

Sean Roberts

From: Programme Officer
Subject: FW: psb2
Attachments: Stafford - PSB 2 - Milwood Resonse to Council Response Document P2-02a.pdf

From: Paul Shaw
Sent: 26 August 2016 13:10
To: Programme Officer
Cc: 'Kev Ryder'
Subject: psb2

Dear Sean

Further to my recent e mails regarding the local authority comments which we have only recently seen I enclose hopefully our last comments which we feel are of a fundamental and material nature to the inspector as they go to the heart of the argument of delivery and supply

Can you please ensure that the inspector has a copy of this.

With regard to the three e mails can you also please ensure that they are posted on the examination library website for the sake of transparency

Regards

Paul

Milwood Limited

PSB 2 – Examination – 25th August 2016

Examination Library Document - P2-02a

COUNCIL RESPONSE TO NOTE MF2: SDL IMPLEMENTATION UPDATE (P2- O2)

Having read through The Council Examination Library Document P2-02a, i have the following comments and observations to make.

Further, notwithstanding my commentary below, having read of over counting, undercounting and double counting in The Council's figures, it does potentially raise the concern of, what Mr Paul Tucker QC, once termed at a Section 78 Planning Appeal at The Council, as '*engaging in mathematical gymnastics in order to portray the most positive delivery outcome to The Inspector*'.

Stafford West SDL Trajectory

During the recent Examination, The Inspector produced Document MF-2 in response to The Councils Response to his Document MF-1 (P2-01).

The Council has recently produced Document P2-02a in response to The Inspectors Document MF-2.

In P2-02a, The Council are now stating to The Inspector that Stafford West will achieve the minimum Plan requirement of 2200 units, and do so within the Plan period.

The most recent 2016 5YS Statement of June 2016, stating the position as at 31st March 2016, displays at page 34, the trajectory for Stafford West, which includes those sites with planning consent, and displays that by the end of the Plan period, the minimum requirement will not be achieved, with, after only some 2 years since adoption, an overrun into the next Plan period of 140 units.

In P2-02a, The Council state that those sites with planning consent were omitted from The Inspectors Document MF-2, which is acknowledged.

These are already included and displayed at page 34 of the 2016 5YS for years 2016/17 to 2020/21, and exactly match the revised figures illustrated by The Council in their Table 1 for this period.

However, you will recall that in the 2016 5YS there was displayed, as recently as June 2016, supported by correspondence from the developers in terms of projected delivery rates, an overrun of 140 units into the next Plan period.

Well, in The Councils Table 1, you will see that they have now removed this Plan overrun, and divided this 140 deficit between each of the remaining Plan years, being 2021/22 to 2030/31, going from 143 units pa in the 2016 5YS to now 157 units pa in their Table 1.

I would suggest that something is ironically amiss here, with the exact same sum that overruns, and the Plan will be short by, is now mysteriously and exactly, to the single unit, accounted for in this Plan period.

This has been revised by The Council independent of any supporting evidence to substantiate these increased delivery rates between 2021/22 and 2030/31.

Firstly, the 2016 5YS and the page 34 rates displayed therein, showing this Plan 140 unit shortfall, were supported, as recently as June 2016 by correspondence from the developers.

Secondly, as recent as the 21st July 2016, being Appendix 1 of The Councils Document P2-01, notwithstanding that only correspondence from one developer is included, and that there are 3

developers present at this SDL, that correspondence itself confirms at its bullet 3, that the delivery rates are as per the 2016 5YS, being 143 units pa, not 157 for this period.

Therefore, i respectfully suggest that the figures as displayed within the 2016 5YS are those to be relied upon, in terms of The Inspectors deliberations.

Stafford North SDL Trajectory

The situation here is identical to that of Stafford West above, yet in addition, i have also identified a larger fundamental question with regard to the delivery rates put forward by The Council, and further question the ability for this SDL to be fully delivered by the end of the Plan period.

During the recent Examination, The Inspector produced Document MF-2 in response to The Councils Response to his Document MF-1 (P2-01).

The Council has recently produced Document P2-02a in response to The Inspectors Document MF-2.

In P2-02a, The Council are now stating to The Inspector that Stafford North will achieve the minimum Plan requirement of 3100 units, and do so within the Plan period.

