how settlement boundaries are drawn. However, in relation to the boundaries being adequate to provide for the scale of new development proposed, Para 20 of the Plan implies that the provision of 10,000 new homes in the Borough over the plan period is a maximum to be planned for. This, however, is not the case; it should be seen as a minimum figure.

1.2 As indicated in the Inspector's report on the Plan for Stafford¹:

"SBC confirm the level of housing provision is not intended as a maximum figure, which might constrain other sustainable and acceptable developments from coming forward. Therefore housing provision could be

¹ PSB Inspector's report Para 35

challenged by developers who propose significantly sustainable developments”.

Accordingly the boundaries should ensure that there is sufficient land to accommodate in excess of 10,000 dwellings during the Plan period and to ensure a continuous 5 year supply of housing land.

(ii) Are the boundaries drawn in accordance with these criteria?

1.3 Gladman considers that the settlement boundaries have not been drawn in accordance with these criteria. There are many areas adjoining settlements that meet all of these criteria but which have not been included within settlement boundaries. The boundaries do not allow for sufficient development land to meet the housing requirement.

2. Overall capacity within the proposed settlement boundaries: Is the overall capacity within the proposed settlement boundaries, having regard to the latest housing land supply situation, and taking into account constraints such as areas of importance for nature conservation, tree preservation orders and other environmental considerations, sufficient to satisfactorily accommodate the objectively assessed housing requirement for Stafford Borough, as set out in PSB1?

2.1 The rationale for drawing settlement boundaries tightly around the towns and key service villages of the Borough is that, in the Council’s view, there is already sufficient land committed (completed, with permission or allocated in the Plan for Stafford Part 1) to accommodate the objectively assessed housing need for the Borough (PSB 2 para 2.4). Table 2 of PSB 2 indicates that as at 31st March 2015 there were 10,812 commitments compared to the minimum housing requirement of 10,000.

2.2 The housing supply relies heavily on four Strategic Development Locations (SDLs) at Stafford and Stone. These four sites are expected to deliver 6,900 dwellings during the plan period, representing some 64% of the housing supply.

- 2.3 Whilst Gladman accepts that the proposed allocations within and adjoining Stafford and Stone urban areas appear, in principle, to be suitable areas for residential development, there are strong concerns that there is an over reliance on these four large sites which in reality, because of their size, character and significant infrastructure requirements, are unlikely to be fully developed during the Plan period.
- 2.4 Such strategic sites are complex, require significant survey work and EIA, attract more objections and require provision of more upfront infrastructure. They also tend to be subject to lengthy negotiation during the application process and in agreeing associated legal agreements. The combination of these factors result in extremely lengthy lead in times for development to take place.
- 2.5 The Northern and Western Stafford SDL's are dependent upon major infrastructure improvements and in multiple ownerships. They therefore represent particularly unreliable sources of housing completions during the plan period.
- 2.6 Major highway works are necessary to bring forward the Western Stafford SDL, in particular the Western Access Route. A summary of the works required is as follows:
- Section A A34 Foregate Street to Timberfield Road - construction of a new 700 metre section of road to be constructed over the River Sow linking to Doxey Road.
 - Section B Timberfield Road to Doxey Road Railway Bridge – highway upgrades and provision of pedestrian and cycle facilities.
 - Section C Doxey Road to Martin Drive – new 320 metre road
- 2.7 The Stafford Borough Infrastructure Delivery Plan (2012) provides that up to 400 dwellings can be constructed before the Western Access Route is completed. The remaining 1,800 dwellings cannot be delivered until Section C is complete.
- 2.8 Funding for Sections A and B is in place but Section C relies on developer contributions totalling approximately £5 million.

- 2.9 Western Stafford SDL is currently in the ownership of one developer. Housing trajectory build out rates anticipate delivery of 143 dwellings per annum between 2021 and 2030. Such a high rate of delivery will require between 3 and 4 developers on site during this period. Gladman believes build out rates at this level to be unrealistic and unachievable.
- 2.10 For the Northern Stafford SDL planning permission is in place for 475 dwellings of which 100 have been built. No applications have been submitted for the remaining 2625 dwellings. The housing trajectory expects delivery of 205 dwellings per annum between 2013 and 2032. This high level of delivery would require in the order of 6 developers on site for this period. Gladman submits that these expectations are also likely to be unrealistic and unachievable.
- 2.11 Gladman considers that the overall housing supply over the whole plan period is flawed. On paper there appears to be a surplus of about 800 dwellings, however delays in the delivery of the SDL's are likely to remove this surplus and there is a real danger that the Plan will not deliver the housing requirement and also result in housing land supply falling below 5 years during the life of the Plan. The Council has no ability in the Plan to increase supply if there is a problem other than by carrying out a review of the Plan which will take a considerable period of time to undertake. As it stands the Plan is unsound in that it is ineffective, containing insufficient flexibility to respond to changing circumstances.
- 2.12 In Gladman's view there is insufficient evidence to justify the Council's strategy and to demonstrate that the SDLs will deliver housing as the trajectory indicates. Consequently in order to render the Plan sound, the Council needs to introduce flexibility and either allocate 'contingency' sites that will address any future shortfall in housing delivery and/or redraft settlement boundaries to allow for sustainable housing development to come forward.
- 3. Flexibility within the proposed settlement boundaries: Is there a case for flexibility within the proposed settlement boundaries in the light of the likely delivery of the housing requirement as set out in PSB1? If the answer is yes:**

