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WASTE RESOURCE MANAGEMENT



**DAVID WILSON HOMES (MERCIA)**

**THE PLAN FOR STAFFORD BOROUGH: PART 2 PROPOSALS**

**HEARING STATEMENT – ISSUE 3**

**JUNE 2016**

*your earth our world*



## 1 ISSUE 3: SETTLEMENT BOUNDARIES: POLICY SB1

### 1.1 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?*

1.1.1 No - Stafford Borough Council has not provided the methodology of how the extent of areas within the settlement boundaries to accommodate the necessary development have been set, so as to enable the delivery of the objectively assessed housing requirement.

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

1.1.2 It has not been demonstrated by Stafford Borough Council what methodology has been applied to establishing the settlement boundaries and how the criteria has been applied.

1.1.3 PSB1 indicates that settlement boundaries will be established in accordance with SP7. Policy SP7 indicates that "Settlement Boundaries will be established in accordance with the following criteria" and lists a number of criteria including considerations such as to ensure development is well related to the existing facilities, accessible by public transport and most sustainable in terms of impact on existing infrastructure or demonstrate that infrastructure can be provided to address development issues.

1.1.4 As previously provided the representation by Wardell Armstrong for PSB2 the Land at Marlborough Road in Stone meets all the necessary criteria of SP7. Furthermore, Stafford Borough Council have also confirmed that the site meet the criteria of SP7 as indicated by a recent Decision Notice (Appendix 3) issued by the Local Planning Authority and a recent signed Statement of Common Ground (Appendix 4) for the recent Appeal (Appeal Ref: APP/Y3425/W/15/31362) for Land at Marlborough Road.

1.2 ***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?***

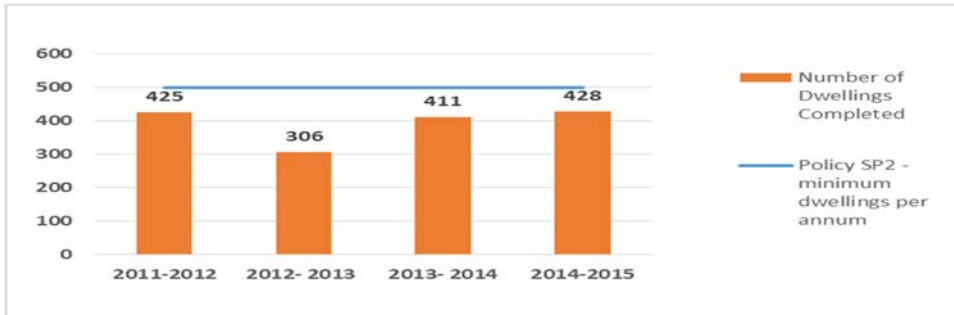
1.2.1 The overall capacity within the proposed settlement boundaries has not been confirmed by Stafford Borough Council. However, having regard to the latest housing land supply situation it is not considered that the proposed settlement boundaries will be sufficiently flexible or robust to satisfactorily accommodate the objectively assessed housing requirement for the Borough. PSB2 does not allocate residential development sites. Therefore, the adoption of the plan would not in itself contribute positively to improving the housing land supply position in Stafford Borough Council.

### **Housing Delivery**

1.2.2 As part of the current Appeal on Land at Marlborough Road, Stone (Pins Ref: APP/Y3425/W/15/3136258) matters of housing delivery within Stafford Borough have been assessed in a great amount of detail. The following is evident;

- Dwelling completions in Stafford Borough have not met the minimum housing target set out in policy SP2.
- Stafford Town (Figure 2) - The number of dwelling completions in Stafford Town has not met the minimum housing targets set out in policy SP4 for the settlement.
- Stone Town (Figure 3) - The number of dwelling completions in Stone Town has not met the minimum housing targets set out in policy SP4 for the settlement.
- Key Service Villages and Rural Areas (Figure 4) – The total number of dwellings completed within the last 4 years within Key Service Villages and Rural areas (719 dwellings) exceeds the numbers of dwellings completed in Stafford Town (677 dwellings) for the same period. This is considered a trend which has a negative impact on the objectives of SP4. The number of dwellings completed in Key Service Villages and Rural areas has continued to exceed that planned for, and is increasing.

