



**The Plan for Stafford Borough –
Publication**

**Examination Statement –
Development Strategy**

October 2013

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DEVELOPMENT STRATEGY (Spatial Principles SP1-SP7)

1. KEY ISSUE:

Is the Development Strategy for Stafford Borough soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?

- 1.1. The Development Strategy for Stafford Borough is set out in Section 6 of the Plan for Stafford Borough – Publication (A1), hereafter “**the Plan (A1)**”. The Borough Council considers that the Development Strategy is soundly based, informed by a robust, credible and proportionate evidence base, and by extensive public consultation and engagement carried out from 2008 to 2012, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15). It has been subject of significant assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11) together with the Habitat Regulations Assessment in respect of Natura 2000 sites (A24) and the Habitat Regulations Assessment in respect of the Cannock Chase Special Area of Conservation (A25). Furthermore the Development Strategy for Stafford Borough is considered to be in conformity with national policy through the National Planning Policy Framework (NPPF) (F1) as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 1.2. The Development Strategy for Stafford Borough is considered to be appropriate and effective in supporting the delivery of the Spatial Vision and Key Objectives of the Plan (A1) which clearly establish the Borough’s priorities and can respond flexibly to changes over the Plan period to 2031. The Key Objectives each support implementation of the locally distinctive Vision through the policies in the Plan (A1). Further details are set out in Examination Statement 2, which concerns the Spatial Vision, Key Objectives and links to the Development Strategy and policies.
- 1.3. The Development Strategy for Stafford Borough provides for the development needs of the Borough within its boundaries, and does not require provision to be met elsewhere, or cross boundary developments. It accords with the Local Plans of neighbouring local authorities, as detailed in the Duty to Co-operate Statement (B3). The Development Strategy is locally distinctive, responding to the character of the Borough and its specific settlements by providing the appropriate level of development within the settlement hierarchy, whilst protecting the high quality environment containing internationally important habitats and nationally important landscapes.
- 1.4. Justification for the Development Strategy is set out within the evidence base (including the identification of the development needs requiring to be met, and the most effective approach to meet these needs). It was a key focus of the process of public consultation and engagement particularly early in the plan making process through the Borough-wide Development Strategy (G9) and Delivering the Plan for Stafford Borough

– Issues & Options (G6). Through these stages the preferred approach for the Development Strategy was established and tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 1 (H10) and the Sustainability Appraisal Commentary Volume 2 (H7).

- 1.5. The Borough Council considers that the Development Strategy has been positively prepared and is consistent with national policy through the NPPF (F1), with further details in the Stafford Borough Self Assessment Checklist (B4), including in the proposed amount of housing, employment and other development, and is appropriate in terms of with the evidence base. Further details about consistency with national policy and justification within the evidence base are provided in response to the relevant sections of this Examination Statement. In addition the Background Statement (K1) Topic Paper A explains the overall scale, distribution and manner of delivery of future development (with further details, for housing, provided by Topic Papers B and C), whilst Topic Paper D provides more details about the Sustainable Settlement Hierarchy and the distribution of development, and Topic Paper E explains the intended delivery of future development at Stafford and Stone through the Strategic Development Locations.

2. SPATIAL PRINCIPLE 1:

Does SP1 properly reflect the presumption in favour of sustainable development set out in the NPPF?

- 2.1. The Borough Council considers that Spatial Principle 1 does properly reflect the presumption in favour of sustainable development as set out in the NPPF (F1), not least because it is virtually identical to the form of words proposed by the Planning Inspectorate through the Planning Portal web-site except that **the word 'always'** is not included at the start of the **second sentence and the words 'and communities'** are added after applicants. The Council considers that it is important to work proactively with communities as well as applicants to deliver proposals but there may be occasions when proactive engagement may not always be appropriate if this would be contrary to the adopted Local Plan approach, for example. Spatial Principle 1 sets out the fundamental principles of delivering the development strategy for the Borough in line with the NPPF which states that there should be a presumption in favour of sustainable development running through plan making and decision making, as detailed in NPPF (F1), paras. 11 - 13.
- 2.2. NPPF (F1) para 14, set out below, is reflected within Spatial Principle 1 of the Plan for Stafford Borough – Publication (A1) to ensure that the new Plan positively seeks opportunities to meet the objectively assessed needs of the Borough when assessed against the policies in the NPPF wherever possible. Furthermore the decision-making element of the planning system is included in Spatial Principle 1 to deliver new development either in the context of the new Plan or the NPPF (F1) para 14:

"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.

For plan-making this means that:

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted¹.*
 -

For decision-taking this means²:

- *approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - *specific policies in this Framework indicate development should be restricted.¹ "*

2.3. As set out in the Plan for Stafford Borough – Submission Consultation Statement (A14) and detailed within the Plan for Stafford Borough Publication – Representations Received (A18) a number of other representations were made concerning Spatial Principle 1 within the Plan (A1), by J Ross Developments, RPS for Barratts West Midlands Ltd, the Garden Centre Group, the local office of the Council for the Protection of Rural England, Taylor Wimpey / Bellway Homes, Mr D Bowers, Creswell Parish Council and Lufton & Associates on behalf of Wassall family, Barratt Homes (trading under BDW Trading Ltd) and Clarke Farms. There was general support for Spatial Principle 1 to meet housing needs through a deliverable plan and particular sites being promoted. However a number of specific issues were raised by individual representors to which the Council will respond, as set out below.

2.4. RPS for Barratts West Midlands Ltd call for the third paragraph of Spatial Principle 1 to be deleted as this repeats NPPF (F1) para 14. Whilst recognising that an element of the NPPF (F1) para. 14 is repeated the Borough Council does not consider that such a deletion should take place as this is an important context for the decision-making process to be taken into account, particularly linking the NPPF to the Plan (A1). The local office of the Council for the Protection of Rural England call for a more robust definition of the 'sustainability' term but the Borough Council does not consider that this is within the scope of the Plan (A1). Taylor Wimpey / Bellway make reference to meeting unmet needs and

¹ For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.

² Unless material considerations indicate otherwise.

household projections which are addressed in subsequent Spatial Principles within the Plan. Mr D Bowers is promoting land south of Stone and calls for the sustainable development principles to be amended to enable planning applications to be in precedent to the NPPF (F1). The Borough Council does not consider this change is appropriate within the current planning system. Creswell Parish Council raise issues of plan delivery in the context of Spatial Principle 1. The Borough Council considers that this is addressed through subsequent Spatial Principles and policies within the Plan (A1).

