Stafford Borough Local Plan 2020 - 2040: Preferred Options Responses

Agents, Developers and Landowners - Part 4

Consultation Period: 24 October - 12 December 2022

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Stafford BOROUGH COUNCIL

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From: Ben Weatherley [redacted]
Sent: 12 December 2022 11:54
To: Strategic Planning Consultations
Subject: Local Plan 2020-2040 Preferred Options - Representations on behalf of Jonathan Lloyd Developments Limited
Attachments: Preferred-Options-Consultation-Response-Form (Jonathan Lloyd Developments Ltd).pdf

Good morning,

Please find attached representations on the Preferred Options consultation on behalf of Jonathan Lloyd Developments Limited, comprising a completed consultation form (including a drawing at Attachment 1 to the form/PDF document).

For the avoidance of doubt and to avoid any of this representation being overlooked in error, we have within the form provided an answer and comment in response to the following questions:

- Question 2 (Policy 1)
- Question 2 (Policy 2)
- Question 3
- Question 4 (Policy 12)
- Question 6 (Policy 16 & Policy 17)

Please confirm your receipt of this email and attachment by reply.

I look forward to hearing from you.

Kind regards,

Ben

Ben Weatherley
Partner

Knights
[redacted]
W www.knightsplc.com

Knights

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Please click here to view our email disclaimer.

Contact Details

Full name (required): Ben Weatherley

Email (required): [redacted]

Tick the box that is relevant to you (required):

- ~~Statutory Bodies and Stakeholders~~
- Agents and Developers
- ~~Residents and General Public~~
- ~~Prefer not to say~~

Organisation or Company Name (if applicable):

Knights (agent) - on behalf of Jonathan Lloyd Developments Ltd (and other landowners)

Tick the box that is relevant to you:
(*This is a non-mandatory question but helps us understand the demographic of our respondents.)*

- ~~Under 18~~
- ~~18-24~~
- ~~25-34~~
- ~~35-44~~
- ~~45-54~~
- ~~55-64~~
- ~~65+~~
- Prefer not to say / not applicable

Do you want to be added to our Local Plan consultation database to be notified about future local plan updates?

[redacted]

Contents

The Local Plan Preferred Options includes the topics listed below.

Each topic has a series of standard questions in order for you to provide a response. You do not have to respond to each of the topics or answer all of the questions. The page numbers below relate to the page the topic starts in this consultation form.

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
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All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: https://www.staffordbc.gov.uk/local-plan

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

Please make your choice from the list of objectives below. (Maximum of 3 to be selected)

Local Plan Preferred Options document reference: Page 12

Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.

To develop a high value, high skill, innovative and sustainable economy.

To strengthen our town centres through a quality environment and flexible mix of uses.

To deliver sustainable economic and housing growth to provide income and jobs.

To deliver infrastructure led growth supported by accessible services and facilities.

To provide an attractive place to live and work and support strong communities that promote health and wellbeing.

To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.

To secure high-quality design.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Select Yes or No for each of the policies and then use the box below each policy to add additional comments.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 19 to 40

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies)

~~Yes~~ / No

Policy 1 Comments:

The Council's efforts to ensure it continues to have an up-to-date development plan in place to maintain a plan-led approach to development across the Borough are welcomed, as is the opportunity to comment on the Council's proposed approach to the New Local Plan in the Preferred Options consultation document.

However, this representation expresses substantive reservations about both the overall development strategy for the Borough, and the deliverability of a large garden community in the location proposed. In doing to it proposes that the Draft Local Plan is revised to (amongst other things) allocate land at the former Hixon Airfield for housing and employment development (plus ancillary uses if the entire site were to be included in the Local Plan), as a major urban extension to the existing village of Hixon and well-established Hixon Airfield Recognised Industrial Estate at the north west edge of the settlement.

The Preferred Options Local Plan focuses the most growth around Stafford, Stone and the proposed garden community at Meecebrook. There are also some small-scale site allocations proposed at Gnosall and Woodseaves, but no growth proposed at any other 'Tier 4 larger settlements' (as identified in the proposed settlement hierarchy in Policy 2), including Hixon or smaller Tier 5 settlements. Over half of all the proposed new housing allocations/supply sources are proposed to be delivered at Meecebrook.

For reasons explained in more detail later in these representations (in response to Question 3), we strongly oppose the inclusion of Meecebrook as a new garden community in the development strategy.

We have serious scepticism and concern over the suitability of the proposed location and extent of the new garden community at Meecebook, its feasibility including mindful of the level of new infrastructure to enable such a high level of development in a poorly connected area at present, and the viability of delivering the amount of development in the plan period (up to 2040) that the development strategy and Local Plan overall depends on.

It is asserted that this strategy poses a genuine risk to the Council's ability to maintain a supply of deliverable housing sites upon adoption of the Local Plan, or later in the plan period if Meecebrook does not start delivering a meaningful number/contribution of homes by 2030 as the Borough Council hopes and anticipates. In effect, the Council's development strategy represents close to a "putting all of your eggs in one basket" approach.

The deliverability of Meecebrook will be discussed in more detail later in this representation, but if Meecebrook isn't delivered within the timescales envisaged, that would likely lead to the authority being faced with speculative applications if it cannot demonstrate a deliverable housing land supply later in the plan period. This would undermine the plan-led approach to development in the Borough that the Council is rightly seeking to pursue.

Furthermore, we feel strongly that a major shortcoming and flaw of the Preferred Options Local Plan is the almost complete lack of support and allowance for growth – including both new housing and employment development – at Hixon and the majority of other Tier 4 settlements, plus at smaller Tier 5 settlements. The number of well-established and successful Recognised Industrial Estates in the Borough provide very important employment opportunities and infrastructure in the rural area. In our view the Draft Local Plan misses the opportunity to facilitate their further ongoing success and potential for growth over the next 17 years (up to 2040), as it generally only allows for new employment development within the Recognised Industrial Estate boundaries in the existing Plan for Stafford Borough and existing commitments/planning permissions within and adjoining those existing boundaries.

We assert that the development strategy should be revised to remove the proposed new garden community at Meecebrook altogether, and provide additional housing allocations – including at suitable locations within and on the edge of Tier 4 settlements, as larger and well-established sustainable rural settlements with good connectivity and levels of existing services.

Considering the conclusions of the various elements of/responses within this representation, the current development strategy for the Borough and the Meecebrook garden community is considered to be unsound on the basis that there is an insufficient level of robust evidence to demonstrate that the plan is realistic, viable and deliverable, and the Council is encouraged to rethink the proposed development strategy.

Consequently, it is submitted that the Council should promote a development strategy that prioritises the following strategy:

1. Growth around the two largest settlements in the Borough (Stafford and Stone).
2. Garden community proposals as a major urban extension to existing settlements, where there are already services and infrastructure available to serve the early phases of development, and better access to the strategic transport network.
3. Growth around additional Tier 4 larger settlements (not just Woodseaves and Gnosall), including site allocations.
4. Some limited growth around the Tier 5 smaller settlements, including some small site allocations and facilitating some rounding off and infilling as appropriate to each individual settlement and its characteristics and development opportunities.

It is considered that the above approach would be more viable and deliverable and that any proposals for larger scale garden communities could form the basis of any future Local Plan or a Local Plan review, which would give sufficient time for the various issues highlighted in this representation to be resolved, without rushing the plan through to an examination or finding that the plan subsequently fails because insufficient numbers of homes and new employment development are being delivered.

This would ensure that the Council has a robust and deliverable strategy, and at such a point that a large (entirely new as opposed to major urban extensions to an existing settlement(s)) garden community has progressed further and is found to be more deliverable, then it would be more appropriate to consider including a garden community at Meecebrook in a Local Plan further into the future.

In our view the current proposed strategy in the Preferred Options Local Plan would stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements (and are consequently included in Tier 4 and Tier 5 of the settlement hierarchy).

Given that housing affordability is an issue of increasing prevalence and importance in rural areas, and that it is recognised in national policy that some additional housing in rural communities can help support the viability of local services and facilities, the current proposed development strategy would appear to conflict with the broad thrust of national policy to support sustainable rural communities. The proposed alternative development strategy set out above is therefore considered to be more viable, realistic and deliverable than the one currently being proposed by the Council.

More specifically, given the excellent road connections and existing public transport network at Hixon (and its short travel time/distance from Stafford and its excellent public transport connections to further afield) and the presence of land that is both suitable and readily available for development that would have a relatively low impact (such as on the local landscape) – and the clear potential to enhance such connections through well-planned new development in the village – we propose that the land at Hixon Airfield be included as a garden community at/major urban extension to the existing settlement at Hixon i.e. as part of item 2 of our proposed revisions to the development strategy set out above.

Indeed, we have previously submitted extensive representations to the LPA promoting the inclusion of land at Hixon Airfield as a major urban extension to this Tier 4 settlement. We have also promoted the strong potential for some of the land at the airfield for employment development only, should the Council not include the entire airfield as a major urban extension. The two elements of this site feature in the Council's latest Strategic Housing and Employment Land Availability Assessment, with references HIX07 and HIX08.

Jonathan Lloyd Developments Ltd are the owners of a large proportion of the land at the former Hixon Airfield, which was included and assessed in detail as one of the reasonable alternatives in the Issues and Options consultation in 2020. Indeed, this site scored second best to Meecebrook in the Stafford Borough Strategic Development Site Options by AECOM, which informed and was made publicly available to coincide with that previous Local Plan consultation.

The AECOM study suggested that:

- In transport terms, Hixon is more suitable for development
- The site is well located to the strategic employment area
- The site has low landscape value
- The site is suitable for economic development

The study went on to conclude that "there are few constraints beyond the gas pipeline and flooding to the north of the site. The site's location relative to Hixon makes it a suitable urban extension that would have a close functional relationship with Stafford also. There could be merit in testing this option alongside growth at Weston. The critical mass could potentially justify a new railway station". In addition, the study suggested that limited new infrastructure would be required to bring forward a garden community in this location.

Therefore, it is considered that this site would be the most appropriate alternative to Meecebrook (or addition to it should the Council agree that additional housing and employment allocations are required to mitigate for potential delays in the delivery of new development at Meecebrook) to provide a garden community/major urban extension in the Local Plan and should be allocated as

such. It is also asserted that a major urban extension at the former airfield offers the potential to deliver additional services/amenities (such as a new school(s), public open space and play facilities, shops/a local centre) and enhance local road and public transport connections, which would be material benefits to existing residents at Hixon and further enhance the sustainability of the settlement, not least by reducing the need to travel further afield to access such services/amenities.

For the avoidance of doubt, these representations are on behalf of both Jonathan Lloyd Developments Ltd and the owners of the remaining balance of the former airfield, who all share the same stance and vision insofar as the redevelopment potential of the former airfield is concerned and are consequently supportive of the submission of these representations. This replicates the position at the time we submitted representations in response to the Issues and Options consultation concerning the land at Hixon Airfield, in April 2020.

It is asserted that, as demonstrated in our previous representations, development of this site would require relatively limited new infrastructure, especially by comparison to the extensive new road, public transport, utilities and other infrastructure connections that would be required to enable a new garden community at Meecebrook to be realised. Indeed, a very detailed Vision Document was submitted in 2019, which featured a detailed assessment of the site's context, connectivity and suitability for development, plus the amount and range of development it could provide. It included assessment of the site's constraints and opportunities, informed by detailed work by a transport consultant and landscape architect, including associated masterplan content.

Development of the former Hixon Airfield would also have a comparatively low impact on the surrounding area, as compared to an entirely new garden community at Meecebrook. Not least as the former airfield is flat, has a recently constructed new access point/road off the A51 (alongside the new Wellington Business Park), has an opportunity to connect to a further A road close by (the A518), and is well contained being bordered by a railway, woodland, Stowe Lane and the existing Hixon Airfield Recognised Industrial Estate.

Further to the airfield scoring second best in the previous assessment of strategic development site options referred to above (by AECOM), the Council's own Issues and Options Local Plan consultation document recognised that this site could accommodation around 2,750 dwellings and supporting employment land. Consequently it could meet – either in place of Meecebrook should it be removed from the Local Plan (and thus replace the level of housing development the Council earmarked for Meecebrook by 2040) - and then abandoned altogether or with a view to it being further assessed and prepared for in readiness for inclusion in the next review of the Local Plan to meet development needs beyond 2040 - or to provide a valuable 'safety net' of deliverable housing and employment land to

ensure the Borough's identified needs can be met, and the Borough in turn allowed to grow and flourish, should Meecebrook be retained in the Local Plan but its delivery stall.

Even if the LPA rejects such a change to the development strategy and persists with Meecebrook, despite strong objections to it and genuine concerns over its feasibility and the viability of it delivering anywhere near to the intended levels of development by 2040, it is submitted that the Local Plan needs to factor in the likelihood of development at Meecebrook stalling and facilitate new housing and employment development elsewhere to allow for that scenario (and thus avoid undermining the plan-led approach to development in the Borough). The land at Hixon Airfield presents a genuinely excellent site for inclusion as an additional allocation for both new housing and employment as a major urban extension to the village, with a comparably low adverse impact on local people and infrastructure both during construction and after development is complete (relative to the scale of development it can accommodate and the anticipated impacts of Meecebrook on the existing settlements and other development in its vicinity), to ensure the housing and employment requirements of the Local Plan and related needs in the Borough are met.

In summary, it is considered that the proposed garden community at Meecebrook is undeliverable, and that the Council should re-consider their strategy and in doing so propose a major urban extension on the land at Hixon Airfield as a deliverable, and more logical and sustainable alternative. Alternatively and if the Council decides to pursue the proposed garden community at Meecebrook, despite the concerns that have been raised regarding its feasibility and viability, it is asserted that the land at Hixon Airfield should be allocated as a major urban extension to the existing village of Hixon to enhance the prospects of the Borough's housing and employment needs being met should the delivery of new development at Meecebrook take longer than the Council hopes and anticipates.

Even in the event the Council decides not to follow our suggested approach of allocating all of the former airfield for development, and maintains its existing proposed development strategy up to the point of submission of the Draft Local Plan – and mindful of our submissions in response to Question 6 (Policy 17) - it is submitted that a good proportion of the land at Hixon Airfield should be allocated for employment purposes. This would enable the well-planned expansion of the Hixon Airfield Recognised Industrial Estate, to meet existing and future demand for additional employment development in the rural area, allow for new employment development in more locations across the Borough, and meet the need for such development in this area (Hixon) specifically.

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

~~Yes~~ / No

Policy 2 Comments:

In light of our reservations about the feasibility and viability of the proposed new garden community at Meecebrook, and related objection to the inclusion of Meecebrook as a new garden community in the Local Plan – and our related comments in response to Question 2 (Policy 1) and Question 3 – we oppose the inclusion of Meecebrook in the settlement hierarchy.

We otherwise agree with the settlement hierarchy, including the inclusion of Hixon as a Tier 4 larger settlement.

However - as set out in detail in our response to Question 2 (Policy 1) - propose that the development strategy is revised to:

i. facilitate growth around additional Tier 4 larger settlements (not just Woodseaves and Gnosall), including site allocations;
ii. moreover, allocate land at Hixon Airfield as a major urban extension to the Tier 4 settlement of Hixon; and
iii. allow some limited growth around the Tier 5 smaller settlements.

We feel strongly that a major shortcoming and flaw of the Preferred Options Local Plan is the almost complete lack of support and allowance for growth – including both new housing and employment development – at Hixon and the majority of other Tier 4 settlements, plus smaller Tier 5 settlements. The Preferred Options consultation document rightly recognises the sustainability of these settlements, but then fails to take the opportunity to allow any controlled growth of them over the next 17 years. Draft Policy 2 indicates that new development in each tier of the hierarchy will be of a scale commensurate with the position of each settlement in the hierarchy, but the extremely limited potential for growth/development in Tier 4 and 5 settlements that the Preferred Options Local Plan allows for does not fulfil this policy/objective.

In turn, the Preferred Options Local Plan would stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements (and are consequently included in Tier 4 and Tier 5 of the settlement hierarchy). This would conflict with the broad thrust of national policy to support sustainable rural communities, which recognises that some additional development (including housing) in rural communities can help support the viability of local services and facilities.

Consequently, it is submitted that the development strategy should be revised to correct this shortcoming and in the manner we have proposed, with the settlement hierarchy amended if/as necessary to facilitate and accord with those revisions to the development strategy (such that it would be more viable, realistic and deliverable than the one currently being proposed by the Council).

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

Policy 4. Climate change development requirements

Yes / No

Policy 4 Comments:

Policy 5. Green Belt

Yes / No

Policy 5 Comments

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which includes a new railway station on the West Coast Main Line, and high quality transport routes.

Do you agree with the proposed new garden community?

~~Yes~~ / No

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

As summarised earlier in these representations (including in response to Question 2 (Policy 1)), we have strong reservations about the feasibility and viability of the proposed new garden community at Meecebrook. In our view there is flawed over-dependence on the delivery of new homes and employment at Meecebrook in the Preferred Options Local Plan, which unnecessarily risks undermining the plan-led approach to meeting the Borough's development needs in the coming years; particularly given the availability of deliverable alternatives either in place or in addition to new development at Meecebrook within the plan period.

This very issue was highlighted in a report on Garden Communities by development consultancy Lichfields (Lichfields Insight: How does your garden grow? A stock take on planning for the Governments Garden Communities programme (December 2019)), who highlighted the risks of relying on garden communities in Local Plans and providing the necessary evidence base to pass the key tests of soundness in the NPPF.

We note from the Council's Local Development Scheme that it envisages submitting the plan for examination during 2024 and that the plan, if found sound, would be adopted around Autumn 2024. Given the time it takes Local Plans to be prepared and examined, it is considered that it is more likely that the plan is adopted during 2025, as invariably, many plans require Main Modifications at examination stage. This would have implications for the timely delivery of a garden community at Meecebrook.

It is noted from the Council's Lead-in Times and Build Rate Assumptions Topic Paper that a development of 500 dwellings or more in the Borough would have a lead-in time of 4.5 years with an outline planning application in place.

For Meecebrook to start delivering homes from 2030, this would require outline planning permission to be in place by mid-2025. A large-scale development of 3,000 dwellings would be EIA development and require substantive technical reports and assessments to be undertaken and carried out prior to the submission of any such planning application for a garden community.

This would require work on preparing a planning application to be commencing now, with a planning application being submitted before the end of 2024. An emerging development plan would carry limited weight in the determination of a planning application until such time that it had passed examination, so the LPA would be unable to determine a planning application favourably until the new Local Plan is nearing adoption.

Following this, any resolution to grant planning permission would need to be subject to the negotiation of a Section 106 Agreement which is likely to be complex and involve a number of landowners before it can be executed and planning permission granted. A further complexity is that a Section 106 Agreement may require the involvement of Network Rail to secure the delivery of the proposed railway station.

Following any grant of outline permission, detailed consents would need to be secured and conditions discharged before any physical works on any phase(s) of development within the site could take place, and it is likely that significant infrastructure would need to be delivered before any dwellings can be delivered as part of the proposed garden community.

Further to this, the Local Plan consultation indicates that the delivery of 3,000 dwellings at Meecebrook would take place between 2030 and 2040, equating to the delivery of 300 dwellings per annum. Given the challenges highlighted above, it is unlikely that 300 dwellings per annum would be delivered at Meecebrook, particularly during the early years of the development.

Added to this, the Council's Lead-in Times and Built Rate Assumptions Topic Paper sets out that build out rate assumptions for developments of 2,000 plus dwellings would be 160 dwellings per annum, but then goes on to suggest that Meecebrook would deliver 300 dwellings per annum without any evidential basis for such an assumption. Even if it was to be accepted that Meecebrook would start to deliver housing from 2030, the Council's more considered build rate assumptions of 160 dwellings per annum suggest that only around 1,600 dwellings would be delivered at Meecebrook during the plan period.

There doesn't appear to be any evidence to demonstrate how the proposed garden community would be phased, whether all landowners within the proposed garden community have made their land available for development, nor has any evidence been presented to demonstrate that a developer or consortium of developers have been appointed or even approached to be development partners for the site. If no developers or consortium of developers are on board as delivery partners, then it would not be possible to ascertain the deliverability of the site and over what timeframe.

Consequently, it is considered that the envisaged delivery of dwellings at Meecebrook from 2030 is unrealistic and that 3,000 dwellings would not be delivered during the plan period. This would undermine the overall development strategy for the Borough with potential implications for the plan-led delivery of housing and employment development.

By way of a practical and real-life illustration of the significant amount of time it can take for new communities to come forward, the Cheshire East Local Plan was adopted in 2017 with a proposal for two growth villages to the north and south of the Borough. The southern growth village that was proposed outside of Crewe proposed 650 dwellings, and the northern growth village at Handforth proposed 1,600 dwellings with associated services, facilities and infrastructure.

The Cheshire East Local Plan is now 5 years old, and a planning application has yet to be submitted for either of the proposed growth villages, even in the context of a Borough with a very strong housing market. Both of these growth villages are located adjacent to the strategic road network in contrast to Meecebrook, which is located away from the strategic road network where road upgrades would be required for the size of development proposed to connect to it. This serves to demonstrate the significant amount of time it can take for new settlements of such scale and nature to come forward, even in the case of an area with a very strong housing market. Given these considerations, it is likely to take significantly longer than the Council envisage for any garden community at Meecebrook to come forward.

In addition, deliverability of a new settlement has recently been considered in the examination of the Tunbridge Wells Borough Local Plan, where the Inspector has published their initial findings (Tunbridge Wells Local Plan Examination Library Document ID-012).

The Inspector's findings at paragraph 31 are clear that paragraph 73 of the Framework requires LPAs to make realistic assessments of delivery rates and lead in times, and paragraph 33 of the Inspector's findings refer to the fact that neither the landowner or the council had any prior experience of delivering a scheme of such a size or complexity. Paragraphs 34 and 35 are clear about the complexities of delivering new settlements, the various stages required to secure planning permission and subsequent delivery rates. The findings of the Inspector

in Tunbridge Wells echo our concerns as expressed in this representation.

Turning to some of the specific matters detailed in the Concept Masterplan, the proposed garden community is to deliver a primary school and a secondary school, mixed use areas, commercial uses, and local centres / community hubs, in addition to a railway station.

At this stage, limited evidence has been published to properly explore the deliverability and viability of the above, nor has any evidence been published to demonstrate the deliverability of the proposed railway station. Whilst some technical studies have been produced to establish the feasibility of a railway station in the location proposed, there is no evidence to demonstrate whether:

- Discussions have been held with Network Rail to demonstrate whether they consider a railway station could be provided in this location.
- Discussions have been held with both Network Rail and train operators to demonstrate whether train timetables can be adjusted to accommodate an additional station in this location, and to what extent timetables may be affected by the works and subsequent operation of HS2.
- Other landowners around the vicinity of the proposed railway station have been consulted in terms of ensuring sufficient land is available around the proposed railway station for both the effective operation and maintenance of the railway station and the associated station buildings, platforms, vehicular access, parking, pick-up and drop-off and bus waiting facilities.

We note that the Council has published a questions and answers document which suggests that Meecebrook is not dependent on a station being built and the lack of a station would not automatically result in the proposal being removed from the plan.

Paragraph 73 of the NPPF is clear that new settlements should be served by a genuine choice of transport modes. At this stage, it is not clear how and when rail and bus services would be provided. This issue has been considered as part of the ongoing examination of the Tunbridge Wells Borough Local Plan referred to above.

In that case, a new settlement is proposed to the east of Tonbridge where a railway line passes through the proposed new settlement. No station was proposed in that location, and it was unclear what bus provision could be provided, such that it was unclear whether genuine alternatives to the private car could be provided (see paragraphs 12-15 of examination library document ID-012). This is comparable to the current situation in the area of the proposed garden community at Meecebrook, where limited opportunities for sustainable transport modes are currently available.

The policy is not clear as to how or when the social and physical infrastructure will be delivered and whether it would need to be in place upon completion of the first phases of residential development. Without any phasing details, the proposal could lead to some unsustainable patterns of development if any services and facilities are not delivered in a timely manner, or elements of the project later become unviable. This would result in a significant number of residents commuting using private transport to access services and facilities in other settlements that are absent from any new garden community in these circumstances.

As things stand, it is considered that the proposed garden community at Meecebrook would now be found sound at the Local Plan examination. This is the case for the following reasons:

- No justification has been provided to demonstrate that the inclusion of the garden community and Meecebrook is justified when assessed against reasonable alternatives, such as major urban extensions around the larger rural settlements.
- No delivery and implementation evidence is available taking account of relevant information about land ownership, delivery model and infrastructure requirements.
- No robust evidence has been presented to date regarding scheme viability which considers the necessary infrastructure, affordable housing provision, a realistic delivery trajectory and robust cost and value assumptions.
- No robust evidence has been presented to demonstrate that sufficient funding is available and whether or not further external funding is required, such as Homes England or Government funding, whether such funding has been applied for and secured, and whether or not any uncertainty around such funding has been factored into the overall delivery trajectory for the project.

Furthermore, we are aware that it was originally intended for Ministry of Defence land at Swynnerton to form a significant proportion of the proposed garden community at Meecebrook, but that the land in question no longer forms part of the proposed garden community. The land in question comprises previously developed land, which would have been an important factor in its favour when it was considered amongst other reasonable alternatives prior to the Issues and Options consultation in 2020; and ultimately identified as the favoured option at that time. To our knowledge, the process of assessing Meecebrook by comparison to other reasonable alternatives has not been undertaken again following the removal of the Ministry of Defence land.

In light of the above considerations, it is considered that as matters stand, the inclusion of the garden community at Meecebrook would be found to be unsound

at examination and the Council would be unable to adopt a Local Plan in its current form.

Consequently, it is submitted that the Council should make alterations to its proposed development strategy and settlement hierarchy, as set out in our responses to Question 2 (Policy 1) and Question 2 (Policy 2).

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations.

Do you agree with the proposed allocations?

Select Yes or No for each of the following policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response. Please provide details of alternative locations for housing and employment growth if you consider this is appropriate.

Ensure any comments relate to the policy comment box you are completing.

If you do want to submit a new site for consideration through the local plan process, we are still accepting sites through the Call for Site process, details are available here: https://www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation

Local Plan Preferred Options document reference: Pages 47 to 56 and appendix 2.

Policy 9. North of Stafford

Yes / No

Policy 9 Comments:

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

Policy 12. Other housing and employment land allocations.
(*In your response, please specify which particular site you are referring to, if relevant*.)

~~Yes~~ / No

Policy 12 Comments:

Whilst we raise no objections to the proposed housing and employment allocations within Policy 12, we object to this policy on the basis that the land at Hixon Airfield should be added to the proposal site allocation; and potentially in turn this policy, within both the proposed housing and employment allocations.

Our reasoning for this is explained in detail in response to Questions 2 (Policy 1 and Policy 2) and 3 and we shall not repeat that here.

In the event the Council agrees to add the land at Hixon Airfield for both housing and employment development, as a major urban extension to the existing Tier 4 settlement of Hixon, it is acknowledged that the site should be the subject of its own allocation policy prior to Policy 12 (i.e. in the same manner as the draft policies dedicated to sites such as Stafford Station Gateway); in which case Policy 12 itself would not need to be amended to include Hixon Airfield.

If however the Council were to propose to allocate just some of the land at Hixon Airfield (e.g. for employment development only), Policy 12 may be the appropriate policy to confirm such an allocation, in which case this policy would need to be revised accordingly. In consideration this scenario, please take account of the extent of the potential employment-only site (as an extension to the existing and well-established Recognised Industrial Estate) as outlined in response to Question 6 and illustrated at **Attachment 1** to this response form.

Q5. The Stafford Borough Local Plan 2020 - 2040 proposes to allocate land for Local Green Space and Countryside Enhancement Areas throughout the borough.

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

Select yes or no for each of the policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

Policy 13. Local Green Space
(In your response, please specify which particular site you are referring to, if relevant)

Yes / No

Policy 13 Comments:

Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)

Yes / No

Policy 14 Comments:

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

Economy Policies

The Economy Policies chapter contains policies that seek to protect employment land and support economic growth within the Borough.

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

~~Yes~~ / No

Select Yes or No and then use the box to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

Broadly speaking we support the recognition within Policy 16 and Policy 17 of the importance of the Recognised Industrial Estates in the Borough. However, we consider that the Preferred Options Local Plan misses the clear opportunity to facilitate further growth of the Recognised Industrial Estates in the plan period/up to 2040.

We consider that there is an over reliance on Meecebrook for the delivery of new employment development (some 15 hectares by 2040), which risks failing to take the opportunity to facilitate economic growth and in turn the prosperity of and within the Borough, given our serious reservations about the feasibility and viability of Meecebrook.

Furthermore, there is a clear and obvious opportunity to mitigate against these issues and associated risks, and also provide greater choice and potential for economic growth in the short term. There are numerous well-established and successful employment areas in the rural area, with substantial scope for further growth and additional success, with resulting potential to deliver additional jobs in already-accessible, well-connected employment areas in the short, medium and long term subject to local and national market factors.

However, the Preferred Options Local Plan does not allow for meaningful growth of the established rural Recognised Industrial Estates. Indeed, its failure to take the opportunity to allow for growth of the Recognised Industrial Estates in the

rural area, despite in some cases (such as at Hixon Airfield) the clear and obvious opportunities 'on the ground' to do so and associated site promotion by landowners, would make it very challenging to secure planning permission for any growth of these important economic centres. The Preferred Options Local Plan therefore effectively stifles economic growth in the vast majority of the rural area and Recognised Industrial Estates within it. Consequently, we assert that the strategy within and detail of the Local Plan should be amended to facilitate some new economic development by way of expansion of Recognised Industrial Estates.

As set out in detail earlier in this representation, we promote the inclusion of the land at the former Hixon Airfield as a major urban extension to Hixon, including both housing and employment development (and associated ancillary uses), either in place of the anticipated housing and employment development at Meecebrook up to 2040, or in addition to Meecebrook to reduce the prospects of the plan-led approach to meeting the Borough's development needs being undermined by slower than anticipated delivery at Meecebrook.

That land comprises the combination of Sites HIX07 and HIX08 in the Council's SHELAA and has been the subject of extensive previous representations that we have submitted, including the Vision Document referred to earlier in this representation (featuring masterplan work amongst other things).

If the Council elects not to follow our suggested approach of allocating all of the former airfield for development, and maintains its existing proposed development strategy up to the point of submission of the Draft Local Plan, it is submitted that a good proportion of the land at Hixon Airfield should be allocated for employment purposes. This would enable the well-planned expansion of the Hixon Airfield Recognised Industrial Estate, to meet existing and future demand for additional employment development in the rural area, allow for new employment development in more locations across the Borough, and meet the need for such development in this area (Hixon) specifically.

In earlier (including both emerging Local Plan and Call for Sites) representations we have promoted the suitability of SHELAA site reference HIX08 for employment development, including mindful of a previous planning application for a science park on the land in question. It remains the case that we consider this to be the most logical area for additional employment development as an extension to the existing Recognised Industrial Estate, should it be that employment development only is allowed for here in the New Local Plan; particularly given its location alongside both the new Wellington Business Park and new access/road serving that business park and future development within the airfield that our client has the vision to deliver (and as this area is well contained by the existing railway along its western edge).

Furthermore, it is considered that the area in question (HIX08) could be extended to the north west to include more land running parallel to the railway, and that would be also contained (and screened) by existing woodland to the north. The extended area in question is shown on the plan at **Attachment 1** to this representation.

We can confirm that there is already significant demand for additional employment land now, which is evident by the fact that our client has been approached by an end user with immediate and strong need for an employment use of the science park land plus further adjoining land (as shown at Attachment 1) due to their level of need and lack of suitable alternative sites elsewhere in the Midlands. It is asserted that the Local Plan should be more positively prepared to facilitate such economic growth at suitable locations on the edge of the well-established Recognised Industrial Estates in the Borough.

Alternatively, should the Council reject both of the proposals above, a part B should be added to Policy 17 to allow for employment development on suitable land adjoining the edge of the Recognised Industrial Estates where there is evidence of need for the proposed development and a lack of alternative available sites elsewhere (and subject to meeting other policies in the Local Plan in terms of the impact of such development e.g. on the transport/highway network).

Even if the Council rejects both the allocation of all of the former airfield for mixed use development/as a major urban extension, and part of it for new employment development, it is asserted that – at the very least - it would be common sense for the proposed boundary of the Hixon Airfield Recognised Industrial Estate to be amended to include the concrete former runways that run alongside the edge of the existing proposed Recognised Industrial Estate boundary.

The runways in question run directly along the edge of a mixture of existing industrial development and further permitted employment uses/development that has not yet been built. In addition, the runways in question themselves accommodate existing employment uses/development (including a commercial vehicle storage/auction use and separate car storage and distribution facility – planning permission refs. 16/25315/COU and 17/27479/COU) and an additional proposed vehicle storage area is the subject of a current planning application that is due to be determined imminently (which has previously been recommended for approval, but deferred by the Council's Special Planning Committee, and is due to be reconsidered at a soon-to-be-arranged meeting of Special Planning Committee – application ref. 19/31487/COU). With these factors and the existing concrete surfacing on the runways in mind, it is submitted that they should certainly be incorporated into the Recognised Industrial Estate boundary in order that it includes all existing and permitted/anticipated industrial development at this industrial estate.

Q7. The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals.

The relevant policies are: 19, 20, 21 and 22.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

Housing Policies

The Housing Policies chapter contains policies that seek to provide for identified need across the borough and support houseowners.

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments. In your response, please specify which particular site you are referring to, if relevant.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling.

The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy.

The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 91 to 99.

Comments:

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality.

The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 101 to 119.

Comments:

Connections

Q13. The connections policies chapter contains policies on transport and parking standards.

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 121 to 124.

Comments:

Evidence Base

To support the Local Plan 2020-2040 an evidence base has been produced.

The evidence base is available to view on our website here:
www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base

Q14. Have we considered all relevant studies and reports as part of our local plan?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Comments:

Q15. Do you think there is any further evidence required?

Yes / No

Select yes or no and then use the box below to add additional comments.

If you think additional evidence is needed, please state what you think should be added and explain your reasoning.

Ensure any comments relate to the policy comment box you are completing.

Comments:

General Comments

If you have any further comments to make on the Local Plan Preferred Options document and evidence base, please use the box below.

If you need further space to add comments, please add pages to the end of the consultation form and reference which question you are answering.

Thank you for taking the time to complete this consultation form.

Completed forms can be submitted by email to:
strategicplanningconsultations@staffordbc.gov.uk

Or returned via post to: Strategic Planning and Placemaking, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

ATTACHMENT 1

Plan showing potential extent of employment allocation at Hixon Airfield

PLOT ONE Area within red edge 119,101sqm 11.91Ha 29.43acres

PLOT TWO Area within red edge 89,010sqm 8.901Ha 21.99acres

Area within red edge 247,566sqm 24.7566 Ha 61.175 acres

Hixon Airfield
(disused)

Hixon Airfield Estate
(Industrial Estate)

Shirleywich

Shirleywich
Bridge

Shirleywich Farm

Yew Tree Farm

Heath
Farm

Wychdon
Cottages

Pond

Pond

Pond

Pond

Amerton Brook

Disused runway

NEW ROAD

A51

398300m 398400m 398500m 398600m 398700m 398800m 398900m 399000m 399100m 399200m 399300m 399400m 399500m 399600m 399700m

326800m 326700m 326600m 326500m 326400m 326300m 326200m 326100m 326000m 325900m

NEW ROAD, HIXON, STAFFS (FORMER AIRFIELD) Scale 1:1250 A0

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From: Alan Corinaldi-Knott [redacted]
Sent: 09 December 2022 17:01
To: Strategic Planning
Cc: [redacted]
Subject: Stafford Borough Local Plan 2020-2040 - Representation on Behalf of the Lower Heamies Residents Association Ref:(238457489) (LOW3307/1)
Attachments: Letter to Stafford Borough Council - Local Plan Preferred Options Conultation Response - LOW3307_1_238215482.pdf

Dear Sir / Madam

Please find attached a representation to the Stafford Borough Local Plan consultation on behalf of the Lower Heamies Residents Association, which responds primarily to the proposed garden community at Meecebrook.

At the request of our client, this representation is copied to their local MP ([redacted]), and the clerk of Chebsey Parish Council ([redacted]).

I would be grateful if you could acknowledge receipt of this representation and we trust that you will take these representations into account when formulating the next version of the Local Plan for Stafford Borough.

Regards

Alan Corinaldi-Knott
Senior Associate

Knights
[redacted]
W www.knightsplc.com

Knights

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From: Preferred Options Consultation [redacted]
Sent: 12 December 2022 11:11
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Alan Corinaldi-Knott**

Email: [redacted]

Agents and Developers

Organisation or Company: **Knights - on behalf of the Lower Heamies Residents Association**

Age: **Prefer not to say / not applicable**

Added to database: [redacted]

Topics (Contents page): **Vision and Objectives**

Vision and Objectives

Q1 - Which 3 are most important to you? **To strengthen our town centres through a quality environment and flexible mix of uses. , To deliver sustainable economic and housing growth to provide income and jobs. and To deliver infrastructure led growth supported by accessible services and facilities.**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No**

Comments: **The Local Plan focuses the most growth around Stafford, Stone and the proposed garden community and Meecebrook with some small-scale allocations at Gnosall and Woodseaves. Over half of all the proposed housing allocations are proposed to be delivered at Meecebrook. The above approach could pose a real risk to the Council's ability to maintain a supply of deliverable housing sites upon the adoption of the Local Plan, or later in the plan period if Meecebrook does not start delivering homes by 2030 as envisaged. In effect, the council's development strategy amounts to a "putting all of your eggs in one basket" approach. The deliverability of Meecebrook will be discussed in more detail later in this representation, but if Meecebrook isn't delivered within the timescales envisaged, that would likely lead to the authority being faced with speculative applications if it cannot demonstrate a deliverable housing land supply later in the plan period. This would undermine the plan-led approach to development in the Borough that the Council is rightly seeking to pursue. This**

issue was highlighted in a report on Garden Communities by development consultancy Lichfields who highlighted the risks of relying on garden communities in local plans and providing the necessary evidence base to pass the key tests of soundness in the NPPF. The LPA should note that the current strategy promoted in the Preferred Options Plan appears to stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements. Given that housing affordability is becoming an increasing issue in rural areas, and that it is recognised in national policy that some additional housing in rural communities can help support the viability of local services and facilities, the strategy currently proposed would appear to conflict with the broad thrust of national policy to support sustainable rural communities. The above development strategy is therefore considered to be a more viable, realistic, and deliverable strategy than the one which is currently being pursued by the Council. It is considered that the above approach would be more viable and deliverable and that any proposals for larger scale garden communities could form the basis of any future Local Plan or a Local Plan review, which would give sufficient time for the various issues highlighted in this letter to be resolved without rushing the plan through to an examination or finding that the plan subsequently fails because insufficient numbers of homes are being delivered. As the Council will of course be aware, a significant element of the Meecebrrok site was to comprise previously developed land, which comprised the Ministry of Defence land at Swynnerton. The residents understand that the Issues and Options process when Meecebrook was identified as the favoured option would have placed this site in a very favourable position. However, residents also understand that the process has not been undertaken again following the removal of the MoD land. This would ensure that the Council has a robust and deliverable strategy, and at such a point that a large garden community has progressed further and is found to be more deliverable, then it would be more appropriate to consider including a garden community at Meecebrook in a local plan further into the future. Considering the conclusions of this representation, the current development strategy for the Borough and the Meecebrook Garden Community is considered to be unsound on the basis that there is an insufficient level of robust evidence to demonstrate that the plan is realistic, viable and deliverable, and the Council is encouraged to rethink the proposed Local Plan strategy.

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **No reply**

Policy 3 (Development in open countryside): **Yes**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **Yes**

Comments: **No reply**

Policy 5 (Green Belt): **Yes**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **Yes**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No**

Comments: **We note from the Council's Local Development Scheme that it envisages submitting the plan for examination during 2024 and that the plan, if found sound, would be adopted around Autumn 2024. Given the time it takes Local Plans to be prepared and examined, it is considered that it may more likely that the plan is adopted during 2025, as invariably, many plans require Main Modifications at examination stage. This would have implications for the timely delivery of a garden community at Meecebrook. It is noted from the Council's Lead-in Times and Build Rate Assumptions Topic Paper that a development of 500 dwellings or more in the Borough would have a lead-in time of 4.5 years with an outline planning application in place. For Meecebrook to start delivering homes from 2030, this would require outline planning permission to be in place by mid-2025. This would require work on preparing a planning application to be commencing now, with a planning application being submitted before the end of 2024. An emerging development plan would carry limited weight in the determination of a planning application until such time that it had passed examination, so the LPA would be unable to determine a planning application favourably until the new Local Plan is nearing adoption. Following this, any resolution to grant planning permission would need to be subject to the negotiation of a Section 106 Agreement which is likely to be complex and involve a number of landowners before it can be executed and planning permission granted. Following any grant of permission, detailed consents would need to be secured and conditions discharged before any physical works on site could be undertaken, and it is likely that significant infrastructure would need to be delivered before any dwellings can be delivered as part of the proposed garden community. Further to this, the Local Plan consultation indicates that the delivery of 3,000 dwellings at Meecebrook would take place between 2030 and 2040, equating to the delivery of 300 dwellings per annum. Given the challenges highlighted above, it is unlikely that 300 dwellings per annum would be delivered at Meecebrook, particularly during the early years of the development. Added to this, the Council's Lead-in Times and Built Rate Assumptions Topic Paper sets out that build out rate assumptions for developments of 2,000 plus dwellings would be 160 dwellings per annum, but then goes on to suggest that Meecebrook would deliver 300 dwellings per annum without any evidential basis for such an assumption. Even if it was to be accepted that Meecebrook would start to deliver housing from 2030, the Council's more considered build rate assumptions of 160 dwellings per annum suggest that only around 1600 dwellings would be delivered at Meecebrook during the plan period. There doesn't appear to be any evidence to demonstrate how the proposed garden community would be phased, whether all landowners within the proposed garden community have made their land available for development, nor has any evidence been presented to demonstrate that a developer or consortium of developers have been appointed or even approached to be development partners for the site. If no developers or consortium of developers are on board as delivery partners, then it would not be possible to ascertain the deliverability of the site and over what timeframe. With regards to the landowner point, the residents have it on good authority that one of the land owners has removed in excess of 200 acres from the identified area, which would considerably dilute the point of having the garden community in the location. It is therefore considered that the envisaged delivery of dwellings at Meecebrook from 2030 is unrealistic and that 3000 dwellings would not be delivered during the plan period. This would undermine the overall development strategy for the Borough with potential implications for the plan-led delivery of housing. By way of a practical and real-life illustration of the significant amount of time it can take for new communities to come forward, the Cheshire**

East Local Plan was adopted in 2017 with a proposal for two growth villages to the north and south of the Borough. The southern growth village that was proposed outside of Crewe proposed 650 dwellings, and the northern growth village at Handforth proposed 1600 dwellings with associated services, facilities and infrastructure. The Cheshire East Local Plan is now 5 years old, and a planning application has yet to be submitted for either of the proposed growth villages, even in the context of a Borough with a very strong housing market. Both of these growth villages are located adjacent to the strategic road network in contrast to Meecebrook, which is located away from the strategic road network where road upgrades would be required for the size of development proposed to connect to it. This serves to demonstrate the significant amount of time it can take for new settlements to come forward, even in the case of an area with a very strong housing market. In light of these considerations, it is likely to take significantly longer than the Council envisage for any garden community at Meecebrook to come forward. In addition to the above, deliverability of a new settlement has been considered in the examination of the Tunbridge Wells Borough Local Plan where the Inspector has published their initial findings . The Inspector's findings at paragraph 31 are clear that paragraph 73 of the Framework requires local planning authorities to make realistic assessments of delivery rates and lead in times, and paragraph 33 of the Inspector's findings refer to the fact that neither the landowner or the council had any prior experience of delivering a scheme of such a size or complexity. Paragraphs 34 and 35 are clear about the complexities of delivering new settlements, the various stages required to secure planning permission and subsequent delivery rates. The findings of the Inspector in Tunbridge Wells echo are concerns expressed in this representation. Turning to some of the specific matters detailed in the Concept Masterplan, the proposed garden community is to deliver a primary school and a secondary school, mixed use areas, commercial uses, and local centres / community hubs, in addition to a railway station. At this stage, limited evidence has been published to properly explore the deliverability and viability of the above, nor has any evidence been published to demonstrate the deliverability of the proposed railway station. Whilst some technical studies have been produced to establish the feasibility of a railway station in the location proposed, there is no evidence to demonstrate whether: • Discussions have been held with Network Rail to demonstrate whether they consider a railway station could be provided in this location. • Discussions have been held with both Network Rail and train operators to demonstrate whether train timetables can be adjusted to accommodate an additional station in this location and to what extent timetables may be affected by the works and subsequent operation of HS2. • Other landowners around the vicinity of the proposed railway station have been consulted in terms of ensuring sufficient land is available around the proposed railway station for both the effective operation and maintenance of the railway station and the associated station buildings, platforms, vehicular access, parking, pick-up and drop-off and bus waiting facilities. We note that the Council has published a questions and answers document which suggests that Meecebrook is not dependent on a station being built and the lack of a station would not automatically result in the proposal being removed from the plan. Paragraph 73 of the Framework is clear that new settlements should be served by a genuine choice of transport modes. At this stage, it is not clear how and when rail and bus services would be provided. This issue has been considered as part of the ongoing examination of the Tunbridge Wells Borough Local Plan referred to above. a new settlement is proposed to the east of Tonbridge where a railway line passes through the proposed new settlement. No station was proposed in that location, and it was unclear what bus provision could be provided, such that it was unclear as to whether or not genuine alternatives to the private car could be provided . This is comparable to the current situation at Meecebrook where limited opportunities for sustainable transport modes are currently available. The policy is not clear as to how or when the social and physical infrastructure will be delivered and whether it would need to be in place upon completion of

the first phases of residential development. Without any phasing details, the proposal could lead to some unsustainable patterns of development if any services and facilities are not delivered in a timely manner, or elements of the project later become unviable. This would result in a significant number of residents commuting using private transport to access services and facilities in other settlements that are absent from any new garden community in these circumstances. As things stand, it is not considered that the proposed garden community at Meecebrook would be found sound at the Local Plan examination. This is the case for the following reasons: • No justification has been provided to demonstrate that the inclusion of the garden community and Meecebrook is justified when assessed against reasonable alternatives, such as other urban extensions around Stone and Stafford, additional development around other larger rural settlements, or other smaller and potentially more deliverable garden communities. • No delivery and implementation evidence are available in light of relevant information about land ownership, delivery model and infrastructure requirements. • No robust evidence has been presented regarding scheme viabilty

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **Yes**

Comments: **No reply**

Policy 10 (West of Stafford): **Yes**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **Yes**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No**

Comments: **Please see comments provided elsewhere in response to the proposed garden community at Meecebrook**

Q15 - Do you think there is any further evidence required? **Yes**

Comments: **Please see comments provided elsewhere in response to the proposed garden community at Meecebrook**

General Comments:

The comments boxes are insufficient in size to provide full detailed responses through this form. A full representation on behalf of the Lower Heamies Residents Association has been sent to the Planning Policy Team via email and copied to the Parish Council and the local MP.
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Date 09 December 2022
Our Reference CCOP1/AKNO1/LOW3307/1
Your Reference
Please ask for Alan Corinaldi-Knott
Telephone [redacted]
Email [redacted]

Knights

Planning Policy
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

BY EMAIL

Dear Sirs

Stafford Borough Local Plan 2020 – 2040 - Preferred Options Consultation – Representation on behalf of the Lower Heamies Residents Association

This representation is submitted on behalf of the residents of Lower Heamies who are members of the Lower Heamies Resident's Association (See Appendix A for list of representors) in response to the Stafford Borough Local Plan 2020 – 2040 Preferred Options Consultation.

Turning to the development strategy first of all, the Local Plan focuses the most growth around Stafford, Stone and the proposed garden community and Meecebrook with some small-scale allocations at Gnosall and Woodseaves. Over half of all the proposed housing allocations are proposed to be delivered at Meecebrook.

The above approach could pose a real risk to the Council's ability to maintain a supply of deliverable housing sites upon the adoption of the Local Plan, or later in the plan period if Meecebrook does not start delivering homes by 2030 as envisaged. In effect, the council's development strategy amounts to a "putting all of your eggs in one basket" approach.

The deliverability of Meecebrook will be discussed in more detail later in this representation, but if Meecebrook isn't delivered within the timescales envisaged, that would likely lead to the authority being faced with speculative applications if it cannot demonstrate a deliverable housing land supply later in the plan period. This would undermine the plan-led approach to development in the Borough that the Council is rightly seeking to pursue. This issue was highlighted in a report on Garden Communities by development consultancy Lichfields[1] who highlighted the risks of relying on garden communities in local plans and providing the necessary evidence base to pass the key tests of soundness in the NPPF.

We note from the Council's Local Development Scheme that it envisages submitting the plan for examination during 2024 and that the plan, if found sound, would be adopted around Autumn 2024. Given the time it takes Local Plans to be prepared and examined, it is considered that it may more likely that

[redacted]nsight: How does your garden grow? A stock take on planning for the Governments Garden [redacted]s programme (December 2019)

the plan is adopted during 2025, as invariably, many plans require Main Modifications at examination stage. This would have implications for the timely delivery of a garden community at Meecebrook.

It is noted from the Council's Lead-in Times and Build Rate Assumptions Topic Paper that a development of 500 dwellings or more in the Borough would have a lead-in time of 4.5 years with an outline planning application in place.

For Meecebrook to start delivering homes from 2030, this would require outline planning permission to be in place by mid-2025. A large-scale development of 3,000 dwellings would be considered to be EIA development and would require substantive technical reports and assessments to be undertaken and carried out prior to the submission of any such planning application for a garden community.

This would require work on preparing a planning application to be commencing now, with a planning application being submitted before the end of 2024. An emerging development plan would carry limited weight in the determination of a planning application until such time that it had passed examination, so the LPA would be unable to determine a planning application favourably until the new Local Plan is nearing adoption. Following this, any resolution to grant planning permission would need to be subject to the negotiation of a Section 106 Agreement which is likely to be complex and involve a number of landowners before it can be executed and planning permission granted. A Section 106 Agreement is also likely to require the involvement of Network Rail to secure the delivery of the proposed railway station.

Following any grant of permission, detailed consents would need to be secured and conditions discharged before any physical works on site could be undertaken, and it is likely that significant infrastructure would need to be delivered before any dwellings can be delivered as part of the proposed garden community.

Further to this, the Local Plan consultation indicates that the delivery of 3,000 dwellings at Meecebrook would take place between 2030 and 2040, equating to the delivery of 300 dwellings per annum. Given the challenges highlighted above, it is unlikely that 300 dwellings per annum would be delivered at Meecebrook, particularly during the early years of the development. Added to this, the Council's Lead-in Times and Built Rate Assumptions Topic Paper sets out that build out rate assumptions for developments of 2,000 plus dwellings would be 160 dwellings per annum, but then goes on to suggest that Meecebrook would deliver 300 dwellings per annum without any evidential basis for such an assumption. Even if it was to be accepted that Meecebrook would start to deliver housing from 2030, the Council's more considered build rate assumptions of 160 dwellings per annum suggest that only around 1600 dwellings would be delivered at Meecebrook during the plan period.