**Figure 1: Dwelling completions in Stafford Borough**

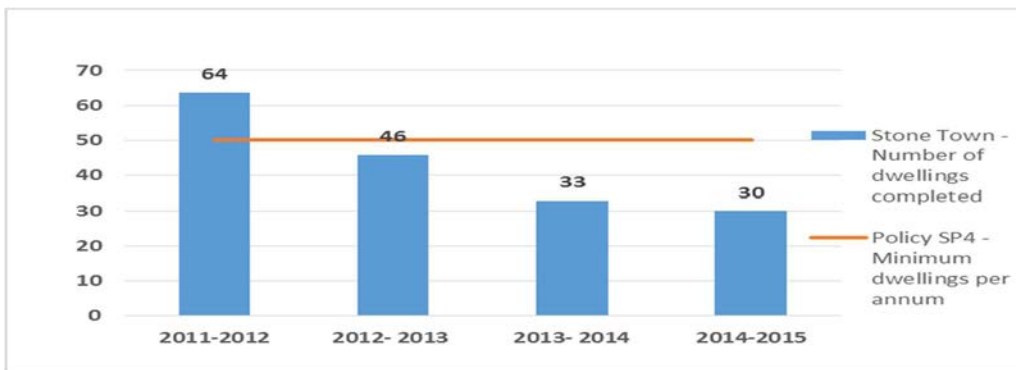


**Figure 2: Dwelling Completions in Stafford Town**



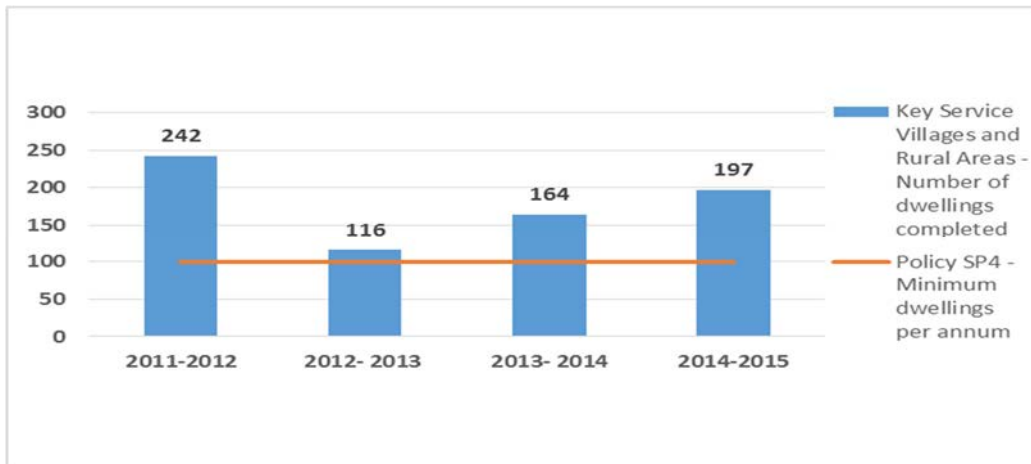
**Source:** Stafford Borough Council Land for New Homes 2012, 2013, 2014 and 2015 (rounded upward)

**Figure 3: Dwelling Completions in Stone Town**



**Source:** Stafford Borough Council Land for New Homes 2012, 2013, 2014 and 2015 (rounded upward)

**Figure 4: Dwelling Completions in Key Service Villages and Rural Areas**



**Source:** Stafford Borough Council Land for New Homes 2012, 2013, 2014 and 2015 (rounded upward)

- 1.2.3 Housing completions within Stafford Borough Council between 2011 and 2015 amounted to 1,570 dwellings. Of this housing completions within Strategic Development Locations between 2011 and 2015 have been restricted to only 42 dwellings (Source: Stafford Borough Council Land for New Homes- 2011-2015) or approx. 2.5% of all completions. It is very clear that in terms of actual completions that the Borough is highly reliant on windfall developments rather than Strategic Development Locations in trying to meet the minimum housing numbers as set out in PSB1.

#### **Affordable Housing Delivery**

- 1.2.4 As part of the current Appeal on Land at Marlborough Road, Stone, Tetlow King on behalf of David Wilson Homes (Mercia) have considered affordable housing delivery and affordable housing land supply within the Borough. It is clear from the table below that there has been an acute shortfall in affordable housing numbers being delivered. Between 2011 and 2015 - a shortfall 499 affordable homes in fact throughout Stafford Borough.

**Table 1: Affordable Housing Delivery**

Affordable Housing Delivery Year	Affordable Housing Completions	Affordable Housing Requirement	Shortfall in Provision of Affordable Homes
2011/12	83	210	127
2012/13	48	210	162
2013/14	91	210	119
2014/15	119	210	91
<b>Total</b>	<b>341</b>	<b>840</b>	<b>499</b>

**Source:** SBC AMRs 2011-2015 and Stafford Borough 2012 Strategic Housing Market Assessment

### 5 Year Housing Land Supply

- 1.2.5 As part of the current Appeal on Land at Marlborough Road, Stone, RCA Regeneration on behalf of David Wilson Homes (Mercia) have recently considered the 5 year housing land supply position within Stafford Borough. The Proof of Evidence indicates that the Council cannot currently demonstrate a 5 year housing land supply. The Proof of Evidence demonstrates the following constrained supply for Strategic Development Locations over the next 5 years.

**Table 2: RCA Regeneration Review of Delivery in SDLs**

	Council's view on 5 year delivery (2016)	RCA view on 5 year delivery	Difference
Northern SDL	610	250	-360
Western SDL	630	170	-460
Eastern SDL	478	418	-60
Stone SDL	270	80	-190
<b>Total</b>	<b>1,988</b>	<b>918</b>	<b>-1,070</b>

### Housing Land Supply (Plan Period)

- 1.2.6 PSB2 indicates that in 2015 a total of 10,800 houses are either completed, have planning permission or are allocated as Strategic Development Location. Of these commitments approximately 60% (6,400 dwellings) are contained within Strategic Development Locations. Therefore, in terms of housing delivery the Borough is heavily reliant on the delivery of a limited number of Strategic Development Locations. These are broken down as follows. As outlined above these Strategic Development Location have only provided 42 dwellings between 2011 and 2015.