3. SPATIAL PRINCIPLE 2:

How has the Council undertaken an objective assessment of housing requirements for the relevant housing market area, and does the Plan fully meet the objectively assessed needs for market and affordable housing within Stafford Borough, along with any unmet housing requirements from neighbouring authorities:

- 3.1. Detailed information and justification concerning the objective assessment of housing requirements are set in the Background Statement (K1) Topic Paper B. In summary, the Borough Council considers that an objective assessment of housing requirements for the relevant housing market area has been undertaken based upon a robust and credible evidence base, which takes into account the latest household and population projections (and reflects provision both for natural change and for migration), together with the Stafford Borough Strategic Housing Market Assessment (D5) produced in 2012.
- 3.2. For Spatial Principle 2 representations state that the housing requirement is failing to meet full objectively assessed housing need, as required by the NPPF, based on evidence set out in the West Midlands Regional Spatial Strategy Panel Report requiring 550 new homes per year over the Plan period 2006 to 2026 and the 2008 household projection figures together with 2011 Census data. Following the Castleworks appeal decision in December 2012 representations argue that a housing shortfall should be addressed in the first 5 years of the new Plan period and the Council has a history of persistent under-delivery so a 20% buffer should be added to the housing requirements for Stafford Borough with 500 new homes per year being a minimum figure to support affordable housing. Ministry of Defence housing should be included. Furthermore the evidence base needs to be updated to provide the most up-to-date information including the population increase through the 2011 Census and latest household projections. Other representations state that only locally generated need should be met in order to support major urban areas such as North Staffordshire and reduce in-migration to Stafford Borough thus reducing pressure for new infrastructure and the environment. A representation queried the relationship between housing and employment.
- 3.3. The Borough Council considers that the Plan fully meets the objectively assessed needs for market and affordable housing within Stafford Borough along with any unmet housing requirements from neighbouring authorities, **based on the latest evidence, through the Plan's provision for 500 new homes per year over the Plan period.** Background Statement (K1) Topic Paper B sets out the justification for the housing provision of 500 new homes per year over the Plan period for Stafford Borough, which

meets both local need and in-migration demands based on evidence within the Stafford Borough Interim 2011 Household Projections (D7 A&B), within the context of the Population and Household Projections for Stafford Borough (D8). Clearly the economic recession from 2007 inevitably had an impact on the delivery of new housing completions. Whilst the Council accepts that there was a period of low delivery in recent years due to economic circumstances the adoption of the new Local Plan will ensure sufficient deliverable housing land is available to meet the 5 year requirements going forward together with the flexibility of a 20% buffer. The Council does not accept 500 new homes per year should be regarded as a minimum figure due to the uncertainty this would create regarding infrastructure capacity and environmental constraints, which needs to be taken into account through the provision of new development. Whilst provision may vary to a small degree up and down around that target, over the plan period it should average out at that level – and the provision of infrastructure is thus based on the proposed levels of growth. The Plan makes sufficient provision for Ministry of Defence housing.

- 3.4. The most up-to-date Strategic Housing Market Assessment (D5) identifies an annual requirement of 210 new affordable homes to be delivered at Stafford Borough over the Plan period. As detailed in Background Statement (K1) Topic Paper B, this level of affordable housing amounts to 42% of total annual provision based on 500 dwellings per annum. The Borough Council accepts that the total objectively assessed affordable housing need will not be met through the actions of the new Local Plan alone, which is a similar position to that found by most local authorities across the country. Nevertheless based on the growth strategy to be delivered through the Plan (A1) there will be a significant increase in the proportion of affordable housing delivered to meet needs compared to past rates, particularly through the delivery of Strategic Development Locations and Policy C2. Further evidence to demonstrate delivery of affordable housing is set out in the Economic Viability of Housing Land in Stafford Borough (D10) for sites of up to 150 house units and through the Viability and Delivery of Northern and Western Strategic Development Locations, Stafford (D51) together with the Stafford Borough Council Infrastructure Study Inputs (D56) for the large-scale housing proposals. The Council will also seek to support the delivery of affordable housing through other mechanisms such as housing association building initiatives and Government schemes in the future.
- 3.5. As the Plan (A1) is seeking to fully meet objectively assessed needs for Stafford Borough over the Plan period for both local need and in-migration from neighbouring authorities it is considered that any unmet housing requirements are being addressed. As detailed in Background Statement (K1) Topic Paper B paras B5.23 to B5.26 there is general **accord with neighbouring authorities regarding the Plan's (A1) approach**, with no key issues raised through the Duty to Co-operate process in terms of Stafford Borough not addressing any unmet housing requirements from neighbouring authorities, evidenced through the Duty to Co-operate Statement (B3) and the Duty to Co-operate Statement Update (K2). The Council considers that the scale of new development set out in the Plan (A1) is appropriate to deliver objectively assessed needs from 2011 to 2031, supported through a robust and credible evidence base which has assessed the implications on environmental constraints and the delivery of supportive new infrastructure.

3.6. Therefore the Borough Council considers that it has undertaken an objective assessment of housing requirements for the relevant housing market area, has fully met the objectively assessed needs for market and affordable housing and addresses any unmet housing requirements from neighbouring authorities.

i. What is the basis, justification and methodology for the level of proposed housing provision (500 dwellings/year), having regard to the supporting evidence (including the SHMA & SHLAA), recent population/household projections (including the 2011-based interim household projections) and Census results, and guidance in the NPPF (¶ 14, 17, 47-55; 159);

3.7. The basis, justification and methodology for the level of proposed housing provision (500 dwellings / year) is detailed in Background Statement (K1) Topic Paper B and summarised here. The approach is justified by the supporting evidence within the context of guidance in the NPPF (F1). NPPF (F1) para 14 requires Local Plans to meet objectively assessed needs through the plan-making process through a presumption in favour of sustainable development. The core planning principles set out in NPPF (F1) para 17 indicate that the needs of an area to meet housing, business and other needs should be objectively met. NPPF (F1) paras. 47 -55 seek to deliver a wide choice of high quality homes through deliverable new housing sites whilst NPPF (F1) para 159 requires local planning authorities to have a clear understanding of housing needs in their area through a robust evidence base. As set out fully in Topic Paper B, the Borough Council considers that the requirements in the NPPF have been addressed by the Plan (A1).

3.8. As explained in the Background Statement (K1) Topic Paper B , the level of proposed housing provision is based on consideration of demographic change through the Stafford Borough Interim 2011 Household Projections (D7 A&B), within the context of the Population and Household Projections for Stafford Borough (D8); the most up-to-date Stafford Borough Strategic Housing Market Assessment (D5); evidence of market demand as demonstrated through the housing completions for Stafford Borough over recent years set out in the Housing Monitor 2013: Land for New Homes (D1); and the scope for sustainable and viable development from potential housing land available identified through the Strategic Housing Land Availability Assessment (SHLAA) Review (D2). Taking these factors into account, the level of proposed housing provision is considered to be appropriate for the Plan period to 2031, and to meet objectively assessed needs.

ii. What is the current and future 5, 10 & 15-year housing land supply position, in terms of existing commitments, future proposed provision, allowance for windfalls, and provision identified in the latest SHLAA; and how will the proposed housing provision be effectively delivered in terms of Strategic Development Locations and other allocations?