There doesn't appear to be any evidence to demonstrate how the proposed garden community would be phased, whether all landowners within the proposed garden community have made their land available for development, nor has any evidence been presented to demonstrate that a developer or consortium of developers have been appointed or even approached to be development partners for the site. If no developers or consortium of developers are on board as delivery partners, then it would not be possible to ascertain the deliverability of the site and over what timeframe.

With regards to the landowner point, the residents have it on good authority that one of the land owners has removed in excess of 200 acres from the identified area, which would considerably dilute the point of having the garden community in the location.

It is therefore considered that the envisaged delivery of dwellings at Meecebrook from 2030 is unrealistic and that 3000 dwellings would not be delivered during the plan period. This would undermine the overall development strategy for the Borough with potential implications for the plan-led delivery of housing.

By way of a practical and real-life illustration of the significant amount of time it can take for new communities to come forward, the Cheshire East Local Plan was adopted in 2017 with a proposal for two growth villages to the north and south of the Borough. The southern growth village that was proposed outside of Crewe proposed 650 dwellings, and the northern growth village at Handforth proposed 1600 dwellings with associated services, facilities and infrastructure. The Cheshire East Local Plan is now 5 years old, and a planning application has yet to be submitted for either of the proposed growth villages, even in the context of a Borough with a very strong housing market. Both of these growth villages are located adjacent to the strategic road network in contrast to Meecebrook, which is located away from the strategic road network where road upgrades would be required for the size of development proposed to connect to it. This serves to demonstrate the significant amount of time it can take for new settlements to come forward, even in the case of an area with a very strong housing market. In light of these considerations, it is likely to take significantly longer than the Council envisage for any garden community at Meecebrook to come forward.

In addition to the above, deliverability of a new settlement has been considered in the examination of the Tunbridge Wells Borough Local Plan where the Inspector has published their initial findings[2].

The Inspector's findings at paragraph 31 are clear that paragraph 73 of the Framework requires local planning authorities to make realistic assessments of delivery rates and lead in times, and paragraph 33 of the Inspector's findings refer to the fact that neither the landowner or the council had any prior experience of delivering a scheme of such a size or complexity. Paragraphs 34 and 35 are clear about the complexities of delivering new settlements, the various stages required to secure planning permission and subsequent delivery rates. The findings of the Inspector in Tunbridge Wells echo are concerns expressed in this representation.

Turning to some of the specific matters detailed in the Concept Masterplan, the proposed garden community is to deliver a primary school and a secondary school, mixed use areas, commercial uses, and local centres / community hubs, in addition to a railway station.

At this stage, limited evidence has been published to properly explore the deliverability and viability of the above, nor has any evidence been published to demonstrate the deliverability of the proposed railway station. Whilst some technical studies have been produced to establish the feasibility of a railway station in the location proposed, there is no evidence to demonstrate whether:

[2] Tunbridge Wells Local Plan Examination Library Document ID-012

- Discussions have been held with Network Rail to demonstrate whether they consider a railway station could be provided in this location.
- Discussions have been held with both Network Rail and train operators to demonstrate whether train timetables can be adjusted to accommodate an additional station in this location and to what extent timetables may be affected by the works and subsequent operation of HS2.
- Other landowners around the vicinity of the proposed railway station have been consulted in terms of ensuring sufficient land is available around the proposed railway station for both the effective operation and maintenance of the railway station and the associated station buildings, platforms, vehicular access, parking, pick-up and drop-off and bus waiting facilities.

We note that the Council has published a questions and answers document which suggests that Meecebrook is not dependent on a station being built and the lack of a station would not automatically result in the proposal being removed from the plan.

Paragraph 73 of the Framework is clear that new settlements should be served by a genuine choice of transport modes. At this stage, it is not clear how and when rail and bus services would be provided. This issue has been considered as part of the ongoing examination of the Tunbridge Wells Borough Local Plan referred to above.

In the case of the above, a new settlement is proposed to the east of Tonbridge where a railway line passes through the proposed new settlement. No station was proposed in that location, and it was unclear what bus provision could be provided, such that it was unclear as to whether or not genuine alternatives to the private car could be provided[3]. This is comparable to the current situation at Meecebrook where limited opportunities for sustainable transport modes are currently available.

The policy is not clear as to how or when the social and physical infrastructure will be delivered and whether it would need to be in place upon completion of the first phases of residential development. Without any phasing details, the proposal could lead to some unsustainable patterns of development if any services and facilities are not delivered in a timely manner, or elements of the project later become unviable. This would result in a significant number of residents commuting using private transport to access services and facilities in other settlements that are absent from any new garden community in these circumstances.

As things stand, it is not considered that the proposed garden community at Meecebrook would be found sound at the Local Plan examination. This is the case for the following reasons:

- No justification has been provided to demonstrate that the inclusion of the garden community and Meecebrook is justified when assessed against reasonable alternatives, such as other urban extensions around Stone and Stafford, additional development around other larger rural settlements, or other smaller and potentially more deliverable garden communities.
- No delivery and implementation evidence are available in light of relevant information about land ownership, delivery model and infrastructure requirements.

[3] See paragraphs 12-15 of examination library document ID-012.

- No robust evidence has been presented to date regarding scheme viability which considers the necessary infrastructure, affordable housing provision, a realistic delivery trajectory and robust cost and value assumptions.
- No robust evidence has been presented to demonstrate that necessary is available and whether or not further external funding is required, such as Homes England or Government funding, whether such funding has been applied for and secured, and whether or not any uncertainty around such funding has been factored into the overall delivery trajectory for the project.

In light of the above considerations, it is considered that as matters stand, the inclusion of the garden community at Meecebrook would be found to be unsound at examination and the Council would be unable to adopt a local plan in its current form.

It is therefore suggested that the Council should promote a development strategy that prioritises the following strategy:

1. Growth around the two largest settlements in the Borough (Stafford and Stone).
2. Garden community proposals as an extension to existing settlements where there are already services and infrastructure available to serve the early phases of development and better access to the strategic transport network.
3. Growth around the larger rural settlements (not just Woodseaves and Gnosall), including site allocations.
4. Some limited growth around the smaller rural settlements, including some small site allocations in addition to facilitating some rounding off and infilling.

Added to the above considerations, the LPA should note that the current strategy promoted in the Preferred Options Plan appears to stifle growth in and around existing villages, even those with a range of local services and facilities that cater for the daily needs of residents in those settlements. Given that housing affordability is becoming an increasing issue in rural areas, and that it is recognised in national policy that some additional housing in rural communities can help support the viability of local services and facilities, the strategy currently proposed would appear to conflict with the broad thrust of national policy to support sustainable rural communities. The above development strategy is therefore considered to be a more viable, realistic, and deliverable strategy than the one which is currently being pursued by the Council.

It is considered that the above approach would be more viable and deliverable and that any proposals for larger scale garden communities could form the basis of any future Local Plan or a Local Plan review, which would give sufficient time for the various issues highlighted in this letter to be resolved without rushing the plan through to an examination or finding that the plan subsequently fails because insufficient numbers of homes are being delivered.

As the Council will of course be aware, a significant element of the Meecebrrok site was to comprise previously developed land, which comprised the Ministry of Defence land at Swynnerton. The residents understand that the Issues and Options process when Meecebrook was identified as the favoured option

would have placed this site in a very favourable position. However, residents also understand that the process has not been undertaken again following the removal of the MoD land.

This would ensure that the Council has a robust and deliverable strategy, and at such a point that a large garden community has progressed further and is found to be more deliverable, then it would be more appropriate to consider including a garden community at Meecebrook in a local plan further into the future.

Considering the conclusions of this representation, the current development strategy for the Borough and the Meecebrook Garden Community is considered to be unsound on the basis that there is an insufficient level of robust evidence to demonstrate that the plan is realistic, viable and deliverable, and the Council is encouraged to rethink the proposed Local Plan strategy.

The Residents Association would like to thank the Council for the opportunity to comment on the Local Plan and welcomes the efforts of the Council to continue to ensure that it has an up-to-date development plan in place to maintain a plan-led approach to development across the Borough.

However, this representation expresses substantive reservations about the overall development strategy for the Borough, and, has substantive reservations about the deliverability of such a large garden community in the location proposed.

The Resident's Association doesn't object to the principle of garden communities per se and recognises that open market and affordable housing needs must be met somewhere, even in locations which may not be welcome to communities adjacent to where they will be located. The Resident's Association also acknowledges the substantial social and economic benefits that are generated through the delivery of homes and infrastructure.

However, it is considered that the proposed garden community at Meecebrook is undeliverable, and that the Council should re-consider their strategy and look more closely at other more reasonable alternatives.

We trust that you will take these representations into consideration when preparing the next draft of the Local Plan.

Yours faithfully

[redacted]

ALAN CORINALDI-KNOTT

Copy: [redacted]

APPENDIX A

List of representors that make up the Lower Heamies Residents Association:

Robert and Elizabeth Grove

[redacted]

Stephen and Lesley Perkins

[redacted]

Leon and Christine Kinnersley

[redacted]

Robert and Sharon Fielding

[redacted]

Nicholas and Theresa Glassey

[redacted]

David and Elizabeth Heaton

[redacted]

Louis and Colline Lotter

[redacted]

From:	Michael Askew
Sent:	01 December 2022 09:36
To:	Strategic Planning
Cc:	
Subject:	Strategic Representations to Preferred Options version of the Local Plan 2020 - 2040 on behalf of Stone Utility Services Limited
Attachments:	4704-02-01 Outline Masterplan.pdf ___AIT128_1_130982833.pdf; Stone Utility Services Limited - Strategic Representations to Preferred Options of Local Plan 1.12.22.pdf

Sir / Madam,

In addition to the online submission form that was completed today (by Knights on behalf of Stone Utility Services Limited) please find attached our details strategic representation letter and a copy of the masterplan that was submitted for the proposed Cold Norton Employment Estate (SHELLA ref. CHE06) for ease of reference.

The letter sets out in detail our case in favour of why draft Policies 3 and 17 should be amended to allocate this site as an employment estate in the Local Plan 2020-2040.

I would be grateful if you could take this into account when reviewing the Preferred Options consultee responses.

Regards,

Michael

Michael Askew
Senior Associate
BA(Hons) PG Dip MRTPI

Knights

W www.knightsplc.com

From: Preferred Options Consultation [redacted]
Sent: 01 December 2022 09:31
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Michael Askew**

Email: [redacted]

Agents and Developers

Organisation or Company: **Knights (agents) on behalf of Stone Utility Services Limited**

Age: **Prefer not to say** / **not applicable**

Added to database: [redacted]

Topics (Contents page): **Site Allocation Policies**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Not asked**

Comments: **Not asked**

Policy 2 (Settlement Hierarchy): **Not asked**

Comments: **Not asked**

Policy 3 (Development in open countryside): **Not asked**

Comments: **Not asked**

Policy 4 (Climate change and development requirements): **Not asked**

Comments: **Not asked**

Policy 5 (Green Belt): **Not asked**

Comments: **Not asked**

Policy 6 (Neighbourhood plans): **Not asked**

Comments: **Not asked**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No**

Comments: **No reply**

Policy 10 (West of Stafford): **No**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No**

Comments: **No reply**

Policy 12 (Other housing and employment land): **Yes**

Comments: **See supporting letter dated 1 December 2022 which seeks to allocate Cold Norton Employment Estate (SHELLA ref. CHE06) as an allocated employment estate. It is therefore requested that Policies 3 and 17 be amended accordingly.**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No**

Comments: **No reply**

Policy 14 (Penk and Sow): **No**

Comments: **No reply**

Policy 15 (Stone Countryside): **No**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **Yes**

Comments: In addition to the existing proposed Employment Allocations that have been

suggested, it is requested that Cold Norton Employment Estate (SHELLA ref. CHE06) be included within these allocations.

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

No reply

Date 1 December 2022
Our Reference MASK1/AIT128/2
Your Reference
Please ask for Michael Askew
Direct Dial [redacted]
Facsimile [redacted]
Email [redacted]

Knights

Planning Policy
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 2AQ

Dear Sir / Madam

Strategic Representations to Preferred Options Consultation of the Stafford Borough Local Plan 2020 – 2040
Land at Eccleshall Road, Norton Bridge, Stone, ST15 0NS (SHELAA Site CHE06)
Proposed Employment Land – Cold Norton Employment Estate

Knights promoted this site on behalf of our client Stone Utility Services Limited through the Call for Sites Exercise on 26 June 2020 and promoted the site againas a potential employment site (comprising light industrial, general industrial and storage & distribution uses) through the Issues and Options consultation of the Stafford Borough Local Plan on 30 March 2021.

Our client wishes to continue to promote this site as an employment allocation through the New Local Plan and the justification for which is set out below. It is envisaged that the site would be called 'Cold Norton Employment Estate'.

Following the Call for Sites Exercise the site was identified within the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2022 Update under Site 'CHE06 – Land at Norton Bridge, ST15 0NS'. In assessing this site, the SHELAA stated that the site is not located within or adjacent to a recognised local plan settlement boundary and that it fell outside of the Sustainable Settlement Hierarchy as set out in Policy SP3 of the Plan for Stafford Borough. Nevertheless, the report did not identify any technical issues that would restrict the site from coming forward and being developed for employment purposes.

The report also recognised that the site was both available and achievable / deliverable. Indeed, our client's call for sites submission included an indicative masterplan, and ecology report and a technical transport note to demonstrate that the proposal would be technically sound as well as deliver a wide range of employment uses (totalling 2,545sqm), which would be read against the adjacent Whitehouse Farm employment estate to the southeast.

[redacted]

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It should also be noted that our client obtained planning permission on 4 December 2020 to convert the existing buildings located in the southeast portion of the site to provide a storage and distribution (Class B8) use under planning permission 20/32746/COU, and this now anchors the site. This development has now been completed and will very shortly be in operation. That planning permission will enable our client to relocate their business to this site from their current rented accommodation in Brookside Business Park, Cold Meece. As part of that planning permission, access improvements were proposed to the site to enable the wider site to be accessible via commercial vehicles.

Whilst the Preferred Options document seeks to allocated at least 80 hectares of employment land over the plan period, it does not propose to allocate this site as a potential employment allocation (and instead proposes that it remain within the open countryside). Draft Policy 17 'Recognised Industrial Estates' proposes to retain the existing Recognised Industrial Estates of Hixon, Hixon Airfield, Ladfordfields, Moorfields, Pasturefields, and Raleigh Hall as employment allocations within the rural area, and Draft Policy 3 provides a closed list of scenarios which includes supporting employment development within these recognised industrial estates. Therefore, as it stands, the redevelopment of this site to provide and enlarged employment estate would be contrary to these two policies.

Notwithstanding this, Draft Policies 7 and 8 set out the proposals for the new Meecebrook Garden Community (which is located approximately 1.5 miles from the site) seeks to provide 3,000 new homes and 15 hectares of employment land during the plan period (with the same again identified beyond the plan period).

It should also be noted that Chapter 6 of the National Planning Policy Framework ('the Framework') places significant weight in the need to support economic growth and productivity with an emphasis upon considering local business needs and wider opportunities for development within paragraph 81. Paragraph 84 of the Framework goes on to support *"the sustainable growth and expansion of all types of business in rural areas … [including] through … well designed new buildings"* whereas paragraph 85 goes on to acknowledge that *"planning policies … should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent or to beyond existing settlements, and in locations that are not well served by public transport"*. In light of the above, bringing forward this site (which is outside of an existing identified settlement) would nevertheless be positioned in close proximity to a number of the settlements that are identified within the revised settlement hierarchy that is proposed in Draft Policy 2 which include; Stone (at Tier 2), Meecebrook Garden Community (at Tier 3), Eccleshall and Yarnfield (at Tier 4) and Cold Meece, Great Bridgeford, Norton Bridge and Swynnerton (at Tier 5).

Paragraph 85 goes on to state that in such circumstances it is important for such development to be sensitive to their surroundings, be acceptable in terms of highway safety and provide opportunities to make the site more sustainable. It has already been demonstrated in the previous Call for Sites submission (through the submitted transport technical note and the indicative masterplan) that an employment estate in this location would meet these aspirations. Indeed, the provision of further commercial units (as proposed here) in such proximity to the existing industrial estate of White House Farm (located on the opposite side of the road) would provide a logical and organic expansion of the established commercial uses in the immediate area. In doing so, the additional employment provision

would provide a wide range of employment opportunities which would be near the following settlements and established industrial areas:

- Stone (Tier 2) – 1.5 miles
- Meecebrook Garden Community (Tier 3) – 1 mile
- Eccleshall (Tier 4) – 3.1 miles
- Yarnfield (Tier 4) – 1.7 miles
- Norton Bridge (Tier 5) – 0.8 miles
- Cold Meece (Tier 5) – 1.7 miles
- Great Bridgeford (Tier 5) – 3 miles
- Swynnerton (Tier 5) – 3.5 miles
- Raleigh Hall (RIE) – 3.2 miles
- Ladfordfields (RIE) – 4.8 miles
- Moorfields (RIE) – 5.1 miles

The site's close proximity to the proposed boundaries of Meecebrook Garden Community and Norton Bridge, and the existing Whitehouse Farm Employment Estate is set out in **Figure 1**. This diagram illustrates how out client's site would clearly assimilate into its surroundings and provide a sustainable form of economic development.

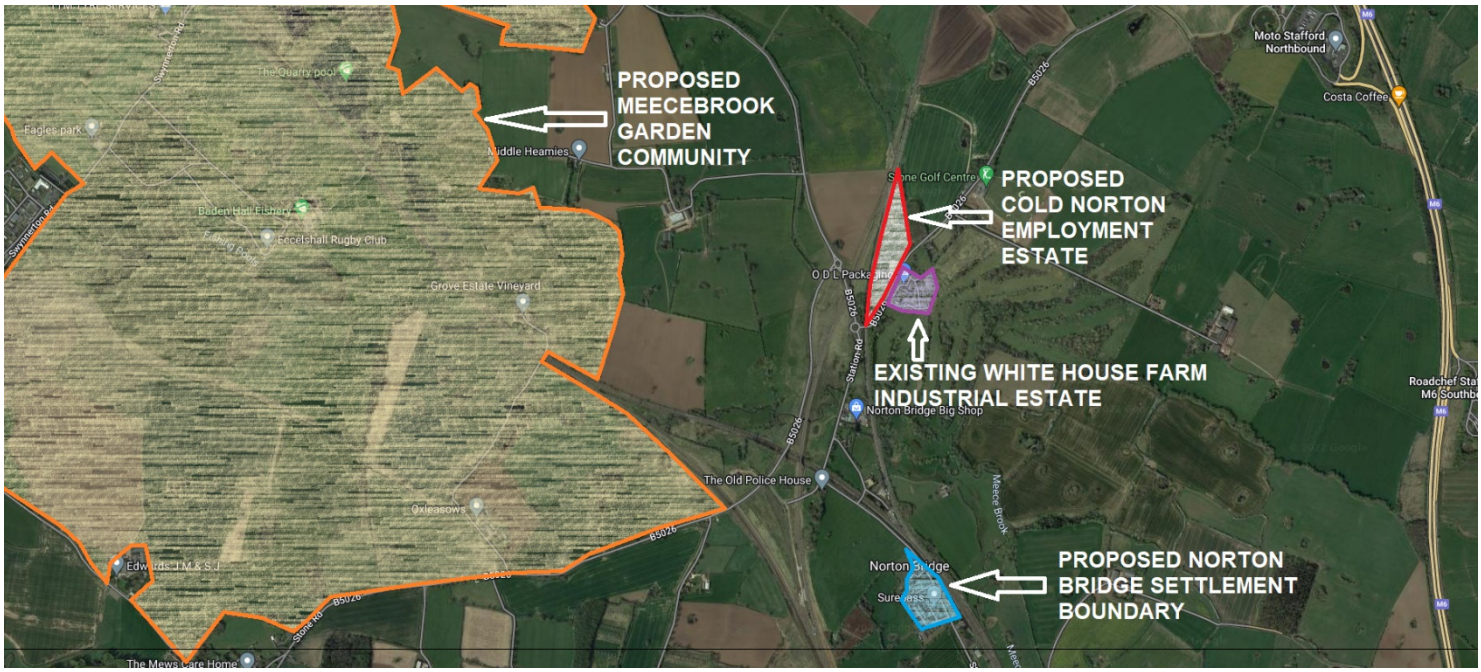

Figure 1 - Client's site shown in context with proposed Meecebrook Community Village and Norton Bridge settlement boundaries and existing Whitehouse Farm employment estate

The proposed employment estate would contribute towards the 'at least 80 hectares target' and would provide a sustainable form of economic development which would be positioned near the settlements and industrial estates stipulated above, whilst providing excellent links to wider transport infrastructure and in doing so reinforcing the rural economy in the surrounding area. Indeed, a part of our Call for Sites

submission, we included a Supply & Demand Report from Mounsey Chartered Surveyors which demonstrated that there is high demand for such employment uses in the wider area.
The proposed Meecebrook Garden Community seeks to propose a substantial amount of employment development during both the Local Plan 2020-2040 period and beyond; all of which is now proposed on greenfield land. Very substantial infrastructure would need to be in place in advance of this site coming forward, which is likely to include a new rail station. The provision of an employment estate nearby at Norton Bridge (as proposed here), could be brought forward without any major infrastructure improvement, and activities would be confined by clearly defensible boundaries on all sides (including the B5026 and the railway line), thereby minimising its impact on the character of the countryside.

Our client's call for sites submission (as set out previously) included a suite of technical documents to demonstrate that the scheme would be technically sound. All of these documents are not included again here however for ease of reference we have included the indicative masterplan that has been produced by Wood Goldstraw Yorath which indicates how this site might reasonably be developed. This is also shown below in **Figure 2**.

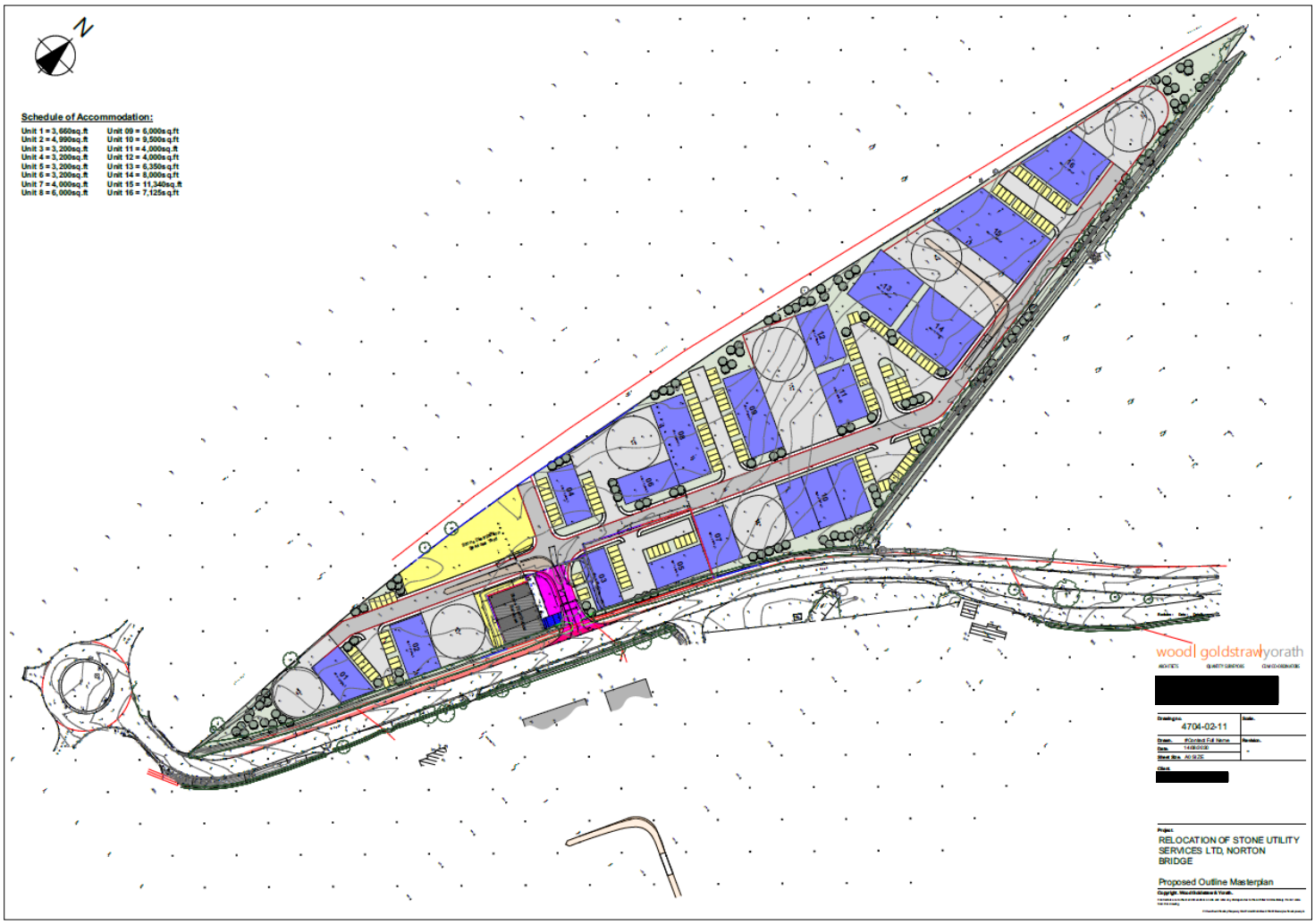

Figure 2 - Indicative masterplan for proposed Cold Norton Employment Estate

Knights

Considering the above, we would request that the Cold Norton Employment Estate be allocated as an employment allocation in the Local Plan 2020-2040 by amending the wording of Draft Policies 3 and 17 to make provision for this site to be utilised for a range of light industrial (Class E.g.iii), general industrial (Class B2) and storage & distribution (Class B8) uses.

Yours faithfully

MICHAEL ASKEW
Senior Associate
BA(Hons) PG Dip MRTPI

Enclosure: Indicative masterplan by Wood Goldstraw Yorath (as submitted in Call for Sites exercise)

From: Preferred Options Consultation [redacted]
Sent: 12 December 2022 10:47
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **kenneth gorman**

Email: [redacted]

Agents and Developers

Organisation or Company: **KPG Design Associates Ltd**

Age: [redacted]

Added to database: **No reply**

Topics (Contents page): **No reply**

Vision and Objectives

Q1 - Which 3 are most important to you? **To develop a high value, high skill, innovative and sustainable economy. , To deliver sustainable economic and housing growth to provide income and jobs. and To provide an attractive place to live and work and support strong communities that promote health and wellbeing.**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Yes**

Comments: **No reply**

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **No reply**

Policy 3 (Development in open countryside): **No**

Comments: **It is considered that the application of restrictions to development in open countryside, and the accepted definitions of open countryside are too restrictive, there is a significant shortfall of housing, particularly Affordable housing, for rural dwellers. This has been the case for many years and, despite many aspirational policies coming forward, the**

automatic resistance from local authorities remains the major stumbling block for any proposed rural development. Staffordshire and adjacent counties have very substantial areas of rural environment, this should be noted and a relaxation of the restrictive policies to provide "the right houses in the right places", certainly as far as rural dwellers are concerned.

Policy 4 (Climate change and development requirements): **No**

Comments: **It is considered that England's sustainability and climate change policies have not been well thought through. The reliance on renewable energy when the infrastructure and technology is not yet sufficiently developed to provide the level of renewable energy currently required to sustain the existing demand. To insist that any new development complies with an unachievable target overall is somewhat ahead of the ability to sustain such a policy. We need to concentrate on the provision of green energy before applying unachievable targets to new development.**

Policy 5 (Green Belt): **No**

Comments: **Put simply, the "Very Special Circumstance" required to satisfy the Decision Makers with regard to development in the Green Belt is very randomly applied and seems to be left to individual interpretations of the actual value of the Green Belt verses the Benefits of the proposal, it has led to many inconsistent and missed opportunities. Furthermore, a good deal of Green Belt was created many decades ago and circumstances and requirements have changed a great deal during those years, however, planners attitudes to the have not.**

Policy 6 (Neighbourhood plans): **Yes**

Comments: **Neighbourhood plans are a good, democracy led way of arriving at the "right decision", however, they are sometimes misapplied to restrict development solely for the benefit of small local communities and/or used to support Planners recommendations for the Refusal of needed, well designed developments that actually comply with sensible policy and relevant policy. It is also interesting to note that they can be ignored when deemed useful to do so.**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Yes**

Comments: **Such developments, when well located and well designed, provide good places to live and work and can utilise all the latest sustainable methods of construction and infrastructure for services, transport and communications.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No**

Comments: **Tittensor is a Tier 5 Small Community, it has however considerable residential development and a very large Transport and Logistics site therein, part of which had penetrated the Green Belt. There is also and awkward, uncontrolled road junction on the A34 and Monument Road to the west and an unclassified lane to the east. There is parcel of land consisting of 1.80 hectares of monoculture grass land, known as The Farm to the immediate east of the A34 with an existing private highway access. It is all with the Green Belt which bounds The Farm, two dwellings and the Transport and Logistics site, which actually penetrates the Green Belt land. Given the significance of the much extended Transport and Logistics site, the considerable amount of existing residential development and the strategically important location on the A34, with ready access to both the local and national transport, it is suggested that Tittensor could be a justifiably be considered a Preferred Location for further development, even within Green Belt.**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **Yes**

Comments: **In addition to the Green Space included within the emerging plan, the site referred to in comments to Policy 12 can provide Green Space with public access.**

Policy 14 (Penk and Sow): **Yes**

Comments: **No reply**

Policy 15 (Stone Countryside): **Yes**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **Yes**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **Yes**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Yes**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Yes**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No**

Comments: **The application of the policies are too restrictive and open to interpretation by Planning Authorities, the "Need" for Affordable Housing in Rural locations is often overlooked in the zealous efforts to "protect" rural areas. Usually this means the values of the existing local homeowner dwellings.**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Yes**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **Yes**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Yes**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No**

Comments: **No reply**

General Comments:

No reply

From:	Samantha Scott [redacted]
Sent:	12 December 2022 09:27
To:	Strategic Planning Consultations
Cc:	[redacted]
Subject:	Stafford Borough Local Plan 2020-2040: Preferred Options
Attachments:	Stafford - Preferred Options (December 2022).pdf; Appendix 1 - Article The Holy Grail - Delivering Housing Need.pdf; Appendix 2 - Article Finalarc4 - CombinedAuthoritiesCollaboration Housing and Planning.pdf

Dear Sir / Madam

Stafford Borough Local Plan 2020-2040: Preferred Options

Please find attached a copy of our representations and appendices in relation to the Stafford Borough Local Plan 2020 – 2040: Preferred Options.

Please confirm safe receipt of this submission.

Kind regards

Sam

Samantha Scott
Managing Director
The Leith Group

[redacted]
www.theleithgroup.co.uk

Head Office:

[redacted]

London Office:

[redacted]

(Working in collaboration with Nicholas & Co Solicitors and Nicholas Peters & Co)

Company Number: 05003971

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STAFFORD BOROUGH
LOCAL PLAN 2020-2040
PREFERRED OPTIONS

REPRESENTATIONS BY LEITH PLANNING
ON BEHALF OF
STAFFORDSHIRE UNIVERSITY

[redacted]

Prepared By:

The Leith Planning Group,

[redacted]

T: [redacted] / www.theleithgroup.co.uk

1. Introduction

Leith Planning Limited was instructed by Staffordshire University, Estates and Commercial Services, to review the content of the Preferred Options Stafford Borough Local Plan 2020 - 2024. This report sets out our comments on the draft Local Plan and where appropriate we have identified paragraph and policy numbers. The consultation period expires at 12.00 noon on Monday 12th December 2022.

It is noted that the Council are consulting upon a full draft plan including proposed site allocations and an updated policies map. We take comfort from the fact that this is not the Council's final draft of the plan and that there is still an opportunity for changes to be made in response to feedback received during the consultation. Given the evolving nature of the plan we have not submitted, at this stage, a forensic examination or commentary on the methodology adopted; we have focused on the principles most referable to Staffordshire University.

While we are broadly supportive of the Council's evolving development plan before deciding whether to object or support specific policies, at publication (July 2023), submission (November 2023) and examination (February 2024) stages; we would like to test the meaning of policies that relate to land owned by the University at Cotes Heath. We would also like a site-specific policy for the Cotes Heath site thus enabling it to contribute to the Borough Council's development needs. It is accepted that the site is in the Green Belt albeit it would appear from reading the plan that the site has some development potential, as set out in this report, albeit within a highly prescriptive policy framework.

Included at Appendix 1 to this submission is an article prepared by Leith Planning Limited, written with Michael Bullock of Arc4, in the Journal of Planning and Environmental Law entitled, "The Holy Grail: Delivering Housing Need" [2018]J.P.L381. These representations do not comment on the Council's housing methodology, at this stage of the process, in circumstances where we are broadly supportive of the direction of travel. It is worth highlighting our conclusions as they are referable to Stafford's development aspirations:

> "However, the starting point for any evaluation is objectively assessing requirements in a consistent manner, endeavour to strike a balance between rented and owner-occupied property, provide clear guidance on assessing affordable need and taking account of demographic change in particular the needs of the elderly.
>
> From the point of view of the property industry tinkering with leaks and blockages creates uncertainty. The planning system needs to be fit for purpose and that includes correctly identifying housing requirements. However, the system must facilitate the development of innovative solutions to existing and future challenges. It must also facilitate the incarnation of tried and tested solutions, which includes new towns and villages."

Included at Appendix 2 is a further article written by Leith Planning, written with Helen Brzozowski of Arc 4 and Campbell Tickell, dated January 2020, entitled "Combined Authorities – collaboration on housing and planning – Research Report Commissioned by the Local Government Association". The report focuses on specific case studies to illustrate innovation and delivery around the following themes: Increasing supply through innovative funding and investment, meeting housing need, accelerating housing delivery by co-ordinating and creating sites, alignment with the wider growth agenda, addressing urban renewal through Mayoral Development Corporations, excellence in quality and design,

advantages of capacity building, procurement, delivery, and resource sharing. Some of the above principles are highly referable to delivering Stafford Borough Council's development aspirations, arguably the acid test for any development plan.

2. Context - Stafford

Staffordshire University are committed to providing all students, colleagues and visitors with the best possible experiences, whether its learning on campus, working on campus or visiting their campus; which is why they continually invest in their campus transformation projects. These latest projects include:

- The Catalyst a flagship £40m physical and virtual hub which aims to connect employers, students and apprentices from across the Midlands and beyond.
- The Centre for Health Innovation is a state-of-the-art £5.8 million Centre for Health Innovation powered through the Government's Getting Building Fund incorporating sector-leading clinical simulation and immersion suites.
- Nursery and Forest School which is located close to the University's nature reserve, this brand new £4.4m facility, which is targeting zero carbon upon completion, will feature four inspirational learning spaces enhanced with digital technology and a forest school provision.
- Innovation Enterprise Zone one of 20 University Enterprise Zones, launched with a £20 million investment by Research England, part of UK Research and Innovation. This investment has funded new incubation space and a hatchery for start-up companies on their main Stoke-on-Trent campus and offers unprecedent access to specialist advanced materials, manufacturing and digital facilities in their innovation ecosystem
- River Trent Restoration 450 m stretch of the river Trent through Stafford University has been very naturalised and providing another link in the chain for a drawing of wildlife corridor through the heart of Stoke-on-Trent.

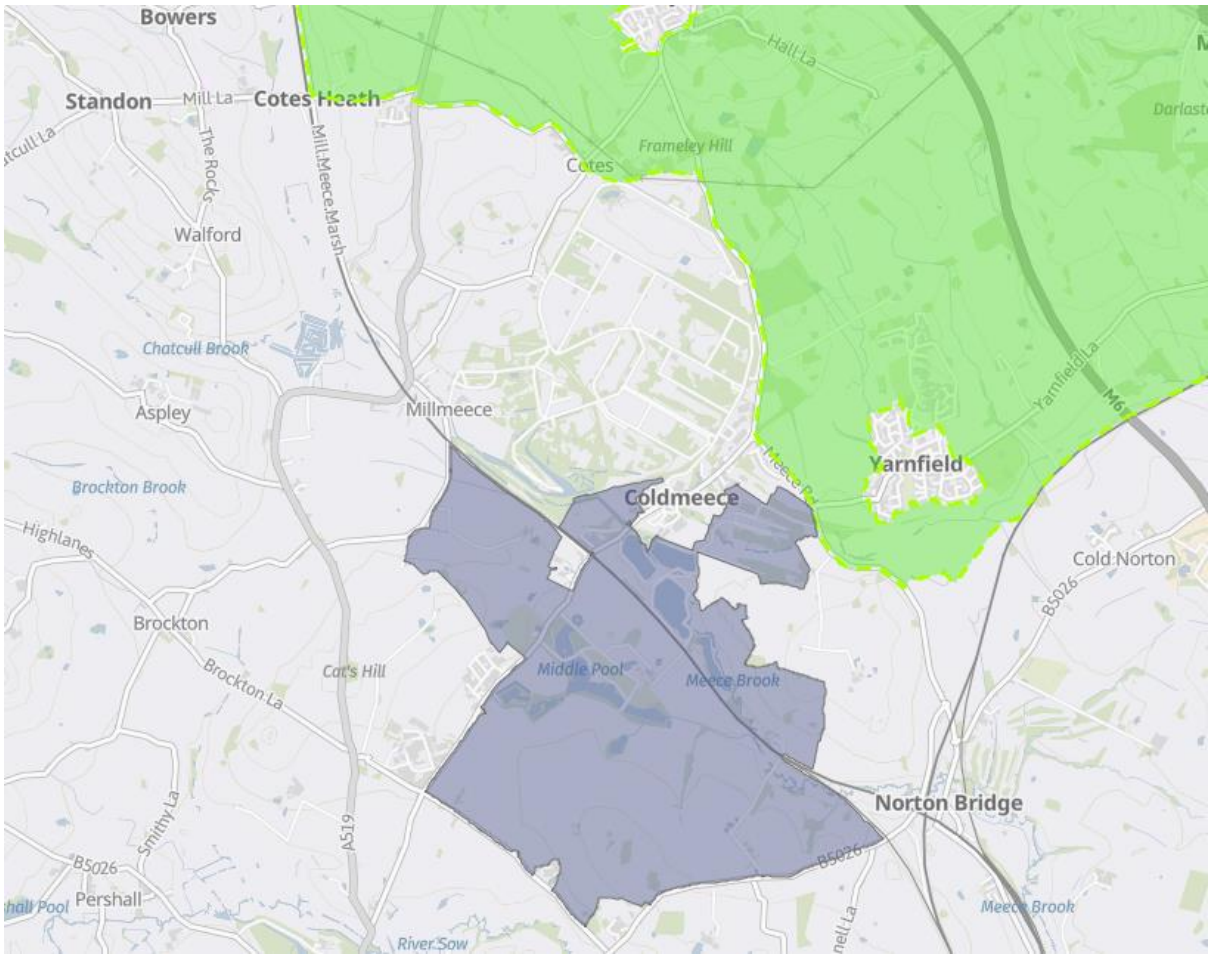
The University has a significant local, regional and national footprint, which includes Staffordshire University London. The University have revealed a £3.5 million expansion of their London campus at Here East adjacent to the Queen Elizabeth Olympic Park in East London. The University also has world leading research,68% of their research was rated as 'world leading' or of international importance' in the Research Excellence Framework (REF) 2021.

The University have historically owned land and property within Stafford Borough Council albeit assets that have been deemed surplus to requirements have been sold to help fund the growth and expansion of the University.

3. Meecebrook Garden Community Proposal

The University is aware of the Staffordshire Council's proposals for the Meecebrook Garden Community, set out in Policy 7 Meecebrook site allocation and Policy 8 Masterplanning and design at Meecebrook. We have also had regard to the Council's Proposal Map and note the extent of the Garden Community and its relationship with the Universities site at Cotes Heath, see Figures 1.

Figure 1
Extract from the Stafford Borough Local Plan 2020 -2040 Preferred Options Proposals Map extent of the Meecebrook Garden Community.



4. Cotes Heath Site

The Cotes Heath Site owned by the University is delineated at Figure 2 and Figure 3 below. The site was previously used by the University and accommodated two football pitches, albeit this use was not authorised by way of a grant of planning consent. The site has not been used as a football pitch for over 5 years, prior to the 26th May 2017 as evidenced by the historic maps on Google Earth and advice received from the University.

The University submitted an application for permission in principle for the erection of up to 9, 100% affordable, dwellings on the site in 2020, Application Reference 20/32081/PIP. The application was supported by a local housing needs analysis, which was based upon responses to a postal survey carried out in July and August 2019 covering the parish of Standon, which resulted in 62 responses from the 417 households initially contacted (ie 15%). The survey indicated that there were eight existing households that require new accommodation (preference being owner-occupied three-bed dwellings) and there were

likely to be seven newly forming households which would require new accommodation (preference being owner-occupied one-bed flats/apartments). However, the above application was subsequently refused on 15th May 2020 and four reasons were given namely:

- It had not been demonstrated that the proposal would meet any defined parish-based need for affordable housing.
- The proposal would result in the loss of land which was last used as playing pitches
- The proposed development, by reason of its location outside of established developed area of Cotes Heath and its encroachment into the green belt, would harm the openness of the green belt, establish the suburbanisation of the green belt and consequently would have an adverse impact on the character and appearance of the surrounding area.
- The proposed development lies outside any defined settlement boundary and represents an unsustainable location for the type of development proposed, with very limited services.

The current use of the site is best described as fallow agricultural land, previously used as football pitches (albeit not authorised by way of a planning consent). Fallow agricultural land refers to arable land not under rotation that is set aside for a period of time. It is noted that the pre-1948 use was as agricultural land.

Figure 2 Site at Cotes Heath

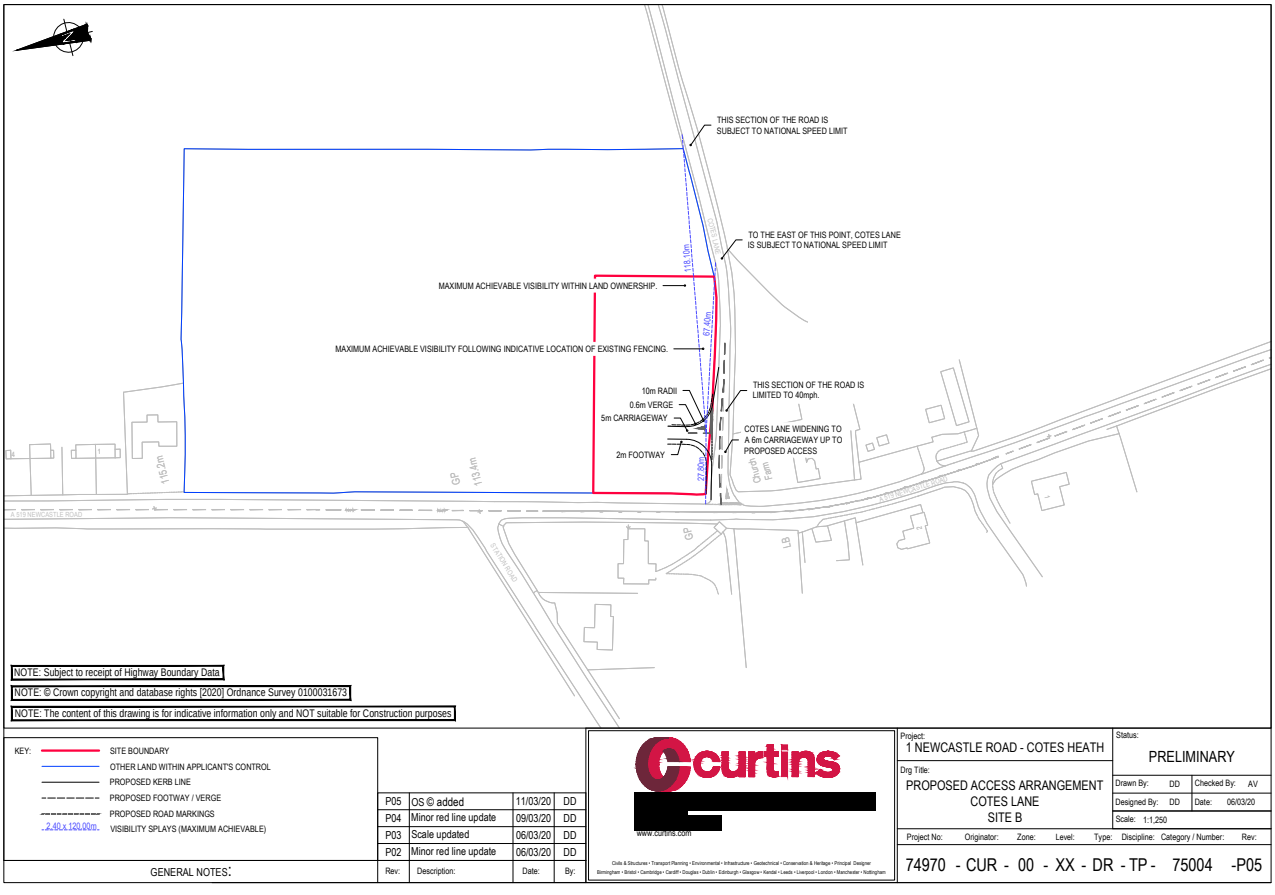


Figure 3 Extract from the Stafford Borough Local Plan 2020 -2040 Preferred Options Proposals Map (showing the Green Belt Boundary and Settlement Boundary)

5. Comment on the Preferred Options Local Plan Consultation Document

Key issues and challenges (page 16 to page 17): The Council recognise that there are several key issues and challenges within Stafford, one concerns affordable housing and another relates to specialist housing.

- *Providing affordable homes: In common with much of England, The Housing and Economic Development Needs Assessment highlights the difficulty that many newly forming households in the borough will face in affording market rents without the support of housing benefit or in buying a home. Therefore, the provision of affordable housing is an important issue to be addressed by the new Local Plan.*
- *Adapting to local demographic change: In line with national trends, the population of Stafford borough is ageing. Between 2020 and 2040 the projected number of borough residents aged over 64 years of age is expected to increase by 37.4% to 43,015 people (2018-based subnational population projections). Meeting the housing needs of the growing older population will be an important challenge. Many of these needs will be able to be met by supporting residents to continue living in their own homes. This can be achieved by future proofing homes to ensure residents can live in them their whole lives, but there will also be a need for the continued provision of specialist older persons' housing, including extra care units to allow for movement between homes.*

Policy 1 Development Strategy (page 20): It is noted at (A) that during the period 2020 to 2040 provision will be made for 1. 10,700 new homes (535 new homes each year); and 2. at least 80 hectares of new employment land. It is noted that the housing requirement will be delivered in accordance with Policy 1 and that this includes:

B(3) the development of a new garden village at Meecebrook in accordance with Policies 7 and 8 which is estimated to deliver 3,000 homes by 2040 as part of a larger planned new community.
B(7) The permitting of housing which accords with the policies of the plan on new housing in rural areas.

It is noted at (C) that the spatial distribution of new housing is shown in the table within the Policy 1; albeit, 'smaller settlements' and 'rural areas' have N/A against "new allocations/supply sources", yet collectively there were 27 completions between 2020-2022 and 75 commitments. On the basis of past performance provision should be made within the emerging Local Plan for housing in smaller settlements and rural areas.

Paragraph 1.12 notes that:

> "1.12 – As detailed in policies 7 and 8 below, Meecebrook will be a new sustainable Garden Community of a scale capable of delivering its own infrastructure. It will contribute significantly to the delivery of housing in the borough in the second part of the plan period and beyond."

Paragraph 1.13 states:

> "1.13 – Housing in the borough's rural communities is allocated in the larger settlements (see Policy 2 Settlement hierarchy) which have more services and facilities."

Paragraph 1.22 states:

> "1.22 – The plan period runs until 2040 but in allocating the garden community at Meecebrook the council is looking ahead beyond 2040 to continue to meet the borough's housing needs in the future."

Policy 2. Settlement Hierarchy (page 33): It is noted at (A) that the settlement hierarchy is set out in the tabulation and that Cotes Heath is classified as a Tier 5 defined as "smaller settlement". Paragraph 2.1 confirms that the policy provides the framework for decisions about the appropriate scale and location of new built development within the borough.

Policy 5 Green Belt (page 39): The Cotes Heath site is located in the Green Belt and Policy 5 states:

POLICY 5. Green Belt

1. The borough's Green Belt boundaries are identified on the policies map.
2. Inappropriate development will not be permitted in the Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed against the relevant national planning policy.
3. The openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy.

Since the Cotes Heath application was refused the Government have a new edition of the National Planning Policy Framework, albeit many principles are unchanged. Paragraph 149 of the NPPF reads:

> "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this include: (f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)."

The proposed policy on Affordable Housing is set out at Policy 23 and Rural Exception Sites at Policy 24 (see below).

The substance of paragraph 151 is also noted, namely:

> "When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."

Policy 7 Meecebrook Site Allocation (page 42): Land is allocated at Cold Meece for a new settlement as shown on the policies map. It is noted that the new settlement will be served by a new railway station on the West Coast Main Line in close proximity to the site.

Policy 8 Masterplanning and design at Meecebrook (page 44): It is noted that:

> **A.** Meecebrook shall be developed in accordance with the concept masterplan and design and development principles set out in Appendix 9 and the Meecebrook Framework Masterplan Supplementary Planning Document.

It is important in evaluating Meecebrook to have regard to the Government's Garden City Communities Toolkit. In putting a case together, the evidence base for a garden community should include "the initial likely costs and returns related to development of a garden community, including cost of the resource needed to plan and deliver the garden community". We look forward to inspecting up to date costs and returns in due course as part of the Local Plan Consultation Process.

The Garden City Communities Toolkit talks about "Different Approaches to Creating a Spatial Framework" namely: 1) Broader location identified in local plan, 2) strategic site allocation and local plan or allocations development plan document, 3) development plan document such as an area action plan for site-specific supplementary planning documents.

The Garden Communities Toolkit advises that "masterplanning is integral to creating well planned and designed garden communities. It deals with preparing your masterplan, typical stages of planning and design process (including information about the level of masterplan detail that you can expect at each stage), testing your masterplan (including a garden communities masterplan checklist), sustainability considerations, creating healthy and safe communities, tools and processes for achieving good design." We will comment in detail on these matters as part of the ongoing consultation process for the new Local Plan.

Policy 24 Homes for Life: Reads as follows:

Accessible and adaptable dwellings

C. 100% of dwellings that are age-restricted general housing, retirement housing or extra care housing shall be built to Building Regulations Part M4(2) standards for accessible and adaptable dwellings.

Specialist housing

G. Proposals for age-restricted general housing, retirement housing, extra care housing or residential care facilities will be supported in principle. Proposals for extra care or residential care facilities should be located at Stafford, Stone, Meecebrook or at tier 4 or tier 5 settlements.

Policy 25 Rural Exception Sites: Reads as follows:

POLICY 25. Rural exception sites

A. On sites outside of but directly adjoining the settlement boundaries of tier 4 larger and tier 5 smaller settlements and in other locations allocated in a 'made' neighbourhood plan the following categories of development will be supported in principle subject to compliance with other policies of this plan
    1. Proposals for entry level exception sites (as defined in the glossary) which are in accordance with national planning policy; and
    2. Proposals for affordable housing exception sites which are in accordance with paragraph B of this policy.