**Table 3: SDL Allocations**

	<b>Allocation</b>
Northern SDL	3,100
Western SDL	2,200
Eastern SDL	600
Stone SDL	500
<b>Total</b>	<b>6,400</b>

1.2.7 It is very clear that the level of growth identified within each Strategic Development Location cannot be delivered in the manner projected within the Plan Period. The housing trajectory as provided by the most up to date Housing Land Supply Statement (2016) is unrealistic. Examples of shortfalls are:

- **Northern Stafford SDL** - The Councils housing trajectory suggest the delivery of 205 dwellings per annum between 2024 – 2031. This delivery rate would require at least 5 developers to be achieved. However currently there is only one developer Taylor Wimpey active on the site and only one sales outlet in situ and Taylor Wimpey are not dual branded, like other volume housebuilders. This build out rate is therefore unrealistic.
- **Western Stafford SDL** - The site forms the route for the Western Access Improvement, which has not been subject to complete CPO along its full length for most phases and as such is in serious doubt in terms of delivery. The Stafford Borough Infrastructure Delivery Plan (2012) (Table 8.2) indicates that 400 homes can be developed prior to completion of section 2 from Doxey Road to Martin Drive. The Council housing trajectory suggest the delivery of 143 dwellings per annum between 2021 – 2031. This would require at least 3 developers on site. This build out rate is also unrealistic.

**Affordable Housing Land Supply (Plan Period)**

1.2.8 PSB1 makes it clear that identified Strategic Development Locations are central to meeting affordable housing need. However, it appears that even with the Strategic Development Locations the level of affordable housing delivery will be well below the identified need for Stafford as set out in the SHMA which identified a need for 2,980 affordable homes in Stafford Town (149 per annum across the 20 year Plan period).

**Table 4: Proposed Affordable Housing Land Supply in Stafford Town SDL's**

SDL	Total Dwellings	Affordable Housing Requirement	Affordable Housing Number
North Stafford SDL	3,100	30%	930
West of Stafford SDL	2,200	30%	660
East of Stafford SDL	600	30%	180
Total	5,900	30%	1,770

**Source:** Stafford Borough Local Plan – Policy Stafford 2 – North of Stafford, Policy Stafford 3 – West of Stafford and Policy Stafford 4 – East of Stafford



**Table 5: Committed Affordable Housing Land Supply in Stafford Town SDL's (2015)**

SDL (Affordable Housing Requirement)	Planning Permission Reference	Total Dwellings Permitted	Affordable Housing Number Required	Current Affordable Housing Provision (\$106 Agreements)	Current Shortfall in Affordable Housing Land Supply	Notes
North Stafford SDL (930 units)	10/13362/OUT	409	123	0	-123	The accompanying S106 Agreement 10/13362/OUT indicates that the owner shall not be required to provide any affordable housing in connection with or as part of the first 100 dwellings constructed on the land. The requirement for any affordable housing will subject to viability at every 100 dwellings thereafter and if viable then 30% secured.
	13/18533/REM	257	77	0	-77	Outline consent stated that no affordable from first 100 dwellings constructed on the land. The requirement for any affordable housing will subject to viability at every 100 dwellings thereafter and if viable then 30% secured.
	14/20781/REM	152	46	0	-46	Officer report states that affordable housing is not required as trigger in S106 not reached.
	14/21007/FUL	66	20	0	-20	The planning officer's report has confirmed that the planning application was accompanied by a viability appraisal and because of viability concerns a financial contribution of £134,372 toward off site affordable housing was accepted.
	15/23050/OUT	330	99	0	-99	Application was refused as not comprehensively masterplanned, no provision for education provision, flawed TA and absence of acceptable FRA.
Western Stafford SDL (660 units)	11/15998/OUT	80	24	24	0	Application was refused but allowed on appeal.
	14/20425/FUL	170	51	51	0	S106 shows 30% affordable secured. No new homes being constructed as yet and site preparation still underway at 17 May 2016.



SDL (Affordable Housing Requirement)	Planning Permission Reference	Total Dwellings Permitted	Affordable Housing Number Required	Current Affordable Housing Provision (\$106 Agreements)	Current Shortfall in Affordable Housing Land Supply	Notes
Eastern Stafford SDL (180 units)	13/18697/OUT	261	78	78	0	Illustrative masterplan shows 261 units. S106 secures 30% affordable.
	13/18698/OUT	373	112	112	0	S106 secures 30% affordable.
	14/20318/REM	361	108	108	0	30% affordable secured.
	16/24075/REM	265	79	0	-79	Pending Decision
Totals		1,359	408	265	<b>-143</b>	-

1.2.9 As outlined in the table above the anticipated delivery of affordable housing in Stafford Strategic Development Locations in Stafford Town will not occur in light of recent planning decisions, associated S106 Agreements and viability concerns. It is also estimated that taking into account all affordable housing land supply (both completions, allocations and planning permissions) within Stafford Town there is a substantial shortfall of affordable housing land to meet affordable housing needs.

**Table 6: Committed Affordable Housing Land Supply in Stone SDL (2015)**

SDL (Affordable Housing Requirement)	Planning Permission Reference	Total Dwellings Permitted	Affordable Housing Number Required	Current Affordable Housing Provision (S106 Agreements)	Current Shortfall in Affordable Housing Land Supply	Notes
Stone SDL (200 units)	13/19002/OUT	500	200	160	-40	The accompanying S106 Agreement 10/13362/OUT indicates that the affordable housing percentage secured is just 32%

**Source:** Planning Permission S106 Agreement for SDLs in Stone

1.2.10 In the same way as outlined in the table above the anticipated delivery of affordable housing in Stone’s Strategic Development Location will not occur in light of recent planning decisions, associated S106 Agreements and viability concerns. It is also estimated that taking into account all affordable housing land supply (both completions, allocations and planning permissions) within Stone Town there is a substantial shortfall of affordable housing land to meet this development need.

#### **Neighbourhood Plan Proposals**

1.2.11 It is also evident that the PSB2 also includes several draft Neighbourhood Plan proposals for development which are at different stages of production. These include the schemes outlined in the table below. These scheme are proposed allocations being considered by several Neighbourhood Plan which currently do not benefit from planning permission. The PSB2 does not provide the details of these commitments and the level of housing growth proposed for each scheme in each settlement.

