

Examination of the Plan for Stafford

Development Strategy – Spatial Policy 7 – Supporting the Location of New Development

Hearing Statement on behalf of St Modwen Developments

The following sets out further submissions on behalf St Modwen Development in respect of matters relating to the issue of Settlement Boundaries, with specific reference to the key questions and matters relevant to St Modwen’s representations to the emerging Plan which are to be addressed at the Examination.

Relevant Examination Question to St Modwen’s Representation

Spatial Principle 7:

a. SP7 indicates that one of the key elements to deliver the proposed scale and distribution of housing and employment development is the establishment of Settlement Boundaries for each of the settlements in the Sustainable Settlement Hierarchy, either in this Plan (for Stafford and Stone) or in neighbourhood plans or the Site Allocations & Policies Document (for Key Service Villages). Is this an appropriate, effective, justified and soundly based way of delivering the scale and distribution of proposed development?

b. Are the criteria for establishing Settlement Boundaries appropriate, justified, effective, soundly based and consistent with national policy?

The move towards the use of Settlement Boundaries is a positive improvement to the Plan compared to earlier draft versions. The approach replaces the former use of Residential Development Boundaries and will logically define a key land use planning distinction between the Urban Area and Open Countryside. Fundamentally different approaches to development will apply on either side of the line. The plan’s evidence base makes it clear that the definition of Settlement Boundaries are a component of the approach to deliver the development needs of the Borough and therefore are critical at this stage to the Plan’s soundness.

Settlement Boundaries have only been defined for Stafford and Stone at this stage and not for all of the settlements within the Sustainable Settlement Hierarchy. Whilst the identification of Settlement Boundaries could be “put off” to a later plan, they are an important designation which should be established sooner rather than later, particularly as they create this important policy distinction.

The Settlement Boundaries which have been drawn for Stone and Stafford bear no material differences to the former Residential Development Boundaries. There is no part of the Evidence base supporting the Plan which shows or explains how the Plan has carefully assessed or evaluated which land should be included within or outwith of the boundary. The accompanying text explains that Settlement Boundaries will be established that provide sufficient scope for the proposed scale of development of housing, employment and other uses within the settlement. Policy SP7 sets out various criteria which will be used to assess development proposals and hence influence the line of the Settlement Boundaries to be defined in the areas other than Stafford and Stone. It is logical that this full range of criteria have been used to establish the Settlement Boundaries for Stafford and Stone which are defined in the Plan however there is no Evidence to explain or justify this.

Whilst the principle of Settlement Boundaries is supported;

- The Boundaries should be established now, they are a critical part of development deliveries.

- The proposed Boundaries for Stafford and Stone are included in the Plan but have not been fully assessed or supported by any evidence to justify their extent.
- Moreover, the Boundaries within the Plan do little than merely follow the former Residential Development Boundaries of the old Local Plan. If further development is to be accommodated then they must include further flexibility and include a broader area. They are no longer just defining an area suitable for housing as the previous Residential Development Boundaries were, they are defining a difference between urban area and countryside in policy application.
- The Boundaries must be established for Stafford and Stone having regard to the same criteria which are to be used for the wider settlements.
- The Boundaries for Stafford and Stone must include sufficient scope for the proposed scale of development in the Plan for housing, employment and other uses commensurate with their principal role.

Two examples are set out on the attached Plans, SMD 1 and SMD 2. Both demonstrate examples of where the Settlement Boundaries have not been appropriately assessed and currently exclude land which should logically be included within the defined Boundary.