3.9. Details of the current housing land supply position is set out in the Stafford Borough Council 5 year Housing Land Statement (D2) and further explained in the Background Statement (K1) Topic Paper C

section C6. To explain the current and future 5, 10 & 15 year housing land supply position there are two key elements to be taken into account: the potential supply of housing land across the Borough as detailed in the Strategic Housing Land Availability Assessment Review 2013 (D2), and the Stafford Borough Housing Trajectory. The Plan (A1) sets out the Stafford Borough Housing Trajectory in Appendix F, which has subsequently been updated with housing completions and commitments up to 31 March 2013 as detailed in the Background Statement (K1) Topic Paper C (Stafford Borough Housing Trajectory Chart in Section C6). For Stafford Borough the housing land supply is made up of three components; existing commitments, as listed in Appendix A of the Housing Monitor 2013: Land for New Homes (D1); the Strategic Development Locations at Stafford and Stone, and deliverable and developable Strategic Housing Land Availability Assessment (SHLAA) sites in the 2013 Review (A2) within or abutting the Settlement Hierarchy defined in Spatial Principle SP3. The Council approach is to ensure effective housing supply is identified to meet the requirements of NPPF (F1), para 47, bullet point 3.

- 3.10. As set out in the Plan (A1), Spatial Principle 2, the annual housing target is 500 new homes per year. Therefore over a 5 year period the total housing requirement is 2,500 new homes, over a 10 year period the requirement is 5,000 new homes and over the 15 year period the requirement is 7,500 new homes. The ability to meet the supply will be considered in two stages: firstly the estimate of likely construction, provided by the Housing Trajectory, and secondly, the potential wider site availability demonstrated by the SHLAA (which includes the Trajectory supply, but also offers other sites with potential).
- 3.11. The Housing Trajectory contained within the Plan (A1, Appendix F), and subsequently updated within the Background Statement (K1), describes the expected rate of construction, based on current information and known market expectations. Using the three components set out above regarding existing housing commitments with planning permission, the Strategic Development Locations at Stafford & Stone, and other SHLAA sites the table below provides details regarding the 5, 10 and 15 year housing land delivery, based on the likely rate of construction through delivery of the Plan (A1):

	5 year period 2013/14 to 2017/18	5 year period 2018/19 to 2022/23	5 year period 2023/24 to 2027/28
Completions from existing commitments	1,989	408	24
Completions from SDLs	1,116	1,930	2,050
Completions from SHLAA sites	50	385	645
TOTAL DELIVERY	3,155	2,723	2719

- 3.12. It should be noted that the Strategic Development Location at Stone is not due to be delivered until after 2021 so no provision from this site has been included in the first 5 year period. In addition, for the 5 year period from 2018/19 to 2022/23 existing commitments on a small number of large sites identified in the Housing Monitor 2013 (D1) have been included.
- 3.13. As distinct from the Stafford Borough Housing Trajectory, which estimates the likely rate of construction, the SHLAA 2013 (D2) identifies a significant reservoir of potential housing sites across Stafford Borough. The following table sets out the potential supply of all housing sites for Stafford, Stone and the Key Service Villages currently detailed in the SHLAA 2013 (D2) both within and adjacent to the existing urban areas:

	5 year period 2013/14 to 2017/18	Beyond the 5 year period 2018/19 to 2027/28
Stafford Potential housing supply	302	7,339
Stone Potential housing supply	127	11,949
Key Service Villages Potential housing supply	166	7,037
TOTAL POTENTIAL SUPPLY	595	26,325

- 3.14. Comparing the Trajectory with the wider housing land supply shown in the above table, the SHLAA 2013 (D2) includes a further stock of potentially deliverable and developable sites at Stafford, Stone and the Key Service Villages over and above those needed to deliver the Stafford Borough Housing Trajectory. There is thus potential additional housing land available within Stafford Borough not currently included in the future housing trajectory for 5, 10 & 15 years, demonstrating that the Plan is not necessarily constrained to the trajectory levels in the delivery of new housing.
- 3.15. The Borough Council does not make an allowance for windfalls as part of meeting the current and future housing land supply position. Although a substantial element of past provision has been through windfalls, a very high proportion of past windfalls have been in locations which the intended future location strategy in Plan would no longer support – and thus in future such a supply would be far less likely to be forthcoming. The Housing Monitor 2013: Land for New Homes (D1) and previous versions of the Housing Monitor from 2008 to 2012 (E1, E2, J12, J13 & J16) show an average of 38% based on a range of between 29% and 57% of new housing development from windfalls in rural areas outside of Stafford and Stone. Clearly the Plan (A1) is seeking to deliver a new development strategy for the Borough area over the Plan period through a more sustainable focus on Stafford Town and Stone, rather than continuing extensive less sustainable development in rural areas. **Confidence in full delivery of the Plan’s housing requirement is intended to be achieved through development in accordance with the distribution policies of the Plan – and thus no reliance is intended to be given to any**

future windfall provision which might come forward, for whatever reason, in other locations.

- 3.16. As set out in the Plan (A1) Spatial Principle 2 the annual housing requirement is 500 new homes per year for the Plan period 2011 to 2031 giving a total of 10,000 new houses. Spatial Principle 4 provides the housing growth distribution for the Borough with 72% at Stafford town equalling 7,200 new homes, 8% at Stone amounting to 800 new homes, 12% at the Key Service Villages equalling 1,200 new homes and the rest of the rural area being 8% amounting to 800 new homes. The Strategic Development Locations (SDLs) at Stafford make provision for 5,500 new houses and the SDL at Stone makes provision for 800 new houses. This means that 6,300 of the 10,000 total requirement (63%), a significantly large proportion, are proposed to be brought forward on sites specifically identified in the Plan (A1), and which have been subject of detailed consideration regarding delivery. Background Statement (K1) Topic Paper D provides further justification for the Settlement Hierarchy approach and the distribution of development. Further details setting out the effective delivery of the SDLs at Stafford and Stone for new housing development is set out in Examination Statements 4 & 5 together with Background Statement (K1) Topic Paper E. Based on the evidence set out above the Council considers that there is more than sufficient supply to meet the requirements for the Plan period, based on the Plan's policy approach through Spatial Principle 7.

iii. How does the Plan address the need for a 5/20% buffer to 5-year housing land supply, as required by the NPPF (¶ 47) to significantly boost housing supply, and address past shortfalls in provision of housing?