**Table 7: Emerging housing commitments within draft Neighbourhood Plans**

Settlement	Site	Potential Total Dwelling Capacity	Notes
Draft Barlaston Neighbourhood Plan	Former Wedgwood Memorial College	57 (at 30 dwellings per hectare)	Former Wedgwood Memorial College Development and Design Guide August 2013
Eccleshall Neighbourhood Plan Examination Report (September 2015)	Several Sites	142 (at 30 dwellings per hectare)	While the Eccleshall Neighbourhood Plan does not allocate sites it does draw a settlement boundary around the village which includes sizable greenfield development opportunities

1.2.12 It is recognised that Neighbourhood Plans should identify and respond to local housing needs and seek to deliver sustainable development in respective settlements. Neighbourhood Plans are likely to propose housing growth above that specified in PSB2.

1.2.13 It is clear from the table above that housing growth is being promoted in the PSB2 in settlements lower down the sustainable settlement hierarchy. Therefore using SBC approach to “*promote patterns of development that are sustainable, growth should be distributed to reflect the % split established in Spatial Principle 4 (SP4)*” then additional housing growth should be delivered within settlements of Stafford Town and Stone.

1.2.14 If delivery in the Key Service Villages rises even further (which does not seem fanciful), then the PSB2 (in order to remain flexible) needs to encourage further development higher up the hierarchy (ie including at Stone). Overall there is a further need for flexibility in PFS2.

### **Conclusion**

1.2.15 Overall the capacity within the proposed settlement boundaries, having regard to the latest housing land supply situation is insufficient to accommodate objectively assessed housing needs for Stafford Borough, as set out in PSB1. Market and Affordable housing completions within the borough are clearly well below minimum requirements. The Borough relies in great measure on SDLs that are already proving difficult to deliver set against delivery projections. Housing completions within SLDs has been very limited. In terms of future supply it is clear the SDLs will not deliver the

level of affordable housing planned for within PS1. The housing trajectory as provided by the most up to date Housing Land Supply Statement (2016) for SDLs is considered unrealistic

**1.3 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?**

1.3.1 Yes, for the reasons outlined above. The PSB2 places a significant constraint on sustainable locations and sustainable development which is contrary to the Framework to boost significantly the supply of housing.

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

1.3.2 In light of the existing evidence the level of flexibility should be high, in order to ensure existing and future development needs are met.

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

1.3.3 No – The existing settlement boundaries seek to restrict development within all settlements identified in the sustainable settlement hierarchy as identified in Spatial Principle 3 (SP3) Stafford Borough Sustainable Settlement Hierarchy.

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

1.3.4 Both Stafford and Stone should have their boundaries extended as these settlements have been identified in the adopted Local Plan as the two most sustainable settlements in the Borough. These settlements have also been identified by the PSB1 as appropriate for meeting strategic housing and employment needs of the Borough.

1.3.5 Other Key Service Settlements may need to have their boundaries extended in a limited way on the basis on meeting local development needs.

1.3.6 In terms of the amount of development that should be accommodated within each settlement this is a matter which should be considered in the round in light of identified need, delivery and viability considerations sustainability considerations using the criteria considerations outlined in SP7. However the **Stafford Borough Infrastructure Stage 1 Final Report (July 2009)** (Extract provided at Appendix 5) demonstrates that additional housing growth over and above the minimum of a 1,000 dwellings in Stone (as identified in PSB) can be accommodated in Stone and sufficient infrastructure exists to support this growth. The study tested the Marlborough Road

Site (Figure 3.1 Strategic Development Locations in Stone (Site SN3) and concluded that sites in the west of stone (including Marlborough Road) can be delivered in the short term with only local improvements to transport infrastructure (par.4.2.1).

- 1.3.7 In light of this evidence and other considerations Stone as the second most sustainable settlement in the Borough can accommodate 2,000 dwellings within the Plan Period. In addition, the Marlborough Road site should be included within the settlement boundary.**

***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?***

- 1.3.8 The proposed settlement boundaries have been inadequately drawn. In light of the above both Stafford and Stone should have their boundaries extended.
- 1.3.9 The suitability of the Marlborough Road site for inclusion within the settlement boundary for Stone has been assessed using the criteria set out in policy Spatial Principle 7 (SP7) of the adopted Stafford Borough Local Plan in previous representation made by Wardell Armstrong to the Plan for Stafford Borough Part 2.
- 1.3.10 As part of the current Appeal on Land at Marlborough Road, Stone (Ref: APP/Y3425/W/15/3136258) Stafford Borough Council in a signed Statement of Common Ground have agreed that the Marlborough Road Appeal proposal site complies with policy SP7, which is consistent with Stafford Borough Council reasons for refusal. This demonstrates that the proposed restricted development boundary for Stone conflicts with a planned development site that is meets policy tests.

**Appendix 3**  
**Decision Notice**



David Wilson Homes  
C/O Wardell Armstrong  
Sir Henry Doulton House  
Forge Lane  
Etruria  
Stoke On Trent  
ST1 5BD

Date Registered 16 March 2015  
Decision Date 19 May 2015  
Issue Date 19 May 2015

FAO Mr Frank Hayes

TOWN AND COUNTRY PLANNING ACT 1990  
REFUSAL OF PERMISSION FOR DEVELOPMENT

Application No:	15/21873/FUL
Proposed Development	Residential development including the creation of a new access onto Marlborough Road, creation of open space, associated landscaping and associated infrastructure
Location	Land At Walton Heath Common Lane Stone
O. S. Reference:	389435 332340

Stafford Borough Council, in pursuance of powers under the Town and Country Planning Act, hereby refuse the above development in accordance with the accompanying plans and subject to the following reason:-

1. The proposed development is on a green field site adjacent to Stone. The Council can demonstrate a 5 year supply of housing land, including a 20% buffer. The Plan for Stafford Borough has demonstrated that for the plan period objectively assessed need can be fully met.