The most recent 2016 5YS Statement of June 2016, stating the position as at 31st March 2016, displays at page 33, the trajectory for Stafford North, which includes those sites with planning consent, and displays that by the end of the Plan period, the minimum requirement will not be achieved, with, after only some 2 years since adoption, an overrun into the next Plan period of 215 units.

In P2-02a, The Council state that those sites with planning consent were omitted from The Inspectors Document MF-2, which is acknowledged.

These are already included and displayed at page 33 of the 2016 5YS for years 2014/15 to 2023/24, and exactly match the revised figures illustrated by The Council in their Table 1 for this period, excepting year 2023/24, which now has an additional 5 units, which i will come onto in due course.

However, you will recall that in the 2016 5YS there was displayed, as recently as June 2016, supported by correspondence from the owners/promoters in terms of projected delivery rates, an overrun of 215 units into the next Plan period.

Well, in The Councils Table 1, you will see that they have now removed this Plan overrun, and divided this 215 deficit between each of the remaining Plan years, being 2023/24 to 2030/31, going from 230 units pa in the 2016 5YS to 235 units pa in their Table 1 in year 2023/24 (the 5 units i spoke of earlier), and then equally across the remaining Plan period from 205 units pa in the 2016 5YS to 235 units pa in their Table 1 across years 2024/25 to 2030/31.

I would suggest that something is ironically amiss here, with the exact same sum that overruns, and the Plan will be short by, is now mysteriously and exactly, to the single unit, accounted for in this Plan period.

This has been revised by The Council independent of any supporting evidence to substantiate these increased delivery rates between 2023/24 and 2030/31.

Firstly, the 2016 5YS and the page 34 rates displayed therein, showing this Plan 215 unit shortfall, were supported, as recently as June 2016 by correspondence from the owners/promoters.

Secondly, as recent as the 20st July 2016, being Appendix 1 of The Councils Document P2-01, notwithstanding that these two correspondences are not from actual developers, both of these correspondences state that the most accurate and up to date delivery and timescale information is

that contained within the Phasing Section of the submitted Masterplan Framework Document of the 15th July 2016 (P2-N18), and here is the further, more fundamental issue at hand.

The Masterplan at Section 6, includes an indicative Phasing Plan at page 86, and accompanying Phasing text at page 87.

The Phasing Plan shows the Remaining SDL allocation separated into two separate parts; The Central Part, between the A34 Stone Road to the West and Marston Lane to the East, being that owned by Akzo Nobel, for 700 units.

The Eastern Part, between Marston Lane to the West and Sandon Road to the East, being that promoted by Maximus Strategic Land, for 2,000 units.

The accompanying text at page 87 states;

Central Part = 700 units

6.47 The Proposed Development will be built on a phased basis. Details of phasing will be confirmed at the detailed design stage and will be led by market conditions. However, the following assumptions have been made at this stage.

6.48 It is assumed that the Proposed Development will be phased as illustrated on the Indicative Phasing Plan.

6.49 As shown on the Indicative Phasing Plan it is likely that the central part of the North of Stafford SDL will be built out generally from west to east, the A34 (Stone Road) to (Marston Lane), over five main phases commencing with phase 1 and culminating with phase 5. It is likely that two phases will be under construction at the same time during the construction period. It is assumed that the local centre and the Primary School will be constructed during phase 3.

6.50 It is anticipated that construction will commence in 2017, with the first operational year of phase 1 in 2018 and the final completion year of phase 5 by 2033. Depending on market conditions it is assumed that the build out rate will be between 20 and 60 dwellings per year.

Eastern Part = 2,000 units

6.51 As shown on the Indicative Phasing Plan it is likely that the eastern area will be built out generally from the east to west, Sandon Lane to Marston Lane, over seven main phases commencing with phase 1 and culminating with phase 7. It is likely that two phases will be under construction at the same time during the construction period with an additional option for access from the A513 (Beaconside). It is assumed that the local centre on Beaconside will be constructed during phase 3 and the second local centre and Primary School will be constructed during Phases 5 and 6. With possible access from Marston Lane or Beaconside, the Secondary School can be constructed within an early phase.

6.52 It is anticipated that construction of the eastern part of the SDL will commence in 2018, with the first operational year of phase 1 in 2019 and similar build out rate to the central part.

