

Hallam Land Limited  
Issue 3

**THE PLAN FOR STAFFORD BOROUGH PART 2 EXAMINATION**  
**INSPECTOR'S KEY ISSUES AND DISCUSSION NOTE**

**Issue 3 – Settlement Boundaries : Policy SB1**

**3.1 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?**

We have no objection to the criteria, however the key issue is that the settlement boundaries should be applied after full account is taken of the land necessary to deliver the housing requirements across the whole of the plan period, and allowing for sufficient flexibility. The Council must, through the Part 2 Plan, justify the boundaries on the basis that sufficient capacity exists within the defined boundaries to deliver the housing requirements. We return to this more specifically in answer to 3.2 below, but two further points can be made which signal the need for flexibility in the approach. Firstly, the housing requirement is not a ceiling; flexibility should be maintained to allow developments that are appropriate and necessary without requiring a review of the plan each time. Secondly, the position is unclear in relation to Neighbourhood Plans – it appears the Plan will allow Neighbourhood Plans to vary the boundaries, which is inconsistent with national policy – either the boundaries apply (and there is an application of them against the criteria) and will be protected or they won't.

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

They appear to be, but again the issue is whether they allow for sufficient capacity within the settlements to meet the requirements.

**3.2 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?**



This is the key issue for the Part 2 Plan. We would argue that the Plan must provide greater flexibility to respond to changing circumstances, and specifically slower than envisaged housing delivery on the major SDA sites and non-delivery on other sites, and that this requires identification of further readily developable land within the settlement boundaries, and specifically within Stafford Town, to make up shortfalls over the plan period. In this way the Plan is able to respond much better to the delays in delivery on major sites (which are already evidenced by the Council's own figures compared with earlier expectations).

The delivery of the SDAs are fraught with complex constraints – they are not straightforward developments and have mixed ownerships, heavy infrastructure requirements and consequently long lead in times. The Council has repeatedly revised its expectations of the rates of delivery from the SDAs, buoyed initially by commitments from the promoters of those SDAs but then having to revise the supply down as the constraints bite. We feel, and have made representations on this in the past, that the Council has relied far too heavily on the SDA approach within Stafford Town. It has had to adjust its approach and rely on other land to make up its 5-year requirement – it is inevitable that it will need to revise its expectations again, especially as the market weakens as the post Brexit reality dawns, and there is no certainty that other unallocated land can continue to make up the deficit. There is a need for further sites to be identified that are attractive, readily developable and unencumbered by large and expensive infrastructure, to provide the necessary flexibility.

By providing further locations, which might be classified as 'safeguarded land' to allow it to be held in reserve in the event of changing circumstances, the Plan would ensure that 'there is hay in the barn' so it can respond better, and not risk triggering paragraph 49 of the NPPF, which would place the whole plan in jeopardy.

**3.3 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 PBS1? If the answer is yes :**

Our view is that flexibility needs to be built into the Plan, and be clearly identified with further allocations/safeguarded land.

**(i) What should the appropriate level of flexibility be for Stafford Borough?**

Our view is that a further 20% should be added to the housing requirements and land allocated on that basis. That would be consistent with DCLG advice.

**(ii) Do the proposed settlement boundaries provide for this level of flexibility?**



No. The settlement boundaries are very tightly drawn to provide only for the housing requirements as stated.

**(iii) If not, which settlements should have their boundaries extended to provide the required level of flexibility and where / by what amount?**

Stafford Town is the most sustainable location; it is top of the settlement hierarchy and provides the access to a higher range of facilities and employment and is the focus for growth within the Part 1 Strategy. The flexibility should apply to Stafford itself. The Part 2 Plan should provide for flexibility by identifying further locations for development at Stafford town.