- 3.17. Background Statement (K1) Topic Paper C Section C6 sets out how the Plan (A1) will address the need for a 5/20% buffer to 5-year housing land supply as required by the NPPF (F1) para. 47 in terms of the Plan period 2011 to 2031. The Council accepts that, as is the case with many authorities, the recent past economic situation has meant that provision has not reached past projected requirements in the Borough, over the last five years. Accordingly a 20% buffer will be needed, as required by NPPF para. 47, in order to attempt to significantly boost housing supply. In the context of the current Plan (A1) determining the correct level of housing provision, based on the most up-to-date evidence base described above, for 500 new homes per year the total 5-year housing land supply is 2,500, plus the 20% buffer, meaning 3,000 new homes in total over the 5 year period. Background Statement (K1) Topic Paper C explains the Stafford Borough Housing Trajectory Chart and Housing Trajectory data, and demonstrates that there is sufficient housing capacity through commitments and SDLs to deliver a housing requirement of 3,155 for the next 5 years (2013/14 to 2017/18), exceeding the 20% buffer of 3,000 new homes over this period. Background Statement (K1) Topic Paper B paras B6.2 to B6.6 sets out the Borough Council position with regard to past shortfalls in provision of housing, in relation to past targets established by the approved, and the emerging (but never adopted) RSS, which has now been revoked – concluding that there is no significant meaningful shortfall which can be identified against any established targets, and the appropriate response is to look forwards to making provision for the Plan period.

iv. Have any alternative levels of housing development been considered, having regard to any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Stafford Borough?

3.18. The Borough Council considers that alternative levels of housing development and any significant and demonstrable adverse impacts of proposing increased levels of housing provision within Stafford Borough have been considered thoroughly through the plan-making process to ensure that Spatial Principle 2 (SP2) – Stafford Borough Housing Requirements is soundly based, informed by a robust, credible and proportionate evidence base.

3.19. Background Statement (K1) Topic Paper B Section B5.iii considers the implications of differing levels of sustainable and viable development, and explains why the level proposed in the Plan is preferred to the alternatives. Justification for Spatial Principle 2 and the appropriateness for the level of new housing have been informed through the preparation of the plan since 2009 and the process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues & Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). In particular significant and demonstrable adverse impacts were specifically highlighted through alternative approaches set out within the Plan for Stafford Borough – Strategic Policy Choices (G1). Details of public consultation and engagement responses are set out in the Plan for Stafford Borough - Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15). Furthermore throughout the plan-making process and its various stages the levels of housing development have been assessed through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).

b. The Plan proposes an annual target of about 8ha of employment land within Stafford Borough (160ha over the plan period):

i. What is the basis for this level of employment land provision, including the various economic scenarios, and how will this provision be delivered effectively in terms of existing commitments and future allocations?

3.20. The basis for the level of employment land provision proposed in the Plan (A1) with an annual target of 8 hectares of employment land per year within Stafford Borough (160 hectares over the Plan period) is explained in Background Statement (K1) Topic Paper A (para. A2.5-10). That Topic Paper explains the two different approaches assessed within the Employment Land Review (D14), and the approach adopted, which is **consistent with the Council's growth vision for the future. This scale of provision has been established through a robust evidence base, extensive public engagement and consultation throughout the plan-making process, assessed by Sustainability Appraisal and requirements set out in the NPPF (F1), detailed through the Stafford Borough Soundness Self-Assessment Checklist (B4).**

- 3.21. In terms of Spatial Principle 5 there is general support for employment growth but some concern about the balance between Stafford, Stone and the rest of the Borough being too much weighted to less sustainable locations and not matching the proportion of housing developments. There is general support for the employment provision for Stafford Borough although one representation expressed concern about using past rates projected forward rather than labour supply.
- 3.22. The proposed annual target of new employment land has been considered through the process of public engagement and consultation since 2009, as being appropriate for the development strategy of Stafford Town through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). The amount of new employment development has also been assessed through the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4) as recorded in the Revised Sustainability Appraisal Report (A10).
- 3.23. The basis for the proposed annual target of new employment land is detailed within the Employment Land Review (D14) together with the Employment Land Review Future Land Estimation Summary Report (E22) and Technical Appendices (E23). This evidence base sets out the existing types of business sectors across Stafford Borough within the socio-economic profile of the area as well as detailing the future likely demand to ensure the Development Strategy for Stafford Borough is delivered.
- 3.24. The majority of the proposed annual target of 8 hectares of employment land will be delivered through the SDLs at Stafford and Stone, and through the Ladfordfields and Raleigh Hall industrial estates, identified on the Plan for Stafford Borough – Stafford Area Inset (A3), Stone Area Inset (A4), Ladfordfields Industrial Estate Inset Map 1 (A5) and Raleigh Hall Industrial Estate Inset Map 2 (A6). The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) demonstrates that new employment development is deliverable and viable alongside the implementation of strategic infrastructure requirements, which have been confirmed by representations received from the site owners and promoters of these areas, including Ladfordfields and Raleigh Hall industrial estates.
- 3.25. As detailed in Background Paper Topic Paper E effective delivery of the SDLs at Stafford has been further demonstrated by the market bringing forward a planning application (subsequently approved in March 2013) for 21.9 hectares of new employment land east of Stafford. This is currently being developed with transport improvements at the junction of Weston Road and Blackheath Lane. In addition in October 2012 planning consent was granted for 28.19 hectares of new employment land north of Stafford, which is currently being developed. A Statement of Common Ground (E98) has been also been signed by the developers for the employment site south of Stone. Furthermore the Meaford Power Station site has planning consent for 34 hectares of new employment land to the north of Stone, although development has not yet started at this location. The latest position in terms of employment provision, completions and commitments as at 31 March 2013 is set out in the table below:

Employment Provision (hectares)	160
Employment Completions 1/4/2011 - 31/3/2013	1.68
Stafford Town Total requirement	90
Commitments at 31/03/2013 including SDLs	61.74
New Provision	28.26
Stone Town Total requirement	20
Commitments at 31/03/2013	0
New Provision	18
Other Borough Areas Total requirement	50
Commitments at 31/03/2013 including Meaford	37.20
New Provision	12.8

3.26. In the context of the evidence base set out above the Borough Council considers that the level of employment land provision and the effective delivery of these requirements is appropriate, effective, sustainable, viable and deliverable, fully justified and soundly based in line with building a strong, competitive economy as required by the NPPF (F1 para 21) and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).

ii. Would the proposed level of new employment land result in a significant over-provision of land within the Borough, which could adversely affect the regeneration and economic prospects of nearby towns in the North Staffordshire conurbation?