Although a proportion of the Borough's housing provision is required at Stone (10%) the amount of housing currently committed at this level of the hierarchy has exceeded this proportion.





David Wilson Homes  
C/O Wardell Armstrong  
Sir Henry Doulton House  
Forge Lane  
Etruria  
Stoke On Trent  
ST1 5BD

Date Registered 16 March 2015  
Decision Date 19 May 2015  
Issue Date 19 May 2015

FAO Mr Frank Hayes

#### TOWN AND COUNTRY PLANNING ACT 1990

#### REFUSAL OF PERMISSION FOR DEVELOPMENT

The proposal would lead to a disproportionate amount of development taking place at a lower level of the sustainable settlement hierarchy. This will undermine the development strategy set out in Spatial Principle 4 of the Plan for Stafford Borough, which is not in accordance with the genuinely plan-led approach advocated in paragraph 17 of the National Planning Policy Framework.

A handwritten signature in black ink, appearing to read "F. Mander", with a horizontal line underneath.

Head of Planning and Regeneration  
On behalf of the Council

## **Appendix 4**

### **Marlborough Road Inquiry - Statement of Common Ground**

Appeal  
David Wilson Homes

Land at Marlborough Road, Walton Heath, Stone, Staffordshire

STATEMENT OF COMMON GROUND: 27<sup>th</sup> June 2016

## **5 AREAS OF COMMON GROUND**

### **5.1 Introduction**



- 5.1.1 It is common ground that pursuant to Article 35 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 that the reasons for refusal set out in the Decision Notice refusing permission in this case are clear, precise and complete.
- 5.1.2 The parties agree that, in light of Article 35 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, the scheme complies fully with all other policies set out in the Development Plan other than Spatial Principle 4 Stafford Housing Growth Distribution.
- 5.1.3 The parties agree that the proposal, subject to planning conditions and planning contributions, are in accordance with the following development plan policies SP2 - Stafford Borough Housing and Employment Requirement, Spatial Principle 7 (SP7) - Supporting the Location of New Development, C1 - Dwelling Types and Sizes, C2 - Affordable Housing, C7 - Open Space, Sport and Recreation, N1 - Design, N2 - Climate Change, N6 - Cannock Chase Special Area of Conservation (SAC), N8 - Landscape Character and I1 - Infrastructure Delivery Policy.

### **5.2 Background**

- 5.2.1 The parties agree the following;
- 5.2.2 That, the scale of proposed housing as put forward in the plan is not intended as a maximum figure.
- 5.2.3 The parties agree that the Plan for Stafford Borough at Paragraph 8.1 states that for Stone "A significant level of development will be concentrated in the town as it is a sustainable location with services and facilities, jobs opportunities and transport links, as well as Stone supporting the surrounding rural hinterland". Policy SP3 identifies Stone as the second most sustainable settlement in the Borough.
- 5.2.4 That the "The proportion of development committed at each level of the hierarchy will change as new developments are granted permission" (Page 4 par. 4 of the Case Officer's Report - Core Document 25).

## 8 SIGNATURES

8.1.1 This statement of Common Ground has been prepared by Wardell Armstrong LLP on behalf of the Appellant and Stafford Borough Council.

Signed On Behalf of the Appellant 	Signed on Behalf of the Local Planning Authority 
Date: 17 June 2016	Date: 28 <sup>th</sup> June 2016
Position: Associate Director	Position: Development Manager

## **Appendix 5**

### **Extract from Stafford Borough Infrastructure Strategy**

Stafford Borough Council

# Stafford Borough Infrastructure Strategy

July 2009

Stage 1 Final Report

TRANSPORT  
TRAFFIC  
DEVELOPMENT  
PLANNING  
URBAN DESIGN  
ECONOMICS  
MARKET RESEARCH

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## 3 Deliverability in the rest of the Borough