This tells us (p6.50) that development for the 700 unit Central Part will commence in 2017 and be completed in 2033 (2 years after the Plan period), a period of 16 years.

At 16 years duration, 700 units equates to a delivery of some 43.75 units per annum.

This tells us (p6.52) that development for the 2,000 unit Eastern Part will commence in 2018. It gives no completion year date, but states that the build out rate will be similar to that of the 700 unit part.

At 43.75 units per annum, this will take a staggering 45.71 years to complete, being, from a start date of 2018, then year 2063 (32 years after the Plan period).

For both the Central and Eastern Parts, it tells us (p6.49/p6.51) that it is likely that 2 phases will be developing at the same time.

(Unfortunately, the text is not very clear here, as to whether it means 1 phase from each Part or 2 phases from each Part simultaneously).

Notwithstanding that it is somewhat unrealistic to expect 4 phases to be operational in such close proximity to each other and for all to yield at a rate of some 43.75 units per annum, to assist The Council i have used the most positive delivery scenario of 2 phases from each Part, making 4 in total, simultaneously).

Therefore, this would mean each Part delivering some 87.5 units per annum (43.75×2), overall totalling some 175 units per annum (87.5×2).

The 2016 5YS Statement at page 33, tells us that these Remaining Allocation Parts will be the single supply source at this SDL from year 2024/25 to end of Plan period year 2030/31.

Therefore, for the purposes of this exercise, to simply highlight the key issue at hand, i have only assessed this period, when we know there will be no other supply source at this location.

The Council's Table 1 within Document P2-02a states for the period 2024/25 to 2030/31, a delivery rate of 235 units per annum.

We know from analysis above, using the owners/promoters delivery rate information, and applying the most positive possible delivery outcome scenario, that, at best, it may deliver at a rate of 175 units per annum.

Therefore;

For the period 2024/25 to 2030/31, there is an identified deficit per annum of 60 units, producing an overall deficit at the end of the Plan period of some 420 units, being significantly higher than even that displayed within the 2016 5YS Statement.

Please note;

i have only assessed the period from year 2024/25 to end of Plan period year 2030/31, when we know that these Remaining Allocation Parts will be the single supply source at this SDL.

However, we know from the owners/promoters own information, that these Remaining Allocation Parts are set to commence in 2017 for the Central Part, and 2018 for the Eastern Part.

Should a more intrusive analysis be undertaken, that includes the period from 2017/18 to 2023/24, when we know from the 2016 5YS Statement, that the other, existing planning consents will also be under construction and contributing to the annual delivery totals, and those percentages of delivery across this further period are factored in to the overall equation, this overall deficit figure would be even higher.

Therefore, in light of the above, it is clear that The Council's Document P2-02a Table 1 figures cannot be relied upon in any regard, and, whilst the 2016 5YS Statement does show an overrun at the end of the Plan period, and its figures appear to be more accurate than Document p2-02a, i would respectfully suggest that even these are suspect and treated with the utmost caution, in terms of The Inspectors deliberations.

Stafford East SDL Trajectory

No comment.

Stone West SDL Trajectory

During the recent Examination, The Inspector produced Document MF-2 in response to The Councils Response to his Document MF-1 (P2-01).

The Council has recently produced Document P2-02a in response to The Inspectors Document MF-2.

The Council within its Document P2-02a state that this site will deliver in accordance with the 2016 5YS trajectory, and therefore display the same within their Table 1.

However, at Appendix 1 to Examination Document P2-01, being the update that The Council sought in order to produce their Document P2-01, the Promoter in its correspondence of the 26th July 2016 clearly states that the 5YS figures of 80 units per annum are *potentially achievable*, **should** the chosen developer have 2 branded outlets that are complimentary (such as Barratt/David Wilson or Persimmon/Charles Church etc).

(my emphasis).

The Promoter goes on to caution and state that, should the developer only have 1 branded outlet, this sum would halve to 40 units per annum.

Further, the Promoter states that a *more realistic* sum would be 60 units per annum, which, if you recall, they emphasised to The Inspector at the Examination.

This being the case, whilst the start year of 2017/18 is agreed, the completion year would be 2025/26, not 2023/24 as shown in Table 1.

Given this up to date information was provided to The Inspector during the Examination by The Council and the Promoter themselves, i am surprised that The Council has elected not to display the same within Document P2-02a and its Table 1.