3.27. The Borough Council does not consider that the proposed level of new employment land results in a significant over-provision of land within the Borough which could adversely affect the regeneration and economic prospects of nearby towns in the North Staffordshire conurbation. The Employment Land Review (D14) sets out the existing types of business sectors across Stafford Borough within the socio-economic profile of the area as well as detailing the future likely demand to ensure the Development Strategy for Stafford Borough is delivered. Background Statement (K1) Topic Paper A introduces the two different approaches within the Employment Land Review (D14) which range from the continuation of past trends leading to a predicted land requirement yield of 178 hectares over the Plan period to the labour supply approach leading to a yield of only 24.5 hectares. The Plan (A1) makes provision for 160 hectares from 2011 to 2031 to deliver a growth vision for the future of Stafford Borough in line with building a strong, competitive economy as required by the NPPF (F1 para 21) and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).

3.28. How provision in the Borough could affect strategic intentions elsewhere has nonetheless been a significant issue discussed throughout the preparation of the Plan (A1) with those authorities likely to be concerned (and latterly through the Duty to Co-operate). In terms of commuting patterns the Employment Land Review Future Land Estimation Summary Report (E22), paragraph 6.12 to 6.16 makes reference to information from the 2001 Census which does not identify any significant employment land requirements arising from people working in Stafford Borough and commuting from neighbouring authorities. The Overview of Staffordshire's Residents and Employees Journey to Work Pattern

(National Statistics, Census of Population, 2001) provides further details for Stafford Borough (J21). It should be noted though that this data is now significantly out of date and the Census 2011 has yet to provide more timely information until March / April 2014. Nevertheless, the Borough Council has been in continued dialogue with the City of Stoke-on-Trent Council and Newcastle-under-Lyme Borough Council concerning cross-boundary issues affecting regeneration and economic prospects of nearby towns in the North Staffordshire conurbation. As detailed within the Duty to Co-operate Statement (B3) and the Duty to Co-operate Statement Update (K2) and confirmed through representations to the Plan (A1) no significant issues have been raised concerning these matters and no evidence presented to demonstrate any adverse effects. Therefore the Borough Council considers that Spatial Principle 2 is appropriate, effective, sustainable, viable and deliverable, fully justified and soundly based.

iii. Has the Plan properly considered the balance between new housing and employment development, and has the evidence base addressed the quantitative and qualitative elements of employment land provision?

- 3.29. The Borough Council considers that the balance between new housing and employment development is appropriate with the Plan (A1) based on the evidence base of meeting objectively assessed needs for housing and business needs as set out in the core planning principles of the NPPF (F1, para 17), recorded in the Stafford Borough Soundness Self-Assessment Checklist (B4), to deliver the growth vision over the Plan period. This approach is positively supported by the Employment Land Review Future Land Estimation Summary Report (E22)
- 3.30. The Development Strategy within the Plan (A1) is seeking to deliver growth for the future of the Borough with the focus of new housing and employment development being at Stafford town which is the key settlement within the Borough for services and facilities, as detailed in Background Statement (K1) Topic Paper D . This is reflected by the scale of housing being 7,200 new homes alongside 90 hectares of new employment land at Stafford town to provide for the future needs of the local communities. In addition the distribution strategy, as set out in Spatial Principles 4 and 5, provides a broad balance in the quantity and distribution of housing and employment to Stafford, Stone and the rest of the Borough aligned with the Settlement Hierarchy in Spatial Principle 3. The Council considers that the approach within the Plan (A1) will ensure that new job opportunities are provided in the right locations to support **the Borough's communities in the future as a deliverable solution in the context of growth at Stafford, Stone and the rest of the Borough.** It is important to note that a significant number of new homes will be provided for people moving into the area and therefore local job opportunities need to be made available as part of the growth strategy to ensure out-commuting is not increased over the Plan period. Based on **2001 Census information currently over 60% of the Borough's population** live and work here. As new people move into the area it is crucial to ensure opportunities exist for these new residents rather than people commuting to jobs elsewhere. Clearly existing residents will also benefit from the opportunity to work locally with new employment provided to reduce commuting elsewhere.

- 3.31. The balance between new housing and employment development has been informed through the preparation of the plan since 2009 and the process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues & Options (G6) and the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Details of public consultation and engagement responses are set out in the Plan for Stafford Borough - Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15). Furthermore throughout the plan-making process and its various stages the scale of new housing and employment development has been assessed through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 3.32. The Employment Land Review (D14) sets out the existing types of business sectors across Stafford Borough within the socio-economic profile of the area, as well as detailing the future likely demand to be delivered by the Development Strategy for Stafford Borough. Over the next few years the business sectors are likely to change with an increase in utilities, construction and financial / business services and a reduction in agriculture, manufacturing, distribution, Government and catering services. In addition the quantitative and qualitative elements of employment land provision are set out within the Employment Land Review Future Land Estimation Summary Report (E22) and its Technical Appendices (E23) through the current and future economic base for the Borough. **The Council considers that the Plan’s provision of 160 hectares** over the period 2011 to 2031, delivered through the SDLs, will meet the quantitative needs. In terms of qualitative needs for expanding business sectors Policy E1 – Local Economy and Policy E3 in the Plan (A1) supports the delivery of high quality new employment provision through an educated workforce both at Stafford, Stone and at the Recognised Industrial Estates whilst not restricting the market capacity to deliver for its requirements throughout the Plan period. This will ensure that a range of employment sites to meet market demands and different sectors will be readily available to meet future requirements, alongside the quality of existing employment areas to further encourage qualitative provision. Therefore the quantitative and qualitative needs will be met.

c. Does SP2 effectively address cross-boundary housing and employment issues, including the relationship with Stoke-on-Trent/Newcastle-under-Lyme and other authorities in north Staffordshire; South Staffordshire, Cannock Chase, Birmingham and the West Midlands conurbation; other adjoining districts and rural areas, in line with national policy (NPPF; ¶ 178-181); and has it taken account of the strategies, plans, priorities and projects of adjoining local authorities and other bodies/agencies?

- 3.33. The Borough Council considers that Spatial Principle 2 effectively addresses cross-boundary housing and employment issues, including the relationship with Stoke-on-Trent / Newcastle-under-Lyme and other authorities in north Staffordshire; South Staffordshire, Cannock Chase, Birmingham and the West Midlands conurbation; other adjoining districts and rural areas. In the case of housing, the Background Statement (K1) Topic Paper B paras. B5.23-26 indicates that there is general accord with

neighbouring authorities regarding **the Plan's (A1) approach, with no key issues raised through the Duty to Co-operate process in terms of Stafford Borough's cross-boundary housing and employment matters.** The evidence of cross-boundary engagement on housing and employment issues for specific authorities is demonstrated through the Duty to Co-operate Statement (B3) and the Duty to Co-operate Statement Update (K2). NPPF (F1) paras 178 – 181 identify requirements for planning strategically across local boundaries through a Duty to Co-operate on strategic priorities between local planning authorities and other bodies within the geographical area.