- (i) What should the appropriate level of flexibility be for Stafford Borough?**
- (ii) Do the proposed settlement boundaries provide for this level of flexibility?**
- (iii) If not, which settlements should have their boundaries extended to provide the required level of flexibility and where/by what amount?**

- 3.1 As indicated above, Gladman considers that there is a strong case for flexibility within the proposed settlement boundaries given that there are real concerns regarding the ability of the Plan to deliver the objectively assessed housing need for the Borough.
- 3.2 In view of the heavy reliance upon the four SDLs to deliver the bulk of the Councils' housing requirement, Gladman suggests that the plan should seek to provide for a 20% buffer to the Council's housing requirement i.e. the Plan should seek to deliver 12,000 dwellings.
- 3.3 As the settlement boundaries are currently drawn tightly around the existing built up areas of settlements allowing only for the SDLs and land already with planning permission, absolutely no flexibility is provided as anything proposed outside the settlement boundary is deemed to be unacceptable.
- 3.4 Paragraph 47 of the NPPF seeks to boost the delivery of housing and requires sites and broad locations for future housing to be identified to ensure there is a sufficient supply of housing over a five to 15 year period. The Plan is not positively prepared as seeking only to meet the minimum targets as the PSB 2 currently proposes fails to accord with the requirements of paragraph 47 of the NPPF in that it doesn't aim to boost the supply of housing; rather it just hopes to meet minimum targets.
- 3.5 In the context of the National Planning Policy Framework, which provides a positive approach to rural development and provides for rural housing to be provided where it can enhance or maintain the vitality of the community, Gladman considers that there is justification for the settlement boundaries of the key villages to be extended or alternatively for the inclusion of a policy which would allow for planning permission to be

granted for sustainable housing developments on sites that immediately adjoin the settlement boundaries.

4. Specific settlement boundaries : In the light of the above considerations, are any of the proposed settlement boundaries inadequately drawn? If so, which of the following settlement boundaries should be redrawn, in terms of specific sites and development capacity?

(h) Hixon

- 4.1 Gladman considers that the settlement boundary for Hixon should be redrawn to include land at Stowe Lane as indicated on the Plan below.
- 4.2 Hixon has a good range of amenities and services including a primary school, shops, pubs, church, public open space, employment areas and a village hall. The village is relatively well connected, being served by two regular bus services that connect the village with the nearby towns of Stafford, Rugeley and Uttoxeter.
- 4.3 The nearest railway station is in Stafford some 12 km to the west of the village. Stafford station is on the West Coast Mainline with services to many destinations including London, Birmingham, Manchester and Scotland.
- 4.4 The Stowe Lane site extends to some 4.8 hectares and comprises four fields, a small caravan park and hardstanding, divided by mature hedgerows and trees. It is presently accessed via the Green Man Public House on Legge Lane, which is located just beyond the south east boundary of the site.
- 4.5 The site is located on the northern edge of the village and is well contained by the existing built form of Hixon and by established field boundaries. A public footpath runs across the south west corner of the site, from Stowe Lane directly into the cul-de-sac on Greenfields. None of the trees on site are the subject of Tree Preservation Orders and the site is located wholly within Flood Zone 1.
- 4.6 The site is not the subject of any historic, environmental or landscape designations and it is not situated within or adjacent to a conservation area. The nearest heritage asset is Bank House Inn, a Grade 2 listed building located on High Street 300 metres south east of the site, however it is

screened from view by intervening topography and existing residential development.

4.7 The various shops, facilities and services within the village are all within reasonable walking distance of the site. The closest bus stops are located on Back Lane, approximately 280 metres of the centre of the site.

4.8 This is a sustainable site eminently suitable for residential development. The site has capacity to accommodate up to 90 dwellings. An outline application for the development of the site for up to 90 dwellings was refused planning permission by the Council in April 2015. An appeal against that refusal has been lodged and a decision in respect of which is awaited.

Land at Stowe Lane, Hixon