### 3.1 Introduction

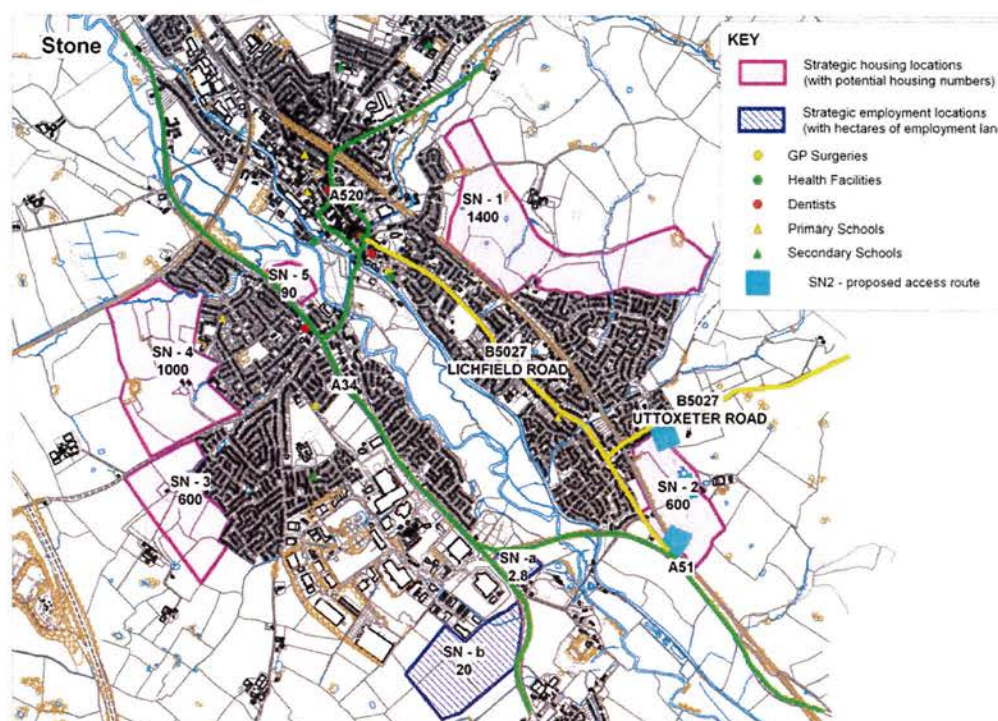
3.1.1 In this chapter we briefly address the issue of deliverability of housing and employment growth in the rest of the Borough outside Stafford town. The LDF Core Strategy Issues and Options Paper identified development options to accommodate growth of between 3,000 and 5,000 homes outside of Stafford town, as well as approximately 90 hectares (Ha) of employment land, on strategic development sites.

3.1.2 The analysis has focussed on transport issues across the Borough, and an assessment of wider infrastructure in Stone.

### 3.2 Stone

3.2.1 The strategic development locations identified for Stone in the LDF Core Strategy Issues and Options Paper are indicated in Fig.3.1 below. Site options accommodating 3,690 homes and 22.8Ha of employment land are identified.

Figure 3.1: Strategic Development Locations in Stone



#### Key infrastructure issues

3.2.2 The key issues for infrastructure provision for Stone are as follows:

- Electricity supply is a key constraint to any new development, requiring network improvements.
- Gas supply is not a significant constraint.
- Limited access to location SN-1 would make it unattractive for development.



- Pingle Lane has limited vehicle capacity but would be needed to provide access to development at SN-1 across the West Coast Main Line (WCML) railway line.
- Development at SN-1 would also require a bridge over the railway line
- SN-2 could be delivered in the long-term without the need for a new railway crossing, subject to further detailed investigation of possible local highway infrastructure improvements.
- The employment sites would also require some local highway infrastructure improvements.
- Sites to the west of Stone (SN-3, SN-4, and SN-5) are deliverable with local highways improvements.

### ***Transport infrastructure***

- 3.2.3 The deliverability of potential growth in Stone faces significant challenges, with only 60% of the housing target on easily deliverable sites. The western housing sites (1,690 new homes) are located around existing infrastructure and could be delivered in the short-term with phased highway improvements, e.g. at the junction of the A34 and B5026.
- 3.2.4 Access for the smaller of the two eastern sites SN-2 (600 homes) and the employment sites located in the south of Stone (22.8Ha of employment land) is problematic. Access for the SN-2 site could be achieved via B5027, but this may lead to problems along Lichfield Road and would require further off site improvements to existing transport infrastructure, e.g. possible enhancement to the A34/A51 roundabout.
- 3.2.5 The WCML crosses the A51, further to the south of Stone, such that it is possible to define an access road alignment that could link into the A51 without the need of a railway crossing. Such an alignment could be difficult to deliver and compromises the long term deliverability of the SN-2 site.
- 3.2.6 The major site to the east of the railway is more challenging. Site SN-1 (1,400 homes) is severely constrained by its location, suffering severe access issues on the existing highway network. Critically, it would require a new bridge over the WCML railway line, which would be technically difficult, time-consuming and costly as construction work would only be possible at holiday periods, the specification required is likely to be high and there are a limited number of appropriate contractors. Access across the railway is also likely to be subject to significant access payments to Network Rail, which may be regarded as a ransom payment.

### ***Other infrastructure***

- 3.2.7 With regard to other infrastructure requirements, the significant constraint identified is electricity supply. The 11kV local supply network is at capacity and will require some level of local improvements to service any new developments. The scale and cost of these improvements is currently subject to a development query by Stafford Borough Council.
- 3.2.8 Gas is not a major constraint. All the sites are connected to the medium pressure gas system, and hence would require 'standard' connections to the system which would normally be treated as a standard developer cost.
- 3.2.9 Waste water treatment is not considered a major constraint as sufficient capacity exists in the existing pumping station and treatment works.
- 3.2.10 Information on clean water supply requirements is not yet available. Severn Trent have indicated that there will be limits on the levels of development which can take place without infrastructure improvements or extensions being required. We await the outputs of their modelling for confirmation of these limits.

- 3.2.11 The Level 1 Strategic Flood Risk Assessment (SFRA), January 2008, identifies the Scotch Brook in Stone as one of two locations in the Borough (the other being the Sandyford Brook in Stafford) that are particularly sensitive in terms of flood risk. The catchment of the Scotch Brook is some 20 sq.km and extends from Meir Heath in the north, out to Hilderstone in the east and down through Oulton in the west. Development anywhere in this catchment has the potential to influence the flood response of the Brook and increase flood risk downstream. The Council will be required to use the findings of the SFRA to undertake a sequential test in accordance with PPS25 to identify suitable locations for development so as to minimise the risk of flooding.
- 3.2.12 With regard to green infrastructure provision, Stafford Borough Council has commissioned a GI study to assess requirements across the Borough.