- 3.34. As set out above through the evidence base, extensive public engagement in the plan-making process and meeting the requirements in the NPPF (F1) the Borough Council considers that Spatial Principle 2 is soundly based, effective, appropriate and fully justified.

4. SPATIAL PRINCIPLES 3, 4 & 5:

a. Does SP3 establish an appropriate, effective, sustainable and soundly based settlement hierarchy, reflecting the existing and future role of settlements, including the County Town of Stafford, Market town of Stone and Key Service Villages, and is this approach fully justified with relevant and up-to-date evidence?

- 4.1. The justification for the sustainable settlement hierarchy, and the approach taken to derive it, is introduced in Background Statement (K1) Topic Paper A, and covered in detail in Topic Paper D. The Borough Council considers that Spatial Principle 3 (SP3) – Stafford Borough Sustainable Settlement Hierarchy is soundly based; informed by a robust, credible and proportionate evidence base; subject of extensive public consultation and engagement carried out from 2008 to 2012, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15); and supported by significant assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore the Spatial Principle 3 is considered to be in conformity with national policy through the NPPF (F1) as detailed in Background Statement (K1) Topic Papers A and D.
- 4.2. Spatial Principle 3 is considered to be appropriate by supporting the delivery of the Spatial Vision and Key Objectives of the Plan (A1) which **clearly establish the Borough's priorities** for particular areas including Stafford, Stone, Villages and Other Areas, and reflecting the existing and future role of these settlements over the Plan period to 2031. Further details regarding the role of Stafford, Stone and the Key Service Villages, together with the planning policy context, is set out in the Topic Papers. Spatial Principle 3 is considered to be sustainable in terms of NPPF (F1) para. 17 by delivering new development in sustainable locations.
- 4.3. Justification for Spatial Principle 3 and the appropriateness of the settlement hierarchy is set out within the evidence base, in particular the Settlement of Services and Facilities (D55) prepared in 2008 to inform

the process of public consultation and engagement early in the plan making process through the Borough-wide Development Strategy (G9), the Principles of Settlement Development (G8) and Delivering the Plan for Stafford Borough – Issues & Options (G6). Subsequently following the Plan for Stafford Borough – Draft Publication (G2) the evidence base was updated in 2012 through the Revised Settlement Assessment of Services and Facilities (D54), to ensure the approach for Spatial Principle 3 was relevant, up-to-date and fully justified to support the Plan (A1). Throughout these stages the preferred approach for Spatial Principle 3, directing the delivery of new development, was established and tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 1 (H10), the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).

- 4.4. For Spatial Principle 3 most of the representations supported the Stafford Borough Sustainable Settlement Hierarchy, particularly developer and landowner interests at Stafford, Stone and the Key Service Villages. However some developers and landowners promoting land outside of the settlement hierarchy objected to Spatial Principle 3. Hall Enterprises and Grainger objected as they were promoting areas of land not included as part of the Settlement Hierarchy. The Garden Centre called for brownfield land outside of Key Service Villages but in sustainable locations to be supported whilst Mr Leather had environmental concerns about new development at Eccleshall. The Council does not accept that it is appropriate to promote land outside of the Settlement Hierarchy as this would be contrary to the NPPF (F1) presumption in favour of sustainable development expressed through the core planning principles in para 17. The scale of new development at specific Key Service Villages within the Settlement Hierarchy will be determined through the Neighbourhood Planning process or a Site Allocations document, which will need to consider local objectively assessed needs, land supply, service provision as well as environmental constraints. Furthermore Lufton Associates called for Gnosall and Eccleshall to be separately identified in the settlement hierarchy due to the scale of services and facilities. The Revised Settlement Assessment of Services and Facilities (D55) lists the services and facilities in each of the Key Service Villages and other settlements. The Council does not consider that Eccleshall and Gnosall have a significantly greater number of services and facilities to justify being identified as a separate category within Spatial Principle 3.
- 4.5. In light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Spatial Principle 3 is appropriate, effective, sustainable and soundness based, reflecting the existing and future role of settlements. Therefore no changes are proposed to Spatial Principle 3, which is fully justified with relevant and up-to-date evidence.

b. Does SP4 establish an appropriate, effective, justified, sustainable and soundly based distribution of housing growth within Stafford Borough, including the target levels of housing and balance between Stafford (72%; 7,200), Stone (8%; 800), Key Service Villages (12%; 1,200) and other areas (8%; 800)? Is the approach to a moratorium

period realistic, appropriate, effective, fully justified and soundly based?

- 4.6. The justification for the distribution between the levels of the sustainable settlement hierarchy, and the approach taken to derive it, are covered in detail in Background Statement (K1) Topic Paper D. The Borough Council considers that Spatial Principle 4 (SP4) – Stafford Borough Housing Growth Distribution is soundly based, informed by a robust, credible and proportionate evidence base, extensive public consultation and engagement carried out from 2009 to 2012, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15), and significant assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore the Spatial Principle 4 is considered to be in conformity with national policy through the NPPF (F1).
- 4.7. Spatial Principle 4 supports the delivery of the Spatial Vision and Key Objectives of the Plan (A1). As Background Statement (K1) Topic Paper D explains, Spatial Principle 4 represents a step change in the distribution of housing growth within Stafford Borough compared to the current population distribution and delivery of housing completions. Nevertheless the target levels of housing and the balance between Stafford, Stone, the Key Service Villages and other areas are considered to be sustainable in light of the local evidence and soundly based in terms of NPPF (F1) para. 17 by delivering new development in sustainable locations.
- 4.8. Justification for Spatial Principle 4 and the appropriateness of the distribution of housing growth within the settlement hierarchy have been informed through the preparation of the plan since 2009 and the process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues & Options (G6), the Plan for Stafford Borough – Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1). This process has been supported by the evidence base through the Settlement of Services and Facilities (D54), the Assessment of Facilities and Services Stafford (E68) and Stone (E69), and the Revised Settlement Assessment of Services and Facilities (D54) demonstrating that there is adequate provision for sustainable local communities to facilitate the distribution of housing growth. Furthermore the Strategic Housing Land Availability Assessment (D2) identifies more than enough land to deliver housing growth as targeted by Spatial Principle 4. Throughout the plan-making stages the distribution of housing growth within Spatial Principle 4, based on delivery of locations for new development, was established and tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 4.9. For Spatial Principle 4 a number of representations state that full objectively assessed housing needs cannot be met for settlements outside of Stafford town due to the restrictive proportions. The delivery of new development at Stafford town is challenged based on viability and the scale of new infrastructure provision necessary, together with the weaker housing market and past completion rates. Therefore

representations state that a greater proportion of new housing development should be directed to Stone and / or other Key Service Villages in order to support existing services and facilities as well as deliver new affordable housing in stronger housing market areas. Developers and landowner representatives at Stone argued that as the second settlement in the hierarchy significantly more new housing development should be directed to Stone including a lack of credible evidence to restrict growth due to the North Staffordshire urban regeneration initiatives.