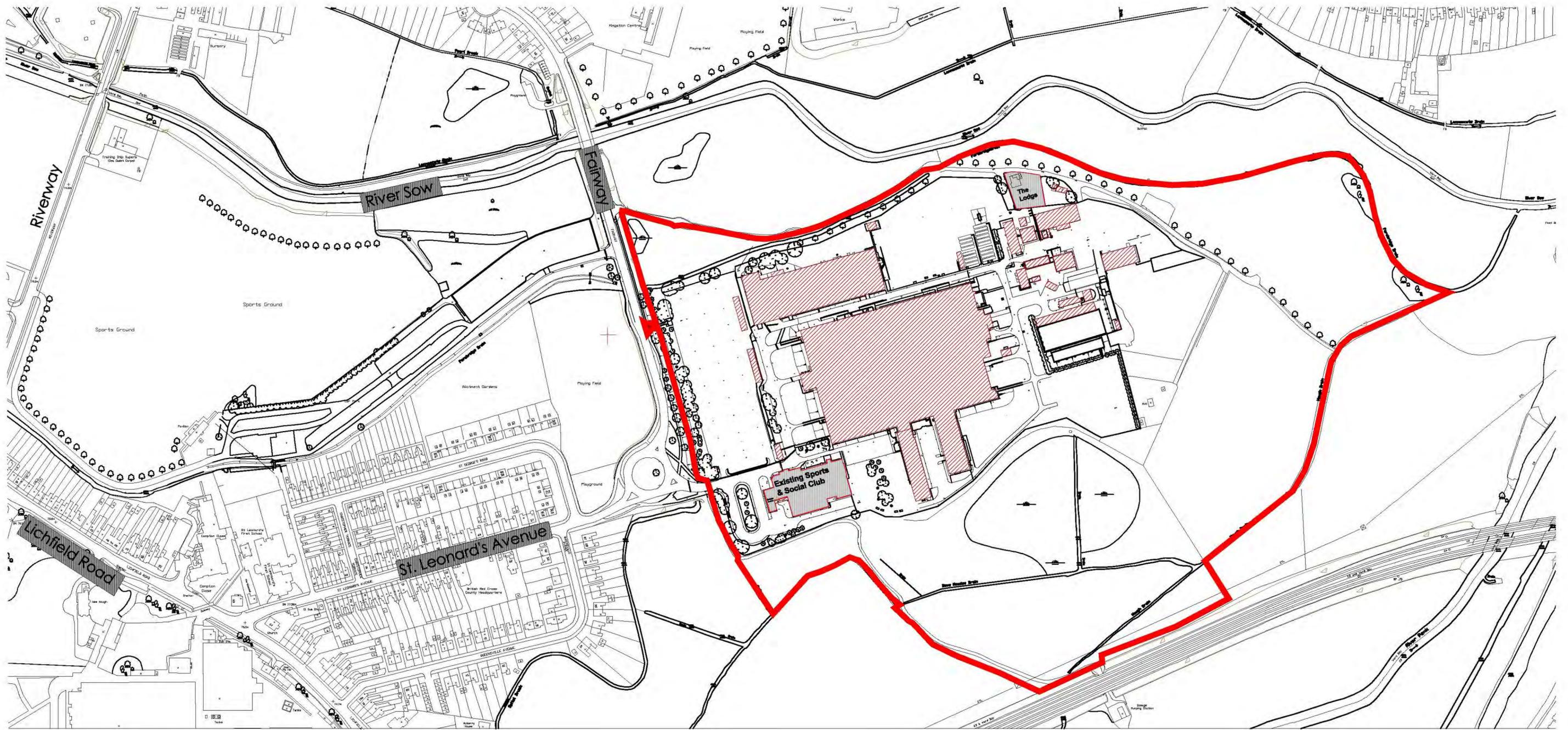
SMD 1 shows the former Castleworks site off Caste Street, Stafford. It has been the subject of a planning appeal (APP/Y3425/A/12/2172968) which was allowed and granted planning permission for a residential development of up to 80 dwellings. The Inspector confirmed in her decision letter that “the character of the area is previously developed and urban. Whilst the site is edge of settlement, it is not rural or countryside in character, having been developed as a factory many years ago”. The site should accordingly be included in the Settlement Boundary.

SMD 2 shows premises at St Leonards Avenue in Stafford. They are excluded from the Settlement Boundary but logically form part of the urban area, are distinct from the wider open countryside and should be included within the Settlement Boundary. Moreover the site has planning permission for redevelopment to part new employment use and part housing, amounting to some 270 dwellings together with new public open space. The Settlement Boundary should reflect this extent of approved development which has been adjudged to be acceptable and supports the growth of Stafford.

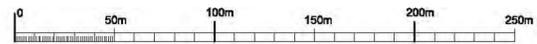
The proposed Settlement Boundaries are supported however;

- The Boundaries should be defined for all settlements now.
- The Boundaries for Stafford and Stone should be supported by evidence that they have been appropriately defined, provide sufficient scope for anticipated future growth and have adopted the same criteria as for other settlements set out in the Policy.
- They should include the land shown in Plans SMD 1 and 2.