B. Affordable housing exception sites must meet the following criteria:
    1. The scale of the proposed development is appropriate to the settlement at which it is located;
    2. The site delivers 100% affordable housing in perpetuity (provided that a planning obligation or other appropriate mechanism ensures that the Right to Buy and Right to Acquire on rented properties is excluded and that re-let or re-sale prices are capped to remain within the definition of affordable housing in perpetuity);
    3. The local need for the housing is justified by local housing needs assessment which demonstrates that there is a need for the type, scale and tenure of the proposed affordable dwellings in that location; and
    4. The provision of limited market housing within a site will only be acceptable to assist with scheme viability, where it can be demonstrated through open and transparent viability evidence that such housing is necessary to ensure the delivery of affordable homes to meet local needs.

Appendices

We have also had regard to the reference to other sites at Appendix 2 and the Meecebrook Garden Community concept Master Plan at Appendix 9.

6. Further Comment

It is recognised that under Section 20 of the 2004 Act, there is a significant change from the former practice relating to Local Plans and Unitary Development Plans. Under the former

regime, it was the Local Planning Authority who organised a Public Local Inquiry into the Plan. It was they who decided whether to accept the recommendations by the Plan Inspector. These functions are now transferred respectively to the Secretary of State, whose responsibility is to cause an Examination to be held; and to the Examiner, whose recommendations become binding on the Local Planning Authority.

The Examination is clearly not an Examination in Public as such, but nevertheless is of that nature; it is certainly not a Public Local Inquiry as one previously understood it. The presumption is that there will be a number of informal hearings with the emphasis on round table discussion.

From the point of view of objectors this procedure has serious shortcomings. Whereas the more formalised procedure ensures that the Local Planning Authority produce to the Examiner all the relevant material including, if demanded, the background material which underwrites their Topic Papers, the lack of formality and rigorous cross-examination can lead to a certain amount of “glossing- over” on the part of the Local Planning Authority seeking to hide behind the Topic Paper in question. Objectors can find the debate, whether round table, informal or otherwise, somewhat arid unless they can really establish how the Local Planning Authority came to the view that they now hold. The answer for the objectors is to formally serve on the Examiner and the Local Planning Authority a formal document requiring full disclosure of the underlying materials so that their consultants have a real chance to verify or otherwise, the methodology and survey results which have given rise to the assumptions in the Plan with which they are concerned.

In view of the concerns identified within this submission we formally request all of the background material and reports which underpin the development plan documents and Topic Papers relating to age-restricted general housing, retirement housing, extra care housing and residential care facilities and affordable housing.

As set out in the Introduction, the Council are consulting upon a full draft plan including proposed site allocations and an updated policies map. We take comfort from the fact that this is not the Council’s final draft of the plan and that there is still an opportunity for changes to be made in response to feedback received during the consultation. Given the evolving nature of the plan we have not submitted, at this stage, a forensic examination or commentary on the methodology adopted; we have focused on the principles most referable to Staffordshire University.

We would request a meeting with the Council Planning Policy Team to discuss Policy 24 Homes for Life (age-restricted general housing, retirement housing, extra care housing and residential care facilities) and Policy 25 Rural Exception Sites as it relates to the University’s site at Cotes Heath. Furthermore, we would request that the Council include a site-specific allocation for the Cotes Heath Site to provide housing consistent with Policy 24, Policy 25 and Paragraph 149 of the NPPF.

Reference ID Code: 95; The Leith Group on behalf of Staffordshire University - Part C

JOURNAL OF PLANNING & ENVIRONMENT LAW

Issue 4 2018 pp. 379–488
Editor: Ashley Bowes

Current Topics

Articles

The Holy Grail: Delivering Housing Need
Chris Plenderleith and Michael Bullock

Building in the Green Belt
Alec Samuels

Parliamentary and Departmental News

SWEET & MAXWELL

The Holy Grail: Delivering Housing Need

Chris Plenderleith
Leith Planning Ltd (Group)

Michael Bullock
Arc4

Affordable housing; Housing markets; Housing supply; National Planning Policy Framework; Need; Planning policy

The legend of the Holy Grail may well be one of the most enduring legends in Western European literature and the search for the vessel became the principle quest of the knights of King Arthur. Just like the search for the Holy Grail, delivering an adequate supply of good quality housing has proven somewhat elusive. This article explores the search over recent years for an adequate supply of good quality housing, the policy position as set out in the NPPF, Objectively Assessed Need, affordable housing, changing housing markets and how best to correct the "leaks and blockages" in the system.

The search

In 2012, Ashley Bowes concluded, in an article entitled "Delivering housing need: an assessment of the NPPF", as follows:

> "The NPPF is a clear expression of two of the Government's key policies of Localism and boosting the supply of good quality housing. It is therefore the clear duty of local council to identify and then plan to deliver the full identified need for housing. A failure to do renders the council's housing policies out-of-date and engages the presumption in favour of granting consent. It remains to be seen whether the changes will deliver much needed good quality homes."[1]

Ashley's question was answered somewhat definitively in 2017 within the Housing White Paper published by the Department of Communities and Local Government on 7 February 2017. The White Paper set the scene in the aptly named document "Fixing our broken housing market" February 2017. The Housing White Paper recognised that since the 1970's, there have been on average 160,000 new homes built each year in England.[2] The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply.[3]

[1] A. Bowes, "Delivering housing need: an assessment of the NPPF" [2012] J.P.L.1174 (the authors are grateful to Dr A. Bowes for his comments on earlier drafts on this article).
[2] DCLG Live Table 104.
[3] e.g. Barker, "Review of Housing Supply—Delivering Stability: Securing our Future Housing Needs" (2004) Final Report; House of Lords Select Committee on Economic Affairs (2016), "Building more homes", July 2016; KPMG and Shelter (2015) "Building the Homes We Need".

The policy position: NPPF

Housing need is often concerned with the need for affordable housing albeit in the context of the National Planning Policy Framework "objectively assessed" need refers to both market and affordable housing.[4]NPPF para.47 states that:

> "to boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period."

In *Secretary of State for Communities and Local Government v Hopkins Homes Ltd*,[5] the Supreme Court analysed the legal status of the NPPF and its relationship to the statutory code for determining planning applications. The NPPF is a material consideration which:

> "... cannot, and does not purport to, displace the primacy given by the statute and policy to the statutory development plan. It must be exercised consistently with, and not so as to displace or distort, the statutory scheme."[6]

However, national policy like the NPPF may affect the weight to attach to policies of the development plan in the planning balance.[7]

The Supreme Court held that a failure to deliver a five-year supply of housing sites, in accordance with the NPPF para.47, is sufficient to trigger the "tilted balance" at NPPF para.14.[8] That begs the question against what figure is the five-year supply calculated? From the extensive case law and PPG we suggest the following principles are now clear:

- The starting point will be the housing requirement in a post-NPPF local plan, unless "significant new evidence" comes to light.[9] New household projections do not automatically render housing requirements out of date.[10] A useful illustration of the situations in which a post-NPPF housing requirement may be departed from is provided in *West Berkshire DC v Secretary of State for Communities and Local Government* .[11] In *West Berkshire*, the Council had a adopted a post-NPPF plan but it was not based on an objective assessment of housing need and, as such, when a objective assessment became available, that provided a rational basis for the Inspector to depart from the local plan housing figure.
- Where there is no figure in an up-to-date local plan, the evidence in "latest full assessment of housing needs" should be used.[12] That might well be a SHMA or HEDNA. That figure may not take account of policy considerations,[13] or normally consider apportionment between

[4] However, the extent to which the market housing need is uplifted to provide for some or all of the affordable housing need is a question of policy, see: *Barker Mill Trustees v Test Valley* [2016] EWHC 3028 (Admin); [2017] P.T.S.R. 408 per Holgate J at [37].
[5] *Secretary of State for Communities and Local Government v Hopkins Homes Ltd* [2017] UKSC 37; [2017] 1 W.L.R. 1865.
[6] *Secretary of State for Communities and Local Government v Hopkins Homes Ltd* [2017] UKSC 37; [2017] 1 W.L.R. 1865 per Lord Carnwath JSC at [21].
[7] See *Edinburgh CC v Secretary of State for Scotland* [1997] 1 W.L.R. 1447 per Lord Clyde at 1458.
[8] *Secretary of State for Communities and Local Government v Hopkins Homes Ltd* [2017] UKSC 37; [2017] 1 W.L.R. 1865 per Lord Carnwath JSC at [54].
[9] PPG-3-030.
[10] PPG 2a-016.
[11] *West Berkshire DC v Secretary of State for Communities and Local Government* [2016] EWHC 267 (Admin).
[12] PPG 3-030.
[13] *Hunston Properties Ltd v Secretary of State for Communities and Local Government* [2013] EWCA Civ 1610; [2014] J.P.L. 599.

authorities within an HMA,[14] although there may be cases where apportionment can be relied upon.[15]

- Where there is no such full assessment available, the DCLG household projections should be used as a starting point.[16]

The policy requirements concerning the supply of housing are set out at the NPPF paras 45 and 159. Lord Gill in the above judgment deals with housing at [76]–[78]:

> "76. In relation to housing, the objective of the Framework is clear. Section 6, 'Delivering a wide choice of high quality homes', deals with the national problem of the unmet demand for housing. The purpose of paragraph 47 is 'to boost significantly the supply of housing'. To that end it requires planning authorities (a) to ensure *inter alia* that plans meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including the identification of key sites that are critical to the delivery of the housing strategy over the plan period; (b) to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for the land; and (c) in the longer term to identify a supply of specific, developable sites or broad locations for growth for years six to ten and, where possible, for years 11–15.
>
> 77. The importance that the guidance places on boosting the supply of housing is further demonstrated in the same paragraph by the requirements that for market and affordable housing planning authorities should illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing, describing how they will maintain delivery of a five-years supply of housing land to meet their housing target; and that they should set out their own approach to housing density to reflect local circumstances. The message to planning authorities is unmistakable.
>
> 78. These requirements, and the insistence on the provision of 'deliverable' sites sufficient to provide the five years' worth of housing, reflect the futility of authorities' relying in development plans on the allocation of sites that have no realistic prospect of being developed within the five-year period."

Further guidance has been provided by the judgment of the Court of Appeal in *St Modwen v Secretary of State for Communities and Local Government*,[17] in which Lindblom LJ held that: (i) deliverability is not the same as delivery; (ii) capable of being delivered does not mean that it will be delivered; and (iii) the test is not that delivery is certain, probable or deliverable to the fullest extent within five years.

Objectively assessed need

Ashley in the above article summarised the steps involved in establishing Objectively Assessed Need, which are reproduced and numerated at 5.28 of Planning Law Practice and Precedents as follows:

> "1. Prepare a Strategic Housing Market Assessment to assess their full housing needs over the plan period, including mix and tenure (Core Planning Principle 1—NPPF para.159).

[14] *Oadby & Wigston BC v Secretary of State for Communities and Local Government* [2016] EWCA Civ 1040; [2017] J.P.L. 358.
[15] *St Modwen Developments Ltd v Secretary of State for Communities and Local Government* [2016] EWHC 968 (Admin).
[16] *Jelson v Secretary of State for Communities and Local Government* [2016] EWHC 2979 (Admin).
[17] *St Modwen Developments Ltd v Secretary of State for Communities and Local Government* [2017] EWCA Civ 1643.

2. Prepare a Strategic Housing Land Availability Assessment to establish enough land to meet that need over the plan period (Core Planning Principle 1—NPPF para.159) but may adopt a lower figure if the 'adverse effects of adopting the full figure would significantly and demonstrably outweigh the benefits (core planning principle 1 NPPF para.14).
3. Identify an annually update a supply of specified deliverable sites to meet five year's worth of housing.
4. Identify a 5% buffer to ensure choice and competition; or if there has been a record of persistent under-delivery', identify a 20% buffer.
5. Identify specific developable sites or broader locations for growth for 6–10 years.
6. Where possible, identify developable sites or broad locations for growth for 11–15 years.
7. Set out an approach to housing density to reflect local circumstances (core planning principle 1 NPPF para.45)."

Proposals for a local housing need figure

The Government has now released a consultation document[18] that sets out a standard and simplified approach to calculating local housing need (although note no mention of the needs being "objectively assessed" anymore) which is based on three key principles:

- **Simple:**

  There should be an easy and transparent process for local people and other interests to understand.

- **Based on publically available data:**

  Which might include national data such as that from the Office for National Statistics, or robust local data.

- **Realistic:**

  To reflect the actual need for homes in each area, taking into account the affordability of homes locally. High house prices indicate a relative imbalance between the supply and demand for new homes and makes housing less affordable. The affordability of new homes is the best evidence that supply is not keeping up with demand.

The consultation document then comments that:

> "In addition, we consider that any approach must allow an understanding of the minimum number of homes that are needed across England as a whole, while also reflecting the effect of our Industrial Strategy as we seek to promote prosperity in every part of the country."[19]

The Government's proposed approach to a standard methodology comprises three elements.

Step 1: Setting the baseline

The starting point will continue to be the most recent projections of future household growth in each area. It is proposed that the demographic baseline should be the annual average household growth over a 10-year period. Household projections should be regarded as the minimum local housing figure.

[18] Department for Communities and Local Government, "Planning for the right homes in the right places: consultation proposals", September 2017.
[19] Department for Communities and Local Government, "Planning for the right homes in the right places: consultation proposals", September 2017, para.14.

Step 2: An adjustment to take account of market signals

A proportionate adjustment is suggested using the workplace-based median house price to median earnings ratio from the most recent year for which data is available. The principle here is that assessing an appropriate level of housing must address the affordability of new homes, which means that projected household growth should be adjusted to take account of market signals.

Step 3: Capping the level of any increase

A cap on the annual local housing need is proposed based on the status of the local plan:

- for authorities with an adopted local plan in the last five years, this cap is 40% above the annual requirement figure currently set out in the local plan;
- for authorities without an up to date local plan, the cap is 40% above whichever is higher of the projected household growth over the plan period or the annual housing requirement figure currently set out in their local plan.

Additionally, Councils can consider a higher local housing need figure to support, for example, a strategic infrastructure project, or increased employment (and hence housing) ambition.

It is worth touching on some of the issues which arise in defining Objectively Assessed Need, namely: tenure, existing need, newly arising need and affordable supply and how these relate to the proposed method to establish local housing need.

Dr Michael Bullock has spoken extensively on the subject of tenure mix and makes a number of observations. Figures for Objectively Assessed Need do not identify a tenure split because baseline demographic data is not broken down by tenure. The Objectively Assessed Need does have an affordability component but this cannot be measured separately. The method Strategic Housing Market Assessments should use to identify the scale of affordable housing need is outlined in the Planning Policy Guidance paras 22–29, with affordable housing referred to at para.29, which reads:

> "The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes."

In defining affordable housing need it is worth commenting on existing need, newly arising need, affordable supply and estimate of annual affordable need.

The backlog (existing need) is identified by consulting the housing register and household surveys, albeit issues arise with scale and affordability testing including the quality of data and assumptions used.

Newly arising need can be identified by consulting the above documents and the Survey of English Housing. The issues are not just traditional household forming age groups, a key driver is relationship breakdown. It is necessary to bear in mind that gross formation rates are falling from 1.69% (2011/2012 to 2013/2014) to 1.55% (2013/2014 to 2015/2016). Furthermore, arc4 household surveys tend to show that the majority of newly forming households tend to move into the private rented and affordable rented sectors.

Affordable supply can be identified by examining the CORE lettings/sales data and Local Authority records.

Affordable housing

In estimating annual affordable need, it is necessary to establish the scale of affordable need and ideally how this is broken down by dwelling size, type and designation, for example: general needs and older persons accommodation. There are several factors which influence delivery of affordable housing these include: national policy (White Paper), Council policy (target linked to viability, sustainability/market restructuring/destabilising market), HCA funding, non s.106 sources such as Council Housing and affordable private renting. When calculating the affordable need, there are a number of accepted assumptions:

- Affordable housing policy figures are generally realistic and take account of viability and relative shortage of affordable housing.
- When setting policy targets, Councils should have regard to affordable housing need, as assessed in Strategic Housing Market Assessments.
- It appears to be settled that there is no requirement that the affordable housing need be met in full,[20] however whether an uplift in market housing to meet some or all of the affordable housing need is part of the OAN is unclear.[21]
- Proposed changes to affordable housing definitions may have an impact on both the range of affordable delivery options and supply, including the potential use of the private rented sector as a source of affordable housing.

It is noted that the proposed local housing need calculation includes a market signals adjustment to factor in a need for affordable housing. This is to be encouraged, although the use of median rather than lower quartile incomes may mask the degree of affordable need from lower income groups.

Changing housing markets

One of the key drivers of demographic change is our ageing population. When considering this aspect of demographic change, it is helpful to understand dwelling choices and the aspirations of older people, rightsizing and helping people to move.

Ageing population and household projections

It is important to understand the ramification of household projections included at Table 1. By way of example in the 75–84 age group there will be a 30% increase in households during the period 2014–2039. However, in the 25–34 age group there will be a reduction in households of 4% over the same period.

[20] See *Kings Lynn & West Norfolk BC v Secretary of State for Communities and Local Government* [2015] EWHC 2464 (Admin).

[21] Holgate J expressed the view that it was not part of the OAN in *Barker Mill Estates Trustees v Test Valley BC* [2016] EWHC 3028 (Admin) at [37] but did not need to resolve the issue (at [38]), and earlier cases have suggested that it was part of the OAN.

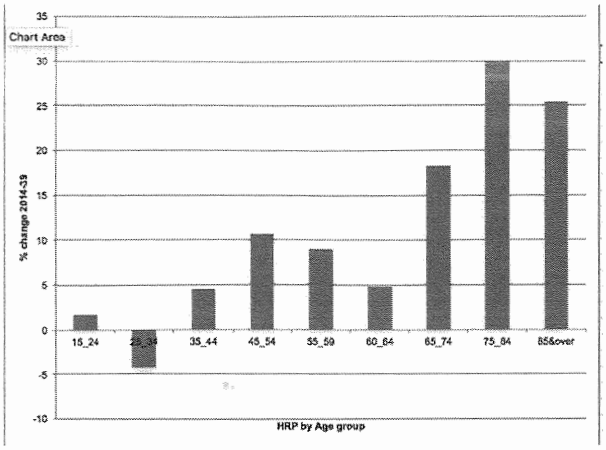


Table 1 Ageing population and household projections[22]

Of the estimated 5.3m household growth during the period 2014–2039, there will be a 3.9m growth in households with Household Reference Person aged 65 plus, that is 74%. Perhaps even more alarming is the fact that the households with Household Reference Person aged 85 plus will increase by 1.3 million.

When one looks at the profile of dwellings occupied by older age groups, included at Table 2, it shows that 37.4% of households in the 85 plus category are in three or more bedroom accommodation. It also shows that 53.1% of households in the 60–84 category are in three or more bedroom accommodation.

Dwelling type	Age Group			
	60-84	85+	All Older	All Age Groups
1 Bed House	0.6	0.0	0.6	0.5
2 Bed House	14.1	13.3	14.1	17.6
3 Bed House	37.2	30.4	36.8	39.5
4 or more Bed House	15.9	7.0	15.3	18.0
1 Bed Flat	7.1	11.9	7.5	6.7
2 Bed Flat	6.2	8.7	6.4	6.9
3+ Bed Flat	0.7	0.5	0.7	0.7
1-2 Bed Bungalow	11.6	21.7	12.3	6.5
3+ Bed Bungalow	6.5	6.7	6.5	3.6
Total	100.0	100.0	100.0	100.0
Base (weighted)	157901	11265	169166	416352

Table 2 Dwelling stock profile[23]

Table 3 evaluates older persons household aspirations, current accommodation with aspirations and variance. The table shows that there is a negative variance of almost 20% in three bedroom houses and just under a 10% negative variance in four or more bed houses. Whereas there is a positive variance of just under 20% in one–two bedroom bungalows and just over a 10% positive variance in three plus bedroom bungalows.

[22] Source: DCLG 2014-based household projections.
[23] Source: arc4 household surveys

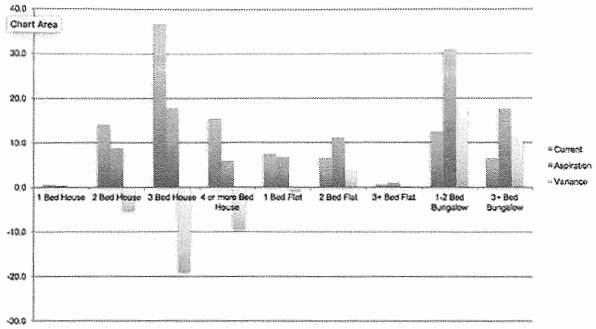


Table 3 Older persons household aspirations[24]

Rightsizing

Table 4 shows the aspirations of households with 54.7% of households aspiring to move into a smaller property, with 62.7% expecting to do so. This can be compared with 11.7% of households aspiring to moving into a larger property, albeit only 7.7% expect to do so.

Recent studies in the South East by arc4 have revealed that help to encourage people to move would be welcomed; with 65.2% of households wanting information about what types of housing are available, 54.1% help with moving to a new property and 26.7% wanted help in sorting out possessions and de-cluttering.

Move type	Aspiration (%)	Expectation (%)
Moving to smaller property	54.7	62.7
Staying same	33.6	29.6
Moving to larger property	11.7	7.7
Total	100	100
Base	3095	2874

Table 4 Rightsizing[25]

Planning policy

Clearly identifying Objectively Assessed Need/local housing need correctly is both an art and science, it involves a degree of judgement. Thereafter, it is a matter of ensuring that the policy framework is fit for purpose. In this regard it is helpful to have regard to the observations of Lord Gill in *Secretary of State for Communities and Local Government v Hopkins Homes Ltd*:

> "I regret to say that I do not agree with the interpretation of the words "relevant policies for the supply of housing" that Lindblom LJ has favoured. In my view, the straightforward interpretation is that these words refer to the policies by which acceptable housing sites are to be identified and the five-years supply target is to be achieved. That is the narrow view. The real issue is what follows from that."[26]

In developing policies by which acceptable housing sites are to be identified and the five-years supply target is to be achieved; there is a concern that the nuance of housing requirements and needs of the aging

[24] Source: arc4 household surveys.
[25] Source: arc4 household survey.
[26] *Secretary of State for Communities and Local Government v Hopkins Homes Ltd* [2017] UKSC 37; [2017] 1 W.L.R. 1865 at [82].

population set out above are not sufficiently considered; however, delivering the nuance of housing requirement (and obvious needs such as the requirements of the aging population), may well be the difference between providing the housing we need and not.

Comment

New proposals for calculating housing need

The purpose of this article is to examine whether the new proposals for calculating housing need and the Housing White Paper proposals will deliver more housing.

A move towards a standardised approach for calculating housing need is welcomed as this will help avoid considerable debate over housing numbers and provide a more transparent process to assess housing need. Within the process, there is a consideration of affordable housing need and there is scope to increase delivery to reflect broader strategic goals.

Currently there is little direction given as to how additional dwelling need will be appraised over and above the demographic projections and market signals, but an overall cap on the level of any increase in housing numbers is suggested. One of the initial outcomes of the new methodology is a skewing of development towards southern and eastern authorities. This in part is due to the impact of land value on house prices and the resulting impact this has on affordability and market signals. However, this approach runs the risk of underestimating market signal adjustments in areas with lower land values: addressing this would help to rebalance housing delivery towards the north and midlands. The consultation does not suggest that constraints (such as the Green Belts, AONBs or national parks) will cease to be relevant when arriving at an overall housing requirement.

It is an unfortunate result of the new methodology that many areas which see a large increase in their need figure are also those with acknowledged constraints, meaning that their overall housing requirement is likely to be considerably less than the consultation paper would suggest. Additionally, a number of authorities which see a large reduction in their need figures are in areas without many constraints and so would have the capacity for greater housing. Whilst the consultation paper envisages authorities adopting methodologies which produce higher figures than the standard method, it is unlikely this will occur in many areas, as the local political narrative is generally skeptical of providing housing above the minimum.

In order to boost housing supply, the Housing White Paper contemplates introducing a Housing Delivery Test, via amendments to the NPPF, which would establish a set of consequences for under-delivery. For example, by November 2020 it is said, a presumption in favour of sustainable development in the National Planning Policy framework would apply if delivery falls below 65% of the annual housing need figure.

From a developer's perspective, the Government is setting a very low bar. The concern is that for Council's resisting development 65% may become the new benchmark. If we are to deliver more houses, the aspiration must be to deliver 100% of the housing need in an area; to do otherwise means that in many parts of the country housing needs will simply not be met.

Affordability and affordable housing

It is recognised that an adjustment for affordability and affordable housing are different steps in the process. Under the new proposals there is an affordability led adjustment but a Council will still need to consider whether to uplift that figure to meet some or all of the affordable housing need (as well as other specialist needs, e.g. C2 care, student accommodation).

Step 2 of the new model relates to an affordable housing adjustment through a market signals uplift; there may be consideration of additional affordable housing as part of a strategic response to local issues but the consultation does not differentiate between the affordability adjustment and an uplift to meet

some/all of the affordable housing need; which was one of the issues associated with the existing process for deriving a Housing Requirement. It remains to be seen whether affordable housing need and other specialist accommodation needs are met effectively via policy-on adjustment, or whether they are now lost in an argument about constraints.

Leaks and blockages

Tim Harford, as the "undercover economist", published an article in the *Financial Times* magazine entitled "Why economists should be more like plumbers" and stated:

> "After the system has been installed, both plumber and economist must tinker with it as leaks and blockages become apparent."[27]

The foundation of modern town planning in the UK is the Town and Country Planning Act 1947 and over the last 70 years we have had leaks and blockages which have resulted in the overhaul of the system; the latest reincarnation being the 1990 Act. Since that date, we have had amendments to the system and policy guidance including with the NPPF in 2012. The White Paper and Needs Consultation are yet further reviews of the system.

It is evident from the Housing White Paper published earlier this year that the changes introduced within the NPPF in 2012 have not delivered sufficient good quality homes. It is perhaps tempting fate to restate Ashley Bowes' question of 2012 as to whether the much awaited consultation, setting out a standard and simplified approach to defining Objectively Assessed Need, will provide a path to delivering the good quality housing that the country requires?

However, the starting point for any evaluation is objectively assessing requirements in a consistent manner, endeavour to strike a balance between rented and owner occupied property, provide clear guidance on assessing affordable need and taking account of demographic change in particular the needs of the elderly.

From the point of view of the property industry tinkering with leaks and blockages creates uncertainty. The planning system needs to be fit for purpose and that includes correctly identifying housing requirements. However, the system must facilitate the development of innovative solutions to existing and future challenges. It must also facilitate the reincarnation of tried and tested solutions, which includes new towns and villages.

The search for Holy Grail is a legend and the goal elusive; delivering an adequate supply of good quality housing has proven elusive albeit it is too important to the welfare of the nation to give up the search.

[27] T. Harford, "Why economists should be more like plumbers", *Financial Times*, magazine 21/22, January 2017.

Combined authorities – collaboration on housing and planning

Research report commissioned by the Local Government Association

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Main Contact: Helen Brzozowski
Email: [redacted]
Telephone: [redacted]
Website: www.arc4.co.uk

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Registered Address: arc4, [redacted]
Email: [redacted] *www.arc4.co.uk*
arc4 Limited Registered in England & Wales 6205180 VAT Registration No: 909 9814 77
Directors - Helen Brzozowski – Michael Bullock

1. Executive summary

1.1 This report looks at how combined authorities have used their powers, resources and partnerships to achieve enhanced outcomes in housing and planning and how they are working with their constituent authorities to deliver these. By focusing on both major innovative approaches and projects, mainstream delivery programmes and smaller scale outcomes, the report recognises that whilst at different stage of development, combined authorities are still evolving.

1.2 The report focuses on specific case studies to illustrate innovation and delivery around the following themes:

- Increasing supply through innovative funding and investment
- Meeting housing need
- Accelerating housing delivery by co-ordinating and creating sites
- Alignment with the wider growth agenda
- Addressing urban renewal through Mayoral Development Corporations
- Excellence in quality and design
- Advantages of capacity building, procurement, delivery and resource sharing.

1.3 The research confirmed how combined authorities and constituent authorities are using their partnerships, resources and joint knowledge to deal with a range of challenges and creating ambitious and innovative approaches in housing and planning delivery. These include:

- *Innovative funding arrangements:* Investment in housing has been a key success for a number of combined authorities such as the housing investment funds set up in **Cambridgeshire and Peterborough** and **Sheffield City Region**. Creating a housing investment fund or equivalent, used to bring sites forward, could be taken a step further with cross-authority affordable housing provision, land packaging to support sites in lower value or challenging locations and better provision of specialist accommodation.
- *Land supply and remediation:* There is a common interest and priority attached to enhancing land supply and achieving brownfield redevelopment for housing and employment purposes. There are a number of case studies which show how bespoke financial initiatives and partnerships can be developed which address this issue and potentially develop enhanced supply at scale. These include remediation of brownfield sites in **Liverpool City Region** and the **West Midlands**, as well as the establishment of Mayoral Development Corporations in the **Tees Valley** and **Greater Manchester**.
- *Housing standards and need:* The activities of combined authorities responding to housing need and driving up housing standards will begin to deliver results which can be evaluated in both the short and medium term. This includes early activity relating to improving the operation of the Private Rented Sector as well as Housing First pilots in the **West Midlands**, **Greater Manchester** and **Liverpool City Region** which have secured government funding, and which will be the subject of robust evaluation.
- *Improved quality and social outcomes:* In some cases, new statutory strategic planning frameworks are being developed by combined authorities which seek not just to guide development and protect the environment but also to achieve social objectives such as reduced

inequality and maximised social value. This holistic approach also encompasses collaborative approaches to broader strategy development including the **West of England** Local Industrial Strategy and the City Region Energy Strategy in **Sheffield City Region**.

- *Efficiency and shared services:* The extent to which core teams and technical capacity has been assembled through a combined authority differs between places. This would be expected given that the scope of activity differs between places, as does the length of time that each authority has been established. There are a range of approaches, with some areas having significant specialist in-house capacity, while other areas have made "catalytic" appointments around specialist advice such as urban design in **West Yorkshire**.
- *Pooling of resources and knowledge*: Most of the case studies highlighted in this document have the pooling of resources across local authorities in partnership with the combined authority at their core. Agile management in the public and private sector, if based on collaboration can make the best use of the resources that are available and effectively compete for new resources. This includes new partnerships and funding approaches to trial modern methods of construction in the **North of Tyne** and the **West of England**.
- *New partnerships for new circumstances:* The development of the combined authority model has enabled policy makers to look at the nature and structure of partnerships. One such innovation has been the combined authorities' engagement with Registered Social Housing providers across local markets and local government geographies, such as a Joint Venture in **Greater Manchester**. These new rescaled housing partnerships increasingly reflect the reality that these agencies also now operate across borders, even if they originated from local authority stock transfers.

1.4 As this report details, there are many examples where collaboration has delivered or will deliver joint benefits for combined authorities and their constituent authorities. As ever, there is scope for more joint working and cross boundary approaches many of which derive from capitalising on the economies of scale created through a combined authority.

1.5 As the programme of activity around housing and planning has matured within combined authority areas, interesting projects have emerged which may be adapted by others over time. There is the potential for new methods of working to be evaluated and the experiences of successes and failures to be shared within this continually developing devolution landscape, allowing local policies and programmes to be adapted in a fast changing national and international environment.

2. Introduction and context

2.1 A key feature of English urban and spatial development over the last decade has been the establishment of combined authorities to facilitate collaboration around economic growth, spatial planning and new housing supply. In some cases, this remit has been extended locally to include public service reform and policies to meet housing need. The approaches which have developed are many and varied and reflect the unique social, economic and political circumstances of each area.

2.2 This report seeks to capture how combined authorities have used their powers, resources and partnerships to achieve enhanced outcomes in housing and planning for their localities which would have been more difficult to achieve without this innovation in spatial governance. The report seeks to outline the current collaboration within housing and planning policy between combined authorities and their constituent local authorities and, in doing so, create opportunities to consider further options for collaboration.

2.3 This report attempts to strike a balance between reporting on large eye-catching innovations and delivery programmes with smaller scale impacts which may otherwise be lost given the scale of investment programmes. Additionally, an important contextual issue needs to be considered by the reader when assessing progress, which is that combined authorities are at different stages of development and are evolving, therefore it is evident that some have well developed and maturing delivery programmes, whilst others are still crafting approaches which are being tested and tailored to their specific circumstances.

2.4 Developed through desk-based research, in-depth interviews with combined authority and local authority officers as well as opportunities to provide feedback through on-line surveys, the report focuses on innovation and delivery around the following themes:

- Increasing supply through innovative funding and investment
- Meeting housing need
- Accelerating housing delivery by co-ordinating and creating sites
- Addressing urban renewal through Mayoral Development Corporations
- Excellence in quality and design
- Advantages of capacity building, procurement, delivery and resource sharing.

2.5 All combined authorities and their constituent authorities were invited to participate, and we are incredibly grateful to all combined authorities and local authorities that contributed to the research for their time, challenge and insight.

3. Combined authorities – origins and location

3.1 Ten combined authorities have been established so far of which eight have secured devolution deals and are mayoral combined authorities, which means that they are led by metro mayors who are directly elected via a supplementary vote. As noted above, combined authorities are not homogenous entities, and this is reflected in the devolution deals they have struck with government. Combined authority areas and their powers, functions and funding have been determined by local leaders and negotiated with government.

3.2 The combined authority with the greatest degree of devolution, Greater Manchester, has now absorbed control over the office of the police and crime commissioner and fire and rescue service. Generally, a number of core powers have been made available to most areas, whilst most areas have also been provided with one or more unique responsibilities. This very much impacts on the focus and work of combined authorities.

3.3 In terms of planning and housing there are a matrix of different deals agreed with combined authorities. In early 2018, 'Housing Deals' were agreed with Greater Manchester and the West Midlands while a 'housing package' was agreed with the West of England. These deals sit alongside the bid-based Housing Infrastructure Fund of £4 billion available between 2018 and 2021, to which combined authorities and other localities have bid during 2017 and 2018.

3.4 The mayoral combined authorities have differing degrees of power over different matters but unlike the Mayor of London, the Mayors of combined authorities must seek the approval of their constituent members. For example, where powers to create a spatial strategy are available, this requires unanimous approval from the Mayor and combined authority members.

3.5 Details of all powers and funding that have been devolved to individual areas can be found on the LGA's Devolution Register, as well as on the individual combined authority sites. **Table 1** illustrates the key housing and planning elements of the devolution deals in place with combined authorities.

Combined authority	Est.	Single Investment Fund (pa for 30 years)	Powers over strategic planning	Non-statutory spatial framework	Statutory spatial framework	Mayoral Development Corporations	Compulsory purchase orders	Land commission	Joint Assets Board	Additional elements and information
Greater Manchester	2011	£30m	✓	-	✓	✓	✓	✓	-	• Additional planning powers
Liverpool City Region	2014	£30m	✓	-	✓	✓	✓	✓	✓	• Development management powers
West Yorkshire	2014	-	-	-	-	-	-	-	-	*WYCA does not have a devolution deal but through the LEP, does have a growth deal. Further information on the functions and priorities of WYCA are available here.*
North East	2014	-	-	-	-	-	-	-	-	*NECA does not have a devolution deal but through the LEP, does have a growth deal. Further information on the functions and priorities of NECA are available here.*
Sheffield City Region	2014	£30m	-	✓	-	✓	-	-	✓	*This entry captures the powers included in the 2015 devolution deal with Government which is still to be implemented – the latest CA update on devolution to Sheffield City Region is available here.*
Tees Valley	2016	£15m	-	-	-	✓	-	✓	-	• Additional government funding secured for MDC site
West Midlands	2016	£36.5m	-	-	-	-	✓	✓	-	• Housing package agreed with Government in 2018 • Extra £6m pa for housing supply • Strategic Plan for Housing and Growth
Cambridgeshire and Peterborough	2017	£20m	-	✓	-	-	-	✓	✓	• Additional £70m over five years ring fenced for Cambridge to meet housing needs
West of England	2017	£30m	✓	-	✓	✓	✓	-	✓	• Planning & Land assembly power
North of Tyne	2018	£20m	✓	-	-	✓	✓	-	-	• Housing and Land Board – power to acquire/dispose land

4. Innovation in housing and planning policy and delivery

4.1 When the first combined authorities were established, the legislation gave them responsibility for aspects of transport, economic development and regeneration. The current position is far more open, leaving the functions of a combined authority to be determined by a combination of local choice and the outcome of negotiations with government. Each combined authority has a unique combination of economic, social and spatial issues which in turn play out across different housing markets, tenures and demographic profiles as well as the quality/quantity of existing and potential housing supply.

4.2 Combined authorities stand and fall on their ability to be greater than the sum of their parts and the deals and undertakings toward devolution are ambitious. The work of the combined authorities seeks to fully integrate cross boundary working, focusing on housing and economic geographies rather than administrative boundaries. There is a natural proclivity to share best practice, work in partnership and create economies of scale to build a combined authority that is innovative, collaborative and efficient.

4.3 Through discussions with combined authorities and their constituent authorities, the research identified innovation around housing and planning delivery which is analysed in this section and supported through a series of case studies.

Increasing supply through innovative funding and investment

4.4 The creation of combined authorities has provided an enhanced platform that enables member councils to be more ambitious in their joint working and to take advantage of the powers and resources devolved from national government. One such example is the ability of combined authorities to access and invest funding devolved from central government.

4.5 Accelerating housing delivery to support economic growth is vital if combined authorities are to meet their full economic potential. Increasing the choice, quality and diversity of the housing offer, as well as the numbers, is therefore a priority for the joint working arrangements of combined and local authorities.

4.6 A common theme within the suite of approaches adopted by the combined authorities is the development of multifaceted partnerships to deliver a mix of new dwellings across their geography at a greater volume than has been the case since the financial crash of 2008/9. Many arrangements focus on utilising investment funds to advance delivery of all types of housing including investment, loans, guarantees and recoverable grant.

Case study: Cambridgeshire and Peterborough Strategic Investment Fund

Cambridgeshire and Peterborough Combined Authority (CPCA) has created a Strategic Investment Fund (SIF) made up of various funds including resources accessed via local authority prudential borrowing and private investment from institutional investors. This fund aims to increase the quantum and pace of housing delivery and to improve the range of housing options for local people through an investment plan which drives the distribution of investment. The tools available to the CPCA include recoverable grant and appraisal processes such as collaborative methodologies and standardised mechanisms to assess viability and housing need.

However, the direct delivery tools demonstrate the extent to which the combined authority is taking a direct approach to investment which provides:

- An equity investment option which enables development schemes to benefit from the fund on a matching finance basis. This enables a development to proceed and as sales are achieved the equity loans are repaid. Profits are shared amongst equity investors in proportion to their equity shareholding.
- Through the block purchase arrangement, the CPCA invests in schemes by purchasing assets to be developed on a forward sale basis. This gives certainty over sales risk for developers, enabling improved funding strategies and unblocking delivery. These assets are then owned and operated by the CPCA over the long term, paying back investment and generating returns over longer timeframes than the development / Registered Provider market can access. These assets can be used to further the CPCA's objectives, such as by providing units for alternative tenures, a stepping-stone to home ownership or through models such as Community Land Trusts.
- CPCA will also undertake the development of residential units, or enabling of residential plots, on land either owned by the CPCA, its partners or land that is purchased. These developments are funded through a combination of debt and equity sourced from the SIF in the form of cash or land. Returns from the development are then used to repay these investments either from one off receipts of units / plots that are sold, or from the income from operational assets. This approach can principally be used for schemes that are broadly viable but are blocked due to a lack of a viable funding strategy or other constraints, such as infrastructure requirements, which CPCA funding could potentially resolve.
- The value capture mechanism allows the SIF to invest in elements such as strategic land, or infrastructure. In return, the uplift in value of developable land owned by third parties is captured to repay the costs of the investment plus a profit for the risk taken. This approach can principally be used where a significant infrastructure intervention is required to unblock development.

Case study: Greater Manchester Housing Investment Fund and Joint Venture scheme

The Greater Manchester Combined Authority established a £300m Housing Investment Fund in 2011 based on recoverable loans which can be recycled for investment following repayment to stimulate further interventions, thereby generating a programme of interventions which over time are partially self-sustaining. This fund has provided support to developers to increase the viability and speed of residential development and is forecast to contribute to the development of between 10,000 and 15,000 new homes over a 10-year period. To date, the Housing Investment Fund has committed over £420m to build over 5,150 units at 40 sites across Greater Manchester. Whilst the Fund has reached the £300m milestone after two-and-a-half years, the Fund has said it is open for business utilising recycled funds and will continue to invest in more homes across the region.

The Fund is supported by a rigorous lending assessment framework through which loans are made and without the combined authority to support the development and training of a Specialist Investment Team, the funding would not have been made available from Government which sought to align appraisal processes which are used nationally to allocate similar public sector investment programmes. This fund has been highly focused upon the development of the housing market in the regional centre and has complemented the inflow of investment into commercial development and growth in financial services employment.

Building on the interventions provided by the revolving loans fund, the combined authority has supported the development of a housing delivery partnership based on land ownership. As a result, a strategic partnership is being developed between Greater Manchester Housing Providers (GMHP) and GMCA to enhance the supply of housing for sale and rent. The Joint Venture (JV) has secured equity investment from the GM Housing Investment Fund to help build 16,000 homes in the region over the next five years.

Members of GMHP and GMCA will invest up to £32million over the next seven years to bring forward hundreds of new homes in all-tenure developments in Greater Manchester. Following a feasibility study, funded by GMHP members, to explore the financial and legal feasibility as well as appraise the viability of the ground-breaking initiative, ten of the providers and the GMCA subsequently committed further funds to develop the concept.

The JV will develop new homes for sale, over and above the housing associations' continuing commitment to the delivery of new affordable homes through their mainstream development programmes. The JV will act as a commercial developer, acquire land, take it through planning, procure contractors and build out sites. It will then sell the homes both on the open market and affordable homes to the best placed local housing provider. The profits from the developments will be reinvested in further developments and some returned to investors. A similar JV is now being developed in the Sheffield City Region Combined Authority area, albeit on a smaller scale initially.

In order to mirror the commercial developer model, funding will be provided in the form of equity investment, committed over a lock-in period of seven years, and debt provided on a revolving credit-style facility. The balance of funding will be dependent on the actual programme of sites and the timing of developments but is expected to be broadly one third equity and two thirds debt.

The scale of this JV has been possible because of the combined authority's ability to focus cross boundary and to work with housing providers as one partner.

The key advantages of the venture include:

- Bringing forward sites that may not otherwise be brought forward
- Sharing risks on some of the more challenging sites around Greater Manchester
- Innovative offer to vendors to share risks and returns
- Delivery of new homes in tenure mixes that meet the different requirements of the 10 Greater Manchester districts
- Additional social / affordable housing through S106
- Housing associations and the GMCA will be able to utilise their balance sheets to earn returns for reinvestment. The returns will be comparable to those earned in the private sector and will be re-invested in line with the social objectives of GMHP members and the GMCA, rather than being paid out to private sector shareholders.

Further detail on the Greater Manchester Joint Venture is available on the LGA website.

4.7 Combined authorities are taking on a significant role not just in terms of access to funding but also in their potential to take a cross boundary approach to supporting new schemes to come forward and ensuring that the investment is integrated within wider transport and infrastructure frameworks. By investing in a series of sites through grant and investment mechanisms, a cross subsidy approach can operate that will deliver financial returns over time whilst enabling schemes with viability and deliverability issues to be unlocked.

4.8 Local authorities consider the combined authorities as key in establishing a strategic framework for investment and delivery to unlock housing sites in sustainable locations and supporting new models of housing delivery and funding that may not have had the economies of scale without the combined authority. This has been seen through many of the plans each has, such as combined authority-wide spatial strategies and frameworks (Cambridgeshire and Peterborough), Mayoral Development Corporations (Greater Manchester, Tees Valley) and compulsory purchase powers (North of Tyne, West Midlands). These interventions aimed at increasing housing supply have also been assisted by new approaches to strategic planning which have integrated proposals for economic and housing growth over a wider spatial geography supported by proposed transport investment.

Case study: Liverpool City Region – Halsnead Garden Village

Halsnead Garden Village (Halsnead), located near Whiston in Knowsley, is one of 14 sites in England which have been awarded Garden Village status by the Government. Halsnead is a significant housing and employment site for the City Region with the potential to deliver approximately 1,600 homes and 22.5 hectares of employment land. Knowsley Council had been successful in a bid to Government for inclusion of the proposed Halsnead Garden Village development site in its 'Locally-led Garden Villages, Towns and Cities' prospectus. However, the Strategic Investment Funding focused on creating access and improving capacity to support development. The funding was essential to deliver off-site transport infrastructure to build capacity and resilience in the existing highway network and create a platform for future private sector development.

Halsnead Garden Village will contribute to the Liverpool City Region's objectives of providing a mixed supply of housing types and developing Knowsley's employment land offer. Delivering a site of such scale will provide the City Region with a significant new offer to the employment market, attracting large scale investment in the logistic and advanced manufacturing sectors for highly skilled workers, thereby helping to address the socioeconomic challenges caused by the dominant low skilled and low wage economy in the borough.

4.9 A benefit of working within the combined authority partnership for constituent authorities is that the combined authority is able to access new forms of funding and work at scale with additional funding, more potential sites and with the potential to attract more investment than a single authority working alone. It can take a cross-boundary approach and share risks on some of the more challenging sites within individual authorities, allowing investment funding to work cross-boundary; this supports more challenging sites to be brought forward. It can also coordinate and package sites for investors, sharing risks and returns in a way that delivers different tenure mixes for local communities through improved viability outcomes during planning.

Meeting housing need

4.10 The widespread housing market failure which emerged in the second decade of the 21st Century impacted on all sections of society and created housing need of varying severity across a wider income span than had previously been the case. One outcome was a rapid rise in street homelessness, the most severe and evident form of need. One of a number of responses to this issue has been the development of the Housing First Programme, which seeks to resettle the street homeless in accommodation and provide wrap around support. Three combined authorities were chosen to pilot a city region wide approach to Housing First[1] and the details of their programmes are linked to at the foot of the page.

4.11 The discussions with combined authorities and their constituent authorities focused on two elements for housing need. The first was understanding housing need and the second was delivering homes to meet that need.

[1] https://www.greatermanchester-ca.gov.uk/news/greater-manchesters-drive-to-tackle-homelessness-accelerates-with-housing-first-announcement/

https://www.liverpoolcityregion-ca.gov.uk/housing-first-staff-start-delivery-in-liverpool-city-region/

https://www.wmca.org.uk/news/west-midlands-receives-96m-to-launch-rough-sleeping-pilot/

Understanding housing need

4.12 There are a number of examples of joint Strategic Housing Market Assessments that identify a housing requirement across regions. For example, the Greater Manchester Strategic Housing Market Assessment was commissioned across the 10 local authorities within Greater Manchester and provides authority level breakdown of data. This very clearly sets out the housing numbers required within the region and has been a central element of the Greater Manchester Spatial Framework.

4.13 As housing markets operate at a scale greater than individual local authority areas, there is a logic to understanding the needs and demands across wider geographies. The combined authorities and their constituent authorities have a wealth of information and analysis about current housing markets, economic trends and locational data and understand the challenges and the opportunities that they face; much of the research is very recent but is often still focused on individual authorities.

4.14 This is generally because:

- Data is required at a Local Planning Authority level because local authorities continue to allocate housing sites and require local plans to do so
- Partner authorities have location specific information on needs analysis and local conditions, which vary significantly from authority to authority
- Housing needs evidence base needs to be at a local authority geography to enable robust negotiations with developers
- As an evidence base needs to be regularly updated and consistent, many partner authorities' timescales for updating is 'out of sync' with other local authorities and a combined authority can address this issue of consistency.

4.15 Despite this, there is an opportunity for further collaboration in this element of research which could ensure that timescales for undertaking assessments are aligned, methodologies are consistent, and findings are co-ordinated as well as financial economies of scale for joint procurement. In the absence of any formal evidence around housing need, there are a number of useful examples of collaboration where combined authorities have developed innovative approaches.

4.16 For example, Cambridgeshire and Peterborough Combined Authority has been identifying key worker accommodation needs by working with larger employers to understand what the local economy requires in terms of attracting additional people at a range of income levels and identifying the type, quantity and tenure of homes needed. It has been able to look across a wider area to meet needs (e.g. Astra Zeneca/Universities/Hospitals - media-tech cluster) and gathering this evidence is supported by the influence and scale that the combined authority has as it combines geographies.

Delivering new affordable housing

4.17 Combined authorities consider housing affordability to be one of their most prominent public policy issues, recognising this growing problem not only in terms of the quality of housing available to those on lower incomes but also in how it affects an individual's standard of living. Whilst the primary focus is usually on delivering affordable housing for rent there are many examples from combined authorities of creating region wide products to support different tenures, particularly intermediate homeownership.

4.18 For example, Cambridgeshire and Peterborough Combined Authority, is planning to develop discounted market sale homes, with property values capped at £100,000 at first sale and profits made thereafter to be shared between the combined authority (as developer) and the initial purchaser. If

the combined authority can deliver discounted market sale homes, with properties capped at £100,000, these homes will be within reach of a much greater proportion of low-income working people in this region.

4.19 Recent governments have remained committed to creating a better quality and fairer private rented sector (PRS), encouraging institutional investment to deliver more homes for rent and this was an area for collaboration between combined authorities and constituent authorities. Combined authorities can have a role in supporting local authorities to create opportunities of the scale that would be difficult to create by a single authority, attracting institutional investment and making investment themselves in Build to Rent programmes.

4.20 For example, the North of Tyne Combined Authority are working with L&G and the Grainger Trust to consider the role that modern methods of construction can have in its delivery of modular homes through their build to rent programme and with Grainger Trust, a major private landlord.

4.21 Recently, the West of England Combined Authority announced funding for a pilot programme to trial modern methods of construction, as part of its commitment to innovation in housing. The combined authority is investing £150,000 to support pilot trials to be conducted and provide case studies for the wider region, based on the learning gained.

4.22 Utilising the PRS as a supply of affordable housing for rent was also being pursued by a number of combined authorities in partnership with their constituent authorities. This focused around projects and initiatives that:

- develop new private rental accommodation to keep pace with demand and tackle rising rents
- build family type accommodation with longer-term tenure to better meet the needs of families for stability (half of UK properties are one or two bed flats)
- attract institutional investment into the PRS to be able to build at scale - the reduction in buy-to-let mortgages since the credit crunch means that individual landlords are unlikely to meet the scale of demand that is emerging.

4.23 The benefit of collaboration was about creating scale for investment that can make an impact in the market.

Case study: Greater Manchester - meeting need through a high quality PRS

In 2019, Greater Manchester Combined Authority secured £128,000 from Government to establish a "rogue landlord hub", targeting landlords and letting agents who flout the law through bad management or by placing housing tenants within neglected and unsafe homes. The hub sought to improve information sharing and enable collaboration across Greater Manchester's local authorities; develop and share best practice and information to provide a more consistent approach across the city-region; provide advanced training for frontline officers to help bring more illegal landlords to justice through the courts; and deliver communications campaigns targeted at both tenants and landlords. The results will be used to shape future initiatives that will continue to crack down on rogue landlords.

The Greater Manchester Housing Strategy includes a commitment to develop a Greater Manchester good landlord scheme to encourage and support landlords providing a safe, decent and secure home to their tenants, working with national and regional landlord and letting agencies networks.

4.24 The principal difficulty that housing providers encounter is making new affordable housing schemes financially viable and this is where combined authorities can make an impact through collaboration.

Land values, development challenges and employment markets produce variations in the economics of housebuilding across all of the combined authorities and this can result in significant differences in relation to viability assessments *within* the combined authority area.

