

DAVID WILSON HOMES

**NOTE ON THE PLAN FOR STAFFORD BOROUGH PART 2 –
RESPONSE TO INSPECTORS NOTE MF 2**

AUGUST 2016

1 INTRODUCTION

- 1.1.1 This note has been prepared by RCA Regeneration, Tetlow King and Wardell Armstrong on behalf of David Wilson Homes in response to the Inspectors Note MF 2. It is clear from MF2 that Stafford Borough Council have provided an update of the housing trajectory for Strategic Development Location in Stafford and Stone.
- 1.1.2 The Council now accepts that the housing trajectory within the Plan for Stafford Borough is unrealistic and that there will be a shortfall in housing completions within Strategic Development Locations for the Plan Period. The revised trajectory has unhelpfully been introduced by the Council late in the Examination process and it is not supported with a written explanation or associated planning rationale.
- 1.1.3 The Council could have instructed the DVS (Valuation Office Agency) to look at the viability of Strategic Development Locations which could have considered the implications for the delivery of market and affordable housing.
- 1.1.4 For West Stafford SDL, we would urge the Planning Inspector to request from the Council a copy of the 'high level appraisal' that has been submitted to the Council by the associated developers. This will outline the resources available with regard to S106 contributions (including affordable housing) in light of all abnormal costs including Compulsory Purchase Order costs. The Council have now indicated that the viability for West Stafford SDL is likely to be an issue for one or more of the developers. It is therefore, likely that the level of affordable housing planned for within the West Stafford SDL will not be delivered.
- 1.1.5 Overall, as outlined in our previous representation there is an imperative to deliver additional housing growth to address the existing shortfall of market and affordable homes that has occurred and which will occur within the plan period within Strategic Development Locations.
- 1.1.6 The Council have shown that currently planning commitments exist for 11,107 dwellings. The Council has identified potential capacity for 227 dwellings in Key Service Villages and 365 dwellings in Stafford Town but no further potential capacity in Stone. However, this does not provide sufficient flexibility. In terms of the level of flexibility over and above Objectively Assessed Housing Need this matter is dependent on a number of factors including the existing shortfall and future shortfall of market and affordable housing, the infrastructure capacity of existing settlements to

accommodate additional housing growth and the proposed balance of distribution of development set out in the Plan for Stafford Borough.

- 1.1.7 As indicated in our previous representations for every additional 200 dwellings brought forward at Key Service Villages then an additional 700 dwellings should go to Stafford and an additional 100 dwellings should go to Stone to maintain the distribution of growth (expressed in percentages) as outlined in Policy SP4.
- 1.1.8 However the Council have not considered these matters and have not provided any evidence these matters.
- 1.1.9 It is considered that in this case considerable additional flexibility is required. It is clear that other Local Plans are taking are providing additional flexibility. In the case of Stratford-upon-Avon District Council the Local Plan is providing for a further 20 % increase over and above Objectively Assessed Housing Need.

1.2 Stafford Housing Market

- 1.2.1 There are noticeable differences between Stafford Town and Stone Town in terms of housing market conditions. Based on the Strategic Housing Market Assessment 2012, it is estimated that the highest average median house price within the Borough between February 2012 and May 2012 was in Gnosall (£187,475), followed by Rural Stafford (£179,705), Stone (£158,090), and Stafford town (£140,165). It is important to note that on average median house prices in the market town of Stone are estimated to be higher than in Stafford town.
- 1.2.2 In addition, the mean income of wards in Stafford town tends to be lower than the mean income in wards in Stone Town. These factors combine and indicate that the housing market in Stone is more buyout than the housing market in Stafford. In addition, the Plan for Stafford Borough indicates (Par. 4.1) that “affordability is particularly acute in rural areas and in Stone Town” and that a “key task for the new Local Plan will be to address the need for regeneration of the larger settlement of Stafford and Stone”.

1.3 Providing Plan Flexibility

- 1.3.1 The Plan for Stafford has an over reliance on Strategic Development Locations (SDL) and in particular unrealistic expectations in terms of the delivery rate of these SDLs.
- 1.3.2 It is highly unlikely that Stafford Town Housing Market, in particular the Council proposed expansion to the Stafford East SDL, can provide the necessary flexibility. It

is clear that on the whole that the existing SDL are underperforming and that significant infrastructure constraints exist.

- 1.3.3 As outlined in our previous consultation response, to date the overwhelming majority of housing completions have occurred on windfall sites rather than on SDLs. The Marlborough Road site in Stone, which is being promoted by David Wilson Homes, is a non-strategic sizes scheme which will make a valuable contribution to boosting the supply of market and affordable homes in the short term. The site has been tested by the Stafford Borough Infrastructure Stage 1 Final Report (July 2009) which indicates that the site can be delivered in the short term. There is also sufficient infrastructure within Stone to accommodate this proposal. The proposal can deliver 114 dwellings including 46 units of affordable housing in a sustainable housing location. As indicated at the recent Planning Inquiry the Council have accepted that there are no technical objections to the scheme. Therefore the Plan for Stafford Borough Part 2 should accommodate this development opportunity.

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