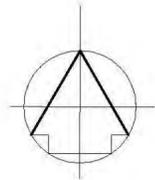
APPENDIX 2 – LAND AT ST LEONARDS – PLAN SMD I



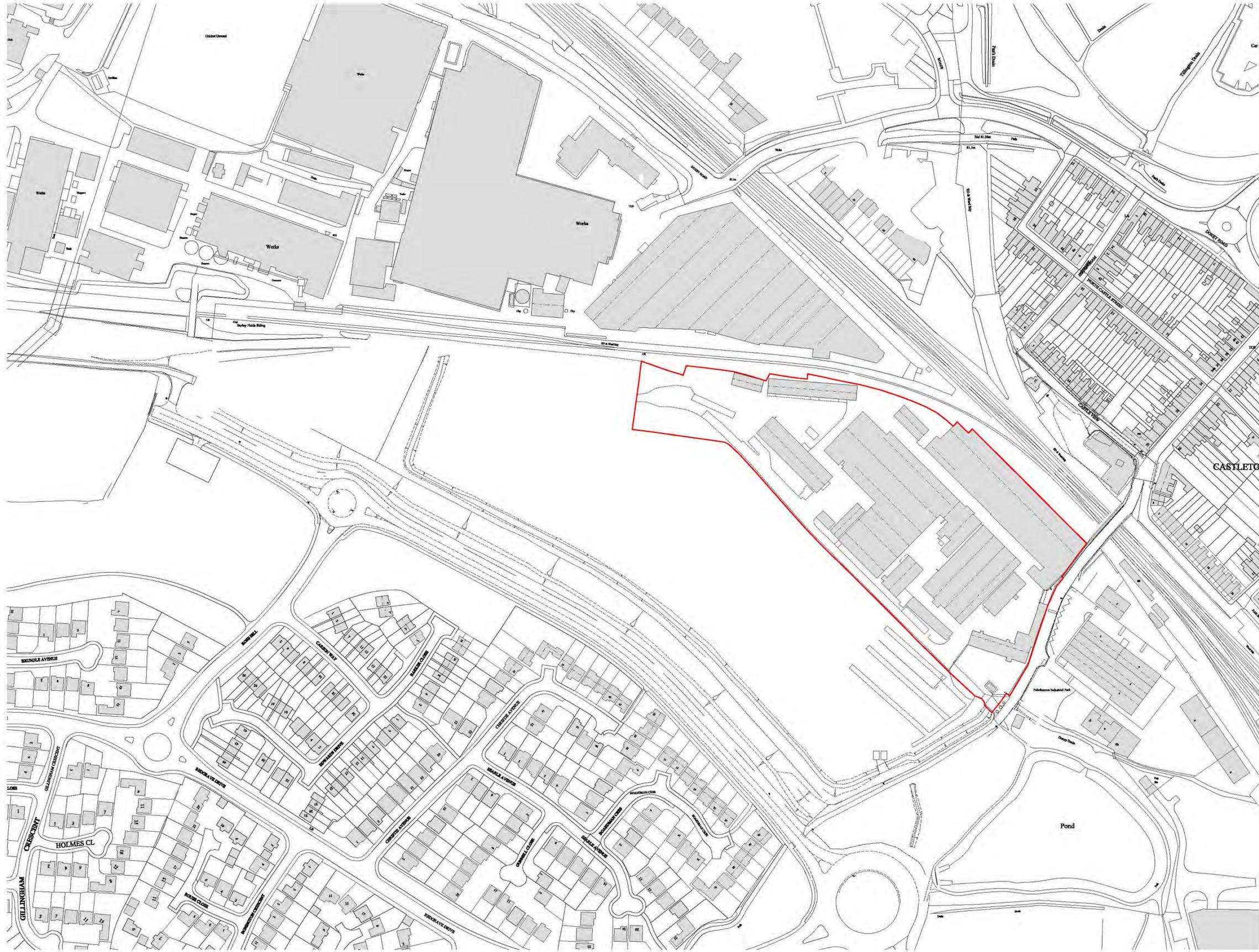
Plan SMD 1 - Land at St Leonard's Ave



Scale



APPENDIX 2 – CASTLEWORKS – PLAN SMD 2



Plan SMD 2 - Former Castleworks, Castle Street, Stafford