4.25 The challenge to achieve an equitable distribution of development has created a number of opportunities for collaborative working across combined authorities. Bringing a consistent approach to viability has given developers certainty of what is expected and can therefore be reflected in the consideration of land allocations and negotiations with willing landowners. It has also enabled challenging sites to be brought forward by looking at cross boundary land parcels, thinking creatively around infrastructure costs and supporting authorities to unlock different land parcels.

Case study: Sheffield City Region Housing Fund

The SCR Housing Fund was created to help public and private sector developers bring forward stalled housing developments to accelerate housing delivery. To date, the fund has allocated £7.5m in grants and loans which has brought forward 524 homes which would otherwise not have been built, this is an intervention rate of c£14k per unit.

The SCR Housing Fund is a 'fund of last resort' so all other sources of finance and funding need to be explored first, and can be used in conjunction with other funding such as from Homes England. A streamlined Assurance Process for considering scheme funding applications has been put in place to ensure rapid decision-making; for example, the first housing scheme was given funding approval less than 5 months after a strategic outline business case was submitted.

The MCA and LEP have given approval for the SCR Housing Fund to move from a pilot phase to Full Fund status with an enhanced budget, which will enable more housing schemes that would otherwise not come forward for development to go ahead.

Case study: West Midlands Combined Authority meeting need through accelerator funding

West Midlands Combined Authority operates within the context of local authorities setting policies for the mix and tenure of developments within their Local Plans, as it itself does not have planning powers. However, issues of affordability need to align with the Strategic Economic Plan and the Local Industrial Strategy and therefore policy integration is a prerequisite to ensure enhanced and balanced growth. Whilst affordable housing targets for constituent authorities range from between 20 and 40%, in reality this isn't always delivered "on the ground" on individual developments. West Midlands Combined Authority is proposing "Accelerator Investment" from central government to radically drive up supply of new affordable and social housing.

A key element is new funding to ensure affordable housing can be delivered on sites where currently that provision is either unviable or below policy requirements, and therefore these sites are not currently coming forward. This funding, alongside unprecedented local and private investment created through the combined authority's influence and joint funding, will help treble the supply of new affordable and social homes within a decade. Alongside the proposal for investment to accelerate delivery, the proposal is also exploring opportunities to maximise existing powers and opportunities including procurement, local development orders and CPOs, where appropriate. Establishing the local expertise and capacity to deliver innovatively is central to this approach.

Accelerating housing delivery by co-ordinating and creating sites

4.26 Planning authorities face a major challenge in increasing housing delivery with many sites difficult to develop because of their size and condition. Combined authorities recognise a primary role to support the existing development and delivery activities of the individual local authorities, but their role can be unclear where planning powers are not delivered through a statutory framework. Working cross boundary and in partnership with constituent authorities, combined authorities are identifying ways of increasing the supply of land for housing and employment and there is a particular focus on bringing forward brownfield sites

4.27 Brownfield land remains a major issue in the older post-industrial city regions and site remediation is often located in larger fragments of urban space where there is also underused land and buildings as well as a need for urban renewal. Local authorities are required to prepare and maintain registers of brownfield land that is suitable for residential development. It is intended to improve the quality and consistency of data held by local planning authorities to provide certainty for developers and communities, encouraging investment in local areas.

4.28 Here there is often a difficult task, as there is with more prosperous suburban locations to generate new development which is also sustainable and well designed. A number of combined authorities have developed consistent approaches to how viability is assessed to enable more certainty to developers as they bring schemes forward and supported local authorities to prioritise sites through strategic viability work.

Case study: West of England Combined Authority – Joint Assets Board

The 2016 Devolution Agreement provided a mechanism for scaling up and elevating collaboration around public sector land and property, through the creation of a West of England Joint Assets Board (JAB), formally constituted in 2018. Crucially, One Public Estate (OPE) funding awarded in 2016 and 2018 has enabled the JAB to be carefully established, at some pace. It has a clear purpose and agreed Terms of Reference with key aims to enable regional collaboration across the public sector to:

- use land more efficiently
- transform public sector services
- strengthen local communities.

Going forward, dedicated resource in the form of a Programme Manager has been created within WECA to manage the JAB, seed funded through OPE.

Outcomes:

- The JAB has been created as a senior and influential Board, with membership at chief executive and executive director level. All areas of the public sector are represented on it, covering central government, education, emergency services, health and local government. It focuses on strategy and policy that enables public sector property and land assets to be used to support economic, sustainable and inclusive growth, across the region.
- The primary output from the JAB is a pipeline of public sector land that can be released for development, which is a key component in delivering against housing targets. Many opportunities have already been identified and priorities agreed.
- A pilot review has started, which will create a template for conducting area-based asset reviews in various locations across the region.
- Whilst the JAB is primarily focused on generating a pipeline of surplus public sector land, it also has an interest in how the land will be developed, so that the benefits from collaboration can be maximised and spread across the public sector.
- The JAB links very closely with the West of England Housing Delivery Board. Work is underway to clarify a West of England strategy for Modern Methods of Construction (MMC) and other innovations in housing delivery. Bristol's Housing Festival is a key element of this and provides a platform for developing and testing housing innovations that it is hoped can then be adopted at scale across the region.

Case study: Liverpool City Region Brownfield Land Register

The Liverpool City Region Combined Authority has developed a Brownfield Register across its region which contains around 800 sites. The register has supported the provision of a one stop shop for developers to identify potential sites across the region and will assist in identifying sustainable urban housing sites which can potentially deliver over 40,000 new homes. To provide a more detailed cost for the remediation of brownfield sites within the Liverpool City Region, the combined authority completed a Brownfield Housing Site Viability Study. This reviewed all sites with a potential capacity of 80+ dwellings listed in the Liverpool City Region Brownfield Register. The outputs of the study were then used to negotiate potential funding streams.

The combined authority was able to hold funding discussions with both Homes England and the Ministry of Housing, Communities and Local Government regarding potential funding for brownfield remediation on a larger scale than for individual authorities. While the discussion relating to the development of a programme of land remediation backed by significant resources is still ongoing, the process has identified a number of sites where a modest amount of gap finance would be sufficient to secure development and allow the combined authority to work with Homes England to develop housing projects that can be given the go ahead at short notice.

4.29 Combined authorities have established ambitious housing growth targets and delivery is at the forefront of much of their thinking. A priority in nearly all approaches has been to develop an overall housing programme from a 'call for sites' from their constituent authorities and there have been a number of approaches to doing this.

Case study: West Yorkshire Strategic Sites Strategy

Whilst West Yorkshire Combined Authority does not have planning powers, the potential to create added value through creating a programme of delivery has been established by developing a list of potential strategic sites. A call for sites enabled local authorities to provide specific information on a mix of sites including housing, employment and town centre locations. Whilst the list was designed to consider strategic sites, there was no definition of strategic sites; though sites did need to be in special priority areas and must be in the Strategic Economic Plan priorities. The list has enabled a pipeline of sites to be established which provides an overall position statement for the combined authority as well as a long-term delivery focus, combining transport and housing funds. The creation of a list of potential sites deliverable to 2036 has helped to make strategic investment decisions and enabled Homes England to make investment decisions.

The West Yorkshire Combined Authority has also had a positive impact in bringing challenging sites forward. A site in York Central had been a priority for the City for a number of years and is located close to a transport hub but was constrained by a range of transport issues, poor pedestrian mobility, disparate land uses and multiple ownership albeit primarily in public ownership. However, the site remained a priority as a strategic brownfield site. The Leeds City Region Growth Deal is helping to fund the 72-hectare York Central development programme. The site has also been designated by Homes England as a Housing Infrastructure Site giving it a priority for funding.

The combined authority has committed investment to develop the project and undertake the necessary site surveys and technical works as well as more than £2 million for delivery of the expected £100 million redevelopment. The York Central scheme is a key project to support the continuing economic growth of the city. Once complete, the site is expected to deliver up to 2,500 new homes, 120,000 square metres of Grade A office space to house more than 7,000 jobs and an uplift in the city's Gross Added Value of more than £1.1 billion.

Alignment with the wider growth agenda

4.30 Supporting and underpinning economic growth is central to the combined authority agenda. The Industrial Strategy sets out the Government's long-term plan to boost the productivity and earning power of people in Britain. It was launched in November 2017 and is built around 'Five Foundations of Productivity' which have an impact on all sectors of the economy - Ideas, People, Infrastructure, Business Environment and Places. Aligning with this are Local Industrial Strategies in individual regions which include a key focus on housing delivery. Four combined authorities have an agreed Local Industrial Strategy in place whilst others are in the process of developing a strategy.[2]

Case study: West of England Local Industrial Strategy

The West of England Combined Authority and Local Enterprise Partnership brought together businesses and organisations from across the region, working closely with government, to develop and agree a Local Industrial Strategy. The strategy draws on the unique strengths of the region, particularly in innovation, and sets out an ambition to be a driving force for clean and inclusive growth. Key commitments contained within the Strategy relating to housing and planning include:

- Working with government to ensure continued engagement in their Joint Assets Board which enables collaboration across the public sector to use land more efficiently, transform services and strengthen communities.

- Support innovation in housebuilding and accelerate the development of carbon neutral homes.

- Develop an ambitious approach to modern methods of construction (MMC) and other housing innovations e.g. co-living communities, smart homes and carbon/energy efficient homes. A West of England Small Sites (Housing) Strategy is being developed, which is likely to be expanded to provide a wider MMC strategy.

4.31 Strategic corridors are also of particular importance in terms of connectivity and economic growth. The underlying rationale for a specific focus on these types of development opportunities and corridors is that they have the potential to bring together a concentration of public and private sector investment across a broad geography (i.e. beyond the boundaries of an individual site) often maximising the opportunities presented by major planned or committed transport investment. These corridors have the capacity to grow, providing new opportunities for establishing and growing economic connections between areas, including complementary approaches to growth sectors and to deliver new housing and the facilitator and potential funding role of a combined authority demonstrates the significance of working across boundaries.

[2] For further detail, see the Local Industrial Strategies for Cambridgeshire and Peterborough, Greater Manchester, the West Midlands and the West of England.

Case study: West Midlands - Adding value through cross-boundary investment frameworks

The principles of corridor-based working, higher design quality and unlocking new investment were at the heart of the draft Spatial Investment and Delivery Plan developed by the West Midlands Combined Authority. Information assembled for the Draft Spatial Investment and Delivery Plan identified some 27 strategic development opportunities within the West Midlands. In these areas, transport investment, development opportunity (frequently on brownfield land) and untapped potential come together to provide the framework to create a critical mass of activity which can have a significant impact on the regeneration of former industrial areas.

The Spatial Investment and Delivery Plan takes as its starting point accelerating and securing the delivery of development opportunities and the land and infrastructure proposals identified in the local plans of constituent and non-constituent members adjacent to the large metropolitan areas. Adding to that process, it seeks to join up areas of opportunity which extend across local authority boundaries and provide a comprehensive plan for delivery and investment supported by new policy principles to guide investment by West Midlands Combined Authority, Homes England and the private sector.

In the Black Country, an area where there has been a long history of local authority collaboration on issues which cross local boundaries, work on the Sandwell to Dudley Corridor has now reached the implementation stage and is focused on how this investment framework can maximise a range of housing and employment opportunities that will be unlocked via the Transforming Cities Fund for the Metro extension from Wednesbury to Brierley Hill. This investment in improving connectivity on an East/West axis in the Black Country builds on the improvements achieved in the connectivity of the North/South axis in the Walsall to Wolverhampton Corridor.

The interventions deployed by West Midlands Combined Authority to develop these large post- industrial corridors has included:

- Commissioning programme management and specialist technical support (as necessary) to prepare sites for delivery/investment and engage vendors/developers
- Co-development of strategic investment and delivery frameworks (see below) to coordinate public sector activities and investment opportunities
- Direct intervention and commercial negotiations – e.g. acquisition, site assembly
- Brokering and facilitation with public and private sector partners
- Deployment of funding and expertise and securing business cases for investment.

In both of the corridors identified above, discussions are taking place around how best the combined authority can collectively secure new public and private investment (especially to unlock challenging brownfield development sites), secure public and private infrastructure provision and deliver the quality of development essential for sustainable growth. This has led to a broad consensus emerging for creating an investment prospectus for each corridor tailored to an investor audience that will secure the funding to deliver inclusive growth in the corridor. Furthermore, it has become clear that the approach in each corridor should be tailored to local circumstances rather than adopting a standard approach for all.

Addressing urban renewal through Mayoral Development Corporations

4.32 Following the fiscal restructuring during the last decade the traditional post war approach to urban renewal was recast, and new forms of delivery and approaches to facilitating urban and economic renewal have been developed. The Mayoral Development Corporation is one such innovation, which

adapts a model of delivery which traditionally was controlled by central Government and anchors it in a local democratic framework. The progress being made in developing these renewal programmes in two locations is outlined below.

Case study: Tees Valley Mayoral Development Corporation

Tees Valley was the first combined authority to establish a Mayoral Development Corporation using the powers of the Cities and Local Government Act 2016. The Development Corporation is the delivery vehicle which is leading on the regeneration of land south of the River Tees, following the closure of Redcar's SSI Steelworks in 2015. The vision is to transform the site into a hotbed of industry, creating 20,000 jobs and delivering £1billion per annum into the local economy. The area covers 4,500 acres of land and is marketed as the single biggest investment opportunity in the UK. As of 2019, the Tees Valley Mayor and Combined Authority has secured £137m from Government to support land initiatives.

The assembling of a financial package, while essential to address the scale of the failure in the land and labour market, is not seen as a sufficient response to ensure that the regeneration of the site is achieved in the most efficient way and within a reasonable timescale. The Mayoral Development Corporation is charged with the master planning, promotion and physical and social renewal functions of the site, with a refreshed Master Plan published in December 2019. Critically, it has Compulsory Purchase Powers to assemble land into developable packages and in April an Order was made for the CPO of the former SSI Steelworks site, covering 870 acres. This is one of the largest individual site acquisitions in the country over the last two decades.

Case study: Greater Manchester Mayoral Development Corporation

Stockport's Town Centre West area in Greater Manchester has the potential to evolve into a new urban village of up to 3,000 new homes with complementary mixed-use development and the social infrastructure required to support a significant increase in the residential population. Large-scale regeneration would ensure that the west of the Town Centre is a healthy, sustainable place which incorporates innovation and smart technology into design and urban living as well as the appropriate social, physical and green infrastructure to support existing and new residents.

The focus on the regeneration of this part of Stockport is a key part of the Mayoral Town Centre Challenge which was launched across GMCA in November 2017. A key part of that challenge is to ensure that a stronger housing and employment offer is developed in GM's Town Centres – as their role as retail centres changes, and to ensure that Stockport is maximising the opportunity of developing brownfield land in sustainable locations. This type of approach to integrated regeneration interventions is designed to maximise the viability of such brownfield land sites for housing and employment through the creation of value and economies of scale enabling cross subsidy.

Excellence in quality and design

4.33 The National Planning Policy Framework sets out the standards to ensure that developments create a strong sense of place and function well. The Social Housing Green Paper highlighted the importance of good place-making to overall wellbeing and quality of life, and how poor design can exacerbate feelings of isolation and neglect. There is growing recognition of the contribution which excellent place-making plays in achieving inclusive growth.

4.34 The 'Place' agenda is an established priority for combined authorities to create strong, confident and integrated communities. Discussions with combined authorities confirmed that there is clear and essential value to building better. Many combined authorities have committed to planning and delivering a significant number of new homes and underpinning this is an understanding that improving the quality of new development will be fundamental to meeting this ambitious target and leaving a positive legacy.

Case study: Liverpool City Region - Accelerating sustainable development with quality design

Funded by the Ministry of Housing, Communities and Local Government through the Planning Delivery Fund awarded to the Liverpool City Region Combined Authority, funding for design reviews will help design high-quality design across the City Region through collaborative learning. Liverpool City Region Combined Authority secured £100,000 funding to deliver 42 design review panels for major developments in the City Region. This enabled the combined authority to work with the Royal Institute of British Architects (RIBA) developers and local authorities, with the objective to make sure every new home is built to a high-quality standard and is fit for purpose. Delivered by Places Matter and supported by RIBA North in Liverpool, the free reviews are available through a programme that aims to promote high-quality design in housing growth and key economic assets. Each review is carried out through Places Matter's established panel of 60 industry experts, at no cost to the applicant.

Liverpool City Region Combined Authority's Design Champion, Paul Monaghan, shared learning from the Liverpool City Region at the West of England's inaugural Placemaking Conference in June 2019. The West of England is now taking forward a range of initiatives with key partners to promote the Placemaking agenda sub-regionally, including the establishment of Design West, which will ensure a consistent and high-quality design review service across the sub-region.

Case study: Cambridgeshire and Peterborough - Designing sustainable development using international knowledge transfer

Fenland District Council, with support from the Cambridgeshire and Peterborough Combined Authority, commissioned a flood risk analysis which demonstrated how a proposed Wisbech Garden Town could be flood resilient, with a suitable flood management strategy for an early Phase 1 development area. The proposal sets out a step change regeneration project to deliver:

- 10,000 – 12,000 new homes over a 40-year period;
- 11,000 new jobs across 100 hectares of employment space;
- The garden town will generate a requirement for 4-5 primary schools, 1-2 secondary schools, and 3 health centres;
- 259 hectares of green space including new open space, retained woodland and orchards, and a country park.

The technical studies sought to investigate how the development of the Garden Town can be designed to avoid the areas at highest risk of flooding and the development as a whole being made safe and sustainable in flood risk terms, in accordance with the requirements of the National Planning Policy Framework (NPPF). The study included live scenario testing and innovative approaches to long term water management. It is being funded in part by the Dutch government, who are keen to promote the further development of innovative engineering solutions. This type of collaborative learning approach could be applied across the region.

Case study: Liverpool City Region - creating social value through Spatial Development Strategy

Work is ongoing in the Liverpool City Region Combined Authority to develop a Spatial Development Strategy and the combined authority is set to be the first in the country to incorporate an evaluation of social value in its Spatial Development Strategy. This will evaluate the social value of every policy within the SDS, at every stage in its development, to ensure that policy makers consider the social impacts on outcomes which impact on the broader community such as health and wellbeing, as well as the impact on the local economy.

The Liverpool City Region has established a Fairness and Social Justice Advisory Board to scrutinise all of the policies and decisions that are established as part of the statutory planning process. The Fairness and Social Justice Advisory Board is made up of representatives from across all elements of society and is the first of its kind in the country. Whilst other local authorities have established commissions to look into justice, fairness, poverty and related areas, all of these have produced a one-off series of recommendations and then been disbanded.

The Fairness and Social Justice Advisory Board will be the first to exist as a permanent body, providing an independent sounding board, to ensure that issues of fairness and social justice are considered by the Liverpool City Region Combined Authority as part of its decision-making and policy development process. At each meeting, members and officers present their areas of current focus/work and this gives board members a direct opportunity to influence policy and ensure that the needs of vulnerable groups are not overlooked, the board has input on policy from inception to implementation and identifies where the Fairness and Social Justice Advisory Board can make a difference; by highlighting good practice and helping promote new approaches to equality and fairness.

Advantages of capacity building, procurement, delivery and resource sharing

4.35 Combined authorities need strong governance to work well. They provide a forum and a framework for joint decision-making and draw together councillors from their "constituent" councils to make joint decisions on issues of mutual importance. Their governance arrangements are well established, supporting decision making that underpins devolution of power.

4.36 Alongside the formal governance arrangements are the practical ways that combined and constituent authorities work together to 'get the job done' through informal arrangements that have been established which underpin a valuable network of knowledge, resource and expertise. One of the key features that combined authorities create is a natural 'place perspective', joining up strategies, resources and networks across the combined authority geography.

4.37 The following examples demonstrate how combined authorities are sharing resources and expertise through the development of cross-boundary housing and planning policies to support increasing economies of scale and sharing of best practice.

Case study: Liverpool City Region creating networks

The Mayor of the Liverpool City Region Combined Authority has created informal governance arrangements that brings the expertise, skills, knowledge and influence of a number of individuals that are able to act as ambassadors of the combined authority, promoting its work, identifying and encouraging investment and championing the region. Seven champions (generally individuals from the private sector) have been appointed by the Mayor and bring their contacts and networks to enable the combined authority 'an open door' on many platforms ordinarily not available. These champions can be 'hands on' in advising on operational issues and/or offer strategic guidance.

Case study: West of England Joint Green Infrastructure Strategy

The West of England (WofE) Combined Authority has been leading the development of the WofE Joint Green Infrastructure Strategy (JGIS). The Strategy is part of a programme of Green Infrastructure (GI) work to specifically assist the WofE vision for sustainable growth. It will provide a new, integrated framework for delivering strategically planned and managed green infrastructure (green and blue) to deliver multiple benefits.

Core purposes of the JGIS include provision of a GI evidence base for spatial planning at either strategic or local plan level and tools for a consistent approach to GI across the 4 unitary authorities.

As a package of work, the JGIS will help the West of England authorities to implement and deliver the ambitions of the Governments 25 Year Environment Plan.

The work is being led by combined authority staff supported by a technical team comprising officers from the four unitary authorities, and key bodies including Natural England, Environment Agency, the West of England Nature Partnership and Bristol Avon Catchment Partnership.

The need to produce the JGIS has been strengthened in view of; Climate and Ecological Emergency declarations; the Environment Bill and current government initiatives linked with the 25-year Environment Plan that all relate to the need to take account of natural assets and services that the natural environment provides, and to maximise the benefits they deliver for people, place and nature.

The JGIS work programme is aligning the regional approach with new national tools and approaches through direct involvement in pilots and commissioned work including, Biodiversity Net Gain, Natural Capital Accounting and National GI Standards. The integration of national approaches at a West of England level will enhance the package of evidence and tools that the JGIS will provide.

Case studies: Combined authorities developing joint services and sharing resources

Sheffield City Region Combined Authority have created a partnership with the Planning Advisory Service (PAS). The SCR Heads of Planning Group have recently agreed a joint 12-month work programme including the development of a shared planning approach, developed with support from PAS. Five pathfinder authorities have undertaken productivity and resource reviews of their planning services and have produced an evidence base on which to base improvement plans. This shared activity is a distinct step-up in terms of collaboration to support the development process and provide a positive experience for investors and developers.

Greater Manchester Combined Authority are sharing the expertise, cost and resource of 3 essential planning units which are funded across all constituent authorities. These are the Archaeological Service, Waste and Minerals and Ecological unit. They are funded jointly by Greater Manchester CA's constituent authorities and provide a comprehensive and robust service without each authority having to deliver their own.

West Yorkshire Combined Authority has appointed a cross authority Urban Design Manager; a fixed term two-year post, the senior appointment has been funded centrally, but supports all of the authorities in developing best practice around scheme design and supports improvements to strategic schemes. This shared cost will impact positively on design.

The **Sheffield City Region Combined Authority** and Local Enterprise Partnership has developed an SCR Energy Strategy which includes the aim to address fuel poverty and excess winter deaths, with an implementation period of 2020-2040. The main objective is to produce a more robust, resilient and decarbonised energy system across South Yorkshire which accelerates growth in the energy sector. This is an example of a programme which is at its inception stage, but at the forefront of thinking about how to achieve emission targets and embed interventions within a positive programme of economic and household growth. The collaborative approach adopted brings joint capacity and expertise.

5. Learning from collaboration

5.1 The interviews and literature review delivered for this research suggests that progress and focus for collaboration in housing and planning has focused on:

- *Innovative funding arrangements:* Funding will always be a constraint and securing and maximising public and private investment from existing and new sources of funding to underpin new delivery was a consistent theme during the research. Investment in housing has been a key success for a number of combined authorities such as Cambridgeshire and Peterborough and Greater Manchester. Creating a housing investment fund or equivalent, used to bring sites forward, could be taken a step further with cross authority affordable housing provision, land packaging to support sites in lower value/challenging locations and better provision of specialist accommodation.
- *Land supply and remediation:* There is a common interest and priority attached to enhancing land supply and achieving brownfield redevelopment for housing and employment purposes. Achieving this has become more complex with the focus on value capture to finance development. There are a number of case studies which show how bespoke financial initiatives and partnerships can be developed which address this issue and potentially develop enhanced supply at scale. There is considerable potential here for knowledge transfer around the generation of value, pooling of sites and the integration of transport infrastructure with mixed use developments.
- *Housing standards and need:* combined authorities have worked with constituent authorities to deliver initial activity that seeks to respond to housing need and to drive up housing standards. This early activity will deliver results which can be evaluated in both the short and medium term. The drive to reduce homelessness has secured additional funding in some areas, with associated outcomes and evaluation requirements. Additionally, activity relating to the improvement of the operation of the Private Rented Sector will also generate an early action programme which can be considered in the context of whether a combined authority wide approach can generate enhanced results.
- *Improved quality and social outcomes:* In some cases, new statutory strategic planning frameworks are being developed by combined authorities which seek not just to guide development and protect the environment but also to achieve social objectives such as reduced inequality and maximised social value. The case studies here reflect the opportunities to uplift standards across large geographic areas by sharing expertise, developing policy commitments and audit processes, and the utilisation of best practice.
- *Efficiency and shared services:* The extent to which core teams and technical capacity has been assembled through a combined authority differs between places. This would be expected given that the scope of activity differs between places, as does the length of time that each authority has been established. Again, there will be a subtlety to assessing what has worked best looking forward. There are a range of approaches, with some areas having significant specialist in house capacity, while other areas have made “catalytic” appointments around specialist advice such as urban design. In some areas Mayoral Advisors have been appointed on an unpaid basis to assist with decision making.
- *Pooling of resources and knowledge*: Most of the case studies highlighted in this document have the pooling of resources across local authorities in partnership with the combined authority at their core. Agile management in the public and private sector, if based on collaboration can make the best use of the resources that are available and effectively compete for new resources.

Knowledge exchange is a fundamental activity which underpins the ability of partnerships to deliver in an environment where historically resources have been relatively constrained.

- *New partnerships for new circumstances:* The development of the combined authority model has enabled policy makers to look at the nature and structure of partnerships. A reoccurring feature of discussions with officials was the scaling up of the One Public Estate initiative to improve its leverage and visibility to central government. A further innovation has been the combined authorities' engagement with Registered Social Housing providers across local markets and local government geographies. These new rescaled housing partnerships increasingly reflect the reality that these agencies also now operate across borders, even if they originated from local authority stock transfers.

6. Conclusion

6.1 This report has detailed how combined authorities have identified their key priorities for housing and planning and worked collaboratively to achieve them. The combined authorities are in the process of gaining a substantial and varied experience of "what works" and this body of evidence and knowledge will feed into discussions about future resources and the extent to which central government will support the aspirations articulated by this new form of multi-local authority governance and delivery.

6.2 This report reflects the differences in approach, scope and scale of activity which in part reflects that combined authorities are at different stages in their evolution but also the freedoms which devolution offers in contrast to one size fits all policy. Combined authorities are relatively new and still evolving. They are reacting to and planning for challenges presented to local government in England flowing from the ten years of reductions in spending power combined with new challenges which are emerging from demographic and household change. The innovations and approaches created by the combined authorities provide valuable learning about how systems of governance and development are evolving.

6.3 There are many examples where collaboration has delivered or will deliver benefits for combined authorities and their constituent authorities and there is scope for more joint working and cross boundary approaches many of which derive from capitalising on the economies of scale created through a combined authority. As the programme of activity around housing and planning has matured, interesting projects have emerged which may be adapted by others over time. There is the potential for new methods of working to be evaluated and the experiences of successes and failures to be shared, allowing local policies and programmes to be adapted in a fast changing national and international environment.

From: Laura Gaffney [redacted]
Sent: 12 December 2022 11:17
To: Strategic Planning Consultations
Cc: [redacted]
Subject: Representations to Stafford Borough Council Preferred Options: Land off Castle Street, Eccleshall [LICH-DMS.FID204632]
Attachments: Representations to Stafford Borough Council- Land off Castle Street Eccleshall.pdf; Preferred-Options-Consultation-Response-Form Eccleshall.pdf

Dear Sir/Madam,

Please find attached our representations to the Stafford Borough Local Plan 2020-2040 Preferred Options Consultation, in relation to Land off Castle Street, Eccleshall submitted on behalf of our clients St Philips Land Ltd.

The submission comprises the following documents:

1. Stafford Borough Local Plan 2020-2040 Preferred Options Representations on behalf of St Philips; and
2. Preferred Options Consultation Response Form

I trust this submission is in good order, however, please do not hesitate to contact us regarding any queries. We would be pleased to meet to discuss our response in due course.

In addition, I would be grateful if you could please confirm receipt of this email and attached representations.

Kind Regards,

Laura Gaffney

Laura Gaffney
Planning Intern
[redacted]

lichfields.uk

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Celebrating 60 years

Stafford Borough Council Preferred Options Consultation Local Plan 2020-2040

Representations on behalf of St Philips Ltd

Land off Castle Street, Eccleshall

St Philips Ltd

December 2022

LICHFIELDS

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Appendices

Appendix 1 Tunbridge Wells Inspectors Report November 2022

Appendix 2 Inspectors letter to Solihull Council September 2022

1.0 Introduction

1.1 These representations to the Stafford Borough Local Plan 2020-2040 ("the Local Plan") Preferred Options Consultation ("the PO") have been prepared by Lichfields on behalf of St Philips Ltd ("St Philips").

1.2 We focus on the strategic matters that are contained within the PO consultation and relate specifically to St Philips site entitled Land off Castle Street, Eccleshall ("the Site").

1.3 St Philips seeks to work constructively with Stafford Borough Council ("the Council") as it progresses towards the submission and adoption of the Local Plan Review and trusts that the comments contained within this document will assist Officers in this regard.

Land off Castle Street, Eccleshall

1.4 A vision document (Appendix 1) has been submitted alongside these representations to support the proposals for a residential development at Land off Castle Street, Eccleshall. The site is located immediately adjacent to the settlement boundary of Eccleshall, which has been identified as a Tier 4 larger settlement in the PO settlement hierarchy. The site is sustainably positioned for residential development with services and facilities located nearby to the site. The nearest primary school is approximately 1km from the site, whilst secondary schools in Stone and Stafford are accessible by bus. A GP surgery and pharmacy are 200m and 130m from the site respectively. Retail facilities are located to the north of Eccleshall Village Centre, which is within walking distance of the site.

1.5 Public transport is easily accessible from the site, with bus stops located on Castle Street offering regular services to Stone, Stafford and Hanley. Stone and Stafford rail stations are within 12km of the site, providing frequent services to London, Manchester, Liverpool, and Birmingham.

1.6 To the south of the site is greenfield land controlled by St Philips which has been approved for the development of 37 new dwellings (Reference: 19/31613/OUT). Therefore, there exists the opportunity to bring forward the sites together to create a sustainable development on the edge of Eccleshall.

Plan-making to Date

1.7 The Council adopted 'The Plan for Stafford Borough- Part 1' and 'The Plan for Stafford Borough- Part 2' on 19th June 2014 and 31st January 2017 respectively. The Plan for Stafford Borough- Part 1 "*contains a vision, spatial principles and specific policies which will guide development across the Borough.*" The Plan for Stafford-Part 2 "*details settlement and Recognised Industrial Estate boundaries together with a policy protecting community / social facilities.*"

1.8 The Council is currently preparing the Stafford Borough Local Plan 2020-2040, which will replace the Plan for Stafford (Part 1 and 2). As per NPPF paragraph 33, "*Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national*

policy"[1]. The Local Plan Review is required to review, inter alia, the housing and employment needs of Stafford. The preparation of the new Stafford Borough Local Plan will guide the scale, location, and nature of new development in the Borough over the Plan period up to 2040.

1.9 Since July 2017, the Council has been undertaking ongoing evidence-gathering exercises including consultations on the 'Sustainability Appraisal Scoping report', 'The New Local Plan- Scoping the Issues' and the 'New Local Plan- Settlement Assessment' documents.

1.10 The Council has also carried out an 'Issues and Options Consultation' ("IOC") between 3rd February and 21st April 2020. The IOC considered a range of issues, including the amount of housing and employment land needed over the next 20 years and how this provision could be distributed. Other topics included, inter alia, the economy, transport, viability, climate change, housing, health and wellbeing and the environment.

1.11 The Council is now undertaking a consultation on the PO, which builds upon the responses received to the IOC. The PO considers proposed development allocations, the distribution throughout the borough and a range of draft policies on topics such as economic development, housing provision, the environment and transport.

Structure

1.12 These representations are structured around the topics set out in the PO consultation, these being:

- Vision and Objectives;
- Development Strategy and Climate Change Response;
- Meecebrook Garden Community;
- Site Allocation Policies;
- Economy Policies;
- Housing Policies;
- Design and Infrastructure Policies;
- Environment Policies;
- Connections;
- Evidence Base; and
- General Comments.

[1] Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

2.0 Areas of Response

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

2.1 St Philips supports the councils' objectives to achieve a prosperous and attractive borough with strong communities. Of the objectives listed, St Philips especially values the Council's aim "*to deliver sustainable economic and housing growth to provide income and jobs*."

2.2 To achieve this objective, St Philips urges the Council to consider further allocations at sustainable locations such as Eccleshall.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies) ~~Yes~~ / No

2.3 Draft Policy 1 (Development Strategy) sets out the total number of homes which will be delivered within the Stafford Borough in the period 2020-40. The Council has referenced evidence provided in the Stafford Borough Economic and Housing Development Needs Assessment (February 2020) ("the EHDNA") in establishing the Borough's housing needs. The EHDNA examined a range of economic growth scenarios and then considered whether any upwards adjustment should be applied to the locally assessed housing need identified through the standard method.

2.4 The housing requirement figures presented in the PO are based on Scenario D of the EHDNA. Scenario D states that the Borough's housing need equates to 435 new dwellings per annum ("dpa") if it is to supply the workforce needed to support the core employment growth forecast. This exceeds the minimum Local Housing Need ("LHN") of 391 dwellings per year (2022) (calculated in accordance with the standard methodology outlined in the Planning Practice Guidance). In addition to the Borough's own needs, draft Policy 1 (Development Strategy) allows for a total of 2,000 new homes to meet the unmet needs of Black Country Authorities. Whilst the Black Country Plan is no longer progressing, these acute unmet needs will still need to be addressed. Draft Policy 1, therefore, proposes that for the period 2020 to 2040 provision will be made for a total of 10,700 new homes (535 dpa).

2.5 St Philips supports the Council's decision to exceed the minimum Local Housing Need figure. Both the NPPF[2] and the Planning Practice Guidance (PPG)[3] are clear that the LHN

[2] Paragraph 61
[3] PPG ID: 2a-002

figure generated by the standard method is a minimum starting point (i.e. actual housing need may be higher than this figure). St Philips also welcomes the Council's contribution to the unmet needs of neighbouring Local Authorities in accordance with the NPPF.[4]

2.6 However, whilst St Philips is supportive of the Council exceeding the minimum LHN figure, it is our view that the Borough's needs would be best met through planning for economic growth Scenario E. Scenario E considers a regeneration scenario, including the job growth projected to occur at Stafford Station Gateway and the proposed garden community. Paragraph 10.90 of the EHDNA states:

2.7 *"Given the aspirations for growth across the Borough, including the strategic growth identified around a new Garden Community and Stafford Station Gateway, it will be important that the Borough identifies a level of future housing that does not act as a drag on future economic growth. Given the jobs growth aspirations for the Borough, planning for a housing requirement of 711 dpa (Regeneration scenario including PCU) is considered a realistic approach."*

2.8 St Philips, therefore, considers a housing requirement of 711 dpa to be the most sustainable for the Borough. This includes the application of a partial catch-up rate which ensures that previous unmet need is not overlooked. St Philips would encourage the Council to consider this to ensure that sufficient housing is delivered to support the Council's economic growth aspirations. The NPPF emphasises the importance *"on the need to support economic growth and productivity"* (Para 81) and is clear that planning policies should *"seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment"* (Para 82c). In essence, the NPPF recognises the implicit link between economic growth and housing need, and that economic growth should not be decoupled from housing growth. This approach would also support the provision of more affordable housing for the Borough.

Affordable Housing

2.9 The PPG[5] is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. In this context, it is noted that the EHDNA (Para 11.76) has found that:

2.10 *"It is clear that there is a significant affordable housing need in the Borough and at current likely delivery (notionally 30% reflecting current policy) the Council needs to give consideration to whether increasing planned housing provision could help to address a greater proportion of affordable housing needs."*

2.11 St Philips notes that the EHDNA (Para 11.68) indicates that the affordable housing need for the Borough is between 252 and 389 dpa depending on the growth scenario examined. This represents a significant proportion of the Borough's LHN. Even the lower affordable housing need figure of 252 dpa would represent 47% of the total planned new houses (535 dpa). Despite this identified need, the Council has stated that it does not consider there to be exceptional circumstances that justify increasing overall housing delivery to meet the affordable housing needs identified in the EHDNA.

[4] Paragraph 35a
[5] PPG ID: 2a-024

2.12 However, St Philips notes that the Sustainability Appraisal (SA) of the New Stafford Borough Local Plan (January 2020) ("The SA 2020") identified affordability as a challenge in some areas of the Borough (Para 7.60).

2.13 The Council's reliance on larger strategic sites such as Meecebrook and Stafford Station Gateway could further undermine the Borough's ability to provide a sufficient supply of affordable housing. St Philips notes the Stafford Borough Council Local Plan and CIL Viability Assessment (September 2022) ("The Viability Assessment") finds these proposals are marginally viable when assessed at a fully policy-compliant level of affordable housing.

2.14 In this context, Paragraph 62 of the NPPF is clear that:

2.15 *"…the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)".*

2.16 As such, St Philips recommends that the Council consider a housing requirement of 711 dpa. This would help to deliver more affordable housing and would be justified and necessary to address worsening affordability within the Borough. The shortage of affordable homes identified could be alleviated through the allocation of sites such as the Land off Castle Street, Eccleshall. Eccleshall is uniquely placed to accommodate this identified need. St Philips notes that draft Policy 23 proposes a 40% affordable housing requirement for major development at Eccleshall. Paragraph 9.10.11 of the SA (October 2022) further states:

"Eccleshall is notable as a higher order settlement where there is the potential to require a much higher rate of affordable housing (40%), but where there are no new local plan allocations (although the village has seen significant recent growth)."

2.17 On this basis, St Philips believes that the Council should reconsider its decision not to allocate any sites at Eccleshall. Eccleshalls' position in the Settlement Hierarchy would make it an ideal location to help alleviate issues of affordability within the Borough.

2.18 **Land Supply Buffer**

2.19 At present, the Council is proposing to make provision for 12,580 dwellings and 150 ha of employment land through allocations and commitments within the PO. In total, the proposed allocations equate to a c. 10% buffer against the housing requirement.

2.20 Paragraph 82 of the NPPF is clear that planning policies be:

2.21 *"flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances".*

2.22 In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Therefore, to achieve a housing requirement a Local Plan must release sufficient land or allow sufficient headroom so that there is an appropriate buffer within the overall planned supply.

2.23 At present, the PO's proposed growth strategy allows for a c.10% land supply buffer. However, St Philips notes that the proposed headroom would not fall within the range identified by other Councils and found sound at the examination as well as being explicitly endorsed by the Inspector:

- Chelmsford: 18% buffer[6]
- South Kesteven: 18% buffer[7]
- Harrogate: 25% buffer[8]
- South Oxfordshire: 27% buffer[9]
- Mansfield: 34% buffer[10]
- Guildford: 36% buffer[11]
- Chesterfield: 59% buffer[12]

2.24 As such, St Philips recommends that a c.20% headroom should be considered by the Council, which would be consistent with the headroom identified by other Councils. This would ensure that there is the flexibility to respond to unforeseen delays in delivering strategic sites such as Meecebrook and other unforeseen circumstances.

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements) ~~Yes~~ / No

2.25 St Philips welcomes that Eccleshall is no longer referred to as a 'Village' within the PO, as is the case within the current Local Plan. The PO proposes that Eccleshall is designated a Tier 4 larger settlement, ranked fourth in the settlement hierarchy. However, St Philips considers that Eccleshall's proposed position in the PO does not distinguish its potential for sustainable development from other Tier 4 settlements. The NPPF is clear that:

"all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;" (Para 11a)

2.26 In this regard, Eccleshall contains 1,541 dwellings[13], making it one of the larger settlements within the Borough. It is also one of the Borough's 3 main service centres, containing a

[6] Inspector's Report to Chelmsford City Council, paragraph 154. Available at: https://www.chelmsford.gov.uk/_resources/assets/inline/full/0/3951296.pdf
[7] Inspector's Report to South Kesteven District Council, paragraph 145. Available at: http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=25671
[8] Inspector's Report to Harrogate Borough Council, paragraph 180. Available at: https://democracy.harrogate.gov.uk/documents/s8649/05-Appendix1-InspectorsReport.pdf
[9] Inspector's Report to South Oxfordshire District Council, paragraph 44. Available at: https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2020/11/Inspectors-Report-November-2020.pdf
[10] Inspector's Report to Mansfield District Council, paragraph 159. Available at: https://www.mansfield.gov.uk/downloads/file/1473/mansfield-local-plan-inspector-s-report
[11] Inspector's Report to Guildford Borough Council, paragraph 42. Available at: https://www.guildford.gov.uk/media/29804/Appendix-1-The-Inspector-s-Report/pdf/Appendix_1_The_Inspectors_Report.pdf?m=637369059509370000
[12] Inspector's Report to Chesterfield Borough Council, paragraph 104. Available at: https://www.chesterfield.gov.uk/media/1270438/final-report-27-may-2020.pdf
[13] Stafford Borough Council Revised Settlement Assessment and Profiles Topic Paper (Preferred Options Stage). Available at: https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Revised-Settlement-Assessment-and-Profiles-Topic-Paper-Accessible.pdf

considerable number of facilities and services that would justify a higher position in the proposed Settlement Hierarchy.

2.27 On this basis, St Philips believes that the Council should consider whether to include a further tier that would distinguish Eccleshall from other Tier 4 settlements. When the Council consulted on the 'New Local Plan Settlement Assessment' in 2018, St Philips suggested that Eccleshall should be designated a 'Market Town'. St Philips, therefore, proposes that Eccleshall be elevated above Tier 4 in the settlement hierarchy, reflecting Eccleshall's greater potential as a location for sustainable growth.

2.28 It should also be noted that St Philips is promoting other sites within the Borough and have commented on this matter in each set of respective representations where necessary.

Policy 3. Development in the open countryside - general principles ~~Yes / No~~

2.29 St Philips does not wish to comment on draft Policy 3 as part of these representations.

Policy 4. Climate change development requirements Yes / ~~No~~

2.30 St Philips supports draft Policy 4 (Climate change development requirements). Paragraph 153 of the NPPF is clear that:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."

2.31 Stafford Borough Council declared a Climate emergency in 2019 and accordingly, St Philips supports draft Policy 4, which promotes the approach of Paragraph 153 of the NPPF.

Policy 5. Green Belt ~~Yes / No~~

2.32 St Philips does not wish to comment on draft Policy 5 (Green Belt) in relation to this site.

Policy 6. Neighbourhood plans ~~Yes / No~~

St Philips does not wish to comments on draft Policy 6 in relation to this site.

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which incudes a new railway station on the West Coast Main Line, and High quality transport routes.

Do you agree with the proposed new garden community? Yes / ~~No~~

2.33 St Philips welcomes the Council's decision to propose a new garden community. The proposal for a new garden settlement is in accordance with Paragraph 73 of the NPPF, which recognises that:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)."

2.34 However, whilst broadly supportive of the new garden community, St Philips has concerns that there is an over-reliance on Meecebrook to meet the housing needs of the Borough and its neighbouring Local Authorities. When only new housing allocations are considered, Meecebrook accounts for 54% of Stafford's allocated supply (refer to Table 2.1). St Philips is concerned that this represents an over-dependency upon one site. In this respect, St Philips further notes that the Viability Assessment (September 2022) identifies the following potential risks that could delay the delivery of Meecebrook:

"Meecebrook is constrained by the lack of clarity around landowner commitment and the unknown costs of infrastructure. It is important that landowners engage continuously in this process and further work is undertaken regarding infrastructure requirements. If landowners are not 'on board', or their financial expectations quantified, the delivery of this scheme is at risk."

2.35 Lichfields' 'Start to Finish (2016)' and subsequent second edition (2020) examines evidence on the speed and rate of delivery of housing on sites across England and Wales (excluding London). It has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; the emerging Mendip Local Plan; and the emerging Doncaster Local Plan).

2.36 A proposition regarding delivery rates for a proposed new settlement was recently considered by the Tunbridge Wells Local Plan Inspector in his report dated November 2022. The Inspector assessed the deliverability of the proposed allocation of Tudeley village and set out that;

31. Paragraph 73 of the Framework requires local planning authorities to make realistic assessments of likely delivery rates given the lead-in times for large scale sites. In this case, the Council confirms that no schemes of a similar size or complexity have been built in Tunbridge Wells or the surrounding area to draw comparisons from. Officers have therefore relied upon lead-in times and delivery rates provided by the site promoters.

32. It is intended that the Hadlow Estate will act as a 'master developer', bringing serviced land parcels to the market which will be offered to selected housebuilders. The transfer of land will be controlled and the Estate will appoint a 'town architect' to oversee quality. The details provided on architectural context, the importance of good design and the level of masterplanning work carried out thus far is extensive and of a high quality.

33. However, neither the Council nor the landowner has any prior experience of delivering a scheme of this size or complexity. No housebuilders are actively involved with the site either. When asked for reassurances about delivery at the hearings, the Council said that this model had been used successfully elsewhere and that provided the confidence it would deliver as expected. But the latest information shows that only 316 houses have been built on the comparative scheme since the approval of planning permission in 20138. Clearly all sites are different, as are the circumstances between Aberdeenshire and Tunbridge Wells. Nevertheless, the evidence only serves to highlight the concerns raised by several participants in the examination, including from the development industry, that the scheme will not deliver the number of homes envisaged by the Council.

34. The most up-to-date, independent evidence of deliverability on large sites before the examination is Start to Finish: Second Edition (Lichfields, 2020). It shows that the average time from validation of an outline planning application to the delivery of houses on large sites over 2,000 dwellings range from 5.0 to 8.4 years. In this case, the submitted Plan would need to be modified and consulted on before adoption, Supplementary Planning Documents would need to be produced, published for consultation and adopted, planning applications would have to be prepared and submitted, 8 Examination Document TWLP/093 7 important details regarding phasing and the deliverability of shared infrastructure would need resolving, along with agreements on complex planning obligations. Details of the bypass would also have to be finalised, tested, applied for and approved, in addition to the compulsory purchase of land before the wider site could come forward. When taking all these factors into account, I am not persuaded that the housing trajectory is realistic."

2.37 A copy of the Tunbridge Wells Inspectors Report November 2022 is included at Appendix 1.

2.38 Start to Finish establishes that for schemes of over 2,000 dwellings, the average time from the validation of the first planning application to the first dwelling being completed is 8.4 years (see Key Figures excerpt of the study, below). It further finds that the average build-out rate for developments of over 2000 dwellings is 160 dpa.

Figure 2.1 Housing Trajectory

	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
Past completions	614	506																		
Stafford North SDL			83	95	159	219	219	219	211	155	120	155	155	155	155	120	120	120	120	120
Stafford West SDL			162	118	150	150	250	250	250	202	150	47								
Stone SDL			55	55	36															
Large permissions			171	171	171	170	170	110	100											
Small permissions			64	64	64															
C2			12	12	12	12	12	34												
Small site windfall						50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Meecebrook											300	300	300	300	300	300	300	300	300	300
Stafford Station Gateway									70	70	70	70	70	70	70	70	70	70	100	100
Other site allocations (policy 12)						86	5	58	210	211	88	104	105	18						

2.39 Figure 2.1 above shows that, starting from the year 2030, the Council has projected that Meecebrook will deliver 300 homes a year. This assertion is made on the assumption that the date of validation is 2024/5 (the monitoring year of adoption of the plan). The findings of the Start to Finish report suggest that this timescale may prove challenging to deliver, particularly considering the report found that Lead-in times jumped after the 2008 financial crash. In this respect, given that the UK economy is widely expected to enter a recession[14], it is considered critical that the Council plans for potential delays to strategic sites.

2.40 The importance of the issue of delivery rates has also recently been considered by the Solihull Local Plan Inspector in assessing the proposed delivery of development and associated housing trajectory for the NEC/ UK Central Hub site. That proposed development forms a significant and critical strategic allocation in the Solihull Local Plan Review and is equally served by existing infrastructure (railway station/ existing highway network and trunk road junctions).

2.41 The Inspector assessed the proposed trajectory put forward by the Council in his letter dated 5 September 2022 and advised that;

"In terms of timescales for bringing forward development on the NEC site, the latest information provided (documents SMBC016 and SMBC017) sets out a timetable which would ultimately see completions taking place in October 2027. It is ambitious and would rely on progress moving smoothly from one stage to another. With a scheme of this size and nature, there is clearly potential at least for some slippage if issues arise. Given that the proposal is not typical of residential developments in Solihull and relies on an innovative approach, the potential for issues to arise affecting progress is increased. We note that the NEC Masterplan is yet to be finalised and published and it was confirmed at the hearing session on 8 July 2022 that the launch of the competitive tender process has now been put back by two months. There would already appear to be some slippage in the programme produced within the past few months. It is of note that as the NEC site is

[14] Bank of England expects UK to fall into longest ever recession. Available at: Bank of England expects UK to fall into longest ever recession - BBC News

previously developed land, not within the Green Belt, there would seem to have been no policy constraints in principle preventing a scheme coming forward to date. 17.

Redevelopment of the NEC site for housing is in principle an appropriate and justified element of the Local Plan. It would utilise previously developed land and form a key element in wider proposals for the UK Central Hub. We consider that the proposal should remain in the Local Plan and indeed be strengthened by the addition of a specific policy along the lines of the suggested Policy UK3. This would help to promote its redevelopment and provide a clear policy framework to do so. However, taking into account the above assessment, we have significant doubts that the site will deliver housing on the scale envisaged up to 2030/31 and in the plan period as a whole. 18."

2.42 The Inspectors letter goes on to conclude;

"In order to limit the risk associated with reliance on delivery the NEC site, the housing trajectory should reduce estimated completions to a figure in the order of 500 dwellings for the latter part of the plan period from 2031/32 onwards. This would be broadly in line with the trajectory for site UK1. The policy associated with the allocation could still refer to the potential for a higher number of dwellings and there would be no policy restriction on the amount of housing development that could come forward up to this higher number."

2.43 A copy of the Inspectors' letter dated 5 September 2022 is attached as Appendix 2.

2.44 In regard to the above, Paragraph 73b of the NPPF requires that Local Authorities should:

"make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)"

2.45 If the scheme was delivered at a rate more in line with the research presented in 'Start to Finish', the Borough may struggle to meet the needs of the Black Country. This could compound the acute unmet housing need within the GBBCHMA. Paragraph 61 of the NPPF requires that:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

2.46 Although the Borough is a single housing market area, it forms part of a broader functional area with the Local Authorities to the North and Birmingham to the South. Considering the scale of the challenge presented by the unmet needs of the GBBCHMA, St Philips considers that it is important that the Borough is able to assist neighbouring Local Authorities. Whilst the Black Country Plan is no longer progressing, the separate authorities will still require assistance. St Philips believes that this can be supported through the allocation of more small and medium sites. Paragraph 69 of the NPPF is clear that:

"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."

2.47 Risks to proposed delivery timescales highlight the need for the Council to ensure that housing allocations are sufficiently diverse. Smaller and medium sites can be delivered

quickly and represent an opportunity to deliver housing to ensure that the needs of neighbouring local authorities are met. Therefore, whilst St Philips is highly supportive of the Council's decision to deliver a new garden community, St Philips would suggest that the Council should diversify its allocations to ensure that there is not an over-reliance upon one site.