### ***Key Issues from Public Consultation***

- 3.2.13 Key issues relating to infrastructure raised in the public consultation on the LDF Core Strategy Issues and Options Paper included:
- Flooding issues with some of the identified strategic housing sites
  - Congestion on narrow roads
  - Problematic car parking in the town centre
  - Concern at capacity of schools and medical facilities
  - SN-2 considered to have potential to make improvements to the local road network.

## **3.3 Rest of the Borough**

- 3.3.1 This stage of the study has investigated transport infrastructure issues in detail across the Borough, and has assessed other infrastructure issues from a review of published information and discussions with service providers. The assessments of transport infrastructure required for each settlement are attached in Appendix 2, and reference to other infrastructure requirements are included in the thematic appendices on each category of infrastructure investigated. We summarise the key issues in this section.
- 3.3.2 Figure 3.2 below identifies the locations of potential sites across the Borough, excluding Stafford, indicating size of site through proportionate circles at each location.

## 4 Conclusions and recommendations for growth directions

### 4.1 Stafford

4.1.1 At Stafford the Northern, Western and Eastern (in part) directions of growth appear to be the most deliverable in planning terms. The phasing of these will critically depend upon the programming of physical infrastructure works required to be undertaken in advance of development.

4.1.2 In the north the waste water treatment infrastructure is the primary determinant, although the timing of its delivery may depend on the scope for a combined approach to the alleviation of flood risk in Sandyford Brook. This is clearly the priority for further detailed assessment by Severn Trent and the Environment Agency. The Council should encourage both parties (working alongside the landowners/developers) to seek to agree a proposed solution in advance of the LDF Core Strategy Submission, to provide greater certainty on the timing of development. We think it prudent to assume at least a 3-4 year lead time following allocation of the sites for the delivery of any advance infrastructure of this nature. Realistically this would mean development could commence from around 2015 (subject to consent).

4.1.3 In the west we consider that some limited growth (300 dwellings) could come forward in advance of the Western Access Package of highway works – subject to developers' interest. We would not expect the remaining allocation (1,800 dwellings) to commence until the highway works have commenced. This will allow sufficient time to provide the waste water infrastructure required.

4.1.4 Eastern growth will also be reliant upon a new pumping station to support new greenfield development. In the interim, early development may be possible of around 350 dwellings on brownfield site SF-5 – subject to its availability.

4.1.5 We do not think that the southern sites present a defensible proposition in terms of deliverability.

4.1.6 Table 4.1 overleaf sets out how Stafford would be able to exceed a housing target of 7,000 dwellings 2006-2026. It is not a housing trajectory but rather a fairly crude estimation of the phasing of key sites based solely on a realistic timeframe for addressing identified infrastructure constraints.

4.1.7 It can be seen that we have assumed that for the first five years of the Plan period the housing targets will be met exclusively through existing commitments and smaller Strategic Housing Land Availability Assessment (SHLAA) sites, subject to planning permission. This may well include an over provision in the rest of the Borough and an under-provision in Stafford Town. More likely is an overall under-delivery as a consequence of the current inactivity in the housing market generally. Indeed, if larger sites were relatively unconstrained at present it is unlikely that they would be delivering large numbers of units in the foreseeable future.

### 4.2 Stone

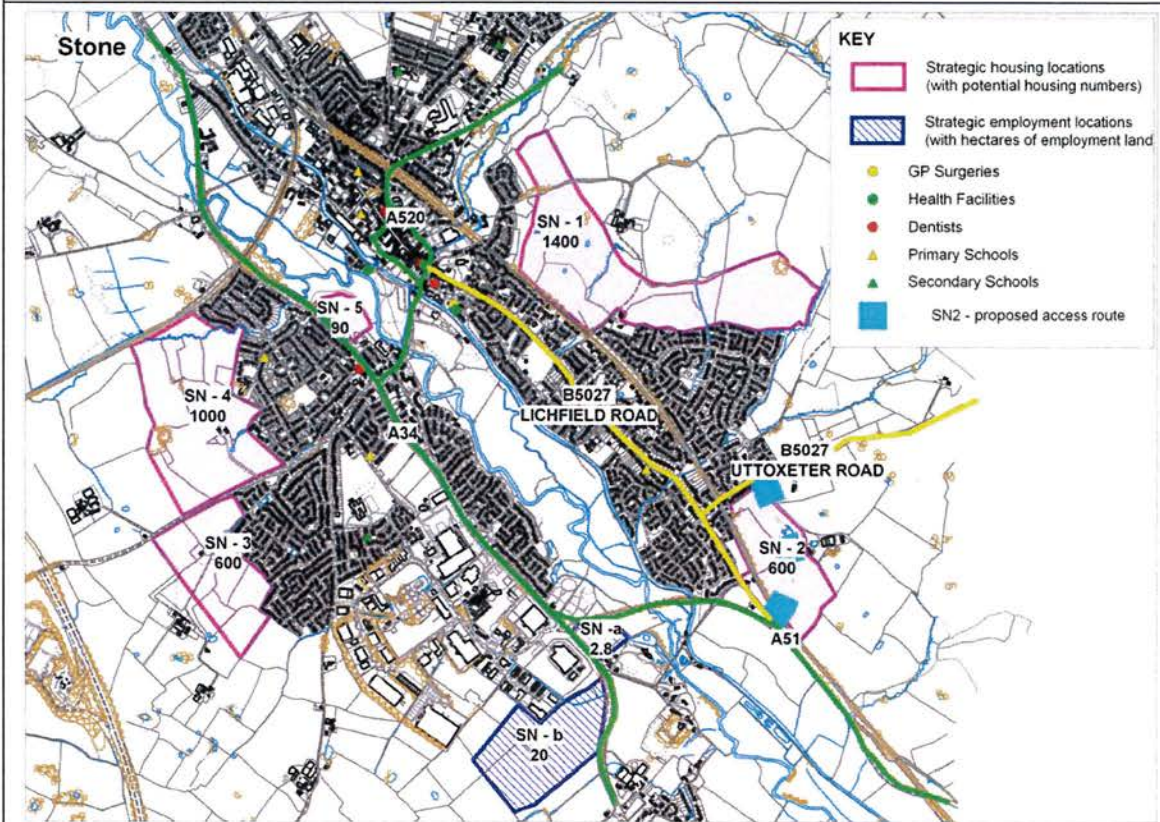
4.2.1 We consider the most deliverable housing sites to be located in the west of Stone. These could be delivered in the short term with local improvements to transport infrastructure. This would be capable of delivering almost 1,700 homes. The employment sites in the south of Stone could also be delivered quickly with limited transport improvements.