- 4.10. Other developers at the Key Service Villages argue for less development at Stafford and Stone and other rural areas, in order to meet local housing needs and affordable housing with a range of proposed alternative proportions advocated as well as indicative targets. Concerns are raised about the moratorium and its impact on housing delivery (considered below), together with restricting the role of Neighbourhood Plans. An up-to-date evidence base is called for to ensure housing delivery and sufficient sites are identified. Some representations express concern about the scale of development impacting on the character of particular settlements including the position of High Speed 2 at Stone and the historic environment at Eccleshall.
- 4.11. In **response, the Council's position is that the balanced established in Spatial Principle SP4** has been derived through extensive debate, and forms a sustainable balanced distribution. This distribution is feasible, and can be achieved. The potential housing supply in addressed in Background Statement (K1) Topic Paper C, and the delivery of new development through the SDLs Stafford and Stone covered in detail in Topic Paper E. As Topic Paper C indicates, the distribution is supported by evidence in the Plan for Stafford Borough: Whole Plan Viability Report (D52), the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Viability and Delivery of Northern and Western Strategic Development Locations, Stafford (D51). The Borough Council therefore considers that 72% of new housing growth can be achieved at Stafford town, based on current and future market conditions.
- 4.12. Turning to the proportion of housing targeted to Stone and the Key Service Villages, the scale of services and facilities is recorded in the Revised Settlement of Services and Facilities (D54) and the Assessment of Services and Facilities Stone (E69). Although it is acknowledged that economic conditions would support greater development in Stone and many other villages, this is not a sustainable approach, as tested through the plan-making process. In the context of the NPPF's (F1) presumption in favour of sustainable development, in the Stafford Borough context it is considered that the target levels of housing and its distribution contained in the Plan (A1) are appropriate, with the emphasis on Stafford town. Further details of the justification for the distribution are set out in Background Statement (K1) Topic Paper D.
- 4.13. The Duty to Co-operate Statement (B3), and the Duty to Co-operate Statement – Update (K2) pro-formas from the City of Stoke-on-Trent Council and Newcastle-under-Lyme Borough Council, demonstrate appropriate consideration of the cross-boundary issues of new development at Stone and to the north of Stafford Borough, in terms of potential implications for the North Staffordshire urban regeneration

initiatives. Whilst the level of past development at Stone and its status as the second settlement in the hierarchy is recognised, as detailed in Background Statement (K1) Topic Paper D, the Duty to Co-operate evidence is considered to be credible and relevant in establishing the preferred development strategy for Stafford Borough together with the proportion of new housing to Stone, which is therefore considered justified over the Plan period to 2031.

- 4.14. Turning to the housing moratorium as set out in the Plan (A1) para. 6.49 and further elaborated within Background Statement (K1) Topic Paper D, the Borough Council considers that the potential to employ a moratorium period is realistic, appropriate, effective, fully justified and soundly based as an approach. As highlighted earlier in this Examination Statement, the Economic Viability of Housing Land in Stafford Borough (D10) shows that Stafford town is the weakest part of the property market within Stafford Borough. However, the Whole Plan Viability Report (D52), and the Viability and Delivery of Northern and Western Strategic Development Locations, Stafford (D51) clearly prove that new housing development will be viable in the town, which has by far the greatest range of facilities, and must be regarded as the most sustainable location in the Borough. In line with the **NPPF's** (F1) presumption in favour of sustainable development and delivering the core planning principles within NPPF (F1) para. 17, it may be necessary to instigate a restriction on housing development in some localities to those proportions defined in Spatial Principle 3, whilst supporting and enabling the delivery of SDLs at Stafford, if the balance of development intended is to be delivered. Without the mechanism of a housing moratorium, as suggested in the Plan (A1) para. 6.49, the historic trend of housing completions in areas outside of Stafford town ranging between 45% to 55% might very well continue, as set out in Background Statement (K1) Topic Paper D and the supporting evidence within the Land for New Homes: Housing Monitors (D1, E1 and E2). In such a situation, without a moratorium this would be likely to lead to greater proportions of new housing development in locations with fewer services and facilities than Stafford town, and therefore be less sustainable.
- 4.15. Background Statement (K1) Topic Paper D, para. D4.11 provides an introduction as to how the moratorium might function. If the new development takes place 25% above the housing distributions set out in SP4 over a four year period, a moratorium in grant of planning permission could be triggered.
- 4.16. Taking Stone as an example, the housing moratorium approach would be deployed as follows. The Plan (A1) identifies 8% of the 500 total new homes per year for the Borough to be delivered at Stone. 8% of 500 is 40 new homes per year for Stone.
- 4.17. The Plan (A1) para 6.49 currently suggests, as an example, a 25% buffer during a 4 year period. However this buffer might reasonably be increased to 50% to allow greater flexibility. In addition, it would be sensible to include commitments as well as completions within the calculation. The Borough Council considers that the Plan (A1) would benefit from further clarification concerning the buffer applied within regards to the moratorium. Therefore the Council sets out in the Schedule of Further Additional Modifications (A27) and amendment to

para 6.49, listed as FAM12. This would mean a four year maximum requirement for Stone would amount to 240 (40 new homes per year multiplied by 4 years plus 50% buffer). Therefore if more than 240 new homes were to be completed or committed in a 4 year period at Stone, the housing moratorium would be applied.

- 4.18. From the start of the Plan period (2011) there have been 109 completions in Stone. As set out in the amended table within the Schedule of Additional (Minor) Modifications (A26), Stone also has 291 houses with planning permission. Adding these together, the current total is 456, well in excess of the 240 threshold – and thus in this case a moratorium would be appropriate from the adoption of the Plan.
- 4.19. The same moratorium calculation will be carried out annually for Stafford, Stone, the Key Service Villages and the rural area. A moratorium for the relevant area would be introduced if necessary, to support the delivery of SP4 and the agreed distribution across the hierarchy.
- 4.20. Spatial Principle 4 is considered to be locally distinctive by providing for the development needs of the Borough whilst reflecting the characteristics of the individual settlements of the Borough through the identification of appropriate levels of development within the settlement hierarchy, and at the same time protecting the high quality environment containing internationally important habitats and nationally important landscapes. In light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Spatial Principle 4 is appropriate, effective, sustainable and soundness based, reflecting the existing and future role of settlements. Therefore no changes are proposed to Spatial Principle 4, which is fully justified with relevant and up-to-date evidence.

c. Does SP5 establish an appropriate, effective, justified, sustainable and soundly based distribution of employment growth, including the proposed target levels of employment land development and the balance between Stafford (56%; 90ha), Stone (12%; 20ha) and other areas (32%; 50ha)?