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations. Do you agree with the proposed allocations?

Do you agree with the proposed allocations? ~~Yes~~ / No

Sustainability of Eccleshall

2.48 Whilst broadly supportive of the Council's allocations, St Philips has reservations regarding the decision to allocate no sites within this plan period to Eccleshall. The PO identifies Eccleshall as a Tier 4 larger settlement within the Settlement Hierarchy. However, as discussed above, it is also designated as a Local Centre within the hierarchy of centres. In this context, the SA (October 2022) recognises that *"the lack of any proposed allocations at Eccleshall is of note, as the village benefits from a strong local offer"* (Paragraph 9.2.2). Eccleshall is served by regular bus services running to Stafford and Stone and contains a range of local facilities. St Philips is therefore concerned that by not allocating any sites at Eccleshall, the Council is potentially constraining the settlement's economic growth.

2.49 The NPPF emphasises importance *"on the need to support economic growth and productivity"* (Para 81). Allocations at Eccleshall could support local services, whilst also ensuring development is directed to one of the most sustainable settlements within the Borough. St Philips, therefore, considers that the PO's proposed allocation of zero dwellings at Eccleshall does not reflect its position as one of the Borough's most sustainable locations.

School Capacity

2.50 The Site is evaluated within the Site Assessment Profiles (Preferred Options Stage) ("The Site Assessment"). The Site Assessment states that the site was rejected on the basis that *"education capacity constraints are unlikely to be able to be resolved"* (Page 69). The SA (October 2022) comments the following:

"a primary driver of the decision not to direct any new allocations to Eccleshall was the lack of available capacity at Sir Graham Balfour high school in Stafford." (Para 9.6.7)

2.51 However, St Philips believes that the proposed development of 30 houses at the Land off Castle Street, Eccleshall would have a negligible impact on school capacity within Eccleshall. According to data available on Gov.uk, Sir Graham Balfour High School has a current capacity of 1042 pupils. However, as of November 2022, there are 954 pupils attending the school. This suggests that the High school is currently at 92% capacity.

Similarly, as of the 24th of November 2022, Bishop Lonsdale CoE Primary Academy is currently attended by 239 pupils but has capacity for 330.

2.52 Staffordshire County Council sets out Staffordshire's Education Infrastructure Contributions Policy.[15] Pupil product ratios (PPR), per dwelling, per year group have been published for the different areas of Staffordshire. When affordable housing is discounted, the development would generate a total number of 3.78 primary pupils and 3.24 secondary pupils.

2.53 On this basis, St Philips considers that the proposed development of the Land off Castle Street, Eccleshall would not present an insurmountable challenge to the capacity of Sir Graham Balfour High School and would comply with paragraph 95 of the NPPF which states:

"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education."

2.54 Furthermore, St Philips has secured permission to develop the land directly to the south of the Land off Castle Street, Eccleshall. In regard to this, St Philips agreed developer contributions to expand Bishop Lonsdale CoE primary school and a secondary education contribution towards a proposed new secondary school in Stafford on the Land north of Beaconside (Reference: 19/31613/OUT). Therefore, St Philips believes that any education capacity constraints can be overcome through negotiated developer contributions.

Heritage

2.55 Heritage was also identified as a constraint, with the Site Assessment stating *"heritage concerns are unlikely to be able to be suitably mitigated for"*. Whilst the Historic Environment Site Assessment Stage 1 Report ("The Historic Environment Assessment") assesses the Land off Castle Street, Eccleshall as a 'High Sensitivity' site, it does outline potential mitigation measures that could be taken to address these concerns:

"…any planning application be accompanied by a detailed heritage impact assessment. This would need to be supported by photomontages illustrating the predicted views from both the Castle and Castle Lodge. Mitigation measures including a trial trench evaluation and or/ geophysical survey are also recommended in order to address the potential for direct impacts upon any archaeological remains that may be present. Given the proximity of the site to the settlement remains that are recorded to the south, a pre-determination evaluation may be considered appropriate in this instance."

2.56 It should be noted that Eccleshall Castle and the historic core of the town are well-screened from the site by woodland, trees, and existing modern development. Furthermore, as set out within the Vision Document, the development will be designed to preserve the character and appearance of the nearby Conservation Area. The development of the site would make a positive contribution to the local character of the area in accordance with paragraph 190c of the NPPF. St Philips, therefore, considers that impacts on heritage from the development of the site could be mitigated as set out above.

[15] Staffordshire Education Infrastructure Contributions Policy - Staffordshire County Council

The Land off Castle Street, Eccleshall

2.57 As set out within the Vision Document submitted alongside these representations, the Site presents the opportunity to deliver a sustainable development of approximately 30 dwellings, including up to 12 affordable homes. As stated, to the south of the site is greenfield land controlled by St Philips which has been approved for the development of 37 new dwellings (Reference: 19/31613/OUT). If the Land off Castle Street, Eccleshall was to be allocated, the opportunity is presented to bring forwards these sites together to create a sustainable development on the edge of Eccleshall.

2.58 The concept masterplan envisages a high-quality development, which is responsive to the Sites context. In this regard, the Vision Document sets out that the development proposals would include:

1 The provision of 30 high-quality new dwellings, including up to 12 affordable homes;

2 The retention of existing landscape assets and new parkland which offers space for recreation for residents of the development and the wider community; and

3 Informal pedestrian routes throughout the site, encouraging healthy life choices.

2.59 St Philips, therefore, urges the Council to consider allocating sites at Eccleshall. Sites such as the Land off Castle Street, Eccleshall offer the opportunity to address the issues raised within these representations and deliver sustainable, high-quality housing for the Borough.

Economy Policies

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies? ~~Yes / No~~

2.60 St Philips do not wish to comment on draft Policies 16, 17 and 18 as part of these representations.

Housing Policies

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy? ~~Yes / No~~

2.61 St Philips does not wish to comment on draft Policy 23 as part of these representations.

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy? ~~Yes / No~~

2.62 St Philips does not wish to comment on draft Policy 30 as part of these representations.

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling. The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies? ~~Yes / No~~

2.63 St Philips does not wish to comment on draft policies 24, 26, 27, 28, 29, 21, 31, 32 and 33 as part of these representations.

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy. The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies? ~~Yes / No~~

2.64 St Philips does not wish to comment on draft policies 34, 25, 36, 37, 38, 39 and 40 as part of these representations.

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality. The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies? ~~Yes / No~~

2.65 St Philips does not wish to comment on draft policies 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51 as part of these representations.

Connections

Q13. The connections policies chapter contains policies on transport and parking standards. The relevant policies are: 52 and 53

Do you agree with these policies? ~~Yes / No~~

2.66 St Philips does not wish to comment on draft policies 52 and 53 as part of these representations.

Evidence Base

Q14. Have we considered all relevant studies and reports as part of our local plan? ~~Yes / No~~

2.67 St Philips does not wish to comment on whether the Council has considered all relevant studies as part of these representations.

Q15. Do you think there is any further evidence required? ~~Yes / No~~

2.68 St Philips does not wish to comment on whether further evidence is required as part of these representations.

General Comments

2.69 To conclude, whilst St Philips supports the Council's decision to exceed the LHN figure, it is our view that the Council should plan for growth scenario E of the EHDNA and apply a partial catch-up rate. This would ensure that a sufficient number of houses are delivered for the Borough whilst also providing necessary affordable housing.

2.70 Further allocations of small and medium sites would also prevent an over-reliance upon larger strategic sites such as Meecebrook, and ensure the Council is able to assist neighbouring local authorities with their unmet needs. The Land off Castle Street, Eccleshall offers the opportunity to address these issues through the allocation of a sustainable, deliverable site.

Appendix 1 Tunbridge Wells Inspectors Report November 2022

The Planning Inspectorate

Examination of the Tunbridge Wells Borough Local Plan: Initial Findings

[redacted]

The Development Strategy – Policy STR1

1. The starting point for considering the soundness of the Local Plan is the National Planning Policy Framework ('the Framework'). Paragraph 35 states that Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

2. Where the Green Belt is concerned, paragraph 137 of the Framework states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Once established, boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of Plans.

3. Around 22% of Tunbridge Wells Borough is within the Metropolitan Green Belt. Broadly speaking, the Green Belt wraps around the main urban area of Royal Tunbridge Wells and extends up to the edge of Paddock Wood. Beyond the Green Belt the remainder of the borough is predominantly rural and almost entirely within the High Weald AONB.

4. Seeking to meet housing needs in the more sustainable parts of the borough is therefore likely to require the use of some Green Belt land. In reaching this conclusion it is evident that the Council has looked at maximising densities in urban areas and discussed the possibility of neighbouring areas accommodating additional housing growth, consistent with paragraph 141 of the Framework. In principle, the strategy is reasonable and appropriate.

5. Having decided at a strategic level to review the Green Belt boundary, the Council has then considered the likely harm that would be caused and the extent to which any impacts could be reduced. This has been done through a three-staged assessment process. The Green Belt Study Stage 3 is the final assessment in the series and is intended to provide a "more refined" consideration of potential harm by looking at individual sites[1]. This is a logical and sound way of considering where growth should take place. It recognises that different sites will have different impacts on the Green Belt and the purposes of including land within it.

[1] Core Document CD3.141

6. However, the Green Belt Study Stage 3 only considers sites allocated for development *in* the submitted Plan - i.e. sites which the Council has already determined are sound and concluded that exceptional circumstances exist to remove them from the Green Belt. If it is accepted that Green Belt land will be required, then why did the Council not carry out a comparative assessment of reasonable alternatives at Stage 3 in order to avoid, or at least minimise, harmful impacts where possible? This is especially relevant when the two largest allocations in the Plan (Tudeley Village and Paddock Wood) were found to cause "high" levels of harm to the Green Belt.

7. Carrying out a comparative assessment may have resulted in the same sites allocated for development. Just because a site would have a "low" level of harm to the Green Belt does not automatically justify its allocation in the Plan. Other factors, such as the need to promote sustainable patterns of development are also clearly relevant. However, national planning policy is clear that the Government attaches great importance to Green Belts and that boundaries should only be amended in <u>exceptional circumstances</u>. Reaching that conclusion should be based on a thorough assessment process which includes an understanding of the likely impacts when compared with other site options, especially where the magnitude of harm from the two largest allocations is "high".

8. Further work is therefore necessary before a conclusion can be reached that exceptional circumstances exist to release the relevant site allocations from the Green Belt.

The Strategy for Tudeley Village – Policy STR/SS3

9. The Plan seeks to take around 170 hectares of land out of the Green Belt to accommodate a new settlement of up to 2,800 houses at Tudeley. In principle, a strategy which seeks to meet housing needs through large scale, strategic allocations is perfectly reasonable. Paragraph 73 of the Framework recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns.

10. However, national planning policy also requires such developments to be "well located" and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Paragraph 73 states that:

> "*Working with the support of local communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.*"

11. In considering whether the allocation is consistent with this requirement, three main issues have been identified. They are: the location and accessibility of the site, whether or not the necessary infrastructure can be provided and the deliverability of the site in the manner envisaged.

Location and Accessibility

12. The new settlement would be approximately 2 miles east of Tonbridge and around 2 miles west of Paddock Wood. At present there are no shops or services nearby. A bus route runs through Tudeley travelling between Tonbridge and Paddock Wood but is limited to typical working hours Monday-Friday with a more limited service on a weekend.

13. Pedestrian and cycle links would be provided as part of the scheme and there is a commitment to include a new dedicated route into Tonbridge. Although this could be secured by policies in the Plan, the distances involved to the centre of Tonbridge and back would not be conducive to walking. Likewise, it would be unrealistic to expect a significant number of people to cycle into Tonbridge, especially during the darker, winter months or during periods of inclement weather. The *Local Cycling and Walking Infrastructure Plan: Phase 2*[2] identifies some of the issues, which include isolation and a lack of passive surveillance due to the remoteness of a route in this location.

14. Cycling and pedestrian links would also extend beyond the plan area. In order to be effective, they would therefore need to be agreed with Tonbridge & Malling Borough Council as part of a wider strategy. Paragraph 106 of the Framework requires planning policies to be prepared with the active involvement of local highways authorities and neighbouring councils so that strategies and investments for supporting sustainable transport and development can be aligned. The neighbouring authority confirms that promoting walking and cycling would require a joined-up approach with projects in their borough, which are still at an early stage.

15. The railway line between Tonbridge and Paddock Wood divides the site yet no new station is proposed. This could have provided an opportunity to access higher order services easily and quickly by public transport and reduce the reliance on private car journeys. In the absence of any rail links, potential future residents would be reliant on buses as an alternative to the car. Again, this could be a policy requirement in the Plan. However, at the hearing sessions it was confirmed that discussions are still ongoing with bus providers and Kent County Council. Even if private services were provided, it would still require some collaboration with Tonbridge & Malling Borough Council in order to be effective. It therefore remains unclear precisely what would be feasible and whether it would offer a genuine alternative to the private car.

16. A key part of the justification for the allocation is the range of facilities that would be provided on-site and the subsequent reduction in the need to travel. The supporting text suggests that up to 10,000 square meters of commercial floorspace will be provided to maximise the "internalisation" of trips.

[2] Core Document 3.115b(i)

17. The scale of commercial floorspace is justified by comparison to settlements such as Cranbrook and Pembury. But Cranbrook is a historic market town which serves a much wider rural area, including other villages such as Sissinghurst. It is categorised by the Council's own assessment[3] as a Group A settlement, second only to the main urban area of Royal Tunbridge Wells and Southborough. It is therefore materially different to Tudeley.

18. An objective analysis of likely future needs is provided in the *Tunbridge Wells Commercial Leisure & Town Centre Uses Study Update*[4]. It predicts, based on the number of houses proposed, capacity for around 1,900 square metres of convenience retail floorspace and approximately 1,000 square metres of comparison goods floorspace. Paragraph 8.11 clarifies that *"Given the likely scale of spending forecast, we would suggest that each of Tudeley Village and Paddock Wood could facilitate a limited number of small retail units as part of 2-3 local centres designed to support new residents' day-to-day shopping needs."*

19. The figures provided are by no means an upper limit or 'cap'. Indeed, the Study recognises that additional floorspace would have the potential to further support residents. However, this would only be where it can be demonstrated that the proposals would not detract from the vitality and viability of surrounding centres, which include Paddock Wood and Tonbridge. The Council's own evidence therefore questions such high-level, aspirational assumptions about the scale of commercial floorspace that could be supported, and the subsequent internalisation of trips that would result.

20. The implications of increased traffic from the site have been considered through various documents.[5] The 'Addendum 2' report is the latest and considers impacts by assessing the "reference case" (with only committed developments), a Local Plan scenario with no changes to the highway network, a Local Plan scenario with highways mitigation and finally a Local Plan scenario with highways mitigation and a 10% modal shift.

21. In summary, the evidence demonstrates that existing traffic volumes and limited capacity cause congestion in Tonbridge town centre. Local Plan growth will add traffic to these junctions, causing negative impacts on their operation. This substantiates the concerns raised by Tonbridge & Malling Borough Council and local residents.

22. The issue with the soundness of the Plan is that, unlike some other junctions (which can be altered to mitigate harmful impacts), the space to provide any mitigation in Tonbridge town centre is limited. Suggested ways forward include traffic management and encouraging "significant modal shift". However, as identified above, details of the public transport improvements that could be provided are still at an early stage and it is not possible to establish whether they would genuinely achieve any significant modal shift.

[3] Settlement Role and Function Study Update
[4] Core Document CD3.86a
[5] Core Document 3.48, Core Document 3.114, Examination Document PS_023 and Examination Document PS_024

23. In summary therefore, at present there is insufficient evidence to suggest that the scheme will achieve the levels of internalisation and changes in modal shift necessary to adequately mitigate against the likely increase in car travel. Given the existing constraints and congestion in Tonbridge town centre, the cumulative impacts of the scale and location of development would be severe. It has not been adequately demonstrated that the impacts can be cost effectively mitigated to an acceptable degree.

Infrastructure – The Five Oak Green Bypass

24. In order to facilitate the new settlement a bypass of Five Oak Green is required. This is because of the projected increase in traffic, the existing highway constraints in the village and a past record of accidents in the area.[6] The new road would run to the south of Five Oak Green from the B2017 to the A228 near Paddock Wood.

25. Assessing the detailed design and suitability of the road would be part of a future planning application process. Nevertheless, it is still necessary to consider the suitability and likelihood of the bypass coming forward at the Local Plan stage, because without it, the allocation would be undeliverable, and thus ineffective.

26. From discussions at the hearings there are three main concerns with this part of the Plan. Firstly, the bypass is to be accessed from a new junction almost directly opposite Capel Primary School. At the hearings the Council confirmed that no detailed consideration had yet been given to the appropriateness of this location having regard to issues such as air quality, road and pedestrian safety and noise. They are all important considerations.

27. Secondly, only limited information has been provided to consider the visual impact of a new road in this location. This is especially important when considering the topography of the area, the need for a crossing over the Alder Stream, heritage and the proximity of the road to the AONB. The *AONB Setting Analysis Report*[7] found that the high ground to the south of Tudeley contributes most to the setting of the AONB because it has the highest intervisibility and forms a transition from the lower ground further north. Significant engineering works, significant increases in traffic volumes, light and noise are all identified as factors which may harm the setting of the AONB. All are probable as part of the development of a new bypass. Without proper consideration of these issues, it is therefore not possible to determine the likely suitability of the scheme. It would also require additional development in the Green Belt and in areas at risk of flooding.

28. Thirdly, there remains uncertainty about the funding, phasing and deliverability of the road. At the hearings, it was suggested by the Council that changes are required to the submitted Plan because only the Tudeley allocation needs to contribute towards it. But without a bypass, presumably some residents of the nearly 3,500 new homes proposed at Paddock Wood will also pass through Five Oak Green?

[6] Tunbridge Wells Borough Council Matter 6 Hearing Statement
[7] Core Document CD3.95a

29. The hearings also flagged uncertainty about when the by-pass would need to be built and what implications this would have on safety within the village. Finally, and crucially, building the road would require land in multiple ownerships. Although the Council is optimistic about the use of compulsory purchase orders, this process adds to the complexity, cost, timescales and general uncertainty of its deliverability.

Deliverability

30. One of the Council's reasons for concluding that exceptional circumstances exist is the significant contribution that the allocation would make towards meeting housing needs. The housing trajectory predicts that around 2,100 dwellings will be delivered over the plan period, with 150 new homes completed each year from 2025 onwards.

31. Paragraph 73 of the Framework requires local planning authorities to make realistic assessments of likely delivery rates given the lead-in times for large scale sites. In this case, the Council confirms that no schemes of a similar size or complexity have been built in Tunbridge Wells or the surrounding area to draw comparisons from. Officers have therefore relied upon lead-in times and delivery rates provided by the site promoters.

32. It is intended that the Hadlow Estate will act as a 'master developer', bringing serviced land parcels to the market which will be offered to selected housebuilders. The transfer of land will be controlled and the Estate will appoint a 'town architect' to oversee quality. The details provided on architectural context, the importance of good design and the level of masterplanning work carried out thus far is extensive and of a high quality.

33. However, neither the Council nor the landowner has any prior experience of delivering a scheme of this size or complexity. No housebuilders are actively involved with the site either. When asked for reassurances about delivery at the hearings, the Council said that this model had been used successfully elsewhere and that provided the confidence it would deliver as expected. But the latest information shows that only 316 houses have been built on the comparative scheme since the approval of planning permission in 2013[8]. Clearly all sites are different, as are the circumstances between Aberdeenshire and Tunbridge Wells. Nevertheless, the evidence only serves to highlight the concerns raised by several participants in the examination, including from the development industry, that the scheme will not deliver the number of homes envisaged by the Council.

34. The most up-to-date, independent evidence of deliverability on large sites before the examination is *Start to Finish: Second Edition* (Lichfields, 2020). It shows that the average time from validation of an outline planning application to the delivery of houses on large sites over 2,000 dwellings range from 5.0 to 8.4 years. In this case, the submitted Plan would need to be modified and consulted on before adoption, Supplementary Planning Documents would need to be produced, published for consultation and adopted, planning applications would have to be prepared and submitted,

[8] Examination Document TWLP/093

important details regarding phasing and the deliverability of shared infrastructure would need resolving, along with agreements on complex planning obligations. Details of the bypass would also have to be finalised, tested, applied for and approved, in addition to the compulsory purchase of land before the wider site could come forward. When taking all these factors into account, I am not persuaded that the housing trajectory is realistic.

35. One consequence of a slower delivery rate is the ability of the site to provide the necessary infrastructure. For example, the Council confirms that the viability assessment supporting the Plan[9] is based on the proposed housing trajectory. When considering that several of the options tested show Tudeley Village in deficit, is it likely that a policy-compliant scheme of the type envisaged can actually be achieved? As the PPG advises[10], viability assessments should not compromise sustainable development, but should be used to ensure that policies are realistic and that the cumulative cost of relevant policies do not undermine the deliverability of the plan.

Conclusion

36. The principle of seeking to help meet housing needs through a high-quality, mixed-use new settlement is a reasonable and positive approach to take. Officers have also clearly worked hard in bringing relevant stakeholders together through the Strategic Sites Working Group. However, at this stage there remain significant and fundamental unanswered questions regarding the accessibility of the site by sustainable modes of transport, the ability to successfully mitigate against serious impacts on the highway network, the suitability and deliverability of the Five Oak Green bypass and the ability of the site to deliver housing at the rate and scale envisaged by the Plan. For reasons discussed above, the decision to allocate the site was also made without the benefit of a comparative assessment of Green Belt impacts on alternative potential development sites.

37. It is clearly not necessary to have all the details of a site allocation agreed and resolved at the local plan stage. Sufficient safeguards can be put in place by development management policies. But the issues raised above go to the heart of whether the site and strategy for Tudeley Village is justified and effective. National planning policy is also clear that the Government attaches great importance to the Green Belt, the boundaries of which should only be altered in exceptional circumstances. When considering the level of acknowledged harm to the Green Belt that would occur, combined with the significance of the issues raised, I find that exceptional circumstances have not been demonstrated to justify removing the site from the Green Belt.

38. The implications of this conclusion and my recommendations for taking the examination forward are discussed in due course.

[9] Core Documents 3.65a-3.65a(v)
[10] Paragraph: 002 Reference ID: 10-002-20190509

The Strategy for Paddock Wood and East Capel – Policy STR/SS1

39. The significant expansion of Paddock Wood is proposed by Policy STR/SS1. In total, sites sufficient to provide around 3,500 houses and roughly 11 hectares of employment land are allocated. The majority of new housing would be to the east and west of the town, with employment to the north.

Strategy and Implementation

40. We discussed at the hearings the need for several main modifications to make it clear what is proposed, where and when at Paddock Wood. These changes are needed for the effectiveness of the Plan and to remove the reliance on supplementary planning documents.

41. Another soundness issue is how the Council will ensure that development comes forward in a comprehensive manner, thus ensuring that the vision for a strategically and holistically planned expansion to the town is realised[11]. As submitted, there is insufficient detail on how the parcels will be delivered. The Plan must be clear on how it will tie the component parts together in order to be effective in achieving the stated aims and objectives.

42. One way of making the Plan sound might be to allocate each parcel for development, set out parameters for the scale, type and mix of uses permitted and then differentiate between the necessary on-site and shared infrastructure. The policy for each parcel could then include a requirement for phasing and infrastructure delivery, in addition to a requirement to accord with a town-wide framework masterplan (or other such document). This would allow individual schemes to progress, whilst ensuring a common objective on shared infrastructure. As part of any re-drafted policy, it will still be necessary to prevent piecemeal development and ensure that developers continue to work collaboratively, especially where connection between sites is required (such as across the railway line).

Education Infrastructure

43. It is my understanding that additional housing in the short-term will require the expansion of Mascalls Academy. Thereafter, it is intended that needs would be served by the Academy *and* a new secondary school at Tudeley Village. However, for the reasons given above, the scale of Green Belt land proposed for release at Tudeley is not justified. What, therefore, are the consequences for growth in Paddock Wood?

44. The *Strategic Sites Masterplanning and Infrastructure Study* seeks to address this scenario in paragraph 6.79. It states that the costs would be "*…allocated as a wider contribution for KCC to distribute across neighbouring schools for targeted expansion…"*. But where are the neighbouring secondary schools and what scope do they have for expansion? Would it continue to be an appropriate strategy to significantly expand Paddock Wood if it meant that school children and parents would have to travel significantly further afield to access secondary education?

[11] Submission Version Local Plan paragraph 5.196

45. In the event that Tudeley Village *was* justified, then another issue to consider is the Five Oak Green bypass. The Council has sought a change to the Plan to delete the requirement for development at Paddock Wood to contribute towards it. However, without the bypass, presumably children and their parents would have to travel through Five Oak Green to reach the new school (which is required, in part, because of the growth at Paddock Wood). Occupants of the new housing would also presumably drive to Tonbridge at times, and the proposed leisure centre would attract Tudeley residents from the other direction? If highway safety concerns necessitate a bypass, then presumably the scale and location of growth in Paddock Wood is also part of the justification? Further clarification is required.

Flooding and Flood Risk

46. Paragraph 161 of the Framework requires all Plans to apply a sequential, risk-based approach to the location of development. Paragraph 162 states that:

> *"The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding*."

47. I agree with the Council that where a large parcel of land contains different flood zones (such as land west of Paddock Wood), it does not automatically follow that the entire parcel should be discounted because one part is subject to flooding. A flood risk assessment would be able to adequately direct development away from the areas at the highest risk. That assessment is contained in the *Strategic Sites Masterplanning and Infrastructure Study*[12] and associated flood modelling. It considered an option (Option 3) where all residential development is removed from Flood Zones 2 and 3.

48. Option 3 was discounted because it represented an 'extreme' application of the sequential test and would impact on viability (it would result in around 610 fewer homes). However, national planning policy is clear that development should not be allocated or permitted if there are reasonably available sites appropriate for the development at a lower risk of flooding. The PPG advises that avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features.[13]

49. Similarly, land proposed for development in the northern parcel is almost entirely within Flood Zones 2 and 3. Given that the employment allocations are not linked to other parcels (i.e. they are coming forward in isolation by separate developers) what is the justification for their redevelopment? The size and scale of land parcels allocated around the town shows that development could take place in areas at lower risk, if required. Insufficient information has therefore been provided to justify their inclusion in the Plan.

[12] Core Document CD3.66
[13] Paragraph: 023 Reference ID: 7-023-20220825

50. The reasons for allocating development in areas at risk of flooding are viability grounds and the improvements that could be achieved to existing parts of the town. However, the sequential test is an absolute test. Framework paragraph 162 is clear that development should not be allocated if there are reasonably available sites appropriate for the proposed uses in areas with a lower risk of flooding. In this case, the masterplanning work has shown that the western parcel could be brought forward in a way that avoids placing new housing in areas at risk. This is synonymous with the aims and objectives of the sequential test.

51. Furthermore, the issues of flooding around Paddock Wood are described as being linked to the railway line and the capacity of flow routes underneath it. When flow rates exceed the capacity, water accumulates and travels eastwards into the town centre where it meets other surface water and results in widespread flooding. No persuasive information has been provided to suggest that proportionate improvement measures, such as flood water storage and improving the maintenance of existing culverts could not be achieved as part of an alternative scheme with housing in Flood Zone 1.

Conclusion

52. Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth[14]. However, the strategy for the town needs revisiting to set out clearly what is proposed on each parcel, both in terms of the scale and mix of uses and any necessary infrastructure provision. In addition, the location of new housing, community and employment uses in areas at higher risk of flooding is not justified. Comprehensive main modifications will therefore be required to the submitted Plan in order to make it sound. As with my conclusions on the Tudeley Village allocation, the implications for the examination moving forward are discussed below.

The Strategy for Royal Tunbridge Wells – Policy STR/RTW1

53. We discussed the need for several main modifications to sites and policies throughout the hearing sessions. The following does not list every change necessary, but instead focuses on those issues which were not resolved or where further information has since been provided.

Former Cinema Site – Policy AL/RTW1

54. This is a prominent town centre site which has a lengthy and detailed planning history. Despite benefitting from planning permission for a mixed-use development for some years, it is yet to come forward.

55. The latest proposals for the site include extra care and/or retirement housing which have materialised after the Plan was submitted. Although some representors have questioned the contribution that such uses would make to

[14] Submission Version Local Plan, paragraph 4.44

the vibrancy of the town centre, I see no reason why extra care and/or retirement housing would be inappropriate as part of a mixed-use scheme which included some active ground floor uses. Paragraph 86(f) of the Framework specifically requires planning policies to recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites. The site has been vacant for a long time and its redevelopment should be supported and encouraged by the Plan.

56. In order to make the Plan sound, greater flexibility should therefore be provided by a re-drafted policy which supports the principle of a broader range of town centre uses. A re-drafted policy could also emphasise the importance of the regeneration of the site to the town and requirements for a sensitive, high-quality design.

Land at Colebrook House

57. The submitted Plan seeks to remove land at Colebrooke House from the Green Belt but does not allocate it for any specific use. Paragraph 4.127 of the Plan states that the site is safeguarded for future economic development and will only come forward following a Local Plan update. Following the hearings, the Council's position has changed. Examination Document TWLP/091 (dated August 2022) suggests that the site should remain in the Green Belt.

58. Paragraph 143 of the Framework does allow for the safeguarding of land between the urban area and the Green Belt in order to meet longer-term development needs. However, this is only 'where necessary' and relates to longer-term needs stretching 'well beyond' the plan period.

59. In this case, the Council has only recently granted planning permission for over 70,000 square metres of commercial floorspace on the adjacent site at Longfield Road. The net developable area (13.4 hectares) almost meets the need for employment land over the whole plan period alone (14 hectares). It is not clear when (during the plan period) this development will be built out and occupied or whether the Council's future strategy will be to continue expanding commercial development eastwards up to the A21.

60. Furthermore, paragraph 143 of the Framework requires Plans to define Green Belt boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The area proposed for removal from the Green Belt would consist of Colebrook House and its grounds only. Land to the north and south would remain in the Green Belt, as would the vacant property to the east, adjacent to the A21. The boundary would therefore be arbitrary in the context of its wider surroundings. It would not be readily recognisable and would place pressure on further areas to be released, such as the parcel to the south which is bounded by the A21 and Longfield Road.

61. In summary, I find no exceptional circumstances to justify altering the Green Belt boundary in this location.

Hawkenbury Recreation Ground - Policy AL/RTW19

62. This site is already allocated in the existing development plan and benefits from planning permission for sports and recreation uses with associated changing rooms and car parking. As part of the new Local Plan, it would also accommodate a new stadium for Tunbridge Wells Football Club.

63. A football stadium accommodating up to 3,000 people would be a materially different, and a far more intensive use of the site than the one already approved. At the hearing sessions we discussed concerns about the proposed access arrangements, with access currently taken from a narrow road at the end of High Woods Lane. High Woods Lane itself is also a narrow, predominantly residential street which at the time of my site visit contained several parked cars.

64. Further information in support of the allocation has been provided in Examination Document TWLP/092, which includes indicative details of the passing places that would be required along High Woods Lane. Because the road widening and re-provision of the parking spaces is critical to the suitability of the site, and because the indicative details have not previously been made available, comments will have to be sought from interested parties who have been actively involved in the examination of this site. Subject to how the examination is taken forward (in light of the comments on the strategic sites above) further consultation will be required on these details at the appropriate point in time.

The Strategy for Southborough – Policy STR/SO1

Land at Mabledon House – Policy AL/SO2

65. Policy AL/SO2 allocates land at Mabledon House for a luxury hotel of up to 200 bedrooms and a leisure development with spa and conference facilities. The site is within the Green Belt, but no alterations are proposed to the Green Belt boundary.

66. The construction of new buildings is inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. To demonstrate very special circumstances, the harm by reason of inappropriateness, and any other harm, must be clearly outweighed by other considerations.

67. No precise details have been provided by the Council on the nature and extent of the built development that would be required at Mabledon House. It is therefore not possible to determine any potential harm, add this to the substantial weight given to the harm to the Green Belt by reason of its inappropriateness, and conclude on the likelihood of this being clearly outweighed by other considerations. Allocating the site for development, but then requiring it to demonstrate very special circumstances does not represent an effective or justified policy.

68. There are, however, some exceptions to inappropriate development in the Green Belt. Amongst others, this includes the partial or complete redevelopment of previously developed land. The conversion of existing structures and the house could also presumably take place without the construction of new buildings. Another way of making the Plan sound might therefore be to support the principle of the uses proposed but within the exceptions permitted by national planning policy. This would potentially be a different type of development to the one proposed by the site promoters. It is therefore a matter which requires further consideration by the Council on the most appropriate way forward.

The Strategy for Cranbrook and Sissinghurst – Policy STR/CRS1

Land South of The Street – Policy AL/CRS6

69. This site is allocated for around 20 houses and a replacement community hall. Following submission of the Plan a detailed scheme has been produced which shows that it is not viable to deliver the replacement hall and meet the full requirement for 30% affordable housing.[15]

70. Having independently assessed the necessary information, the Council's suggested way forward is to modify the Plan by introducing additional flexibility for up to 30% affordable housing. I agree. As submitted, the policy requirements would render the allocation unviable and thus undeliverable. However, some affordable housing may be possible, with the final amount determined by a site-specific viability assessment. This would allow the scheme to come forward whilst maximising the efficient use of land and securing a new hall for the local community.

71. The allocation should therefore be modified in line with Document TWLP/094, with consequential changes also made to the supporting text. Maximising the amount of affordable housing (or necessary off-site contribution) would be a matter for the planning application process to determine.

The Strategy for Hawkhurst – Policy STR/HA1

Land North of Birchfield Grove – Policy AL/HA5

72. During the hearing sessions we heard that a developer has an agreement to purchase this site, which is allocated for a new medical centre. Upon completion, the developer would then gift an area of land to the medical practice for the new centre.

73. However, restrictions on the agreement mean that the developers can only purchase the site with the benefit of planning permission for housing on the remainder of the land to the north. The Council considered the suitability of that land and discounted it due to the likelihood for landscape harm (the site is within the High Weald AONB). It was made clear that no alternative scheme would be suitable either due to the landscape sensitives of the site.

[15] Examination Document TWLP/094

74. The prospective developer also owns a 'ransom strip' running between Birchfield Grove and the proposed medical centre site. Regardless of the situation with the remainder of the site, access over this land would have to be agreed and/or resolved in order to bring the site forward.

75. Both sides clearly have very different views on how the land should be developed, with no evidence to suggest that the situation is likely to be resolved anytime soon. Based on the information provided the medical centre is therefore undeliverable and the allocation ineffective. As a result, it should be deleted from the Plan. Although the Council refers to the possible use of compulsory purchase powers, the outcome of this process is not guaranteed and could take several years to conclude, by which time an alternative site or another way of meeting the need may have been identified.

76. The outcome of deleting the allocation is that no site would be identified for the necessary medical centre. In order to make the Plan sound, the Council should therefore give consideration to how the necessary facilities can be provided. Depending on timescales, this may necessitate a commitment to review parts of the Plan in order to meet the need.

Land at Limes Grove (March's Field) - Policy AL/HA8

77. Policy AL/HA8 safeguards land at Limes Grove for employment uses, only allowing it to come forward if monitoring shows that other allocations have stalled or there is evidence of need in this part of the borough.

78. Limes Grove is a narrow country lane situated at the rear of the existing business park. In places the visibility of oncoming traffic is limited. The width of the road is narrow and does not allow vehicles to pass. There is also no footpath to the main entrance of the business park or the bus stops on the A229. As explored at the hearing sessions, the site would therefore be wholly unsuitable for unrestricted commercial uses where the loading and unloading of large vehicles was necessary.

79. That being the case, the site is currently vacant and was formerly used for commercial purposes as a woodyard. It is also directly opposite the existing business park, is within the same ownership and has been identified as suitable for commercial uses by the Council. Rather than deleting the allocation entirely, another way of making the Plan sound might therefore be to identify the site for smaller, less-intensive ancillary uses associated with the business park.

80. In terms of restrictions on when the site can come forward, representations from the site owners state that local businesses need more space now. This is one of the reasons for the larger expansion of the site to the south. Moreover, this is a small site (the net developable area is less than 0.5 hectares) which has a close physical and historical relationship with the remainder of the business park. As such, there is no justification for restricting when it can come forward. Both soundness issues can be rectified by main modifications to Policy AL/HA8.

The Strategy for Benenden – Policy PSTR/BE1

81. Sites are allocated in and around Benenden by Policies AL/BE1 – AL/BE4. During the course of the examination the Benenden Neighbourhood Plan has been 'made'. The sites now form part of the development plan for the area.

82. The Council's suggested response was to delete the allocations from the Local Plan. I agree that it would be unnecessary to modify each policy to precisely mirror the Neighbourhood Plan. Paragraph 16 of the Framework states that Plans should avoid unnecessary duplication. Nevertheless, it would still be beneficial to decision-makers and developers to list the sites in the Local Plan and set out what they are allocated for. This would ensure consistency with other parishes which each have their own policy in the Local Plan. The necessary changes can be made by main modifications.

The Strategy for Pembury – Policy PSTR/PE1

Land at Downingbury Farm, Maidstone Road - Policy AL/PE4

83. Policy AL/PE4 allocates land at Downingbury Farm for 25 dwellings. The allocation also includes an area of safeguarded land for expansion of the Hospice in the Weald.

84. Criterion 5 requires the two sites to be tied together through a legal agreement. There is no justification for this requirement. Because the two uses are different and could come forward independently from one another, the Plan should allocate each site separately.

85. Based on the evidence provided by the Hospice, expansion of the Pembury site is also needed in a much shorter timeframe, with the site currently operating at and above capacity. If the intention of the Plan was to allow the Hospice to expand onto adjacent land, and that expansion is needed during the plan period rather than beyond, then there is no justification for safeguarding for the future. Greater flexibility should be provided by allocating the site and thus enabling its timely delivery.

86. Despite 'safeguarding' the land, the submitted Plan did not seek to remove it from the Green Belt. In order to be effective, the Council suggests that a further change would be necessary to the Green Belt boundary around Pembury. The necessary justification is provided in Examination Document TWLP/095. This will need to be consulted on alongside other recommended changes to the Plan in due course.

The Strategy for Sandhurst – Policy PSTR/SA1

Sharps Hill Farm - Policy AL/SA2

87. For reasons which shall be set out in my Final Report, the principle of modest residential development on this site is justified. However, main modifications are required to ensure that the final design and layout is appropriate, and that the allocation is effective.

88. As submitted, criterion 4 requires development in the south-west corner to be 'low density'. This lacks sufficient precision. Moreover, it will not just be the density of development which is the determining factor in the suitability of a future scheme. The number of properties, their layout, scale, design and appearance will all be material considerations, especially in the south-west corner of the site away from the existing settlement edge. Changes will therefore be necessary to ensure that the policy provides appropriate and effective safeguards against inappropriate forms of development, such as the scheme previously refused by the Council and dismissed on appeal. In the first instance, and as with other main modifications, I invite the Council to look at the wording and propose the necessary changes.

Housing for Older People and People with Disabilities

89. Paragraph 62 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Amongst others, this includes housing for older people and people with disabilities.

90. At the hearing sessions we agreed that the supporting text should not seek to define whether a development falls within Use Class C3 (dwellinghouses) or Use Class C2 (provision of accommodation and care to people in need of care). This would be determined on a case-by-case basis having regard to the specific details of each proposal.

91. The supporting text at paragraphs 6.356 to 6.370 of the Plan then refers to the need for extra care housing and sets out how this will be met. A useful summary of the evidence supporting the Plan is provided in Examination Document TWLP_032a, which includes reference to the *Housing Needs Assessment Topic Paper*[16].

92. As with other matters, the Final Report will consider in detail the evidence supporting the Plan and conclude whether or not its policies will be effective in meeting housing needs for older people. At this stage, for effectiveness, the Plan should be modified to clearly set out the gross need for extra care housing based on the two methods used (as per the tables in Examination Document TWLP_032a which show a range between 342 and 431 units). For the same reasons the Plan should then make it clear how needs will be met by listing the relevant sites, including any committed schemes.

93. Conclusions reached above in relation to Tudeley Village and Paddock Wood will no doubt have consequential impacts on how the needs for older people and people with disabilities will be met (both strategic sites include requirements to provide sheltered and extra care housing). In the first instance this will be a matter for the Council to consider in suggesting ways that the Plan could be made sound.

[16] Core Document CD3.73

Conclusions and Next Steps

94. A significant amount of hard work has clearly gone into the preparation of the Local Plan which is positively prepared in seeking to meet housing needs despite large areas of Green Belt and the High Weald AONB. The majority of changes required to the submitted Plan are relatively straightforward and the main modifications referred to above should be incorporated into the schedule which is already in preparation.

95. As for the strategic sites, significant changes and/or the preparation of further supporting information is going to be necessary before they can be found sound. At Paddock Wood, I am relatively confident that this can be achieved without fundamental changes to the Plan's strategy. However, the implications of my initial findings at Tudeley Village could have far greater, consequential impacts on other aspects of the Plan, from infrastructure provision to whether the Plan is able to identify a sufficient supply of housing land.

96. In the first instance, I would therefore be grateful to understand how the Council considers that the Plan could be modified in a way that would make it sound and capable of adoption. In seeking to move the examination forward I consider that there are three broad options available to the Council. They are:

- Provide additional information to justify the Tudeley Village allocation as submitted.
- Modify the submitted Plan by making significant changes to the Tudeley Village allocation, and in doing so, seek to overcome the soundness issues identified above.
- Delete the allocation from the submitted Plan.

97. The first option is unlikely to be a quick or straightforward exercise. It would require further dialogue with key stakeholders, the preparation of substantial new evidence, consultation on that evidence and examination. There is also no guarantee that it would satisfactorily resolve the issues identified above or justify the scale and location of development proposed. It is not without risk. Similar issues would apply to the second option, and both could potentially add significant delays to the examination process.

98. The third option would be to delete the allocation and make consequential changes to the Plan. The benefit of this approach is that it would deal with the soundness problems identified above, and subject to considering alternative secondary school provision, has already been tested as a possible outcome in the strategic sites masterplanning documents. It may negate the need for significant further work and potentially avoid lengthy delays to the examination process.

99. One of the main consequences of deleting Tudeley Village is the impact on housing provision. The Plan envisages 2,100 dwellings coming forward over the plan period. In deciding how to proceed, the Council will therefore need to give further consideration to how best the Plan can still meet housing needs, having particular regard to the requirements in paragraph 68 of the Framework. It may be, for example, that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage.

100. I appreciate that this is not a straightforward exercise and that the Council will need time to consider the issues raised. Once the Council has considered these matters it would be useful to agree on a strategy and timescale for taking the examination forward, before the Council commits to any significant further work. Should you have any queries or wish to discuss potential ways forward in further detail, please do not hesitate to contact me.

101. I have asked the Programme Officer to upload a copy of these findings to the examination website, but no comments are sought from participants at this stage. Any suggested ways forward will be subject to consultation in due course and further hearing sessions may be necessary.

[redacted]

Examining Inspector
November 2022

Appendix 2 Inspectors letter to Solihull Council September 2022

The Planning Inspectorate

[redacted]
Group Manager – Policy & Engagement
Growth & Development
Solihull Metropolitan Borough Council

Our Ref: PINS/Q4625/429/4

Date: 5 September 2022

Dear [redacted]

Examination of the Solihull Local Plan

1. Further to the additional hearing session held on 8 July 2022, we are now in a position to set out our conclusions in relation to housing requirements, the proposals for the National Exhibition Centre (NEC) and the overall supply of housing sites. You will see that these have significant implications for the examination of the Local Plan. We also set out our conclusion in respect of the site allocation South of Knowle (Arden Triangle) and Policy KN2, given the particular implications of this. We must stress that there are a range of soundness issues affecting other aspects of the Local Plan which would require main modifications in due course and that a detailed explanation of our findings will ultimately be contained in our report.

Housing requirements

2. The Council's position is that the housing need for Solihull is 816 dwellings per year. This is based on the standard methodology calculation (807 dwellings per year) plus a modest uplift to accommodate the additional employment growth arising from the UK Central Hub proposals. We have concluded that this is justified. The Council has a longstanding commitment to contribute approximately 2,000 dwellings to unmet need in the wider Housing Market Area up to 2030/31, on the basis of the shortfall established in the adopted Birmingham Development Plan. This is made clear in the submitted Local Plan and formed a key element in duty to co-operate discussions and statements of common ground with relevant local planning authorities. The Council has maintained this position throughout the examination. We have concluded that this commitment is necessary to ensure that the Local Plan is positively prepared and justified.

3. Following our request, the Council produced additional information and suggestions regarding an updated stepped annual housing requirement and extending the plan period to 2036/37, to allow for a 15 year period from the likely point of adoption (document SMBC013). The suggested stepped requirement would recognise the situation with the reduced housing delivery test requirement for 2020/21, it would ensure that Solihull's own needs for the plan period were met and would also ensure that a contribution of approximately 2,000 dwellings towards the identified shortfall in Birmingham up to 2030/31 would be made. On the basis of the latest housing trajectory produced by the Council

POSITIVE ABOUT DISABLED PEOPLE

(document SMBC013) there would be a five year supply of housing sites as of 2022/23 (the earliest likely date of adoption of the Local Plan). We have concluded that the updated stepped housing requirement set out in SMBC013 would be justified and effective, subject to the resolution of the housing supply issues discussed below.

4. Putting all of this together, we have concluded that the housing requirement should be 537 dwellings for 2020/21, 807 dwellings per year from 2021/22 to 2025/26, 1,281 dwellings per year from 2026/27 to 2030/31 and 816 dwellings per year from 2031/32 to 2036/37. This equates to a total requirement for the extended plan period of 15,873 dwellings and a requirement up to 2030/31 of 10,977 dwellings, including a contribution of approximately 2,000 dwellings towards unmet needs in Birmingham up to 2030/31. The submitted Local Plan would need to be modified accordingly to be justified and effective.

The NEC and the overall supply of housing sites

5. Our letter of 11 February 2022 highlighted particular concerns in relation to the proposals for the NEC site. We are grateful for the Council's constructive response and the additional evidence and information that has been provided. We have considered this evidence and information carefully and taken into account the written submissions from interested parties and the discussion at the additional hearing session on 8 July 2022.

6. The submitted Local Plan and the Council's housing trajectory anticipate that the NEC site will deliver 2,240 dwellings in the plan period, by far the largest single site in terms of dwelling numbers. However, the submitted Local Plan says relatively little about the NEC site and there is no specific policy for it unlike sites UK1 and UK2 and all of the housing site allocations. There is no clear policy framework or explanation of constraints and infrastructure requirements. The Council has again responded constructively to our concerns and suggested an additional Policy UK3. Whilst there are some detailed issues relating to the clarity of the policy criteria and infrastructure requirements, the suggested policy would go a long way to addressing our concerns about an appropriate policy framework.

7. We turn now to our concerns over delivery. The context for these concerns is the overall situation regarding the anticipated supply of housing sites for the whole plan period (extended up to 2036/37) and up to 2030/31 and the role that the NEC site is expected to play in this. The Council's most up to date trajectory in SMBC013 indicates an overall supply up to 2036/37 of 16,050 dwellings, compared with the requirement of 15,873 dwellings. For the period up to 2030/31 the anticipated supply is 11,200, compared with the requirement of 10,977 dwellings. For both time periods the anticipated supply is therefore only marginally above requirements.

8. The Council anticipates the NEC site playing a key role in ensuring that requirements for the plan period are met and that an appropriate contribution to unmet needs from Birmingham up to 2030/31 is made. The latest trajectory shows 1,112 completions on the NEC site up to 2030/31. In terms of paragraph 68 of the National Planning Policy Framework and assuming 2022/23 is regarded as year 1 based on the point of adoption, the NEC site is envisaged to make a contribution as a specific developable site of 1,258 dwellings in years 6-10. The implications of significant under delivery on the NEC site are considerable.

9. The NEC Masterplan Consultation Draft of November 2021 (NEC Masterplan) sets out an ambitious long term vision for the site involving an “urban village” of 5,000 homes, commercial and leisure development and associated community and other infrastructure. As noted above it is envisaged that Phase 1 involving 2,240 dwellings will be completed within the plan period. Phase 1 would be largely based on the redevelopment of existing surface level car parks on the north eastern part of the NEC site. The total developable area is 27.29ha and the area for Phase 1 is 12.92ha (Figures taken from the Viability Study Addendum SMBC018). It is anticipated that 70% of the dwellings would be apartments and 30% houses. For Phase 1 this would equate to 1,580 apartments and 660 houses although we note that SMBC018 appears to have assessed viability on the basis of a higher proportion of apartments (approximately 73% for Phase 1 and 77% overall). The Council’s latest trajectory envisages the first completions (217 dwellings) in 2027/28, a peak of 352 completions in 2030/31 and an average of 224 a year up to 2036/37.

10. The proposals seek to create a significant new residential community from scratch on a site which is not within or adjacent to an established residential area, nor is it within or close to a city centre. It is physically contained by significant road infrastructure with the M42 to the east, the A45 to the south and Bickenhill Parkway/Bickenhill Lane to the north and west. Birmingham International Rail Station and Birmingham Airport lie just to the west of the site and Birmingham Business Park sits to the north. The NEC site itself includes substantial exhibition and conference buildings, hotels, leisure and hospitality venues and associated car parking and infrastructure.

11. To deliver the amount of housing envisaged on the site would require very high densities to be achieved. Overall, Phase 1 would need to average 173 dwellings per hectare (dph). For houses, given the number anticipated (assuming 660) and the fact that land would also be required to accommodate 1,580 apartments, the average density would need to be significantly above the 40dph indicative density set out in the submitted Local Plan for houses in the UK Central Hub Area and the 45dph for neighbourhoods of mainly houses referred to in SMBC018. It is unclear exactly what assumptions have been made for densities. However, as discussed at the hearing session, even if an average density of 75dph were assumed for houses, this would take up 8.8ha (or 8.13ha if there were 610 houses) leaving only 4.12ha (or 4.79ha) for apartments. The apartments would need to be built at an average density of 383dph (or 340dph). Again this would be very substantially above the indicative density of 90-150dph for apartments in the submitted Local Plan.

12. There is no evidence that such very high densities or anything approaching them have been achieved in Solihull. Whilst the NEC site clearly presents a particular opportunity for higher density housing, there is significant uncertainty that sufficient demand will exist for housing at such high densities on the scale and over the timescale envisaged. It is also unclear as to the practical implications of such densities for the quality of the living environment and the design and character of the development.

13. Due to the high proportion of apartments and the very high densities required for both houses and apartments it is difficult to see how the development would be compliant with some policies in the submitted Local Plan. Policy P4C refers to 70% of market dwellings being three or four bedrooms. Policy P4A refers to 70% of social rented dwellings being houses and 45% of shared ownership dwellings being houses. SMBC018 concludes that the whole scheme was currently viable with 10% affordable housing provision, whereas Policy P4A refers to 40%.

14. The Housing Delivery Supplementary Report (document SMBC015) points to examples of schemes in other areas to illustrate the realism of timescales and rates of delivery at the NEC site. However these are in London, Cambridge and Birmingham. Whilst noting that assumed build out rates for the NEC site are lower than the examples from London and Cambridge, it is clear that these are in very different market locations, with different site characteristics and backgrounds. Their value as genuine comparisons is relatively limited.