- 4.2.2 The sites in the east of Stone are more challenging, with the smaller site SN-2 being deliverable only if the site access could connect with the A51 to the south-east of where the WCML bridges the A51, such that no rail crossing would be required.
- 4.2.3 Site SN-1 is not considered deliverable in the short or medium-term, due to the extensive enabling works that would be required to access the site via a new bridge across the WCML, as well as significant improvements to the local highway network.
- 4.2.4 While it is not anticipated that utilities will be a major constraint to deliverability, further information in relation to electricity supply will be required before confirming the position.

### **4.3 Rest of Stafford**

- 4.3.1 At present there appear to be no major physical constraints to delivery of the identified housing and employment locations in the rest of the Borough, although Woodseaves is a significant distance from a gas connection point. This is subject to some further investigation of infrastructure requirements relating to clean water supply and waste water treatment. The range of improvements required to facilitate development or manage its impact relate to site-related needs and local transport improvements. These will require developer contributions as well as service provider funding.
- 4.3.2 On this basis, the selection of appropriate growth locations could equally be driven by factors of social and environmental sustainability based on the level of social and community infrastructure available for each settlement rather than physical infrastructure or deliverability constraints.

**Settlement: STONE**



**Location:**

The LDF Core Strategy Issues & Options Paper identifies five potential housing developments that could deliver 3,690 dwellings and two potential employment sites delivering 23 hectares. The housing site options are located to the east and west of Stone town centre, with the employment area to the south of Stone. The development options for Stone consist of an eastern and western expansion, with the eastern expansion dependent on one or perhaps two new bridges crossing the West Coast Main Line (WCML).

This opens up the possibility that the landowners (or worse, the County Council) would be held to ransom by Network Rail or other parties and also raises questions about the technical difficulties in spanning the WCML.

**Local access to services and facilities:**

This settlement is in a rural location to the north of Stafford and is the largest outlying settlement. As such there are a number of services and facilities within the Stone area such that there are opportunities to make trips by walking and cycling. Stone has a Primary School and a GP surgery, which can be accessed via walking or cycling. There is a secondary school in Stone which reduces the need to travel to Stafford. It is unlikely that a high proportion of trips leaving Stone for other settlements can be made by either walking or cycling. Public transport offers alternatives to the car with good links to Stafford and the City of Stoke on Trent.

**Off-site infrastructure requirements:**

The provision of two access roads, including the use of Pingle Lane which is limited in terms of vehicle capacity, would make site SN-1 unattractive for development. Lichfield Road is a mainly residential road and is unsuitable to provide access to a further residential area. The use of Pingle Lane would be critical to gain access to the development over the WCML railway and it is likely that this would be subject to ransom by Network Rail.

The technical requirements of building a bridge are also onerous because Network Rail can insist that all the cost is met by the local authorities or developers but also insists on the most expensive design. The work can only be carried out at Christmas or Easter when the WCML is closed for longer periods and even then 24 hour working is usually required. The works usually have to be planned two to three years in advance and if a window of opportunity is missed, it can be two or three years before another opportunity arises. Only four main contractors on Network Rail framework can usually obtain the insurance cover needed, and they are usually very busy when the line is closed. So the scope for competitive tendering is much reduced.

The employment sites, together with SN-2, are located to the south adjacent to the A34 and A51 corridors. These developments may occur without the need for significant infrastructure, with the exception of the A34/A51 roundabout that may need enhancement. Therefore these developments could be delivered in the short term. Trips from the north would come through Stone which may mean some localised improvements are necessary. The development of housing site SN-2, although better located being south of the Uttoxeter Road, may lead to problems along Lichfield Road and would require further off-site improvements to existing transport infrastructure. An access road alignment could be defined that could link into the A51 via the B5027, without the need for a railway crossing. However, such an alignment could be difficult to deliver, and would make the delivery of this site a long-term prospect.

The residential development to the west of Stone are centred on the B5026 Eccleshall Road. This may need enhancing together with the A34 junction. As these are based around existing infrastructure these developments could be delivered in the short term, but phased in line highway improvements.

**Site access requirements:**

The site access to the housing site SN-1 (1,400 dwellings) is taken from Pingle Lane which passes over the railway line. This is currently unsuitable for the quantum of development proposed and would need at least one additional access point, possibility from the B5027. Development of this site would also require further infrastructure improvements along Lichfield Lane and the Uttoxeter Road.

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