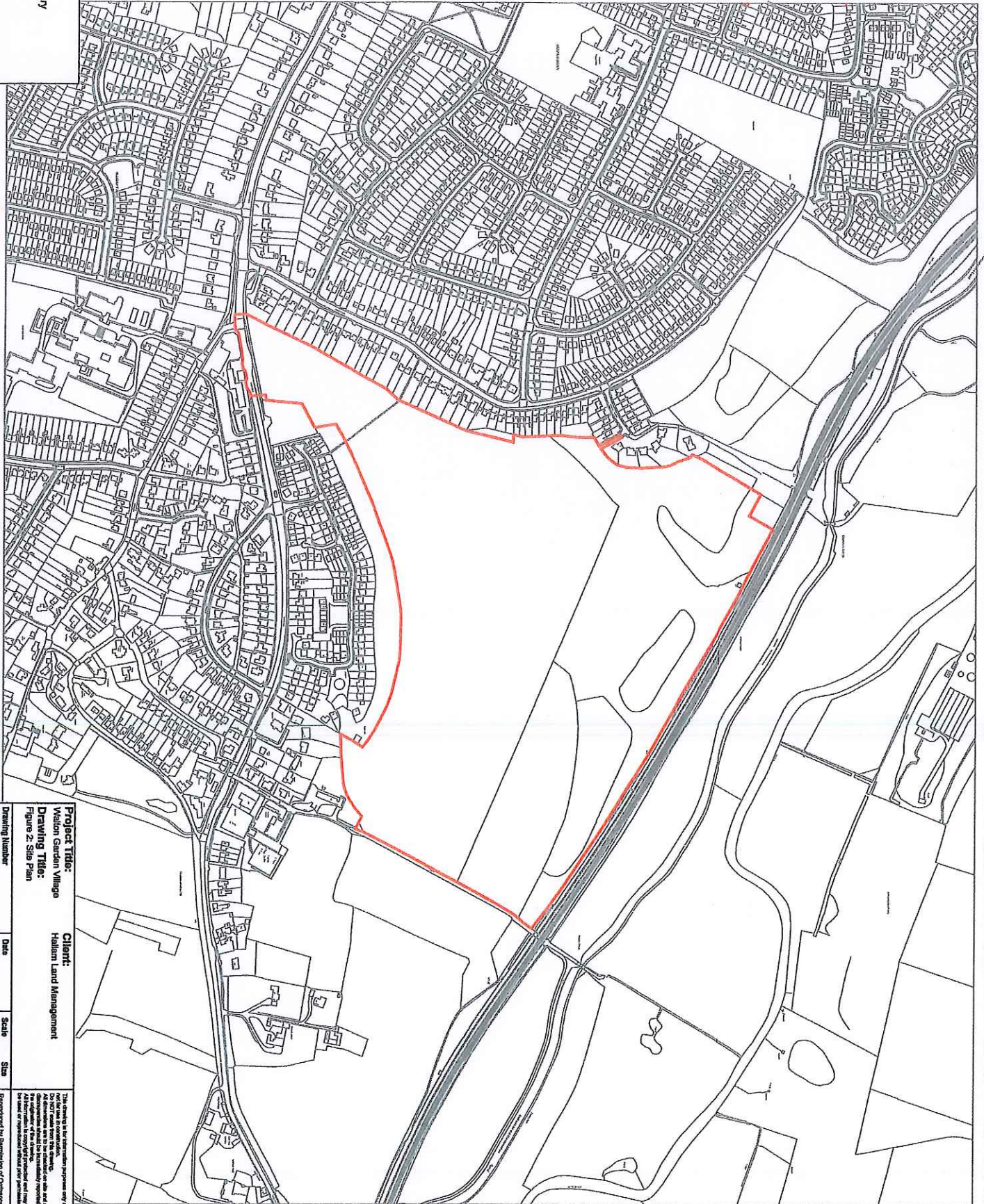
We have argued that settlement boundaries at Stafford Town (and Stone) are inconsistent with a flexible and responsive plan, and that it is important to the overall strategy to encourage development at Stafford town and away from the smaller, less sustainable villages, which have been the focus for development in previous plans. The management of development around Stafford town could be achieved through a criteria-based approach, which is how the policy is currently being applied, in advance of adoption of the settlement boundaries. Boundaries are, by their very nature, inflexible, and the inevitable need to adjust them can create doubt and uncertainty within communities.

**3.4 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?**

The settlement boundary to Stafford town should be revised to allow for further capacity for growth, and we identify above that this should be of the order of a 20% increase. Sites would need to be identified to fulfil this additional requirement, and the SHLAA has identified sites that can meet this requirement. The Part 1 strategy identifies SDA on the north, west and east of the town but not on the south, despite there being locations that are relatively unconstrained and well-served by existing infrastructure. Sites that have been promoted on the southern edge of the town but have been rejected by the council because of housing supply arguments, not because they are physically unsustainable. A southern focus for growth on one or more sites, including our own off Milford Road at Weeping Cross, are sustainable and can be readily brought forward, should the need arise (site plan attached).



Application Boundary



**Project Title:**  
Vinton Garden Village

**Client:**  
Hollam Land Management

**Drawing Title:**  
Figure 2: Site Plan

**Drawing Number:**  
WGV/001 - 002 - E

**Date:**  
25/07/2014

**Scale:**  
1:5000

**Size:**  
A3

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