15. In terms of viability, as noted above, SMBC018 concludes that the whole scheme is viable, albeit with only 10% affordable housing provision. We note the argument on behalf of the Council that the Benchmark Land Value used in the appraisal in effect builds in a buffer to accommodate costs that cannot be accurately quantified at present. However, there remains some uncertainty as to infrastructure costs and therefore the effect on viability, particularly in relation to a contribution to UK Central Hub wide infrastructure and potentially contributions to additional works or accessibility improvements to existing secondary school provision (see note from Council on education provision following the hearing session on 8 July 2022).

16. In terms of timescales for bringing forward development on the NEC site, the latest information provided (documents SMBC016 and SMBC017) sets out a timetable which would ultimately see completions taking place in October 2027. It is ambitious and would rely on progress moving smoothly from one stage to another. With a scheme of this size and nature, there is clearly potential at least for some slippage if issues arise. Given that the proposal is not typical of residential developments in Solihull and relies on an innovative approach, the potential for issues to arise affecting progress is increased. We note that the NEC Masterplan is yet to be finalised and published and it was confirmed at the hearing session on 8 July 2022 that the launch of the competitive tender process has now been put back by two months. There would already appear to be some slippage in the programme produced within the past few months. It is of note that as the NEC site is previously developed land, not within the Green Belt, there would seem to have been no policy constraints in principle preventing a scheme coming forward to date.

17. Redevelopment of the NEC site for housing is in principle an appropriate and justified element of the Local Plan. It would utilise previously developed land and form a key element in wider proposals for the UK Central Hub. We consider that the proposal should remain in the Local Plan and indeed be strengthened by the addition of a specific policy along the lines of the suggested Policy UK3. This would help to promote its redevelopment and provide a clear policy framework to do so. However, taking into account the above assessment, we have significant doubts that the site will deliver housing on the scale envisaged up to 2030/31 and in the plan period as a whole.

18. Reliance on the anticipated trajectory for completions on the NEC site poses a substantial risk in terms of meeting housing requirements and making an appropriate contribution to unmet needs from Birmingham up to 2030/31. These are two of the fundamental principles underlying the Local Plan and principles that the Council has remained committed to throughout the examination. In some cases, other local planning authorities in the wider Housing Market Area raised strong concerns that Solihull's contribution towards unmet housing needs should in fact be increased to extend beyond 2030/31 and also address unmet needs from the Black Country, in addition to Birmingham. In some cases, local plans elsewhere in the Housing Market Area have been prepared on the basis of making

contributions to these unmet needs. If this Local Plan did not make an appropriate contribution, there could be significant implications for agreements and co-operation between authorities and the progress of other local plans in the Housing Market Area.

19. In order to limit the risk associated with reliance on delivery the NEC site, the housing trajectory should reduce estimated completions to a figure in the order of 500 dwellings for the latter part of the plan period from 2031/32 onwards. This would be broadly in line with the trajectory for site UK1. The policy associated with the allocation could still refer to the potential for a higher number of dwellings and there would be no policy restriction on the amount of housing development that could come forward up to this higher number. This would leave a shortfall in supply of approximately 1,700 dwellings for the extended plan period and approximately 1,100 up to 2030/31. As we note above, the supply is only marginally above requirements, even with the higher figures for the NEC site.

20. This Local Plan should address this issue if it is to comply with the fundamental principles that underpin it and which informed the Council's duty to co-operate engagement and statements of common ground with other authorities. The alternative of not addressing the issue in this Local Plan and leaving it to a future review is not an appropriate option, given the particular circumstances that apply, notably the commitment to contribute approximately 2,000 dwellings to unmet need in Birmingham up to 2030/31. Such a review would be likely to take considerable time to come to fruition and go through necessary stages of preparation, submission and examination. The Council would need a clear trigger point for a review and to initiate the preparation of a new local plan. The key concern for us is delivery and given that construction starting on site is anticipated to start in September 2025 and first completions expected in October 2027 (see document SMBC016), these would seem to be the most obvious trigger points for a review. Leaving a decision to undertake the preparation of a new local plan to such a time would mean that it is unlikely to be adopted much before 2030/31 and the contribution that could be made to Birmingham's unmet needs by that date would be limited.

21. We request that the Council gives consideration to the above and informs us as to how it intends to address the issue.

Site allocation South of Knowle (Arden Triangle) and Policy KN2

22. Policy KN2 allocates the site South of Knowle for residential development (600 dwellings) together with the redevelopment of the existing Arden Academy secondary school and a new primary school to provide a new "all through" school. The allocated site is currently partly taken up by the existing school buildings, car parking areas, outdoor spaces and sports pitches for the Arden Academy. The entire site is currently in the Green Belt.

23. The reasoned justification of the Local Plan and Concept Masterplan of October 2020 (document 005) make it clear that the intention is for the new "all through" school to be relocated to another part of the overall site and for the existing school site to be redeveloped for housing. The Council confirmed that this remained its position. The earlier version of the Concept Masterplan of January 2019 (document 012) identified two options for the site. The first would see the Arden Academy retained on its existing site. The second would see it relocated to land currently partly occupied by some of its playing fields. In both options there would be a separate new primary school.

24. We have concluded that there are exceptional circumstances to alter the Green Belt in this case and allocate the site for housing development. There are some detailed issues of soundness with the wording of Policy KN2 which we will address in due course. Our key concern however is the inclusion of the requirement to relocate the Arden Academy to a different part of the site.

25. The Council has confirmed that the housing proposed on the site would not in itself generate a need for additional secondary school provision. On the basis of information provided and following the thorough site visit undertaken on 9 March 2022, it is clear that the layout of separate school buildings and in some cases their age, size, design and condition causes issues for the management and operation of the school. We fully appreciate the desire to rationalise the buildings and provide a new purpose built school of a good standard. We also acknowledge the strong support from the community for a replacement school. However, the school continues to operate on its current site and performs well. There is nothing to suggest that it could not continue to operate in its current form if the rest of site KN2 was developed for housing. Subject to design and layout it would seem possible in principle to redevelop the school within its own grounds, if required. We consider therefore that it is not essential that the proposal for site KN2 requires the relocation of the Arden Academy from its current grounds.

26. Whilst Homes England has expressed support and indicated financial assistance for the acquisition of the existing school site, there is considerable uncertainty regarding the overall funding for a new school. Funding has not been secured and it is not clear which sources of funding would be sought and what the prospects of securing funding are. As noted above the proposed new housing would not generate the need for developer contributions towards the provision of additional secondary school places.

27. The Local Plan Viability Study (document 701) did not factor in the costs of a replacement secondary school. It is also very clear from written submissions and discussion at the hearing sessions that there is substantial resistance to the relocation of the Arden Academy on to another part of the overall site from landowners, site promoters and developers with interests in the site. This resistance extends to the clear statement that the land in question shown on the Concept Masterplan (document 005) will not be made available for a relocated school. The site allocation would therefore not be deliverable if it were to retain the requirement for the Arden Academy to be relocated elsewhere within the wider site.

28. Taking all of this into account, we conclude that the site allocation KN2 is neither justified nor effective in its current form. It can be made justified and effective by a main modification which removes references to the Arden Academy being relocated to another part of the site. In light of this the potential capacity for housing on the site may need to be reviewed.

Next steps

29. Given the significance of our conclusions on the above issues, we would like to give the Council the opportunity to consider matters fully and inform us as to how it wishes to proceed.

30. We must stress that we have fully considered all of the evidence and information available to us and taken full account of written submissions and discussions at the hearing sessions. The Council and others have had adequate opportunity to make submissions and provide

evidence and information. We are not expecting further submissions from the Council or other interested parties regarding the merits of our conclusions. However, we would expect this letter to be added to the examination website with an appropriate update as soon as is reasonably possible. We would be grateful if you could inform us via the programme Officer of the likely timescale for your response to this letter.

Yours sincerely,

[redacted]

INSPECTORS

Celebrating
60
years

Contact Details

Full name (required): Myles Wild-Smith

Email (required): [redacted]

Tick the box that is relevant to you (required):

- ☐ Statutory Bodies and Stakeholders
- **X Agents and Developers**
- ☐ Residents and General Public
- ☐ Prefer not to say

Organisation or Company Name (if applicable): Lichfields on behalf of St Philips Land Ltd

Tick the box that is relevant to you:
(*This is a non-mandatory question but helps us understand the demographic of our respondents.)*

- ☐ Under 18
- ☐ 18-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65+
- ☐ Prefer not to say / not applicable

Do you want to be added to our Local Plan consultation database to be notified about future local plan updates?

[redacted]

Contents

The Local Plan Preferred Options includes the topics listed below.

Each topic has a series of standard questions in order for you to provide a response. You do not have to respond to each of the topics or answer all of the questions. The page numbers below relate to the page the topic starts in this consultation form.

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: https://www.staffordbc.gov.uk/local-plan

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

Please make your choice from the list of objectives below. (Maximum of 3 to be selected)

Local Plan Preferred Options document reference: Page 12

- ☐ Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- ☐ To develop a high value, high skill, innovative and sustainable economy.
- ☐ To strengthen our town centres through a quality environment and flexible mix of uses.
- **X To deliver sustainable economic and housing growth to provide income and jobs.**
- ☐ To deliver infrastructure led growth supported by accessible services and facilities.
- ☐ To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- ☐ To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- ☐ To secure high-quality design.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Select Yes or No for each of the policies and then use the box below each policy to add additional comments.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 19 to 40

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies)

~~Yes~~ / No

Policy 1 Comments:

Please refer to section 2 of our detailed representations

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

~~Yes~~ / No

Policy 2 Comments:

Please refer to section 2 of our detailed representations

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

No response

Policy 4. Climate change development requirements

Yes / ~~No~~

Policy 4 Comments:

Please refer to section 2 of our detailed representations

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No response

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No response

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which includes a new railway station on the West Coast Main Line, and high quality transport routes.

Do you agree with the proposed new garden community?

Yes / ~~No~~

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

Please refer to section 2 of our detailed representations

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations.

Do you agree with the proposed allocations?

Select Yes or No for each of the following policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response. Please provide details of alternative locations for housing and employment growth if you consider this is appropriate.

Ensure any comments relate to the policy comment box you are completing.

If you do want to submit a new site for consideration through the local plan process, we are still accepting sites through the Call for Site process, details are available here: https://www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation

Local Plan Preferred Options document reference: Pages 47 to 56 and appendix 2.

Policy 9. North of Stafford

Yes / No

Policy 9 Comments:

No response

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No response

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No response

Policy 12. Other housing and employment land allocations.
(*In your response, please specify which particular site you are referring to, if relevant*.)

~~Yes~~ / No

Policy 12 Comments:

Please refer to section 2 of our detailed representations

Q5. The Stafford Borough Local Plan 2020 - 2040 proposes to allocate land for Local Green Space and Countryside Enhancement Areas throughout the borough.

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

Select yes or no for each of the policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

Policy 13. Local Green Space
(In your response, please specify which particular site you are referring to, if relevant)

Yes / No

Policy 13 Comments:

No response

Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)

Yes / No

Policy 14 Comments:

No response

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No response

Economy Policies

The Economy Policies chapter contains policies that seek to protect employment land and support economic growth within the Borough.

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

No response

Q7. The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals.

The relevant policies are: 19, 20, 21 and 22.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

No response

Housing Policies

The Housing Policies chapter contains policies that seek to provide for identified need across the borough and support houseowners.

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

No response

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments. In your response, please specify which particular site you are referring to, if relevant.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

No response

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling.

The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

No response

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy.

The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 91 to 99.

Comments:

No response

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality.

The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 101 to 119.

Comments:

No response

Connections

Q13. The connections policies chapter contains policies on transport and parking standards.

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 121 to 124.

Comments:

No response

Evidence Base

To support the Local Plan 2020-2040 an evidence base has been produced.

The evidence base is available to view on our website here:
www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base

Q14. Have we considered all relevant studies and reports as part of our local plan?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Comments:

No response

Q15. Do you think there is any further evidence required?

Yes / No

Select yes or no and then use the box below to add additional comments.

If you think additional evidence is needed, please state what you think should be added and explain your reasoning.

Ensure any comments relate to the policy comment box you are completing.

Comments:

No response

General Comments

If you have any further comments to make on the Local Plan Preferred Options document and evidence base, please use the box below.

Please refer to section 2 of our detailed representations

If you need further space to add comments, please add pages to the end of the consultation form and reference which question you are answering.

Thank you for taking the time to complete this consultation form.

Completed forms can be submitted by email to:
strategicplanningconsultations@staffordbc.gov.uk

Or returned via post to: Strategic Planning and Placemaking, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

From: Laura Gaffney [redacted]
Sent: 12 December 2022 11:15
To: Strategic Planning Consultations
Cc: [redacted]
Subject: Representations to Stafford Borough Council Preferred Options: Land to the North of Stone [LICH-DMS.FID379535]
Attachments: Vision Document for Land to the North of Stone.pdf; Representations to Stafford Borough Council Preferred Options - Land North of Stone .pdf; Call for Sites form 12.12.22.pdf; Preferred-Options-Consultation-Response-Form Stone.pdf

Dear Sir/Madam,

Please find attached our representations to the Stafford Borough Local Plan 2020-2040 Preferred Options Consultation, in relation to Land North of Stone submitted on behalf of our clients St Philips Land Ltd. In addition, a call for sites form is included for consideration.

The submission comprises the following documents:

1. Stafford Borough Local Plan 2020-2040 Preferred Options Representations on behalf of St Philips; and
2. Preferred Options Consultation Response Form; and
3. Call for Sites Form; and
4. Site Location Plan; and
5. Vision Document

I trust this submission is in good order, however, please do not hesitate to contact us regarding any queries. We would be pleased to meet to discuss our response in due course.

In addition, I would be grateful if you could please confirm receipt of this email and attached representations.

Kind Regards,

Laura Gaffney

Laura Gaffney
Planning Intern
[redacted]

lichfields.uk

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Celebrating 60 years

Stafford Borough Council Preferred Options Consultation Local Plan 2020-2040

Representations on behalf of St Philips Ltd

Land to the North of Stone

St Philips Ltd

8 December 2022

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Appendices

Appendix 1 Tunbridge Wells Inspectors Report November 2022

Appendix 2 Inspectors letter to Solihull Council September 2022

1.0 Introduction

1.1 These representations to the Stafford Borough Local Plan 2020-2040 ("the Local Plan") Preferred Options Consultation ("the PO") have been prepared by Lichfields on behalf of St Philips Ltd ("St Philips").

1.2 We focus on the strategic matters that are contained within the PO consultation and relate specifically to St Philips site entitled Land to the North of Stone ("the Site").

1.3 St Philips seeks to work constructively with Stafford Borough Council ("the Council") as it progresses towards the submission and adoption of the Local Plan Review and trusts that the comments contained within this document will assist Officers in this regard.

Land to the North of Stone

1.4 A vision document has been submitted alongside these representations to support the proposals for a mixed-use development at the Land to the North of Stone. The Site lies within the Green Belt on the north-western edge of Stone, which has been identified as a Tier 2 settlement in the PO settlement hierarchy. It is bound by the A34 to the west, the Trent and Mersey Canal to the east, a single residential property to the south and a field to the north.

1.5 The Site primarily consists of short mown grasslands and is generally flat, sloping gently towards the canal on the eastern boundary. It is located in flood zone 1 of the Environment Agency's 'Flood Map for Planning' and therefore at the lowest risk of flooding. It is sequentially preferable for development in flood risk terms.

1.6 The A34 provides connections to Stoke-on-Trent, Newcastle-under-Lyme, and Birmingham. Public transport is easily accessible, with the nearest bus stop within walking distance. Local services are within a 20-minute walk of the Site, including schools, a town hall, and recreational facilities. Stone Business Park and Walton Industrial Estate are to the South of the Site and can be accessed by bus, bike or car.

Plan-making to Date

1.7 The Council adopted 'The Plan for Stafford Borough- Part 1' and 'The Plan for Stafford Borough- Part 2' on the 19th of June 2014 and 31st of January 2017 respectively. The Plan for Stafford Borough- Part 1 "*contains a vision, spatial principles and specific policies which will guide development across the Borough"*. The Plan for Stafford-Part 2 "*details settlement and Recognised Industrial Estate boundaries together with a policy protecting community / social facilities"*.

1.8 The Council is currently preparing the Stafford Borough Local Plan 2020-2040, which will replace the Plan for Stafford (Part 1 and 2). As per NPPF paragraph 33, "*Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy*"[1]. The Local Plan Review is required to review, inter alia, the housing and employment needs of Stafford. The preparation of the new Stafford Borough Local Plan will

[1] Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

guide the scale, location, and nature of new development in the Borough over the Plan period up to 2040.

1.9 Since July 2017, the Council has been undertaking ongoing evidence-gathering exercises including consultations on the 'Sustainability Appraisal Scoping report', 'The New Local Plan- Scoping the Issues' and the 'New Local Plan- Settlement Assessment' documents.

1.10 The Council has also carried out an 'Issues and Options Consultation' ("IOC") between 3rd February and 21st April 2020. The IOC considered a range of issues, including the amount of housing and employment land needed over the next 20 years and how this provision could be distributed. Other topics included, inter alia, the economy, transport, viability, climate change, housing, health and wellbeing and the environment.

1.11 The Council is now undertaking a consultation on the PO, which builds upon the responses received from the IOC. The PO considers proposed development allocations, the distribution throughout the Borough and a range of draft policies on topics such as economic development, housing provision, the environment and transport.

Structure

1.12 These representations are structured around the topics set out in the PO consultation, these being:

- Vision and Objectives;
- Development Strategy and Climate Change Response;
- Meecebrook Garden Community;
- Site Allocation Policies;
- Economy Policies;
- Housing Policies;
- Design and Infrastructure Policies;
- Environment Policies;
- Connections;
- Evidence Base; and
- General Comments.

2.0 Areas of Response

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

2.1 St Philips supports the councils' objectives to achieve a prosperous and attractive borough with strong communities. Of the objectives listed, St Philips especially values the Council's aim "*to deliver sustainable economic and housing growth to provide income and jobs*."

2.2 To achieve this objective, St Philips urges the Council to consider further allocations at sustainable locations such as Stone.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies) ~~Yes~~ / No

2.3 Draft Policy 1 (Development Strategy) sets out the total number of homes which will be delivered within the Stafford Borough in the period 2020-40. The Council has referenced evidence provided in the Stafford Borough Economic and Housing Development Needs Assessment (February 2020) ("the EHDNA") in establishing the Borough's housing needs. The EHDNA examined a range of economic growth scenarios and then considered whether any upwards adjustment should be applied to the locally assessed housing need identified through the standard method.

2.4 The housing requirement figures presented in the PO are based on Scenario D of the EHDNA. Scenario D states that the Borough's housing need equates to 435 new dwellings per annum ("dpa") if it is to supply the workforce needed to support the core employment growth forecast. This exceeds the minimum Local Housing Need ("LHN") of 391 dwellings per year (2022) (calculated in accordance with the standard methodology outlined in the Planning Practice Guidance). In addition to the Borough's own needs, draft Policy 1 (Development Strategy) allows for a total of 2,000 new homes to meet the unmet needs of Black Country Authorities. Whilst the Black Country Plan is no longer progressing, these acute unmet needs will still need to be addressed. Draft Policy 1, therefore, proposes that for the period 2020 to 2040 provision will be made for a total of 10,700 new homes (535 dpa).

2.5 St Philips supports the Council's decision to exceed the minimum Local Housing Need figure. Both the NPPF[2] and the Planning Practice Guidance (PPG)[3] are clear that the LHN figure generated by the standard method is a minimum starting point (i.e. actual housing need may be higher than this figure). St Philips also welcomes the Council's contribution to the unmet needs of neighbouring Local Authorities in accordance with the NPPF.[4]

2.6 However, whilst St Philips is supportive of the Council exceeding the minimum LHN figure, it is our view that the Borough's needs would be best met through planning for economic growth Scenario E. Scenario E considers a regeneration scenario, including the job growth projected to occur at Stafford Station Gateway and the proposed garden community. Paragraph 10.90 of the EHDNA states:

"Given the aspirations for growth across the Borough, including the strategic growth identified around a new Garden Community and Stafford Station Gateway, it will be important that the Borough identifies a level of future housing that does not act as a drag on future economic growth. Given the jobs growth aspirations for the Borough, planning for a housing requirement of 711 dpa (Regeneration scenario including PCU) is considered a realistic approach."

2.7 St Philips, therefore, considers a housing requirement of 711 dpa to be the most sustainable for the Borough. This includes the application of a partial catch-up rate which ensures that previous unmet need is not overlooked. St Philips would encourage the Council to consider this to ensure that sufficient housing is delivered to support the Council's economic growth aspirations. The NPPF emphasises importance *"on the need to support economic growth and productivity"* (Para 81) and is clear that planning policies should *"seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment"* (Para 82c). In essence, the NPPF recognises the implicit link between economic growth and housing need, and that economic growth should not be decoupled from housing growth. This approach would also support the provision of more affordable housing for the Borough.

Affordable Housing

2.8 The PPG[5] is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. In this context, it is noted that the EHDNA (Para 11.76) has found that:

"It is clear that there is a significant affordable housing need in the Borough and at current likely delivery (notionally 30% reflecting current policy) the Council needs to give consideration to whether increasing planned housing provision could help to address a greater proportion of affordable housing needs."

2.9 St Philips notes that the EHDNA (Para 11.68) indicates that the affordable housing need for the Borough is between 252 and 389 dpa depending on the growth scenario examined. This represents a significant proportion of the Borough's LHN. Even the lower affordable housing need figure of 252 dpa would represent 47% of the total planned new houses (535 dpa). Despite this identified need, the Council has stated that it does not consider there to

[2] Paragraph 61
[3] PPG ID: 2a-002
[4] Paragraph 35a
[5] PPG ID: 2a-024

be exceptional circumstances that justify increasing overall housing delivery to meet the affordable housing needs identified in the EHDNA.

2.10 However, St Philips notes that the Sustainability Appraisal (SA) of the New Stafford Borough Local Plan (January 2020) ("The SA 2020") identified affordability as a challenge in some areas of the Borough, with the settlement of Stone identified as being particularly affected by a shortage of affordable homes (Para 7.60):

"Affordability is particularly acute in certain areas, notably some rural areas and in Stone. This has led to increasing challenges in terms of entering the housing market for particular groups, including young people, single parent families and those on below average wages."

2.11 The Council's reliance on larger strategic sites such as Meecebrook and Stafford Station Gateway could further undermine the Borough's ability to provide a sufficient supply of affordable housing. St Philips notes the Stafford Borough Council Local Plan and CIL Viability Assessment (September 2022) ("The Viability Assessment") finds these proposals are marginally viable when assessed at a fully policy-compliant level of affordable housing.

2.12 In this context, Paragraph 62 of the NPPF is clear that:

"…the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)".

2.13 As such, St Philips recommends that the Council consider a housing requirement of 711 dpa. This would help to deliver more affordable housing and would be justified and necessary to address worsening affordability within Stone and other parts of the Borough. The shortage of affordable homes identified at Stone could be alleviated through the allocation of sites such as the Land to the North of Stone.

Land Supply Buffer

2.14 At present, the Council is proposing to make provision for 12,580 dwellings and 150 ha of employment land through allocations and commitments within the PO. In total, the proposed allocations equate to a c. 10% buffer against the housing requirement.

2.15 Paragraph 82 of the NPPF is clear that planning policies be:

"flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances".

2.16 In practice, this means ensuring a housing trajectory has sufficient land supply across the plan period so that it can adjust and accommodate any unforeseen circumstances, such as a degree of flexibility in delivery rates and densities. Therefore, to achieve a housing requirement a Local Plan must release sufficient land or allow sufficient headroom so that there is an appropriate buffer within the overall planned supply.

2.17 At present, the PO's proposed growth strategy allows for a c.10% land supply buffer. However, St Philips notes that the proposed headroom would not fall within the range identified by other Councils and found sound at the examination as well as being explicitly endorsed by the Inspector:

- Chelmsford: 18% buffer[6]
- South Kesteven: 18% buffer[7]
- Harrogate: 25% buffer[8]
- South Oxfordshire: 27% buffer[9]
- Mansfield: 34% buffer[10]
- Guildford: 36% buffer[11]
- Chesterfield: 59% buffer[12]

2.18 As such, St Philips recommends that a c.20% headroom should be considered by the Council, which would be consistent with the headroom identified by other Councils. This would ensure that there is the flexibility to respond to unforeseen delays in delivering strategic sites such as Meecebrook and other unforeseen circumstances.

Green Belt

2.19 Paragraph 5.3 of the PO states that the Council does not consider that *"exceptional circumstances"* exist to justify the removal of land from the Green Belt. However, St Philips believes the Council has arrived at this conclusion prematurely. The Council should gather further evidence in the form of a Green Belt review to ensure that development is being directed towards the most sustainable locations.

2.20 St Philips recognises that the NPPF is clear on the weight attached to Green Belt by the Government, and paragraph 140 of the NPPF states:

"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."

2.21 The NPPF does not define the term "*Exceptional Circumstances"*, however, it goes on to provide a set of criteria in paragraph 141 which should be satisfied prior to establishing exception circumstances, including (*inter alia*) the optimisation of brownfield land and densities, and discussions with neighbouring authorities (e.g., a sequential approach of sorts).

[6] Inspector's Report to Chelmsford City Council, paragraph 154. Available at: https://www.chelmsford.gov.uk/_resources/assets/inline/full/0/3951296.pdf
[7] Inspector's Report to South Kesteven District Council, paragraph 145. Available at: http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=25671
[8] Inspector's Report to Harrogate Borough Council, paragraph 180. Available at: https://democracy.harrogate.gov.uk/documents/s8649/05-Appendix1-InspectorsReport.pdf
[9] Inspector's Report to South Oxfordshire District Council, paragraph 44. Available at: https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2020/11/Inspectors-Report-November-2020.pdf
[10] Inspector's Report to Mansfield District Council, paragraph 159. Available at: https://www.mansfield.gov.uk/downloads/file/1473/mansfield-local-plan-inspector-s-report
[11] Inspector's Report to Guildford Borough Council, paragraph 42. Available at: https://www.guildford.gov.uk/media/29804/Appendix-1-The-Inspector-s-Report/pdf/Appendix_1_The_Inspectors_Report.pdf?m=637369059509370000
[12] Inspector's Report to Chesterfield Borough Council, paragraph 104. Available at: https://www.chesterfield.gov.uk/media/1270438/final-report-27-may-2020.pdf

2.22 In dismissing the potential release of Green Belt land early in plan preparation, the Council's evidence base does not comprehensively examine whether density and brownfield land have been optimised, although the Sustainability Appraisal (SA) of the Stafford Borough Local Plan 2020-2040 (October 2022) ("The SA, October 2022") does suggest that there is limited opportunity for further development upon previously developed land:

"A fairly limited proportion of growth is set to be directed to previously developed land. However, there is no identified 'reasonable alternative' strategy that would perform better in this respect." (Para 9.11.7)

2.23 Furthermore, there is a significant, and persistent level of unmet housing need across the Greater Birmingham and Black Country Housing Market Area ("GBBCHMA"). Many of the Council's neighbouring authorities are already unable to meet their own needs within existing urban areas. Indeed, the Borough is proposing to contribute a total of 2,000 new homes to meet the unmet needs of Black Country Authorities.

2.24 The Council should therefore examine in detail whether *"exceptional circumstances"* exist. In this regard, the 2015 Calverton Parish Council v Nottingham City Council High Court Judgment[13] sets out 5 points which could guide the formulation of an exceptional circumstances case:

(i) The acuteness/ intensity of the objectively assessed need (matters of degree may be important);

(ii) The inherent constraints on supply/ availability of land prima facie suitable for sustainable development;

(iii) (On the facts of this case) The consequent difficulties in achieving sustainable development without impinging on the Green Belt.

(iv) The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and

(v) The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated to the lowest reasonably practicable extent.

2.25 St Philips acknowledges and welcomes that the Council has allocated land for 535 dwellings per year, exceeding the calculated minimum LHN and contributing 2000 homes towards the unmet needs of the Black Country.

2.26 However, St Philips believes that the Council should have further regard to the acuteness of the unmet housing needs within the wider GBBCHMA which might reasonably be considered an *"exceptional circumstance*". Indeed, in the 2015 Calverton Parish Council case, the Judge pointed to the acuteness of the OAN when considering whether housing needs should be considered an exceptional circumstance (Para 51).[14]

2.27 Whilst Stafford is a single housing market area, it forms part of a broader functional area with the Local Authorities to the North and Birmingham to the South. Considering the scale of the neighbouring authorities' unmet needs it is possible that neighbouring authorities

[13] Nottingham City Council v Calverton Parish Council [2015] EWHC 503 (Admin) (02 March 2015)

[14] It is noted that this Judgment is set within the context of the 2012 NPPF. However, whilst the 2019 NPPF marginally amended national Green Belt policy, it can be adjudged that the definition and tests for exceptional circumstances have not, in and of itself, changed under the 2019 NPPF. Therefore, definitions and tests established under the 2012 NPPF through case law can be considered relevant and instructive in respect of the current context.

will request assistance in meeting their housing requirements. St Philips believes that this may reasonably constitute part of an exceptional circumstances case.

2.28 Furthermore, having been rejected on the basis of being within the Green Belt, the Land to the North of Stone is not considered within the SA (October 2022). St Philips considers that the Council's approach, which prematurely rejects sites for development even where development can still be sustainable, does not promote sustainable patterns of development.

2.29 In essence, the Council's approach has unduly influenced the outcomes of the site selection exercises. Crucially, this has, in all likelihood, unduly limited the release of sites in the Borough for residential purposes that would otherwise be sustainable and suitable. As such, the Council runs the risk of potentially falling into a position where either the evaluation of reasonable alternatives in the SA could be interpreted to either have not been undertaken or to have been 'improperly restricted', in the context of the iterative process necessary for progressing a plan.

2.30 In this context, the Council declared a climate emergency in 2019 and St Philips is concerned that the exclusion of Green Belt sites from the SA could potentially undermine the Council's target of Net Zero emissions by the year 2040.[15] Research commissioned by the Council has found that within Stafford a high proportion of total emissions are associated with the motorways.[16] This demonstrates the importance of locating development nearby settlements with excellent public transport connections. In this context, St Philips would encourage the Council to reconsider its decision not to conduct a review of the Green Belt. This would allow for a more comprehensive understanding of where development can be located sustainably. Stone is recognised in the SA (October 2022) as a particularly sustainable location:

"Stone is suited to receiving a proportion of growth through new local plan allocations on account of being the second largest settlement in the borough, specifically the only town other than Stafford. The town has a vibrant town centre, a good local employment offer and good connectivity by road and rail, with the City of Stoke-on-Trent only ten minutes by rail." (Pg. 114, SA Appendix VI)

2.31 When having regard to the need to release Green Belt land, such an approach would be consistent with paragraph 142 of the NPPF: Where amendments to Green Belt boundaries are required, the promotion of sustainable patterns of development should be considered, alongside giving first consideration to land which is, *inter alia*, well-served by public transport.

2.32 St Philips further believes that the Site can accommodate a retail provision, providing much-needed local facilities. There has been significant interest from retail operators, and other potential locations that have been identified within Stone face technical challenges. The provision of a food store is needed to meet the growing needs of Stone and could contribute towards the formation of an *"exceptional circumstances"* case.

2.33 The Site itself must also be considered in the context of Paragraph 138 of the NPPF, which states that the Green Belt serves five purposes:

a) to check the unrestricted sprawl of large built-up areas;

[15] Stafford Climate Change Mitigation and Adaption Report. Available at: Stafford Policy Summary (staffordbc.gov.uk)
[16] Stafford Climate Change Mitigation and Adaption Report. Available at: Stafford Policy Summary (staffordbc.gov.uk)

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.34 Although a Green Belt review would consider these matters in detail, a brief appraisal of the Site demonstrates that the Site does not contribute significantly to the Green Belts 5 purposes. Indeed, the Vision Document submitted in support of these representations sets out that the Site's defensible boundaries would form a logical and resilient new Green Belt Boundary. St Philips respectfully requests that the Council conduct a Green Belt review to consider these matters in more detail.

Sustainability of Stone

2.35 Whilst broadly supportive of the Council's allocations, St Philips has reservations regarding the Stone settlement strategy. The PO identifies Stone as a Tier 2 settlement, only surpassed by Stafford in the settlement hierarchy. Considering Stone's position in the hierarchy, St Philips is concerned that Stone is only the source of 7% of the Borough's housing supply for the period 2020-2040. This percentage drops to 4.9% when only new allocations are considered (See Table 2.1 below).

Table 2.1 Broad spatial distribution of housing

Sources of Housing Supply 2020-2040 (proportion in brackets)	Completions 2020-2022	Commitments	New Allocations/ supply sources
Windfall (6%)	N/A	N/A	750
Stafford (59%)	766	5,438	1,181
Stone (7%)	243	268	270
Meecebrook (24%)	N/A	N//A	3,000
Larger Settlements (4%)	84	144	234
Smaller Settlements (<1%)	7	13	N/A
Rural Areas (<1%)	20	62	N/A
Total	1,120	5,925	5,535

2.36 The NPPF seeks to ensure development is directed towards sustainable locations (Para 11a). In this regard, paragraph 1.31 of the PO establishes that Stone would be a sustainable location for the development of new housing:

"Stone is an important market town and second principal town and main provider of services, facilities, employment and transport links."

2.37 St Philips consequently considers that the Council's housing allocation to Stone does not reflect the town's proposed position in the settlement hierarchy. St Philips would therefore

encourage the Council to consider further allocations at sustainable locations such as Stone, in accordance with paragraph 9 of the NPPF.

2.38 Furthermore, St Philips notes that the SA (October 2022) states that two of Stone's largest proposed allocations are associated with some considerable constraints. Both the Land East of Oakleigh Road (Capacity for 131 dwellings) and the Land at Uttoxeter Road (Capacity for 97 dwellings) will need further discussions with Network Rail regarding the suitability, with the SA noting:

"Certain aspects of the proposed supply are associated with some notable delivery risk (e.g. sites at Stone close to a level crossing…)" (Para 9.10.2)

2.39 Therefore, St Philips considers that the allocations to Stone are not sufficient for a sustainable location of this size. This is especially true considering the risks to the delivery of the other proposed allocations. St Philips' Site on the edge of Stone would therefore represent an ideal location to allocate further housing sites.

Land to the North of Stone

2.40 As set out within the Vision Document submitted in support of these representations, the Site presents an excellent, sustainable location to deliver approximately 40 dwellings, including up to 16 affordable dwellings. The residential development would be responsive to its surroundings with dwellings set back and screened with landscaping, ensuring the creation of an attractive and active frontage to the canal.

2.41 The Vision Document envisages that the development proposals would include:

1 Approximately 40 dwellings, including up to 16 affordable homes;

2 The provision of a 0.7 ha retail site with parking, servicing and access;

3 New pedestrian and cycle access points, encouraging recreation, physical activity and sustainable travel;

4 A multi-functional green infrastructure network, with new footpaths, new tree planting and an area for formal play;

2.42 The Land to the North of Stone therefore represents an opportunity to deliver a sustainable development that addresses the issues raised within these representations.

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements) ~~Yes~~ / No

2.43 As stated, St Philips has concerns that the proposed distribution of housing does not reflect Stone's position in the settlement hierarchy. Draft Policy 2b states:

"In accordance with Policies 1, 7, 8, 9, 10, 11 and 12, the development of new housing and workplaces will be focussed on Stafford, Stone and Meecebrook Garden Community."

2.44 As stated, Stone only accounts for 4.9% of the new housing supply. As a highly sustainable settlement, St Philips believes that further allocations to Stone should be considered by the Council. It should also be noted that St Philips is promoting other sites within the Borough and have commented on this matter in each set of respective representations where necessary.

Policy 3. Development in the open countryside - general principles ~~Yes / No~~

2.45 St Philips does not wish to comment on draft Policy 3 as part of these representations.

Policy 4. Climate change development requirements Yes / ~~No~~

2.46 St Philips supports draft Policy 4 (Climate change development requirements). Paragraph 153 of the NPPF is clear that:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."

2.47 Stafford Borough Council declared a Climate emergency in 2019 and accordingly, St Philips supports draft Policy 4, which promotes the approach of Paragraph 153 of the NPPF.

Policy 5. Green Belt ~~Yes / No~~

2.48 St Philips does not wish to comment on draft Policy 5 as part of these representations.

Policy 6. Neighbourhood plans ~~Yes / No~~

2.49 St Philips does not wish to comment on draft Policy 6 as part of these representations.

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which incudes a new railway station on the West Coast Main Line, and High-quality transport routes.

Do you agree with the proposed new garden community? Yes / ~~No~~

2.50 St Philips welcomes the Council's decision to propose a new garden community. The proposal for a new garden settlement is in accordance with Paragraph 73 of the NPPF, which recognises that:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)."

2.51 However, whilst broadly supportive of the new garden community, St Philips has concerns that there is an over-reliance on Meecebrook to meet the housing needs of the Borough and its neighbouring Local Authorities. When only new housing allocations are considered, Meecebrook accounts for 54% of Stafford's allocated supply (refer to Table 2.1). St Philips is

concerned that this represents an over-dependency upon one site. In this respect, St Philips further notes that the Viability Assessment (September 2022) identifies the following potential risks that could delay the delivery of Meecebrook:

"Meecebrook is constrained by the lack of clarity around landowner commitment and the unknown costs of infrastructure. It is important that landowners engage continuously in this process and further work is undertaken regarding infrastructure requirements. If landowners are not 'on board', or their financial expectations quantified, the delivery of this scheme is at risk."

2.52 Lichfields' 'Start to Finish (2016)' and subsequent second edition (2020) examines evidence on the speed and rate of delivery of housing on sites across England and Wales (excluding London). It has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; the emerging Mendip Local Plan; and the emerging Doncaster Local Plan).

2.53 A proposition regarding delivery rates for a proposed new settlement was recently considered by the Tunbridge Wells Local Plan Inspector in his report dated November 2022. The Inspector assessed the deliverability of the proposed allocation of Tudeley village and set out that;

31. Paragraph 73 of the Framework requires local planning authorities to make realistic assessments of likely delivery rates given the lead-in times for large scale sites. In this case, the Council confirms that no schemes of a similar size or complexity have been built in Tunbridge Wells or the surrounding area to draw comparisons from. Officers have therefore relied upon lead-in times and delivery rates provided by the site promoters.

32. It is intended that the Hadlow Estate will act as a 'master developer', bringing serviced land parcels to the market which will be offered to selected housebuilders. The transfer of land will be controlled and the Estate will appoint a 'town architect' to oversee quality. The details provided on architectural context, the importance of good design and the level of masterplanning work carried out thus far is extensive and of a high quality.

33. However, neither the Council nor the landowner has any prior experience of delivering a scheme of this size or complexity. No housebuilders are actively involved with the site either. When asked for reassurances about delivery at the hearings, the Council said that this model had been used successfully elsewhere and that provided the confidence it would deliver as expected. But the latest information shows that only 316 houses have been built on the comparative scheme since the approval of planning permission in 20138. Clearly all sites are different, as are the circumstances between Aberdeenshire and Tunbridge Wells. Nevertheless, the evidence only serves to highlight the concerns raised by several participants in the examination, including from the development industry, that the scheme will not deliver the number of homes envisaged by the Council.

34. The most up-to-date, independent evidence of deliverability on large sites before the examination is Start to Finish: Second Edition (Lichfields, 2020). It shows that the average time from validation of an outline planning application to the delivery of houses on large sites over 2,000 dwellings range from 5.0 to 8.4 years. In this case, the submitted Plan would need to be modified and consulted on before adoption, Supplementary

Planning Documents would need to be produced, published for consultation and adopted, planning applications would have to be prepared and submitted, 8 Examination Document TWLP/093 7 important details regarding phasing and the deliverability of shared infrastructure would need resolving, along with agreements on complex planning obligations. Details of the bypass would also have to be finalised, tested, applied for and approved, in addition to the compulsory purchase of land before the wider site could come forward. When taking all these factors into account, I am not persuaded that the housing trajectory is realistic."

2.54 A copy of the Tunbridge Wells Inspectors Report November 2022 is included at Appendix 1.

2.55 Start to Finish establishes that for schemes of over 2,000 dwellings, the average time from the validation of the first planning application to the first dwelling being completed is 8.4 years (see Key Figures excerpt of the study, below). It further finds that the average build-out rate for developments of over 2000 dwellings is 160 dpa.

Figure 2.1 Housing Trajectory

	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40
Past completions	614	506																		
Stafford North SDL			83	95	159	219	219	219	211	155	120	155	155	155	155	120	120	120	120	120
Stafford West SDL			162	118	150	150	250	250	250	202	150	47								
Stone SDL			55	55	36															
Large permissions			171	171	171	170	170	110	100											
Small permissions			64	64	64															
C2			12	12	12	12	12	34												
Small site windfall						50	50	50	50	50	50	50	50	50	50	50	50	50	50	50
Meecebrook											300	300	300	300	300	300	300	300	300	300
Stafford Station Gateway									70	70	70	70	70	70	70	70	70	70	100	100
Other site allocations (policy 12)						86	5	58	210	211	88	104	105	18						

2.56 Figure 2.1 above shows that, starting from the year 2030, the Council has projected that Meecebrook will deliver 300 homes a year. This assertion is made on the assumption that the date of validation is 2024/5 (the monitoring year of adoption of the plan). The findings of the Start to Finish report suggest that this timescale may prove challenging to deliver, particularly considering the report found that Lead-in times jumped after the 2008 financial crash. In this respect, given that the UK economy is widely expected to enter a recession[17], it is considered critical that the Council plans for potential delays to strategic sites.

2.57 The importance of the issue of delivery rates has also recently been considered by the Solihull Local Plan Inspector in assessing the proposed delivery of development and associated housing trajectory for the NEC/ UK Central Hub site. That proposed development forms a significant and critical strategic allocation in the Solihull Local Plan Review and is equally served by existing infrastructure (railway station/ existing highway network and trunk road junctions).

[17] Bank of England expects UK to fall into longest ever recession. Available at: Bank of England expects UK to fall into longest ever recession - BBC News

2.58 The Inspector assessed the proposed trajectory put forward by the Council in his letter dated 5 September 2022 and advised that;

"In terms of timescales for bringing forward development on the NEC site, the latest information provided (documents SMBC016 and SMBC017) sets out a timetable which would ultimately see completions taking place in October 2027. It is ambitious and would rely on progress moving smoothly from one stage to another. With a scheme of this size and nature, there is clearly potential at least for some slippage if issues arise. Given that the proposal is not typical of residential developments in Solihull and relies on an innovative approach, the potential for issues to arise affecting progress is increased. We note that the NEC Masterplan is yet to be finalised and published and it was confirmed at the hearing session on 8 July 2022 that the launch of the competitive tender process has now been put back by two months. There would already appear to be some slippage in the programme produced within the past few months. It is of note that as the NEC site is previously developed land, not within the Green Belt, there would seem to have been no policy constraints in principle preventing a scheme coming forward to date. 17.

Redevelopment of the NEC site for housing is in principle an appropriate and justified element of the Local Plan. It would utilise previously developed land and form a key element in wider proposals for the UK Central Hub. We consider that the proposal should remain in the Local Plan and indeed be strengthened by the addition of a specific policy along the lines of the suggested Policy UK3. This would help to promote its redevelopment and provide a clear policy framework to do so. However, taking into account the above assessment, we have significant doubts that the site will deliver housing on the scale envisaged up to 2030/31 and in the plan period as a whole. 18."

2.59 The Inspectors letter goes on to conclude;

"In order to limit the risk associated with reliance on delivery the NEC site, the housing trajectory should reduce estimated completions to a figure in the order of 500 dwellings for the latter part of the plan period from 2031/32 onwards. This would be broadly in line with the trajectory for site UK1. The policy associated with the allocation could still refer to the potential for a higher number of dwellings and there would be no policy restriction on the amount of housing development that could come forward up to this higher number."

2.60 A copy of the Inspectors' letter dated 5 September 2022 is attached as Appendix 2.

2.61 In regard to the above, Paragraph 73b of the NPPF requires that Local Authorities should:

"make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)"

2.62 If the scheme was delivered at a rate more in line with the research presented in 'Start to Finish', the Borough may struggle to meet the needs of the Black Country. This could compound the acute unmet housing need within the GBBCHMA. Paragraph 61 of the NPPF requires that:

"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

2.63 Although the Borough is a single housing market area, it forms part of a broader functional area with the Local Authorities to the North and Birmingham to the South. Considering the scale of the challenge presented by the unmet needs of the GBBCHMA, St Philips considers that it is important that the Borough is able to assist neighbouring Local Authorities. Whilst the Black Country Plan is no longer progressing, the separate authorities will still require assistance. St Philips believes that this can be supported through the allocation of more small and medium sites. Paragraph 69 of the NPPF is clear that:

"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."

2.64 Risks to proposed delivery timescales highlight the need for the Council to ensure that housing allocations are sufficiently diverse. Smaller and medium sites can be delivered quickly and represent an opportunity to deliver housing to ensure that the needs of neighbouring local authorities are met. Therefore, whilst St Philips is highly supportive of the Council's decision to deliver a new garden community, St Philips would suggest that the Council should diversify its allocations to ensure that there is not an over-reliance upon one site.

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations. Do you agree with the proposed allocations?

Do you agree with the proposed allocations? ~~Yes~~ / No

2.65 St Philips broadly supports the proposed site allocations detailed within the PO. However, as outlined above, St Philips believes that there is an over-reliance on large strategic sites to achieve the Borough's housing needs. St Philips is also concerned that potential sustainable sites have been overlooked prematurely due to being located within the Green Belt.

2.66 St Philips, therefore, believes that the Council should conduct a Green Belt review to ensure development is being directed to the most sustainable locations. Further sites should also be allocated to ensure that the Borough's needs are being met, as demonstrated in section 2.

Economy Policies

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies? ~~Yes / No~~

2.67 St Philips do not wish to comment on draft Policies 16, 17 and 18 as part of these representations.

Housing Policies

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy? ~~Yes / No~~

2.68 St Philips does not wish to comment on draft Policy 23 as part of these representations.

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy? ~~Yes / No~~

2.69 St Philips does not wish to comment on draft Policy 30 as part of these representations.

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling. The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies? ~~Yes / No~~

2.70 St Philips does not wish to comment on draft policies 24, 26, 27, 28, 29, 21, 31, 32 and 33 as part of these representations.

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy. The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies? ~~Yes / No~~

2.71 St Philips does not wish to comment on draft policies 34, 25, 36, 37, 38, 39 and 40 as part of these representations.

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality. The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies? ~~Yes / No~~

2.72 St Philips does not wish to comment on draft policies 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51 as part of these representations.

Connections

Q13. The connections policies chapter contains policies on transport and parking standards. The relevant policies are: 52 and 53

Do you agree with these policies? ~~Yes / No~~

2.73 St Philips does not wish to comment on draft policies 52 and 53 as part of these representations.

Evidence Base

Q14. Have we considered all relevant studies and reports as part of our local plan? ~~Yes~~/ No

2.74 As set out in section 2, St Philips respectfully requests that the Council undertake a review of the Green Belt to ensure that the Local Plan is based on all available evidence.

Q15. Do you think there is any further evidence required? Yes / ~~No~~

2.75 As stated, St Philips considers it necessary for a Green Belt review to be commissioned to ensure that development is directed towards the most sustainable locations.

General Comments

2.76 To conclude, whilst St Philips supports the Council's decision to exceed the LHN figure, it is our view that the Council should plan for growth scenario E of the EHDNA and apply a partial catch-up rate. This would ensure that a sufficient number of houses are delivered for the Borough whilst also providing necessary affordable housing.

2.77 The Council could achieve this by undertaking a Green Belt review, which would further ensure that development is directed to the most sustainable locations. Further allocations of small and medium sites would also prevent an over-reliance upon larger strategic sites such as Meecebrook, and ensure the Council is able to assist neighbouring local authorities with their unmet needs. The Land to the North of Stone is a smaller, sustainably located Site and can therefore help to address these issues.

Appendix 1 Tunbridge Wells Inspectors Report November 2022

The Planning Inspectorate

Examination of the Tunbridge Wells Borough Local Plan: Initial Findings

[redacted]

The Development Strategy – Policy STR1

1. The starting point for considering the soundness of the Local Plan is the National Planning Policy Framework ('the Framework'). Paragraph 35 states that Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

2. Where the Green Belt is concerned, paragraph 137 of the Framework states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Once established, boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of Plans.

3. Around 22% of Tunbridge Wells Borough is within the Metropolitan Green Belt. Broadly speaking, the Green Belt wraps around the main urban area of Royal Tunbridge Wells and extends up to the edge of Paddock Wood. Beyond the Green Belt the remainder of the borough is predominantly rural and almost entirely within the High Weald AONB.

4. Seeking to meet housing needs in the more sustainable parts of the borough is therefore likely to require the use of some Green Belt land. In reaching this conclusion it is evident that the Council has looked at maximising densities in urban areas and discussed the possibility of neighbouring areas accommodating additional housing growth, consistent with paragraph 141 of the Framework. In principle, the strategy is reasonable and appropriate.

5. Having decided at a strategic level to review the Green Belt boundary, the Council has then considered the likely harm that would be caused and the extent to which any impacts could be reduced. This has been done through a three-staged assessment process. The Green Belt Study Stage 3 is the final assessment in the series and is intended to provide a "more refined" consideration of potential harm by looking at individual sites[1]. This is a logical and sound way of considering where growth should take place. It recognises that different sites will have different impacts on the Green Belt and the purposes of including land within it.

[1] Core Document CD3.141

6. However, the Green Belt Study Stage 3 only considers sites allocated for development *in* the submitted Plan - i.e. sites which the Council has already determined are sound and concluded that exceptional circumstances exist to remove them from the Green Belt. If it is accepted that Green Belt land will be required, then why did the Council not carry out a comparative assessment of reasonable alternatives at Stage 3 in order to avoid, or at least minimise, harmful impacts where possible? This is especially relevant when the two largest allocations in the Plan (Tudeley Village and Paddock Wood) were found to cause "high" levels of harm to the Green Belt.

7. Carrying out a comparative assessment may have resulted in the same sites allocated for development. Just because a site would have a "low" level of harm to the Green Belt does not automatically justify its allocation in the Plan. Other factors, such as the need to promote sustainable patterns of development are also clearly relevant. However, national planning policy is clear that the Government attaches great importance to Green Belts and that boundaries should only be amended in <u>exceptional circumstances</u>. Reaching that conclusion should be based on a thorough assessment process which includes an understanding of the likely impacts when compared with other site options, especially where the magnitude of harm from the two largest allocations is "high".

8. Further work is therefore necessary before a conclusion can be reached that exceptional circumstances exist to release the relevant site allocations from the Green Belt.

The Strategy for Tudeley Village – Policy STR/SS3

9. The Plan seeks to take around 170 hectares of land out of the Green Belt to accommodate a new settlement of up to 2,800 houses at Tudeley. In principle, a strategy which seeks to meet housing needs through large scale, strategic allocations is perfectly reasonable. Paragraph 73 of the Framework recognises that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns.

10. However, national planning policy also requires such developments to be "well located" and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Paragraph 73 states that:

> "*Working with the support of local communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.*"

11. In considering whether the allocation is consistent with this requirement, three main issues have been identified. They are: the location and accessibility of the site, whether or not the necessary infrastructure can be provided and the deliverability of the site in the manner envisaged.

Location and Accessibility

12. The new settlement would be approximately 2 miles east of Tonbridge and around 2 miles west of Paddock Wood. At present there are no shops or services nearby. A bus route runs through Tudeley travelling between Tonbridge and Paddock Wood but is limited to typical working hours Monday-Friday with a more limited service on a weekend.

13. Pedestrian and cycle links would be provided as part of the scheme and there is a commitment to include a new dedicated route into Tonbridge. Although this could be secured by policies in the Plan, the distances involved to the centre of Tonbridge and back would not be conducive to walking. Likewise, it would be unrealistic to expect a significant number of people to cycle into Tonbridge, especially during the darker, winter months or during periods of inclement weather. The *Local Cycling and Walking Infrastructure Plan: Phase 2*[2] identifies some of the issues, which include isolation and a lack of passive surveillance due to the remoteness of a route in this location.

14. Cycling and pedestrian links would also extend beyond the plan area. In order to be effective, they would therefore need to be agreed with Tonbridge & Malling Borough Council as part of a wider strategy. Paragraph 106 of the Framework requires planning policies to be prepared with the active involvement of local highways authorities and neighbouring councils so that strategies and investments for supporting sustainable transport and development can be aligned. The neighbouring authority confirms that promoting walking and cycling would require a joined-up approach with projects in their borough, which are still at an early stage.

15. The railway line between Tonbridge and Paddock Wood divides the site yet no new station is proposed. This could have provided an opportunity to access higher order services easily and quickly by public transport and reduce the reliance on private car journeys. In the absence of any rail links, potential future residents would be reliant on buses as an alternative to the car. Again, this could be a policy requirement in the Plan. However, at the hearing sessions it was confirmed that discussions are still ongoing with bus providers and Kent County Council. Even if private services were provided, it would still require some collaboration with Tonbridge & Malling Borough Council in order to be effective. It therefore remains unclear precisely what would be feasible and whether it would offer a genuine alternative to the private car.

16. A key part of the justification for the allocation is the range of facilities that would be provided on-site and the subsequent reduction in the need to travel. The supporting text suggests that up to 10,000 square meters of commercial floorspace will be provided to maximise the "internalisation" of trips.

[2] Core Document 3.115b(i)

17. The scale of commercial floorspace is justified by comparison to settlements such as Cranbrook and Pembury. But Cranbrook is a historic market town which serves a much wider rural area, including other villages such as Sissinghurst. It is categorised by the Council's own assessment[3] as a Group A settlement, second only to the main urban area of Royal Tunbridge Wells and Southborough. It is therefore materially different to Tudeley.

18. An objective analysis of likely future needs is provided in the *Tunbridge Wells Commercial Leisure & Town Centre Uses Study Update*[4]. It predicts, based on the number of houses proposed, capacity for around 1,900 square metres of convenience retail floorspace and approximately 1,000 square metres of comparison goods floorspace. Paragraph 8.11 clarifies that *"Given the likely scale of spending forecast, we would suggest that each of Tudeley Village and Paddock Wood could facilitate a limited number of small retail units as part of 2-3 local centres designed to support new residents' day-to-day shopping needs."*

19. The figures provided are by no means an upper limit or 'cap'. Indeed, the Study recognises that additional floorspace would have the potential to further support residents. However, this would only be where it can be demonstrated that the proposals would not detract from the vitality and viability of surrounding centres, which include Paddock Wood and Tonbridge. The Council's own evidence therefore questions such high-level, aspirational assumptions about the scale of commercial floorspace that could be supported, and the subsequent internalisation of trips that would result.

20. The implications of increased traffic from the site have been considered through various documents.[5] The 'Addendum 2' report is the latest and considers impacts by assessing the "reference case" (with only committed developments), a Local Plan scenario with no changes to the highway network, a Local Plan scenario with highways mitigation and finally a Local Plan scenario with highways mitigation and a 10% modal shift.

21. In summary, the evidence demonstrates that existing traffic volumes and limited capacity cause congestion in Tonbridge town centre. Local Plan growth will add traffic to these junctions, causing negative impacts on their operation. This substantiates the concerns raised by Tonbridge & Malling Borough Council and local residents.

22. The issue with the soundness of the Plan is that, unlike some other junctions (which can be altered to mitigate harmful impacts), the space to provide any mitigation in Tonbridge town centre is limited. Suggested ways forward include traffic management and encouraging "significant modal shift". However, as identified above, details of the public transport improvements that could be provided are still at an early stage and it is not possible to establish whether they would genuinely achieve any significant modal shift.

[3] Settlement Role and Function Study Update
[4] Core Document CD3.86a
[5] Core Document 3.48, Core Document 3.114, Examination Document PS_023 and Examination Document PS_024

23. In summary therefore, at present there is insufficient evidence to suggest that the scheme will achieve the levels of internalisation and changes in modal shift necessary to adequately mitigate against the likely increase in car travel. Given the existing constraints and congestion in Tonbridge town centre, the cumulative impacts of the scale and location of development would be severe. It has not been adequately demonstrated that the impacts can be cost effectively mitigated to an acceptable degree.

Infrastructure – The Five Oak Green Bypass

24. In order to facilitate the new settlement a bypass of Five Oak Green is required. This is because of the projected increase in traffic, the existing highway constraints in the village and a past record of accidents in the area.[6] The new road would run to the south of Five Oak Green from the B2017 to the A228 near Paddock Wood.

25. Assessing the detailed design and suitability of the road would be part of a future planning application process. Nevertheless, it is still necessary to consider the suitability and likelihood of the bypass coming forward at the Local Plan stage, because without it, the allocation would be undeliverable, and thus ineffective.

26. From discussions at the hearings there are three main concerns with this part of the Plan. Firstly, the bypass is to be accessed from a new junction almost directly opposite Capel Primary School. At the hearings the Council confirmed that no detailed consideration had yet been given to the appropriateness of this location having regard to issues such as air quality, road and pedestrian safety and noise. They are all important considerations.

27. Secondly, only limited information has been provided to consider the visual impact of a new road in this location. This is especially important when considering the topography of the area, the need for a crossing over the Alder Stream, heritage and the proximity of the road to the AONB. The *AONB Setting Analysis Report*[7] found that the high ground to the south of Tudeley contributes most to the setting of the AONB because it has the highest intervisibility and forms a transition from the lower ground further north. Significant engineering works, significant increases in traffic volumes, light and noise are all identified as factors which may harm the setting of the AONB. All are probable as part of the development of a new bypass. Without proper consideration of these issues, it is therefore not possible to determine the likely suitability of the scheme. It would also require additional development in the Green Belt and in areas at risk of flooding.

28. Thirdly, there remains uncertainty about the funding, phasing and deliverability of the road. At the hearings, it was suggested by the Council that changes are required to the submitted Plan because only the Tudeley allocation needs to contribute towards it. But without a bypass, presumably some residents of the nearly 3,500 new homes proposed at Paddock Wood will also pass through Five Oak Green?

[6] Tunbridge Wells Borough Council Matter 6 Hearing Statement
[7] Core Document CD3.95a

29. The hearings also flagged uncertainty about when the by-pass would need to be built and what implications this would have on safety within the village. Finally, and crucially, building the road would require land in multiple ownerships. Although the Council is optimistic about the use of compulsory purchase orders, this process adds to the complexity, cost, timescales and general uncertainty of its deliverability.

Deliverability

30. One of the Council's reasons for concluding that exceptional circumstances exist is the significant contribution that the allocation would make towards meeting housing needs. The housing trajectory predicts that around 2,100 dwellings will be delivered over the plan period, with 150 new homes completed each year from 2025 onwards.

31. Paragraph 73 of the Framework requires local planning authorities to make realistic assessments of likely delivery rates given the lead-in times for large scale sites. In this case, the Council confirms that no schemes of a similar size or complexity have been built in Tunbridge Wells or the surrounding area to draw comparisons from. Officers have therefore relied upon lead-in times and delivery rates provided by the site promoters.

32. It is intended that the Hadlow Estate will act as a 'master developer', bringing serviced land parcels to the market which will be offered to selected housebuilders. The transfer of land will be controlled and the Estate will appoint a 'town architect' to oversee quality. The details provided on architectural context, the importance of good design and the level of masterplanning work carried out thus far is extensive and of a high quality.

33. However, neither the Council nor the landowner has any prior experience of delivering a scheme of this size or complexity. No housebuilders are actively involved with the site either. When asked for reassurances about delivery at the hearings, the Council said that this model had been used successfully elsewhere and that provided the confidence it would deliver as expected. But the latest information shows that only 316 houses have been built on the comparative scheme since the approval of planning permission in 2013[8]. Clearly all sites are different, as are the circumstances between Aberdeenshire and Tunbridge Wells. Nevertheless, the evidence only serves to highlight the concerns raised by several participants in the examination, including from the development industry, that the scheme will not deliver the number of homes envisaged by the Council.

34. The most up-to-date, independent evidence of deliverability on large sites before the examination is *Start to Finish: Second Edition* (Lichfields, 2020). It shows that the average time from validation of an outline planning application to the delivery of houses on large sites over 2,000 dwellings range from 5.0 to 8.4 years. In this case, the submitted Plan would need to be modified and consulted on before adoption, Supplementary Planning Documents would need to be produced, published for consultation and adopted, planning applications would have to be prepared and submitted,

[8] Examination Document TWLP/093

important details regarding phasing and the deliverability of shared infrastructure would need resolving, along with agreements on complex planning obligations. Details of the bypass would also have to be finalised, tested, applied for and approved, in addition to the compulsory purchase of land before the wider site could come forward. When taking all these factors into account, I am not persuaded that the housing trajectory is realistic.

35. One consequence of a slower delivery rate is the ability of the site to provide the necessary infrastructure. For example, the Council confirms that the viability assessment supporting the Plan[9] is based on the proposed housing trajectory. When considering that several of the options tested show Tudeley Village in deficit, is it likely that a policy-compliant scheme of the type envisaged can actually be achieved? As the PPG advises[10], viability assessments should not compromise sustainable development, but should be used to ensure that policies are realistic and that the cumulative cost of relevant policies do not undermine the deliverability of the plan.

Conclusion

36. The principle of seeking to help meet housing needs through a high-quality, mixed-use new settlement is a reasonable and positive approach to take. Officers have also clearly worked hard in bringing relevant stakeholders together through the Strategic Sites Working Group. However, at this stage there remain significant and fundamental unanswered questions regarding the accessibility of the site by sustainable modes of transport, the ability to successfully mitigate against serious impacts on the highway network, the suitability and deliverability of the Five Oak Green bypass and the ability of the site to deliver housing at the rate and scale envisaged by the Plan. For reasons discussed above, the decision to allocate the site was also made without the benefit of a comparative assessment of Green Belt impacts on alternative potential development sites.

37. It is clearly not necessary to have all the details of a site allocation agreed and resolved at the local plan stage. Sufficient safeguards can be put in place by development management policies. But the issues raised above go to the heart of whether the site and strategy for Tudeley Village is justified and effective. National planning policy is also clear that the Government attaches great importance to the Green Belt, the boundaries of which should only be altered in exceptional circumstances. When considering the level of acknowledged harm to the Green Belt that would occur, combined with the significance of the issues raised, I find that exceptional circumstances have not been demonstrated to justify removing the site from the Green Belt.

38. The implications of this conclusion and my recommendations for taking the examination forward are discussed in due course.

[9] Core Documents 3.65a-3.65a(v)
[10] Paragraph: 002 Reference ID: 10-002-20190509

The Strategy for Paddock Wood and East Capel – Policy STR/SS1

39. The significant expansion of Paddock Wood is proposed by Policy STR/SS1. In total, sites sufficient to provide around 3,500 houses and roughly 11 hectares of employment land are allocated. The majority of new housing would be to the east and west of the town, with employment to the north.

Strategy and Implementation

40. We discussed at the hearings the need for several main modifications to make it clear what is proposed, where and when at Paddock Wood. These changes are needed for the effectiveness of the Plan and to remove the reliance on supplementary planning documents.

41. Another soundness issue is how the Council will ensure that development comes forward in a comprehensive manner, thus ensuring that the vision for a strategically and holistically planned expansion to the town is realised[11]. As submitted, there is insufficient detail on how the parcels will be delivered. The Plan must be clear on how it will tie the component parts together in order to be effective in achieving the stated aims and objectives.

42. One way of making the Plan sound might be to allocate each parcel for development, set out parameters for the scale, type and mix of uses permitted and then differentiate between the necessary on-site and shared infrastructure. The policy for each parcel could then include a requirement for phasing and infrastructure delivery, in addition to a requirement to accord with a town-wide framework masterplan (or other such document). This would allow individual schemes to progress, whilst ensuring a common objective on shared infrastructure. As part of any re-drafted policy, it will still be necessary to prevent piecemeal development and ensure that developers continue to work collaboratively, especially where connection between sites is required (such as across the railway line).

Education Infrastructure

43. It is my understanding that additional housing in the short-term will require the expansion of Mascalls Academy. Thereafter, it is intended that needs would be served by the Academy *and* a new secondary school at Tudeley Village. However, for the reasons given above, the scale of Green Belt land proposed for release at Tudeley is not justified. What, therefore, are the consequences for growth in Paddock Wood?

44. The *Strategic Sites Masterplanning and Infrastructure Study* seeks to address this scenario in paragraph 6.79. It states that the costs would be "*…allocated as a wider contribution for KCC to distribute across neighbouring schools for targeted expansion…"*. But where are the neighbouring secondary schools and what scope do they have for expansion? Would it continue to be an appropriate strategy to significantly expand Paddock Wood if it meant that school children and parents would have to travel significantly further afield to access secondary education?

[11] Submission Version Local Plan paragraph 5.196

45. In the event that Tudeley Village *was* justified, then another issue to consider is the Five Oak Green bypass. The Council has sought a change to the Plan to delete the requirement for development at Paddock Wood to contribute towards it. However, without the bypass, presumably children and their parents would have to travel through Five Oak Green to reach the new school (which is required, in part, because of the growth at Paddock Wood). Occupants of the new housing would also presumably drive to Tonbridge at times, and the proposed leisure centre would attract Tudeley residents from the other direction? If highway safety concerns necessitate a bypass, then presumably the scale and location of growth in Paddock Wood is also part of the justification? Further clarification is required.

Flooding and Flood Risk

46. Paragraph 161 of the Framework requires all Plans to apply a sequential, risk-based approach to the location of development. Paragraph 162 states that:

> *"The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding*."

47. I agree with the Council that where a large parcel of land contains different flood zones (such as land west of Paddock Wood), it does not automatically follow that the entire parcel should be discounted because one part is subject to flooding. A flood risk assessment would be able to adequately direct development away from the areas at the highest risk. That assessment is contained in the *Strategic Sites Masterplanning and Infrastructure Study*[12] and associated flood modelling. It considered an option (Option 3) where all residential development is removed from Flood Zones 2 and 3.

48. Option 3 was discounted because it represented an 'extreme' application of the sequential test and would impact on viability (it would result in around 610 fewer homes). However, national planning policy is clear that development should not be allocated or permitted if there are reasonably available sites appropriate for the development at a lower risk of flooding. The PPG advises that avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features.[13]

49. Similarly, land proposed for development in the northern parcel is almost entirely within Flood Zones 2 and 3. Given that the employment allocations are not linked to other parcels (i.e. they are coming forward in isolation by separate developers) what is the justification for their redevelopment? The size and scale of land parcels allocated around the town shows that development could take place in areas at lower risk, if required. Insufficient information has therefore been provided to justify their inclusion in the Plan.

[12] Core Document CD3.66
[13] Paragraph: 023 Reference ID: 7-023-20220825

50. The reasons for allocating development in areas at risk of flooding are viability grounds and the improvements that could be achieved to existing parts of the town. However, the sequential test is an absolute test. Framework paragraph 162 is clear that development should not be allocated if there are reasonably available sites appropriate for the proposed uses in areas with a lower risk of flooding. In this case, the masterplanning work has shown that the western parcel could be brought forward in a way that avoids placing new housing in areas at risk. This is synonymous with the aims and objectives of the sequential test.

51. Furthermore, the issues of flooding around Paddock Wood are described as being linked to the railway line and the capacity of flow routes underneath it. When flow rates exceed the capacity, water accumulates and travels eastwards into the town centre where it meets other surface water and results in widespread flooding. No persuasive information has been provided to suggest that proportionate improvement measures, such as flood water storage and improving the maintenance of existing culverts could not be achieved as part of an alternative scheme with housing in Flood Zone 1.

Conclusion

52. Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. I therefore agree with the Council that it represents a 'logical choice' for growth[14]. However, the strategy for the town needs revisiting to set out clearly what is proposed on each parcel, both in terms of the scale and mix of uses and any necessary infrastructure provision. In addition, the location of new housing, community and employment uses in areas at higher risk of flooding is not justified. Comprehensive main modifications will therefore be required to the submitted Plan in order to make it sound. As with my conclusions on the Tudeley Village allocation, the implications for the examination moving forward are discussed below.

The Strategy for Royal Tunbridge Wells – Policy STR/RTW1

53. We discussed the need for several main modifications to sites and policies throughout the hearing sessions. The following does not list every change necessary, but instead focuses on those issues which were not resolved or where further information has since been provided.

Former Cinema Site – Policy AL/RTW1

54. This is a prominent town centre site which has a lengthy and detailed planning history. Despite benefitting from planning permission for a mixed-use development for some years, it is yet to come forward.

55. The latest proposals for the site include extra care and/or retirement housing which have materialised after the Plan was submitted. Although some representors have questioned the contribution that such uses would make to

[14] Submission Version Local Plan, paragraph 4.44

the vibrancy of the town centre, I see no reason why extra care and/or retirement housing would be inappropriate as part of a mixed-use scheme which included some active ground floor uses. Paragraph 86(f) of the Framework specifically requires planning policies to recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites. The site has been vacant for a long time and its redevelopment should be supported and encouraged by the Plan.

56. In order to make the Plan sound, greater flexibility should therefore be provided by a re-drafted policy which supports the principle of a broader range of town centre uses. A re-drafted policy could also emphasise the importance of the regeneration of the site to the town and requirements for a sensitive, high-quality design.

Land at Colebrook House

57. The submitted Plan seeks to remove land at Colebrooke House from the Green Belt but does not allocate it for any specific use. Paragraph 4.127 of the Plan states that the site is safeguarded for future economic development and will only come forward following a Local Plan update. Following the hearings, the Council's position has changed. Examination Document TWLP/091 (dated August 2022) suggests that the site should remain in the Green Belt.

58. Paragraph 143 of the Framework does allow for the safeguarding of land between the urban area and the Green Belt in order to meet longer-term development needs. However, this is only 'where necessary' and relates to longer-term needs stretching 'well beyond' the plan period.

59. In this case, the Council has only recently granted planning permission for over 70,000 square metres of commercial floorspace on the adjacent site at Longfield Road. The net developable area (13.4 hectares) almost meets the need for employment land over the whole plan period alone (14 hectares). It is not clear when (during the plan period) this development will be built out and occupied or whether the Council's future strategy will be to continue expanding commercial development eastwards up to the A21.

60. Furthermore, paragraph 143 of the Framework requires Plans to define Green Belt boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The area proposed for removal from the Green Belt would consist of Colebrook House and its grounds only. Land to the north and south would remain in the Green Belt, as would the vacant property to the east, adjacent to the A21. The boundary would therefore be arbitrary in the context of its wider surroundings. It would not be readily recognisable and would place pressure on further areas to be released, such as the parcel to the south which is bounded by the A21 and Longfield Road.

61. In summary, I find no exceptional circumstances to justify altering the Green Belt boundary in this location.

Hawkenbury Recreation Ground - Policy AL/RTW19

62. This site is already allocated in the existing development plan and benefits from planning permission for sports and recreation uses with associated changing rooms and car parking. As part of the new Local Plan, it would also accommodate a new stadium for Tunbridge Wells Football Club.

63. A football stadium accommodating up to 3,000 people would be a materially different, and a far more intensive use of the site than the one already approved. At the hearing sessions we discussed concerns about the proposed access arrangements, with access currently taken from a narrow road at the end of High Woods Lane. High Woods Lane itself is also a narrow, predominantly residential street which at the time of my site visit contained several parked cars.

64. Further information in support of the allocation has been provided in Examination Document TWLP/092, which includes indicative details of the passing places that would be required along High Woods Lane. Because the road widening and re-provision of the parking spaces is critical to the suitability of the site, and because the indicative details have not previously been made available, comments will have to be sought from interested parties who have been actively involved in the examination of this site. Subject to how the examination is taken forward (in light of the comments on the strategic sites above) further consultation will be required on these details at the appropriate point in time.

The Strategy for Southborough – Policy STR/SO1

Land at Mabledon House – Policy AL/SO2

65. Policy AL/SO2 allocates land at Mabledon House for a luxury hotel of up to 200 bedrooms and a leisure development with spa and conference facilities. The site is within the Green Belt, but no alterations are proposed to the Green Belt boundary.

66. The construction of new buildings is inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. To demonstrate very special circumstances, the harm by reason of inappropriateness, and any other harm, must be clearly outweighed by other considerations.

67. No precise details have been provided by the Council on the nature and extent of the built development that would be required at Mabledon House. It is therefore not possible to determine any potential harm, add this to the substantial weight given to the harm to the Green Belt by reason of its inappropriateness, and conclude on the likelihood of this being clearly outweighed by other considerations. Allocating the site for development, but then requiring it to demonstrate very special circumstances does not represent an effective or justified policy.

68. There are, however, some exceptions to inappropriate development in the Green Belt. Amongst others, this includes the partial or complete redevelopment of previously developed land. The conversion of existing structures and the house could also presumably take place without the construction of new buildings. Another way of making the Plan sound might therefore be to support the principle of the uses proposed but within the exceptions permitted by national planning policy. This would potentially be a different type of development to the one proposed by the site promoters. It is therefore a matter which requires further consideration by the Council on the most appropriate way forward.

The Strategy for Cranbrook and Sissinghurst – Policy STR/CRS1

Land South of The Street – Policy AL/CRS6

69. This site is allocated for around 20 houses and a replacement community hall. Following submission of the Plan a detailed scheme has been produced which shows that it is not viable to deliver the replacement hall and meet the full requirement for 30% affordable housing.[15]

70. Having independently assessed the necessary information, the Council's suggested way forward is to modify the Plan by introducing additional flexibility for up to 30% affordable housing. I agree. As submitted, the policy requirements would render the allocation unviable and thus undeliverable. However, some affordable housing may be possible, with the final amount determined by a site-specific viability assessment. This would allow the scheme to come forward whilst maximising the efficient use of land and securing a new hall for the local community.

71. The allocation should therefore be modified in line with Document TWLP/094, with consequential changes also made to the supporting text. Maximising the amount of affordable housing (or necessary off-site contribution) would be a matter for the planning application process to determine.

The Strategy for Hawkhurst – Policy STR/HA1

Land North of Birchfield Grove – Policy AL/HA5

72. During the hearing sessions we heard that a developer has an agreement to purchase this site, which is allocated for a new medical centre. Upon completion, the developer would then gift an area of land to the medical practice for the new centre.

73. However, restrictions on the agreement mean that the developers can only purchase the site with the benefit of planning permission for housing on the remainder of the land to the north. The Council considered the suitability of that land and discounted it due to the likelihood for landscape harm (the site is within the High Weald AONB). It was made clear that no alternative scheme would be suitable either due to the landscape sensitives of the site.

[15] Examination Document TWLP/094

74. The prospective developer also owns a 'ransom strip' running between Birchfield Grove and the proposed medical centre site. Regardless of the situation with the remainder of the site, access over this land would have to be agreed and/or resolved in order to bring the site forward.

75. Both sides clearly have very different views on how the land should be developed, with no evidence to suggest that the situation is likely to be resolved anytime soon. Based on the information provided the medical centre is therefore undeliverable and the allocation ineffective. As a result, it should be deleted from the Plan. Although the Council refers to the possible use of compulsory purchase powers, the outcome of this process is not guaranteed and could take several years to conclude, by which time an alternative site or another way of meeting the need may have been identified.

76. The outcome of deleting the allocation is that no site would be identified for the necessary medical centre. In order to make the Plan sound, the Council should therefore give consideration to how the necessary facilities can be provided. Depending on timescales, this may necessitate a commitment to review parts of the Plan in order to meet the need.

Land at Limes Grove (March's Field) - Policy AL/HA8

77. Policy AL/HA8 safeguards land at Limes Grove for employment uses, only allowing it to come forward if monitoring shows that other allocations have stalled or there is evidence of need in this part of the borough.

78. Limes Grove is a narrow country lane situated at the rear of the existing business park. In places the visibility of oncoming traffic is limited. The width of the road is narrow and does not allow vehicles to pass. There is also no footpath to the main entrance of the business park or the bus stops on the A229. As explored at the hearing sessions, the site would therefore be wholly unsuitable for unrestricted commercial uses where the loading and unloading of large vehicles was necessary.

79. That being the case, the site is currently vacant and was formerly used for commercial purposes as a woodyard. It is also directly opposite the existing business park, is within the same ownership and has been identified as suitable for commercial uses by the Council. Rather than deleting the allocation entirely, another way of making the Plan sound might therefore be to identify the site for smaller, less-intensive ancillary uses associated with the business park.

80. In terms of restrictions on when the site can come forward, representations from the site owners state that local businesses need more space now. This is one of the reasons for the larger expansion of the site to the south. Moreover, this is a small site (the net developable area is less than 0.5 hectares) which has a close physical and historical relationship with the remainder of the business park. As such, there is no justification for restricting when it can come forward. Both soundness issues can be rectified by main modifications to Policy AL/HA8.

The Strategy for Benenden – Policy PSTR/BE1

81. Sites are allocated in and around Benenden by Policies AL/BE1 – AL/BE4. During the course of the examination the Benenden Neighbourhood Plan has been 'made'. The sites now form part of the development plan for the area.

82. The Council's suggested response was to delete the allocations from the Local Plan. I agree that it would be unnecessary to modify each policy to precisely mirror the Neighbourhood Plan. Paragraph 16 of the Framework states that Plans should avoid unnecessary duplication. Nevertheless, it would still be beneficial to decision-makers and developers to list the sites in the Local Plan and set out what they are allocated for. This would ensure consistency with other parishes which each have their own policy in the Local Plan. The necessary changes can be made by main modifications.

The Strategy for Pembury – Policy PSTR/PE1

Land at Downingbury Farm, Maidstone Road - Policy AL/PE4

83. Policy AL/PE4 allocates land at Downingbury Farm for 25 dwellings. The allocation also includes an area of safeguarded land for expansion of the Hospice in the Weald.

84. Criterion 5 requires the two sites to be tied together through a legal agreement. There is no justification for this requirement. Because the two uses are different and could come forward independently from one another, the Plan should allocate each site separately.

85. Based on the evidence provided by the Hospice, expansion of the Pembury site is also needed in a much shorter timeframe, with the site currently operating at and above capacity. If the intention of the Plan was to allow the Hospice to expand onto adjacent land, and that expansion is needed during the plan period rather than beyond, then there is no justification for safeguarding for the future. Greater flexibility should be provided by allocating the site and thus enabling its timely delivery.

86. Despite 'safeguarding' the land, the submitted Plan did not seek to remove it from the Green Belt. In order to be effective, the Council suggests that a further change would be necessary to the Green Belt boundary around Pembury. The necessary justification is provided in Examination Document TWLP/095. This will need to be consulted on alongside other recommended changes to the Plan in due course.

The Strategy for Sandhurst – Policy PSTR/SA1

Sharps Hill Farm - Policy AL/SA2

87. For reasons which shall be set out in my Final Report, the principle of modest residential development on this site is justified. However, main modifications are required to ensure that the final design and layout is appropriate, and that the allocation is effective.

88. As submitted, criterion 4 requires development in the south-west corner to be 'low density'. This lacks sufficient precision. Moreover, it will not just be the density of development which is the determining factor in the suitability of a future scheme. The number of properties, their layout, scale, design and appearance will all be material considerations, especially in the south-west corner of the site away from the existing settlement edge. Changes will therefore be necessary to ensure that the policy provides appropriate and effective safeguards against inappropriate forms of development, such as the scheme previously refused by the Council and dismissed on appeal. In the first instance, and as with other main modifications, I invite the Council to look at the wording and propose the necessary changes.

Housing for Older People and People with Disabilities

89. Paragraph 62 of the Framework states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Amongst others, this includes housing for older people and people with disabilities.

90. At the hearing sessions we agreed that the supporting text should not seek to define whether a development falls within Use Class C3 (dwellinghouses) or Use Class C2 (provision of accommodation and care to people in need of care). This would be determined on a case-by-case basis having regard to the specific details of each proposal.

91. The supporting text at paragraphs 6.356 to 6.370 of the Plan then refers to the need for extra care housing and sets out how this will be met. A useful summary of the evidence supporting the Plan is provided in Examination Document TWLP_032a, which includes reference to the *Housing Needs Assessment Topic Paper*[16].

92. As with other matters, the Final Report will consider in detail the evidence supporting the Plan and conclude whether or not its policies will be effective in meeting housing needs for older people. At this stage, for effectiveness, the Plan should be modified to clearly set out the gross need for extra care housing based on the two methods used (as per the tables in Examination Document TWLP_032a which show a range between 342 and 431 units). For the same reasons the Plan should then make it clear how needs will be met by listing the relevant sites, including any committed schemes.

93. Conclusions reached above in relation to Tudeley Village and Paddock Wood will no doubt have consequential impacts on how the needs for older people and people with disabilities will be met (both strategic sites include requirements to provide sheltered and extra care housing). In the first instance this will be a matter for the Council to consider in suggesting ways that the Plan could be made sound.

[16] Core Document CD3.73

Conclusions and Next Steps

94. A significant amount of hard work has clearly gone into the preparation of the Local Plan which is positively prepared in seeking to meet housing needs despite large areas of Green Belt and the High Weald AONB. The majority of changes required to the submitted Plan are relatively straightforward and the main modifications referred to above should be incorporated into the schedule which is already in preparation.

95. As for the strategic sites, significant changes and/or the preparation of further supporting information is going to be necessary before they can be found sound. At Paddock Wood, I am relatively confident that this can be achieved without fundamental changes to the Plan's strategy. However, the implications of my initial findings at Tudeley Village could have far greater, consequential impacts on other aspects of the Plan, from infrastructure provision to whether the Plan is able to identify a sufficient supply of housing land.

96. In the first instance, I would therefore be grateful to understand how the Council considers that the Plan could be modified in a way that would make it sound and capable of adoption. In seeking to move the examination forward I consider that there are three broad options available to the Council. They are:

- Provide additional information to justify the Tudeley Village allocation as submitted.
- Modify the submitted Plan by making significant changes to the Tudeley Village allocation, and in doing so, seek to overcome the soundness issues identified above.
- Delete the allocation from the submitted Plan.

97. The first option is unlikely to be a quick or straightforward exercise. It would require further dialogue with key stakeholders, the preparation of substantial new evidence, consultation on that evidence and examination. There is also no guarantee that it would satisfactorily resolve the issues identified above or justify the scale and location of development proposed. It is not without risk. Similar issues would apply to the second option, and both could potentially add significant delays to the examination process.

98. The third option would be to delete the allocation and make consequential changes to the Plan. The benefit of this approach is that it would deal with the soundness problems identified above, and subject to considering alternative secondary school provision, has already been tested as a possible outcome in the strategic sites masterplanning documents. It may negate the need for significant further work and potentially avoid lengthy delays to the examination process.

99. One of the main consequences of deleting Tudeley Village is the impact on housing provision. The Plan envisages 2,100 dwellings coming forward over the plan period. In deciding how to proceed, the Council will therefore need to give further consideration to how best the Plan can still meet housing needs, having particular regard to the requirements in paragraph 68 of the Framework. It may be, for example, that needs could be catered for over a shorter timeframe without the need for any specific additional sites to be identified at this stage.

100. I appreciate that this is not a straightforward exercise and that the Council will need time to consider the issues raised. Once the Council has considered these matters it would be useful to agree on a strategy and timescale for taking the examination forward, before the Council commits to any significant further work. Should you have any queries or wish to discuss potential ways forward in further detail, please do not hesitate to contact me.

101. I have asked the Programme Officer to upload a copy of these findings to the examination website, but no comments are sought from participants at this stage. Any suggested ways forward will be subject to consultation in due course and further hearing sessions may be necessary.

[redacted]

Examining Inspector
November 2022

Appendix 2 Inspectors letter to Solihull Council September 2022

The Planning Inspectorate

[redacted]
Group Manager – Policy & Engagement
Growth & Development
Solihull Metropolitan Borough Council

Our Ref: PINS/Q4625/429/4

Date: 5 September 2022

Dear [redacted]

Examination of the Solihull Local Plan

1. Further to the additional hearing session held on 8 July 2022, we are now in a position to set out our conclusions in relation to housing requirements, the proposals for the National Exhibition Centre (NEC) and the overall supply of housing sites. You will see that these have significant implications for the examination of the Local Plan. We also set out our conclusion in respect of the site allocation South of Knowle (Arden Triangle) and Policy KN2, given the particular implications of this. We must stress that there are a range of soundness issues affecting other aspects of the Local Plan which would require main modifications in due course and that a detailed explanation of our findings will ultimately be contained in our report.

Housing requirements

2. The Council's position is that the housing need for Solihull is 816 dwellings per year. This is based on the standard methodology calculation (807 dwellings per year) plus a modest uplift to accommodate the additional employment growth arising from the UK Central Hub proposals. We have concluded that this is justified. The Council has a longstanding commitment to contribute approximately 2,000 dwellings to unmet need in the wider Housing Market Area up to 2030/31, on the basis of the shortfall established in the adopted Birmingham Development Plan. This is made clear in the submitted Local Plan and formed a key element in duty to co-operate discussions and statements of common ground with relevant local planning authorities. The Council has maintained this position throughout the examination. We have concluded that this commitment is necessary to ensure that the Local Plan is positively prepared and justified.

3. Following our request, the Council produced additional information and suggestions regarding an updated stepped annual housing requirement and extending the plan period to 2036/37, to allow for a 15 year period from the likely point of adoption (document SMBC013). The suggested stepped requirement would recognise the situation with the reduced housing delivery test requirement for 2020/21, it would ensure that Solihull's own needs for the plan period were met and would also ensure that a contribution of approximately 2,000 dwellings towards the identified shortfall in Birmingham up to 2030/31 would be made. On the basis of the latest housing trajectory produced by the Council

POSITIVE ABOUT DISABLED PEOPLE

(document SMBC013) there would be a five year supply of housing sites as of 2022/23 (the earliest likely date of adoption of the Local Plan). We have concluded that the updated stepped housing requirement set out in SMBC013 would be justified and effective, subject to the resolution of the housing supply issues discussed below.

4. Putting all of this together, we have concluded that the housing requirement should be 537 dwellings for 2020/21, 807 dwellings per year from 2021/22 to 2025/26, 1,281 dwellings per year from 2026/27 to 2030/31 and 816 dwellings per year from 2031/32 to 2036/37. This equates to a total requirement for the extended plan period of 15,873 dwellings and a requirement up to 2030/31 of 10,977 dwellings, including a contribution of approximately 2,000 dwellings towards unmet needs in Birmingham up to 2030/31. The submitted Local Plan would need to be modified accordingly to be justified and effective.

The NEC and the overall supply of housing sites

5. Our letter of 11 February 2022 highlighted particular concerns in relation to the proposals for the NEC site. We are grateful for the Council's constructive response and the additional evidence and information that has been provided. We have considered this evidence and information carefully and taken into account the written submissions from interested parties and the discussion at the additional hearing session on 8 July 2022.

6. The submitted Local Plan and the Council's housing trajectory anticipate that the NEC site will deliver 2,240 dwellings in the plan period, by far the largest single site in terms of dwelling numbers. However, the submitted Local Plan says relatively little about the NEC site and there is no specific policy for it unlike sites UK1 and UK2 and all of the housing site allocations. There is no clear policy framework or explanation of constraints and infrastructure requirements. The Council has again responded constructively to our concerns and suggested an additional Policy UK3. Whilst there are some detailed issues relating to the clarity of the policy criteria and infrastructure requirements, the suggested policy would go a long way to addressing our concerns about an appropriate policy framework.

7. We turn now to our concerns over delivery. The context for these concerns is the overall situation regarding the anticipated supply of housing sites for the whole plan period (extended up to 2036/37) and up to 2030/31 and the role that the NEC site is expected to play in this. The Council's most up to date trajectory in SMBC013 indicates an overall supply up to 2036/37 of 16,050 dwellings, compared with the requirement of 15,873 dwellings. For the period up to 2030/31 the anticipated supply is 11,200, compared with the requirement of 10,977 dwellings. For both time periods the anticipated supply is therefore only marginally above requirements.

8. The Council anticipates the NEC site playing a key role in ensuring that requirements for the plan period are met and that an appropriate contribution to unmet needs from Birmingham up to 2030/31 is made. The latest trajectory shows 1,112 completions on the NEC site up to 2030/31. In terms of paragraph 68 of the National Planning Policy Framework and assuming 2022/23 is regarded as year 1 based on the point of adoption, the NEC site is envisaged to make a contribution as a specific developable site of 1,258 dwellings in years 6-10. The implications of significant under delivery on the NEC site are considerable.

9. The NEC Masterplan Consultation Draft of November 2021 (NEC Masterplan) sets out an ambitious long term vision for the site involving an “urban village” of 5,000 homes, commercial and leisure development and associated community and other infrastructure. As noted above it is envisaged that Phase 1 involving 2,240 dwellings will be completed within the plan period. Phase 1 would be largely based on the redevelopment of existing surface level car parks on the north eastern part of the NEC site. The total developable area is 27.29ha and the area for Phase 1 is 12.92ha (Figures taken from the Viability Study Addendum SMBC018). It is anticipated that 70% of the dwellings would be apartments and 30% houses. For Phase 1 this would equate to 1,580 apartments and 660 houses although we note that SMBC018 appears to have assessed viability on the basis of a higher proportion of apartments (approximately 73% for Phase 1 and 77% overall). The Council’s latest trajectory envisages the first completions (217 dwellings) in 2027/28, a peak of 352 completions in 2030/31 and an average of 224 a year up to 2036/37.

10. The proposals seek to create a significant new residential community from scratch on a site which is not within or adjacent to an established residential area, nor is it within or close to a city centre. It is physically contained by significant road infrastructure with the M42 to the east, the A45 to the south and Bickenhill Parkway/Bickenhill Lane to the north and west. Birmingham International Rail Station and Birmingham Airport lie just to the west of the site and Birmingham Business Park sits to the north. The NEC site itself includes substantial exhibition and conference buildings, hotels, leisure and hospitality venues and associated car parking and infrastructure.

11. To deliver the amount of housing envisaged on the site would require very high densities to be achieved. Overall, Phase 1 would need to average 173 dwellings per hectare (dph). For houses, given the number anticipated (assuming 660) and the fact that land would also be required to accommodate 1,580 apartments, the average density would need to be significantly above the 40dph indicative density set out in the submitted Local Plan for houses in the UK Central Hub Area and the 45dph for neighbourhoods of mainly houses referred to in SMBC018. It is unclear exactly what assumptions have been made for densities. However, as discussed at the hearing session, even if an average density of 75dph were assumed for houses, this would take up 8.8ha (or 8.13ha if there were 610 houses) leaving only 4.12ha (or 4.79ha) for apartments. The apartments would need to be built at an average density of 383dph (or 340dph). Again this would be very substantially above the indicative density of 90-150dph for apartments in the submitted Local Plan.

12. There is no evidence that such very high densities or anything approaching them have been achieved in Solihull. Whilst the NEC site clearly presents a particular opportunity for higher density housing, there is significant uncertainty that sufficient demand will exist for housing at such high densities on the scale and over the timescale envisaged. It is also unclear as to the practical implications of such densities for the quality of the living environment and the design and character of the development.

13. Due to the high proportion of apartments and the very high densities required for both houses and apartments it is difficult to see how the development would be compliant with some policies in the submitted Local Plan. Policy P4C refers to 70% of market dwellings being three or four bedrooms. Policy P4A refers to 70% of social rented dwellings being houses and 45% of shared ownership dwellings being houses. SMBC018 concludes that the whole scheme was currently viable with 10% affordable housing provision, whereas Policy P4A refers to 40%.

14. The Housing Delivery Supplementary Report (document SMBC015) points to examples of schemes in other areas to illustrate the realism of timescales and rates of delivery at the NEC site. However these are in London, Cambridge and Birmingham. Whilst noting that assumed build out rates for the NEC site are lower than the examples from London and Cambridge, it is clear that these are in very different market locations, with different site characteristics and backgrounds. Their value as genuine comparisons is relatively limited.

15. In terms of viability, as noted above, SMBC018 concludes that the whole scheme is viable, albeit with only 10% affordable housing provision. We note the argument on behalf of the Council that the Benchmark Land Value used in the appraisal in effect builds in a buffer to accommodate costs that cannot be accurately quantified at present. However, there remains some uncertainty as to infrastructure costs and therefore the effect on viability, particularly in relation to a contribution to UK Central Hub wide infrastructure and potentially contributions to additional works or accessibility improvements to existing secondary school provision (see note from Council on education provision following the hearing session on 8 July 2022).

16. In terms of timescales for bringing forward development on the NEC site, the latest information provided (documents SMBC016 and SMBC017) sets out a timetable which would ultimately see completions taking place in October 2027. It is ambitious and would rely on progress moving smoothly from one stage to another. With a scheme of this size and nature, there is clearly potential at least for some slippage if issues arise. Given that the proposal is not typical of residential developments in Solihull and relies on an innovative approach, the potential for issues to arise affecting progress is increased. We note that the NEC Masterplan is yet to be finalised and published and it was confirmed at the hearing session on 8 July 2022 that the launch of the competitive tender process has now been put back by two months. There would already appear to be some slippage in the programme produced within the past few months. It is of note that as the NEC site is previously developed land, not within the Green Belt, there would seem to have been no policy constraints in principle preventing a scheme coming forward to date.

17. Redevelopment of the NEC site for housing is in principle an appropriate and justified element of the Local Plan. It would utilise previously developed land and form a key element in wider proposals for the UK Central Hub. We consider that the proposal should remain in the Local Plan and indeed be strengthened by the addition of a specific policy along the lines of the suggested Policy UK3. This would help to promote its redevelopment and provide a clear policy framework to do so. However, taking into account the above assessment, we have significant doubts that the site will deliver housing on the scale envisaged up to 2030/31 and in the plan period as a whole.

18. Reliance on the anticipated trajectory for completions on the NEC site poses a substantial risk in terms of meeting housing requirements and making an appropriate contribution to unmet needs from Birmingham up to 2030/31. These are two of the fundamental principles underlying the Local Plan and principles that the Council has remained committed to throughout the examination. In some cases, other local planning authorities in the wider Housing Market Area raised strong concerns that Solihull's contribution towards unmet housing needs should in fact be increased to extend beyond 2030/31 and also address unmet needs from the Black Country, in addition to Birmingham. In some cases, local plans elsewhere in the Housing Market Area have been prepared on the basis of making

contributions to these unmet needs. If this Local Plan did not make an appropriate contribution, there could be significant implications for agreements and co-operation between authorities and the progress of other local plans in the Housing Market Area.

19. In order to limit the risk associated with reliance on delivery the NEC site, the housing trajectory should reduce estimated completions to a figure in the order of 500 dwellings for the latter part of the plan period from 2031/32 onwards. This would be broadly in line with the trajectory for site UK1. The policy associated with the allocation could still refer to the potential for a higher number of dwellings and there would be no policy restriction on the amount of housing development that could come forward up to this higher number. This would leave a shortfall in supply of approximately 1,700 dwellings for the extended plan period and approximately 1,100 up to 2030/31. As we note above, the supply is only marginally above requirements, even with the higher figures for the NEC site.

20. This Local Plan should address this issue if it is to comply with the fundamental principles that underpin it and which informed the Council's duty to co-operate engagement and statements of common ground with other authorities. The alternative of not addressing the issue in this Local Plan and leaving it to a future review is not an appropriate option, given the particular circumstances that apply, notably the commitment to contribute approximately 2,000 dwellings to unmet need in Birmingham up to 2030/31. Such a review would be likely to take considerable time to come to fruition and go through necessary stages of preparation, submission and examination. The Council would need a clear trigger point for a review and to initiate the preparation of a new local plan. The key concern for us is delivery and given that construction starting on site is anticipated to start in September 2025 and first completions expected in October 2027 (see document SMBC016), these would seem to be the most obvious trigger points for a review. Leaving a decision to undertake the preparation of a new local plan to such a time would mean that it is unlikely to be adopted much before 2030/31 and the contribution that could be made to Birmingham's unmet needs by that date would be limited.

21. We request that the Council gives consideration to the above and informs us as to how it intends to address the issue.

Site allocation South of Knowle (Arden Triangle) and Policy KN2

22. Policy KN2 allocates the site South of Knowle for residential development (600 dwellings) together with the redevelopment of the existing Arden Academy secondary school and a new primary school to provide a new "all through" school. The allocated site is currently partly taken up by the existing school buildings, car parking areas, outdoor spaces and sports pitches for the Arden Academy. The entire site is currently in the Green Belt.

23. The reasoned justification of the Local Plan and Concept Masterplan of October 2020 (document 005) make it clear that the intention is for the new "all through" school to be relocated to another part of the overall site and for the existing school site to be redeveloped for housing. The Council confirmed that this remained its position. The earlier version of the Concept Masterplan of January 2019 (document 012) identified two options for the site. The first would see the Arden Academy retained on its existing site. The second would see it relocated to land currently partly occupied by some of its playing fields. In both options there would be a separate new primary school.

24. We have concluded that there are exceptional circumstances to alter the Green Belt in this case and allocate the site for housing development. There are some detailed issues of soundness with the wording of Policy KN2 which we will address in due course. Our key concern however is the inclusion of the requirement to relocate the Arden Academy to a different part of the site.

25. The Council has confirmed that the housing proposed on the site would not in itself generate a need for additional secondary school provision. On the basis of information provided and following the thorough site visit undertaken on 9 March 2022, it is clear that the layout of separate school buildings and in some cases their age, size, design and condition causes issues for the management and operation of the school. We fully appreciate the desire to rationalise the buildings and provide a new purpose built school of a good standard. We also acknowledge the strong support from the community for a replacement school. However, the school continues to operate on its current site and performs well. There is nothing to suggest that it could not continue to operate in its current form if the rest of site KN2 was developed for housing. Subject to design and layout it would seem possible in principle to redevelop the school within its own grounds, if required. We consider therefore that it is not essential that the proposal for site KN2 requires the relocation of the Arden Academy from its current grounds.

26. Whilst Homes England has expressed support and indicated financial assistance for the acquisition of the existing school site, there is considerable uncertainty regarding the overall funding for a new school. Funding has not been secured and it is not clear which sources of funding would be sought and what the prospects of securing funding are. As noted above the proposed new housing would not generate the need for developer contributions towards the provision of additional secondary school places.

27. The Local Plan Viability Study (document 701) did not factor in the costs of a replacement secondary school. It is also very clear from written submissions and discussion at the hearing sessions that there is substantial resistance to the relocation of the Arden Academy on to another part of the overall site from landowners, site promoters and developers with interests in the site. This resistance extends to the clear statement that the land in question shown on the Concept Masterplan (document 005) will not be made available for a relocated school. The site allocation would therefore not be deliverable if it were to retain the requirement for the Arden Academy to be relocated elsewhere within the wider site.

28. Taking all of this into account, we conclude that the site allocation KN2 is neither justified nor effective in its current form. It can be made justified and effective by a main modification which removes references to the Arden Academy being relocated to another part of the site. In light of this the potential capacity for housing on the site may need to be reviewed.

Next steps

29. Given the significance of our conclusions on the above issues, we would like to give the Council the opportunity to consider matters fully and inform us as to how it wishes to proceed.

30. We must stress that we have fully considered all of the evidence and information available to us and taken full account of written submissions and discussions at the hearing sessions. The Council and others have had adequate opportunity to make submissions and provide

evidence and information. We are not expecting further submissions from the Council or other interested parties regarding the merits of our conclusions. However, we would expect this letter to be added to the examination website with an appropriate update as soon as is reasonably possible. We would be grateful if you could inform us via the programme Officer of the likely timescale for your response to this letter.

Yours sincerely,

[redacted]

INSPECTORS

Celebrating 60 years

Contact Details

Full name (required): Janet Rowley

Email (required): [redacted]

Tick the box that is relevant to you (required):

- ☐ Statutory Bodies and Stakeholders
- **X Agents and Developers**
- ☐ Residents and General Public
- ☐ Prefer not to say

Organisation or Company Name (if applicable): Lichfields on behalf of St Philips Land Ltd

Tick the box that is relevant to you:
(*This is a non-mandatory question but helps us understand the demographic of our respondents.)*

- ☐ Under 18
- ☐ 18-24
- ☐ 25-34
- ☐ 35-44
- ☐ 45-54
- ☐ 55-64
- ☐ 65+
- ☐ **Prefer not to say / not applicable**

Do you want to be added to our Local Plan consultation database to be notified about future local plan updates?

[redacted]

Contents

The Local Plan Preferred Options includes the topics listed below.

Each topic has a series of standard questions in order for you to provide a response. You do not have to respond to each of the topics or answer all of the questions. The page numbers below relate to the page the topic starts in this consultation form.

- **Vision and Objectives** - page 5
- **Development Strategy and Climate Change Response** - page 6
- **Meecebrook Garden Community** - page 9
- **Site Allocation Policies** - page 10
- **Economy Policies** - page 14
- **Housing Policies** - page 16
- **Design and Infrastructure Policies** - page 18
- **Environment Policies** - page 19
- **Connections** - page 20
- **Evidence Base** - page 21
- **General Comments** - page 22

All of the local plan documents and the Local Plan 2020-2040: Preferred Options document are available here: https://www.staffordbc.gov.uk/local-plan

Vision and Objectives

Q1. There are eight objectives for the local plan to achieve the vision of:

"A prosperous and attractive borough with strong communities."

Of the following objectives which 3 are the most important to you?

Please make your choice from the list of objectives below. (Maximum of 3 to be selected)

Local Plan Preferred Options document reference: Page 12

- ☐ Contribute to Stafford Borough being net zero carbon by ensuring that development mitigates and adapts to climate change and is future proof.
- ☐ To develop a high value, high skill, innovative and sustainable economy.
- ☐ To strengthen our town centres through a quality environment and flexible mix of uses.
- **X To deliver sustainable economic and housing growth to provide income and jobs.**
- ☐ To deliver infrastructure led growth supported by accessible services and facilities.
- ☐ To provide an attractive place to live and work and support strong communities that promote health and wellbeing.
- ☐ To increase and enhance green and blue infrastructure in the borough and to enable greater access to it while improving the natural environment and biodiversity.
- ☐ To secure high-quality design.

Development Strategy and Climate Change Response

Q2. The development strategy and climate change response chapter includes the policies below.

Do you agree with each of the policies in this chapter?

Select Yes or No for each of the policies and then use the box below each policy to add additional comments.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 19 to 40

Policy 1. Development strategy (which includes the total number of houses and amount of employment land to be allocated and the Stafford and Stone settlement strategies)

~~Yes~~ / **No**

Policy 1 Comments:

Please refer to section 2 of our detailed representations

Policy 2. Settlement Hierarchy (Tier 1: Stafford, Tier 2: Stone, Tier 3: Meecebrook, Tier 4: Larger settlements, Tier 5: Smaller settlements)

~~Yes~~ / **No**

Policy 2 Comments:

Please refer to section 2 of our detailed representations

Policy 3. Development in the open countryside - general principles

Yes / No

Policy 3 Comments:

No response

Policy 4. Climate change development requirements

Yes / ~~No~~

Policy 4 Comments:

Please refer to section 2 of our detailed representations

Policy 5. Green Belt

Yes / No

Policy 5 Comments

No response

Policy 6. Neighbourhood plans

Yes / No

Policy 6 Comments:

No response

Meecebrook Garden Community

Q3. The local plan proposes a new garden community called Meecebrook close to Cold Meece and Yarnfield. This new community is proposed to deliver housing, employment allocations, community facilities, including new schools, sport provision and health care facilities, retail and transport provision, which includes a new railway station on the West Coast Main Line, and high quality transport routes.

Do you agree with the proposed new garden community?

Yes / ~~No~~

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 41 to 45

Comments:

Please refer to section 2 of our detailed representations

Site Allocation Policies

Q4. The Stafford Borough Local Plan 2020 - 2040 proposes allocations for both housing and employment to meet the established identified need.

The site allocation policies chapter includes the policies below for housing and employment allocations.

Do you agree with the proposed allocations?

Select Yes or No for each of the following policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response. Please provide details of alternative locations for housing and employment growth if you consider this is appropriate.

Ensure any comments relate to the policy comment box you are completing.

If you do want to submit a new site for consideration through the local plan process, we are still accepting sites through the Call for Site process, details are available here: https://www.staffordbc.gov.uk/call-sites-including-brownfield-land-consultation

Local Plan Preferred Options document reference: Pages 47 to 56 and appendix 2.

Policy 9. North of Stafford

Yes / No

Policy 9 Comments:

No response

Policy 10. West of Stafford

Yes / No

Policy 10 Comments:

No response

Policy 11. Stafford Station Gateway

Yes / No

Policy 11 Comments:

No response

Policy 12. Other housing and employment land allocations.
(*In your response, please specify which particular site you are referring to, if relevant*.)

~~Yes~~ / No

Policy 12 Comments:

Please refer to section 2 of our detailed representations

Q5. The Stafford Borough Local Plan 2020 - 2040 proposes to allocate land for Local Green Space and Countryside Enhancement Areas throughout the borough.

The policies which relate to these proposals are listed below.

Do you agree with the proposed allocations?

Select yes or no for each of the policies and then use the box below each policy to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 56 to 59 and appendix 2.

Policy 13. Local Green Space
(In your response, please specify which particular site you are referring to, if relevant)

Yes / No

Policy 13 Comments:

No response

Policy 14. Penk and Sow Countryside Enhancement Area (Stafford Town)

Yes / No

Policy 14 Comments:

No response

Policy 15. Stone Countryside Enhancement Area

Yes / No

Policy 15 Comments:

No response

Economy Policies

The Economy Policies chapter contains policies that seek to protect employment land and support economic growth within the Borough.

Q6. The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses.

The relevant policies are: 16, 17 and 18.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 61 to 65

Comments:

No response

Q7. The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals.

The relevant policies are: 19, 20, 21 and 22.

Do you agree with these policies?

Yes / No

Select Yes or No and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 65 to 71

Comments:

No response

Housing Policies

The Housing Policies chapter contains policies that seek to provide for identified need across the borough and support houseowners.

Q8. The local plan proposed a policy (Policy 23) on affordable housing.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 74 to 76

Comments:

No response

Q9. The local plan proposes a policy (Policy 30) to help meet identified local need for pitches for Gypsies and Travellers. There are 2 new proposed sites; one near Hopton and the other near Weston.

Do you agree with this policy?

Yes / No

Select yes or no and then use the box below to add additional comments. In your response, please specify which particular site you are referring to, if relevant.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 84 to 86

Comments:

No response

Q10. The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension of dwellings, residential subdivision and conversion, housing mix and density, residential amenity and extension to the curtilage of a dwelling.

The relevant policies are: 24, 26, 27, 28, 29, 21, 31, 32 and 33.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: pages 73 to 89

Comments:

No response

Design and Infrastructure Policies

Q11. The design and infrastructure chapter contains policies on urban design general principles, architectural and landscape design, infrastructure to support new development, electronic communications, protecting community facilities and renewable and low carbon energy.

The relevant policies are: 34, 25, 36, 37, 38, 39 and 40.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 91 to 99.

Comments:

No response

Environment Policies

Q12. The environment policies chapter contains policies on the historic environment, flood risk, sustainable drainage, landscapes, Cannock Chase Area of Outstanding Natural Beauty (AONB), Green and blue infrastructure network, biodiversity, Special Areas of Conservation (SAC), Trees, Pollution and Air Quality.

The relevant policies are: 31, 42, 43, 44, 45, 46, 47, 48, 49, 50 and 51.

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 101 to 119.

Comments:

No response

Connections

Q13. The connections policies chapter contains policies on transport and parking standards.

The relevant policies are: 52 and 53

Do you agree with these policies?

Yes / No

Select yes or no and then use the box below to add additional comments. If referring to a specific policy, please include the policy number.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Local Plan Preferred Options document reference: Pages 121 to 124.

Comments:

No response

Evidence Base

To support the Local Plan 2020-2040 an evidence base has been produced.

The evidence base is available to view on our website here:
www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base

Q14. Have we considered all relevant studies and reports as part of our local plan?

~~Yes~~ **/ No**

Select yes or no and then use the box below to add additional comments.

Explain your reasoning and add any evidence to justify your response.

Ensure any comments relate to the policy comment box you are completing.

Comments:

Please refer to section 2 of our detailed representations

Q15. Do you think there is any further evidence required?

Yes / ~~No~~

Select yes or no and then use the box below to add additional comments.

If you think additional evidence is needed, please state what you think should be added and explain your reasoning.

Ensure any comments relate to the policy comment box you are completing.

Comments:

Please refer to section 2 of our detailed representations

General Comments

If you have any further comments to make on the Local Plan Preferred Options document and evidence base, please use the box below.

Please refer to section 2 of our detailed representations

If you need further space to add comments, please add pages to the end of the consultation form and reference which question you are answering.

Thank you for taking the time to complete this consultation form.

Completed forms can be submitted by email to:
strategicplanningconsultations@staffordbc.gov.uk

Or returned via post to: Strategic Planning and Placemaking, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ

The consultation closes at 12 noon on Monday 12 December 2022, comments received after this date may not be considered.

THE FILLYBROOKS

STONE

VISION DOCUMENT

DECEMBER 2022

THE VISION

THE PROPOSALS FOR THE FILLYBROOKS WILL ENHANCE THE SETTING OF THE TRENT AND MERSEY CANAL, WITH OPPORTUNITIES FOR STRENGTHENED CONNECTIONS WITH THE EXISTING NATIONAL CYCLE ROUTE AND TOWPATH. DEVELOPMENT WILL SIT WITHIN A NETWORK OF SPACES AND PLACES THAT CELEBRATE EXISTING GREEN CAPITAL AND ENCOURAGE OUTDOOR RECREATION. COMMUNITY PRIDE WILL BE INSPIRED THROUGH THE CREATION OF AN ACTIVE AND ATTRACTIVE SCHEME.

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J:\34000\34369 - Blythe Park, Stone\A5 - Reports & Graphics\Graphic Design\Documents\Vision\34369 The Fillybrooks, Stone Vision A04

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Date: 07.12.22 / Status: Final / Rev: - / Author: MD/CDB / Checked by: JdH

INTRODUCTION

This Vision Document has been prepared on behalf of St Philips to support the proposals for a mixed use development at The Fillybrooks, Stone.

The key aims and objectives of the document are:

- To present an initial understanding of the site and the local context; and
- To present the emerging concept masterplan, accompanied by an explanation of the key design principles that have informed it.

The Site

The site is located on the north western edge of Stone in Staffordshire. The settlement lies approximately 11km north of Stafford and 9.5km to the southeast of Stoke-on-Trent. It benefits from being located adjacent to the A34 which connects to Stoke-on-Trent and Newcastle-under-Lyme to the north and Stafford and Birmingham to the south. A bus stop located in walking distance to the site along the A34 provides convenient public transport connections to the surrounding area and towns. There are local amenities situated within 20min walking distance of the site, including a town hall, a number of schools, recreational areas and facilities, which provide community, education and employment opportunities. Additionally, Stone Business Park and Walton Industrial Estate are both located south of the site and easily accessible by bus, car, or bike via the A34.

The site is approximately 3.27 hectare (ha) in size and predominantly comprises short mown grassland. The land is generally flat and slopes very gently towards the canal along the eastern site boundary. The site is bounded by tree and hedgerow planting along the A34 to the west, a single residential property to the south and a grassy field to the north. The eastern boundary is characterised by the occasional hedges and shrubs which provide open views towards the canal and the residential development along the eastern side of the watercourse. A small group of mature trees is located in the north-eastern corner of the site.

Aerial Site Location Plan

Site Boundary

National Cycle Network Route 5

GREEN BELT REVIEW

At present no Green Belt review or assessment has been published that covers the site, its immediate setting or the local and wider area. As such a site specific Green Belt assessment has been undertaken to consider the contribution the site makes with regard to the purposes of the Green Belt as defined by para 138 of the NPPF.

Purpose 1 NPPF: (a) to check the unrestricted sprawl of large built-up areas

The site is enclosed by the A34 to the west, and the Trent & Mersey Canal to the east that form distinct boundaries between the site and the immediate and local landscape. The existing settlement edge is such that development extends within the immediate setting to the north west on more elevated landform, as a result of a modern residential estate. Therefore, the release of this area supplemented by the clearly defined boundaries of the transport routes at its edges, would form a logical new Green Belt edge, establishing robust clearly defined Green Belt boundaries.

Purpose 2 NPPF: (b) to prevent neighbouring towns merging into one another

There are no towns within the immediate, local or wider landscape to the north or west of the Site, it is therefore considered that the Site does not contribute to preventing neighbouring towns from merging – No Contribution

Purpose 3 NPPF (c) to assist in safeguarding the countryside from encroachment

The site is bounded by roads to the west and within the immediate setting to the north, with the A34 providing a notable urbanising influence on the setting. The release of this land would not cause encroachment into the countryside as it is a landscape that has a strong sense of enclosure. This is a result of the mature vegetated boundaries, and thus, the site does not have a sense of 'openess', with it having a strong relationship with the existing settlement edge – No contribution

Purpose 4 (d) to preserve the setting and special character of historic towns; and

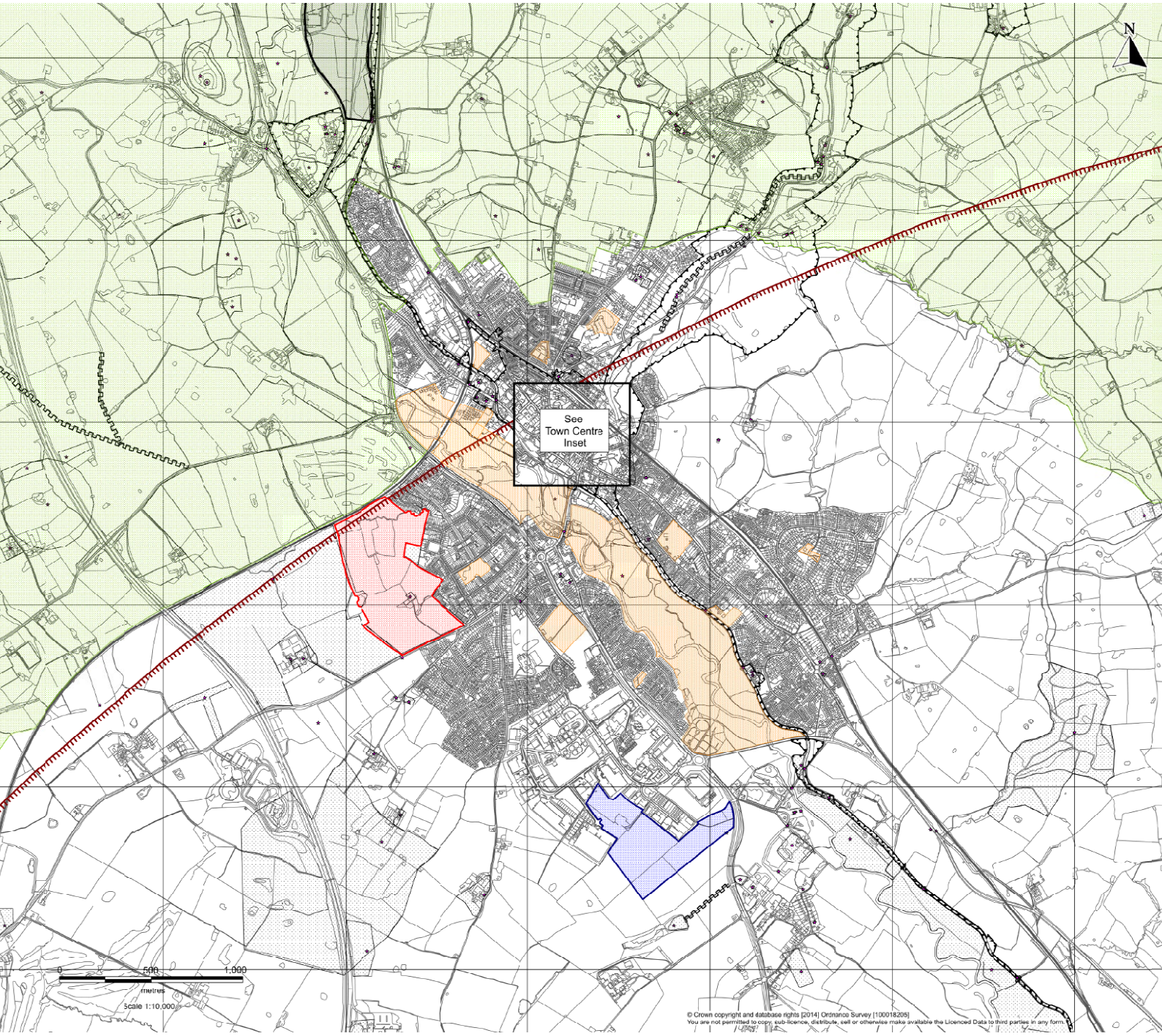
The site does not form a part of the setting or contribute to the special character of a historic town – No Contribution

Purpose 5 (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site is undeveloped and not considered to assist in urban regeneration – No Contribution

Proposed Green Belt Change

The site provides little to no contribution to the purposes of Green Belt. The existing easily recognisable physical features of the A34 to the west and Meaford Road to the north, would form a logical new and resilient Green Belt boundary. Therefore, an opportunity exists to release land at The Fillybrooks,.



Stone Area Plan

- Strategic Development Location - Housing
- Strategic Development Location - Employment
- Green Infrastructure (GI)
- Green Belt
- Staffordshire Historic Environment Record (HER)
- Major Developed Sites within the Green Belt
- Cannock Chase Special Area of Conservation 15 km buffer

CONSTRAINTS AND OPPORTUNITIES

Findings from an initial site and context assessment have been evaluated to identify the opportunities and constraints relevant to the development of the site. A summary of these initial findings is set out below:

Access and Movement

- The site can be accessed from the A34 via a left-in/left-out taper merge/diverge arrangement.
- There is opportunity for pedestrian and cycle connectivity surrounding the site. This includes connections onto the adjacent canal towpath, and onto existing facilities along the A34. The opportunities to connect to the A34 include improving connections towards Stone town centre and connecting to the existing shared footway/cycleway provision to the north of the site.

Green Infrastructure and Ecology

- Deliver a landscape led scheme that retains and enhances existing green capital.
- Retain and enhance existing ecological habitats and deliver Biodiversity Net Gain.
- Provide a multi-functional green infrastructure network that celebrates the setting of the canal and is highly accessible for new residents.
- Provide an active frontage to new areas of open space and footpath routes to ensure good levels of natural surveillance and positively address the surrounding context.

Hydrology and Drainage

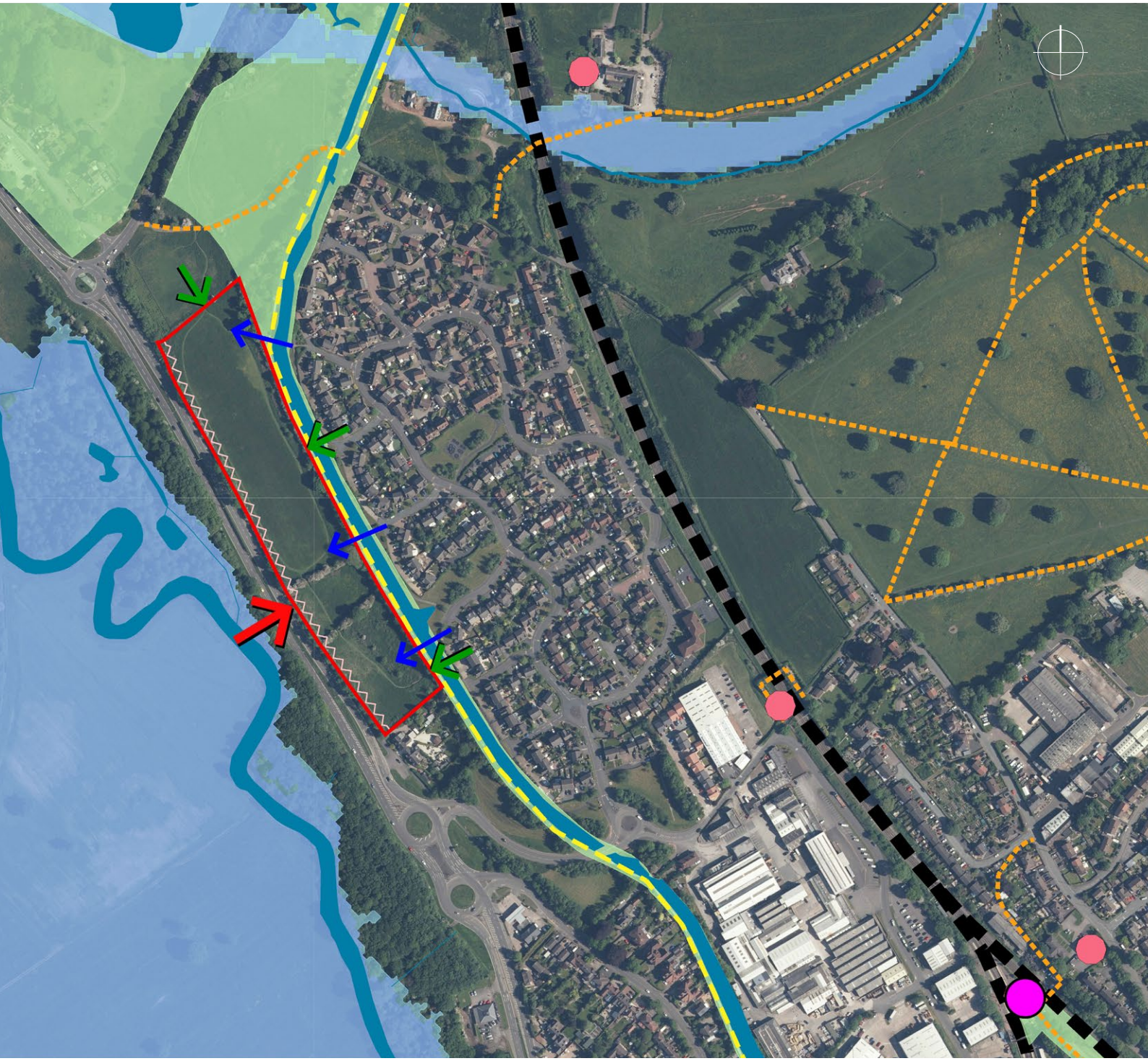
- The site is located in Flood Zone 1 which has a low risk of flooding from rivers of sea.
- The Trent and Mersey Canal is located adjacent to the eastern site boundary which is well maintained and poses no risk of flooding for the site.

Heritage and Archaeology

- Development of the site will not cause any direct impacts on any known designated or non designated heritage assets.
- The proposals should provide a sensitive and considered response to the setting of Stone and Meaford, in addition to the Canal.

Noise

- An offset should be provided between the A34, in addition to consideration of the orientation of dwellings so that gardens are located on the screened side of the dwelling. Additional mitigation measures could include localised acoustic fencing and uprated glazing and ventilation.



Constraints and Opportunities Plan

- Site Boundary
- Proposed Main Vehicular Access Point
- Potential footpath connections
- Setting Consideration: Visual connections with existing develo
- Public Right of Way
- National Cycle Network Route 5
- Railway
- Listed Building
- Train Station
- Setting Consideration: Noise
- Conservation Area
- Flood Zone 2
- Flood Zone 3
- Existing Watercourse

CONCEPT MASTERPLAN

The concept masterplan presented opposite has been informed by site and context assessment, along with the following design principles.

Development Form

- Provision of approximately 1.09ha of residential land, achieving circa 40 dwellings using an average density of 35 dwellings per hectare.
- Provision of a 0.7ha retail site with associated parking, servicing and access.
- Development parcels overlook streets and spaces wherever possible, aiding natural surveillance and activity. This design approach ensures the creation of an attractive and active frontage to the canal, with dwellings set back and screened and softened by existing retained tree and vegetation planting.
- Development parcels will front on to the western site boundary (A34) with gardens screened by the dwellings.

Access and Movement

- The site can be accessed via a left-in/left-out taper merge/diverge arrangement. The arrangement comprises an auxiliary lane measuring 55m in length for vehicles entering the site from the A34 via a taper diverge, and an auxiliary lane of 90m in length for vehicles exiting the site and joining the A34 southbound via a taper merge. The carriageway leading into the site would measure 7.3m in width.
- New pedestrian and cycle access points are proposed to facilitate connections on foot or by bicycle to the A34 and canal towpath and NCR.
- A new network of foot and cycle routes will encourage recreation and physical activity within and beyond the site.

Landscape and Open Space

- A multi-functional green infrastructure network is proposed. This will support biodiversity net gain and comprise a variety of spaces and places that accommodate new footpaths, existing and new tree/vegetation planting, an area for formal play and areas for attenuation.
- Existing tree and hedgerow planting has been retained within green corridors wherever possible. The setting of public open space will be further enhanced by the provision of new planting, including street tree planting.
- Open space is easily accessible for all residents, encouraging physical exercise and interaction with the outdoors.

Concept Sketch

- Site Boundary
- Primary Vehicular Access
- Pedestrian Access Point
- NCR (along Canal Towpath)
- Residential
- Retail Element
- Public Open Space
- Proposed Attenuation Area
- Tree and Hedgerow Planting
- Proposed Footpath
- Proposed Area for Formal Play

From: Preferred Options Consultation [redacted]
Sent: 12 December 2022 09:03
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Luke Webb**

Email: [redacted]

Agents and Developers

Organisation or Company: **Living Space Housing**

Age: [redacted]

Added to database: [redacted]

Topics (Contents page): **Site Allocation Policies**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Not asked**

Comments: **Not asked**

Policy 2 (Settlement Hierarchy): **Not asked**

Comments: **Not asked**

Policy 3 (Development in open countryside): **Not asked**

Comments: **Not asked**

Policy 4 (Climate change and development requirements): **Not asked**

Comments: **Not asked**

Policy 5 (Green Belt): **Not asked**

Comments: **Not asked**

Policy 6 (Neighbourhood plans): **Not asked**

Comments: **Not asked**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **Not asked**

Comments: **Not asked**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No**

Comments: **No reply**

Policy 10 (West of Stafford): **Yes**

Comments: **Agree with Policy 10 in delivery the remaining allocation of 1,729 new homes, through a mix of housing types, tenures, sizes and styles with proportions of 2, 3 and 4 bedroomed properties and with a proportion of affordable housing in line with Policy 23. Currently, the site in Doxey is draft allocated as Green Infrastructure, however due to its current inaccessibility, this is not suitable for Green Infrastructure. However, the site is suitable for residential development and should be considered by the Council as a deliverable site in the short term to help contribute to the 1,729 identified need. The site could meet all policy requirements within the preferred options document.**

Policy 11 (Stafford Station Gateway): **No**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No**

Comments: **No reply**

Policy 14 (Penk and Sow): **No**

Comments: **No reply**

Policy 15 (Stone Countryside): **No**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **Yes**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **Yes**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **Yes**

Comments: **The site in Doxey is currently allocated for Green Infrastructure. However, this is not suitable or reasonable given the sites location adjacent the railway. The site fails to contribute positively towards green infrastructure, however could be delivered for residential development with a positive contribution towards affordable housing.**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **Yes**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **Yes**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **Yes**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No**

Comments: **As mentioned in previous sections, the site is captured by the Green Infrastructure policy. However, the site fails to contribute positively towards this policy due to its current constraints and the inaccessibility for the public. However, the site could be opened up for**

public access if allocated for residential development, without impacting negatively on the wider green infrastructure network.

Connections

Q13 - Do you agree with policies? **Yes**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **Yes**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No**

Comments: **No reply**

General Comments:

No reply

From: Preferred Options Consultation [redacted]
Sent: 11 November 2022 07:45
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Hugh Lufton**

Email: [redacted]

Agents and Developers

Organisation or Company: **Lufton & Associates**

Age: **No reply**

Added to database: [redacted]

Topics (Contents page): **Development Strategy and Climate Change Response**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No reply**

Comments: **No reply**

Policy 2 (Settlement Hierarchy): **Yes**

Comments: **Policy 2D. The settlement boundary of Yarnfield should be drawn to reflect the opportunity for a highly sustainable site in the north-east of the village to deliver a local food retail supermarket or local food retail supermarket/mixed use with C2/C3 residential - to address under-provision of local convenience shopping. See submission Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land at Yarnfield, near Stone, Staffordshire (0.61 hectares).**

Policy 3 (Development in open countryside): **No reply**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No**

Comments: **Policy 2D. The Green Belt and settlement boundary of Yarnfield should be drawn to reflect the opportunity for a highly sustainable site in the north-east of the village to deliver a local food retail supermarket or local food retail supermarket/mixed use with C2/C3 residential - to address under-provision of local convenience shopping. See submission Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land at Yarnfield, near Stone, Staffordshire (0.61 hectares).**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No reply**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No**

Comments: **Policy 12. Significant retail/leisure allocations should also be identified. A site of 0.61 ha in Yarnfield should be listed with a site capacity of 1500m2. See submission Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land at Yarnfield, near Stone, Staffordshire (0.61 hectares).**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

No reply

From: Preferred Options Consultation [redacted]
Sent: 14 November 2022 07:04
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Hugh Lufton**

Email: [redacted]

Agents and Developers

Organisation or Company: **Lufton & Associates**

Age: [redacted]

Added to database: [redacted]

Topics (Contents page): **Meecebrook Garden Community**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Not asked**

Comments: **Not asked**

Policy 2 (Settlement Hierarchy): **Not asked**

Comments: **Not asked**

Policy 3 (Development in open countryside): **Not asked**

Comments: **Not asked**

Policy 4 (Climate change and development requirements): **Not asked**

Comments: **Not asked**

Policy 5 (Green Belt): **Not asked**

Comments: **Not asked**

Policy 6 (Neighbourhood plans): **Not asked**

Comments: **Not asked**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No**

Comments: **The former DCLG and now Department for Levelling Up, Housing & Communities appear to have a long-term commitment to undeliverable garden villages (and new settlements). There is a long tail of research, investment and promotion that has not lead to a single acre of development land being accomplished. The West Midlands has seen a number of new settlements that have been promoted right through the plan process from (the former) Regional Spatial Strategy and failed. The AECOM study undertaken by a group of consultants lead by David Carlisle is an intelligent piece of evidence supporting the Issues and Options and now the selection of Meecebrook as the main strand of strategy in the Preferred Option. This study however appeared to clearly start with the answer to the future development of the Borough which was the new garden village very heavily promoted and funded by central government. The basic premise to the justification of a new settlement that it be built of surplus brownfield public land has disappeared. There has never been any clear indication that the MoD land at Swynnerton was redundant and in fact now seems to be more active and significant than ever. To hold on to the story of the new settlement the promoters have simply switched to land that is entirely in private ownership and is not previously developed. The evidence (with more than £1m of public funds spent) has been scrambled to justify the myth that this is a sustainable from of development. It is very clearly not and being entirely on private land there is no justification for the public authorities to continue to promote it.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

No reply

From: Preferred Options Consultation [redacted]
Sent: 15 November 2022 12:28
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Hugh Lufton**

Email: [redacted]

Agents and Developers

Organisation or Company: **Lufton & Associates**

Age: **No reply**

Added to database: [redacted]

Topics (Contents page): **Meecebrook Garden Community**

Vision and Objectives

Q1 - Which 3 are most important to you? **Not asked**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **Not asked**

Comments: **Not asked**

Policy 2 (Settlement Hierarchy): **Not asked**

Comments: **Not asked**

Policy 3 (Development in open countryside): **Not asked**

Comments: **Not asked**

Policy 4 (Climate change and development requirements): **Not asked**

Comments: **Not asked**

Policy 5 (Green Belt): **Not asked**

Comments: **Not asked**

Policy 6 (Neighbourhood plans): **Not asked**

Comments: **Not asked**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No**

Comments: **An expanded village of Yarnfield offers more opportunity to allow the redevelopment of brownfield land and is as least as a sustainable option for the development of a garden community as the private landholding at Meecebrook. The basic premise to the justification of a new settlement that it be built of surplus brownfield public land has disappeared. There has never been any clear indication that the MoD land at Swynnerton was redundant and in fact now seems to be more active and significant as a military base than ever. The AECOM study undertaken by a group of consultants lead by David Carlisle is an intelligent piece of evidence supporting the Issues and Options and now the selection of Meecebrook in the Preferred Option. There is nothing in the evidence base that implies a development around Yarnfield would be any less sustainable than the development of entirely greenfield high quality productive farmland at Meecebrook. Land around Yarnfield (that is all promoted through the 2021 SHLAA) offers much more opportunity to develop underused brownfield land and create a sustainable expanded village.**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No reply**

Comments: **No reply**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No reply**

Comments: **No reply**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

No reply

From: Hugh Lufton [redacted]
Sent: 28 November 2022 13:32
To: Strategic Planning
Subject: Preferred Option Local Plan Consultation: Representation for Cooper Leisure Time Ltd
Attachments: Land at Yarnfield, Stone, Staffordshire_submission to PO SBLP.pdf; SBPFLP_Yarnfield Land adj Meadow Butts Farm.jpg

Dear Stafford Borough.

Please find the attached case document;

'Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land Adjacent to Meadow Butts Farm at Yarnfield, near Stone, Staffordshire (0.61 hectares)'

As relates to submission made under policies 2, 12 and 19. Also attached for reference.

--
Best Regards,
Hugh
--
Hugh Lufton BA(Hons) DipTP MRTPI
Principal Consultant
[redacted]

www.charteredplanningconsultancy.co.uk

[redacted]

From: Preferred Options Consultation [redacted]
Sent: 11 November 2022 14:47
To: Strategic Planning Consultations
Subject: Preferred Options Consultation - Submitted Response

Full name: **Hugh Lufton**

Email: [redacted]

Agents and Developers

Organisation or Company: **Lufton & Associates for Cooper Leisure Time Ltd**

Age: **No reply**

Added to database: [redacted]

Topics (Contents page): **Vision and Objectives**

Vision and Objectives

Q1 - Which 3 are most important to you? **No reply**

Development Strategy and Climate Change

Q2 - Do you agree with each of the policies in this chapter?

Policy 1 (Development Strategy): **No reply**

Comments: **No reply**

Policy 2 (Settlement Hierarchy): **No reply**

Comments: **Policy 2d. The settlement boundary for Yarnfield village should be amended to include land adjacent to Meadow Butts Farm. See Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land Adjacent to Meadow Butts Farm at Yarnfield, near Stone, Staffordshire (0.61 hectares).**

Policy 3 (Development in open countryside): **No reply**

Comments: **No reply**

Policy 4 (Climate change and development requirements): **No reply**

Comments: **No reply**

Policy 5 (Green Belt): **No reply**

Comments: **No reply**

Policy 6 (Neighbourhood plans): **No reply**

Comments: **No reply**

Meecebrook Garden Community

Q3 - Do you agree with proposed new garden community: **No reply**

Comments: **No reply**

Site Allocation Policies

Q4 - Do you agree with the proposed allocations?

Policy 9 (North of Stafford): **No reply**

Comments: **No reply**

Policy 10 (West of Stafford): **No reply**

Comments: **No reply**

Policy 11 (Stafford Station Gateway): **No reply**

Comments: **No reply**

Policy 12 (Other housing and employment land): **No**

Comments: **Policy 12. Land adjacent to Meadow Butts Farm in Yarnfield should be included as a retail/leisure use allocation of 0.61ha with up to 1500m2 of floorspace. See Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land Adjacent to Meadow Butts Farm at Yarnfield, near Stone, Staffordshire (0.61 hectares).**

Site Allocation Policies (continued)

Q5 - Do you agree with the proposed allocations?

Policy 13 (Local Green Space): **No reply**

Comments: **No reply**

Policy 14 (Penk and Sow): **No reply**

Comments: **No reply**

Policy 15 (Stone Countryside): **No reply**

Comments: **No reply**

Economy Policies

Q6 - The local plan seeks to protect previously allocated and designated industrial land and support home working and small-scale employment uses. Do you agree: **No reply**

Comments: No reply

Q7 - The Stafford Borough Plan proposes policies around the town centres uses, agriculture and forestry development, tourism development and canals. Do you agree? **No**

Comments: **Policy 19. Land adjacent to Meadow Butts Farm in Yarnfield should be included as a retail/leisure use allocation of 0.61ha with up to 1500m2 of floorspace. See Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3) Land Adjacent to Meadow Butts Farm at Yarnfield, near Stone, Staffordshire (0.61 hectares).**

Housing Policies

Q8 - The local plan proposed a policy (23) on affordable housing. Do you agree? **No reply**

Comments: **No reply**

Q9 - The local plan proposes a policy (30) to help meet identified local need for pitches for Gypsies and Travellers. Do you agree? **No reply**

Comments: **No reply**

Q10 - The local plan proposes policies around homes for life, rural exception sites, new rural dwellings, replacement dwellings, extension etc. Do you agree? **No reply**

Comments: **No reply**

Design and Infrastructure Policies

Q11 - Do you agree with policies? **No reply**

Comments: **No reply**

Environment Policies

Q12 - Do you agree with policies? **No reply**

Comments: **No reply**

Connections

Q13 - Do you agree with policies? **No reply**

Comments: **No reply**

Evidence Base

Q14 - Have we considered all relevant studies and reports? **No reply**

Comments: **No reply**

Q15 - Do you think there is any further evidence required? **No reply**

Comments: **No reply**

General Comments:

No reply

[redacted]

Stafford Borough – Preferred Option Local Plan Consultation – October to December 2022

Case for Site Allocation for Retail Development (up to 1500m2) – Supermarket / Fuel Filling Station / Retail Store // Mixed use site allocation with Residential (Classes C2 and C3)

Land Adjacent to Meadow Butts Farm at Yarnfield, near Stone, Staffordshire (0.61 hectares)

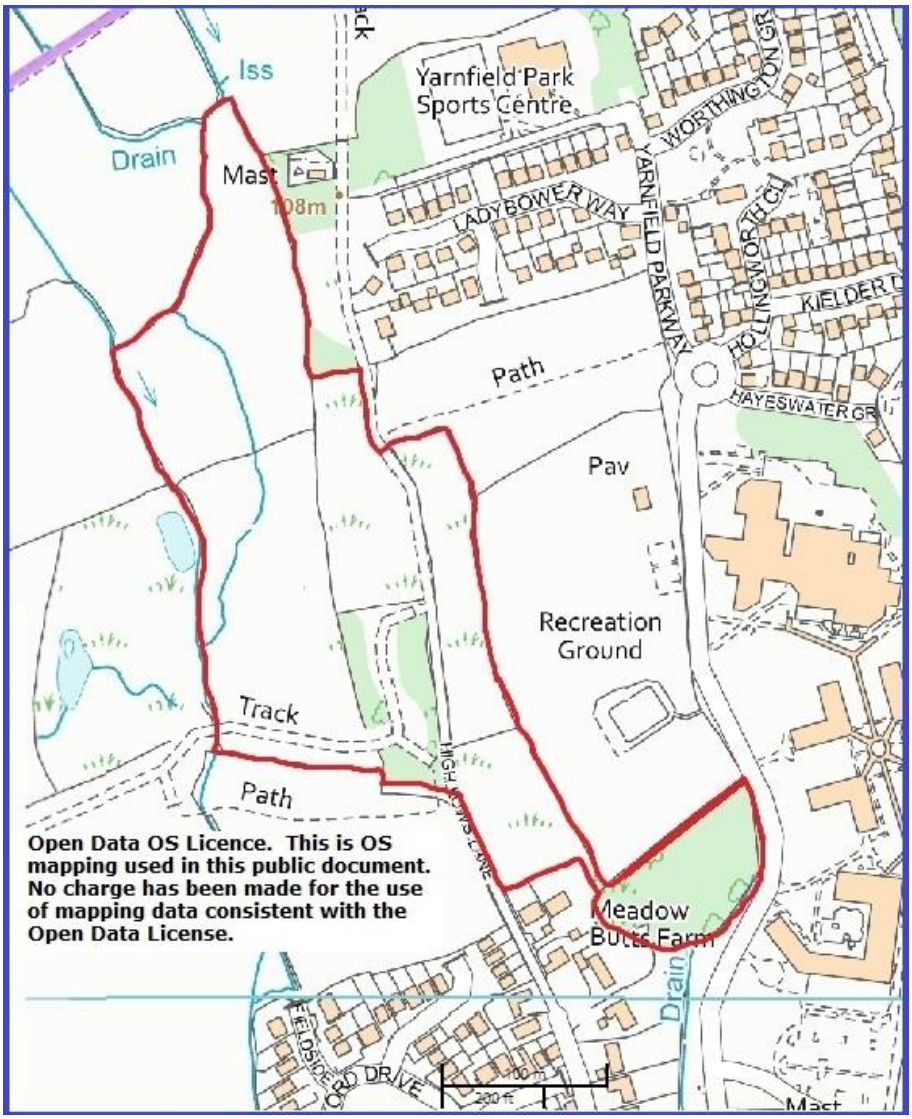
Background

Lufton & Associates have been acting for the landowners of a site in Yarnfield for a number of years and it is registered on the current Strategic Housing and Employment Land Availability Assessment (SHELAA).

The major land holding amounts to 5.07 hectares and although it is very well located to the village it has a number of access and environmental constraints. Part of the land holding a 0.6ha (1.5 acre) field to the south is somewhat detached and has direct highway access on the through road that links the village centre to the new housing areas to the north-west. This is considered to be a prime development site despite the policy constraint of being on the edge of the development boundary (policy) in the North Staffordshire Green Belt.

The sites areas are shown below in Figures 1 and 2.

Figure 1- 5.07 hectare site



Area Measurements

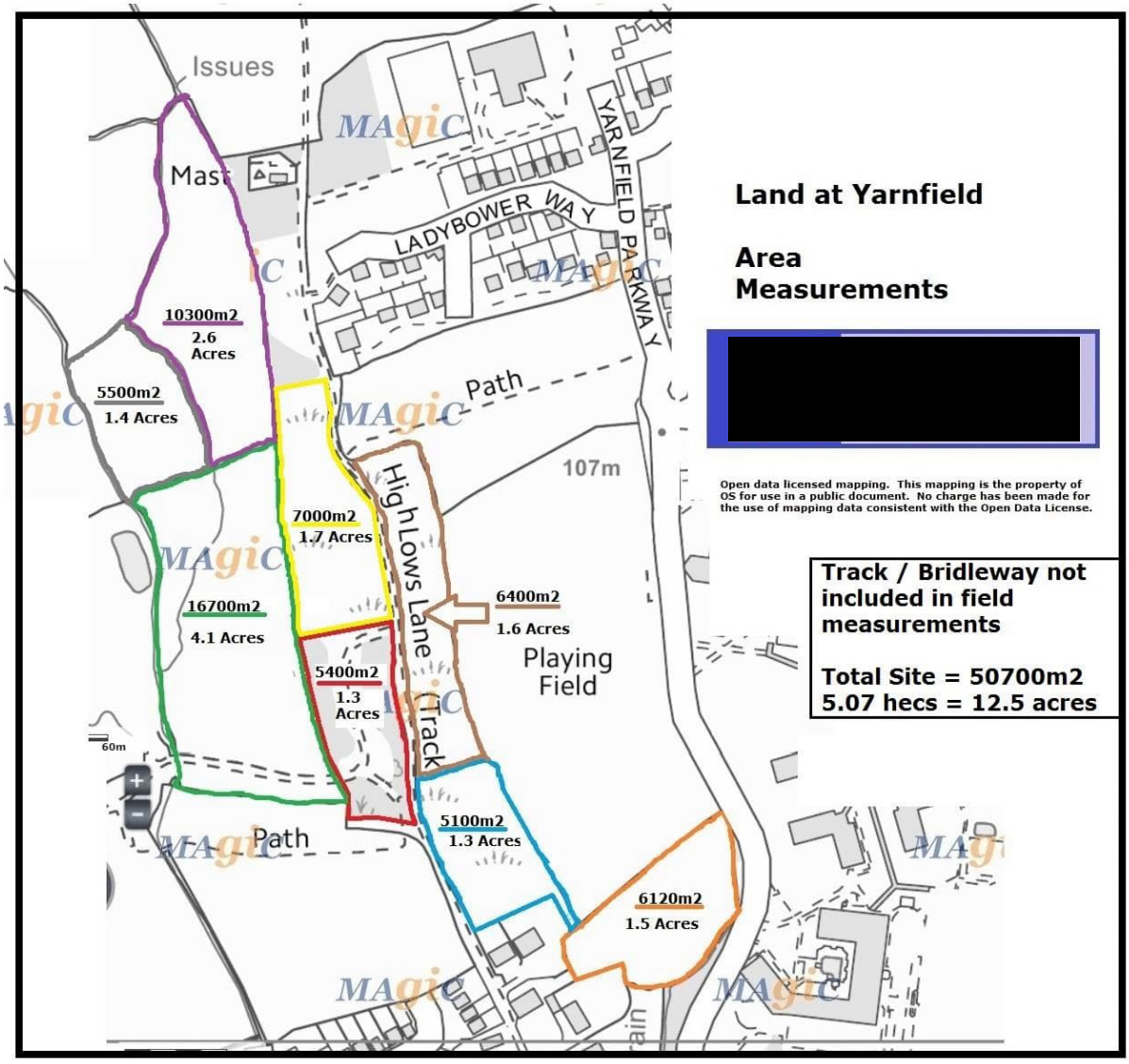


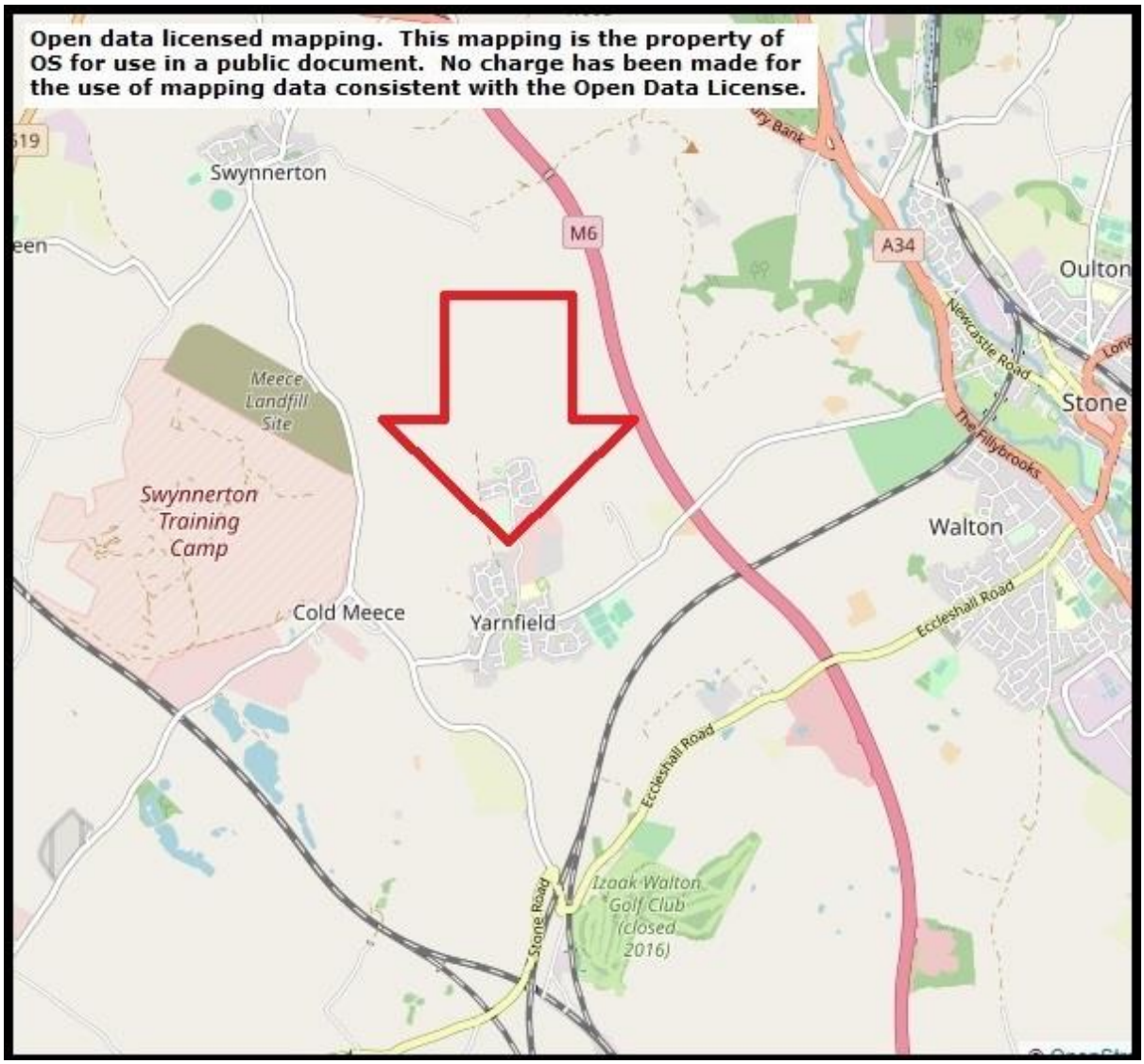
Figure 2- 0.6 hectare site

The premium 1.5 acre site is situated directly 2.5km west of the market town of Stone (**Figure 3**) in the recently expanded village that has seen substantial new residential development in the last 5 years. In the 2WW Yarnfield had double the built footprint that it has now and hosted a vast population producing munitions for the war effort.

The site lies directly south of the main recreational playing fields in the village adjacent to Yarnfield Conference Centre owned by British Telecommunications. It has substantial road frontage of approximately 120m.

The village currently hosts only a single Post Office store with a limited range of convenience goods offer. This is reflected in the Preferred Option plan in a Neighbourhood services designation.

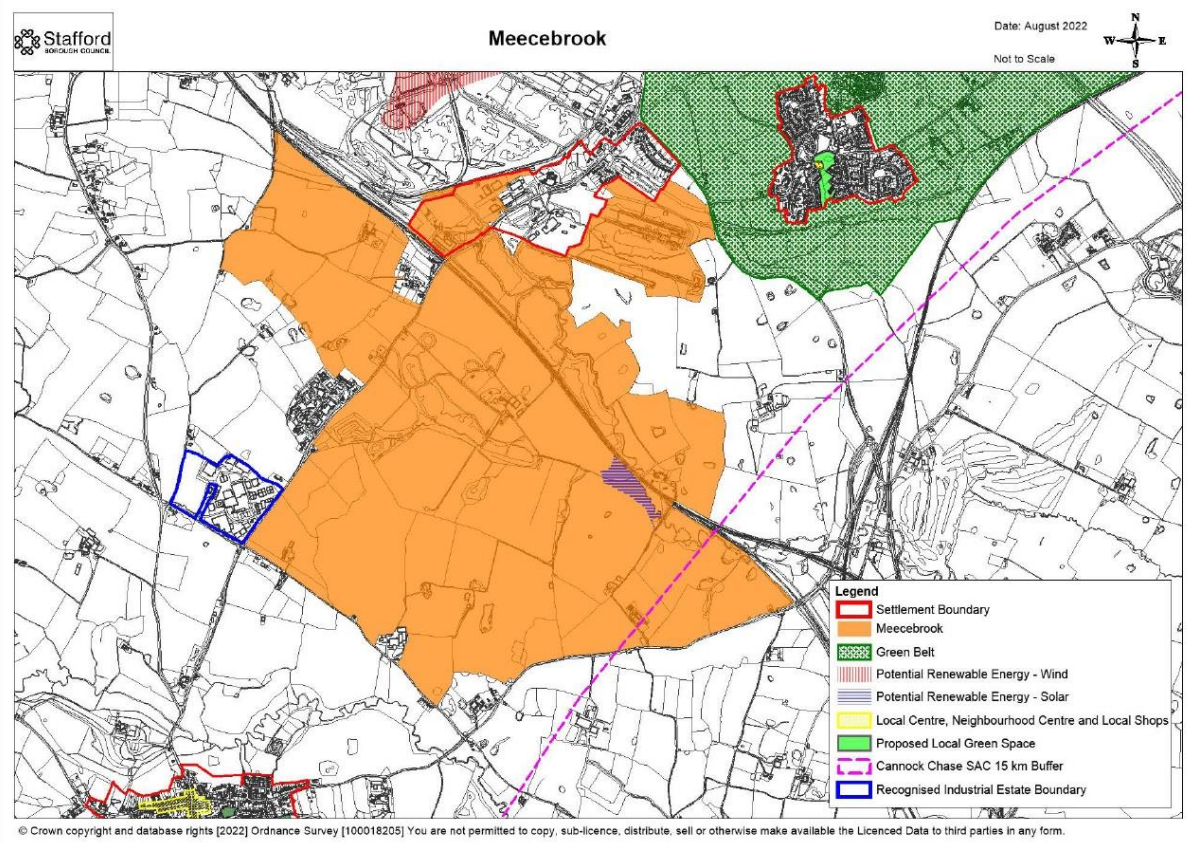
Figure 3



Around two years ago on the instruction of the landowners we had a number of discussions with retail interests including Aldi, Lidl, Heron Foods, M&S BP and the Co-op Food retail group. At that time the site was not interesting to the market primarily because of the focus of development in Stafford and Stone and the intricacies of the distribution network that is largely driven by the existing distribution centre network routes. A key requirement was access to a passing trade on and a flagship advertising position on a road with two-way flows of 10,000 vehicles+.

Now that the Garden Village of Meecebrook[1] (**Figure 4**) has been continually promoted by the Borough Council as the major locational limb (the most significant) of its future development strategy (2020-2040) the criteria for the review of sites at Yarnfield we feel have clearly changed. This site should be highly attractive to the market in the medium term with the combined proximity of a new garden village community and the lack of facilities in the expanded village (Yarnfield).

Figure 4



[1] supported by over £1m of public funded assessment to investigate a non-public landholding.

The Desired Site Allocation

The site comprises a gross developable area of (0.6 ha) 1.5 acres, with a net developable area of approximately 1.3 acres. The vendor requires to retain an access right to the neighbouring land to the north. The site comprises underused pasture land.

We are seeking the land to be removed from the North Staffordshire Green Belt justified in terms of very special circumstances to provide a convenience retail site (see **Figure 5**) much needed by the local community to provide a sustainable location and dramatically reduce the need to travel for food shopping to Stone and Eccleshall. This would simply be achieved by amending the development boundary for Yarnfield village to include the land shown in **Figure 2**.

Figure 5