- 4.21. The Borough Council considers that Spatial Principle 5 (SP5) – Stafford Borough Employment Growth Distribution is soundly based, informed by a robust, credible and proportionate evidence base, extensive public consultation and engagement carried out from 2009 to 2012, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15), and assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore Spatial Principle 5 is considered to be in conformity with national policy through the NPPF (F1), paras 21 and 28, as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 4.22. Spatial Principle 5 is considered to be appropriate in that it supports the delivery of the Spatial Vision and Key Objectives of the Plan (A1) through the distribution of employment growth for particular areas including Stafford, Stone and Other Areas over the Plan period to 2031. Further

details regarding the distribution of employment growth at Stafford, Stone and Other Areas, together with the local planning policy context, is set out in Background Statement (K1) Topic Paper A. Spatial Principle 5 seeks to deliver a scale of growth to the settlements in the hierarchy defined in Spatial Principle SP3, particularly Stafford and Stone, in proportions broadly consistent with those intended for new housing developments, under Spatial Principle SP4. However, inevitably it must reflect the existence of current planning permissions for employment development within Stafford Borough, particularly at Meaford Power Station, in establishing the precise proportions. The target levels of employment land development and the balance between Stafford, Stone and other areas is considered to be sustainable in light of the local evidence and soundly based in terms of the NPPF (F1) paras. 17 and 21, by delivering new development in sustainable locations at Stafford and Stone through a clear economic vision and strategy for the Borough to encourage growth.

- 4.23. Justification for Spatial Principle 5, the appropriateness of the distribution of employment growth and the balance between Stafford, Stone and other areas has been informed through the preparation of the plan since 2009 and the process of public consultation and engagement through Delivering the Plan for Stafford Borough – Issues & Options (G6), the Plan for Stafford Borough – Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1). This process has been supported by the evidence base through the Assessment of Facilities and Services Stafford (E68) and Stone (E69), and the Revised Settlement Assessment of Services and Facilities (D54) demonstrating the level of provision at Stafford and Stone compared to other areas. Throughout the plan-making stages the distribution of employment growth within Spatial Principle 5, based on delivery of locations for new development, was established and tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7) and subsequently through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 4.24. In term of Spatial Principle 5 there is general support for employment growth but some concern about the balance between Stafford, Stone and the rest of the Borough being too much weighted to less sustainable locations and not matching the proportion of housing developments. As set out above the explanation for the failure to achieve a perfect match with the proportion of housing development arises due to the planning permission for 34 hectares at the Meaford Power Station site. If the same proportions of housing distribution were applied to employment, i.e. 72% to Stafford, 8% to Stone and 20% elsewhere, the division would be 115 hectares to Stafford town compared to 90 hectares, 13 hectares to Stone compared to 20 hectares and 32 hectares to the rest of Borough compared to 50 hectares. The Council considers that the scale of new employment land at Stafford and Stone is appropriate to deliver the growth strategy for these settlements alongside the level of housing provision identified. Throughout the Borough there are a number of areas where a variety of Class B employment uses are concentrated, which are defined as Recognised Industrial Estates (RIEs). A number of RIEs have capacity for further development which will provide opportunities for new investment as well as enabling existing firms to expand during the plan period, subject to the existing character and local context.

- 4.25. Through Policy E4 of the Plan (A1) 6 hectares of new employment provision is identified at Ladfordfields Recognised Industrial Estate, east of Woodseaves, and a further 6 hectares at Raleigh Hall Recognised Industrial Estate, north of Eccleshall in the rural area which the Council considers is appropriate to deliver sustainable rural development in line with para 28 of the NPPF (F1) to support local communities at the Key Service Villages of Eccleshall and Gnosall for employment development. Whilst the total provision outside of Stafford and Stone is 32% amounting to 50 hectares the quantity of 15 hectares for new employment land, excluding completions and commitments, is only 9% of the total Borough provision. Therefore the Council considers that the balance between Stafford, Stone and the rest of the Borough is appropriate.
- 4.26. Taking into account the NPPF (F1), which encourages local planning authorities to build a strong, competitive economy and support a prosperous rural economy including the expansion of business and enterprise, the Borough Council considers that the approach in the Plan (A1) is justified and sustainable. Furthermore in light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Spatial Principle 5 is appropriate, effective and soundly based as a distribution of employment growth over the Plan period. The Borough Council considers that the Plan (A1) is sound but would benefit from an update of the employment provision table linked to para. 6.59. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies proposed changes, listed as M25.

5. SPATIAL PRINCIPLE 6:

a. How will SP6 help to achieve rural sustainability, including the re-use of redundant buildings, new employment, public transport and housing mix?

- 5.1. The Borough Council considers that Spatial Principle 6 (SP6) will help to achieve rural sustainability, by providing a strategic policy overview in line with the NPPF (F1), and a context for more detailed policies which seek to ensure sustainable new development in the rural areas, namely Policy E2 – Sustainable Rural Development) and Policy C5 – Residential Proposals outside the Settlement Hierarchy. Further detailed consideration of these policies is included in Examination Statements 6 and 8. The main national planning context is provided by NPPF para 28:

“Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include*

supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and

- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”*

- 5.2. The principles contained in this guidance, together with the NPPF's (F1) basic presumption in favour of sustainable development which seeks to balance social, environmental and economic aspects, are reflected in Spatial Principle 6. Stafford Borough has an extensive rural area and therefore will benefit from planning policy to ensure sustainable local communities are enhanced over the Plan period.
- 5.3. Spatial Principle 6 gives strong support for rural sustainability, including to achieve re-use of agricultural buildings, appropriate new employment, supporting public transport, and achieving a new housing mix – all of which will be vital to the sustainability of rural areas. However two representations expressed concern about the effectiveness of other policies in the Plan (A1) in actually implementing Spatial Principle 6, including in relation to the delivery of entry level affordable housing. The Borough Council considers housing delivery and affordable housing issues in Examination Statement 8.
- 5.4. Taking into account NPPF (F1) para. 28 which encourages local planning authorities to support a prosperous rural economy, the Borough Council considers that the approach in the Plan (A1) will help to achieve rural sustainability. Therefore no changes are proposed to Spatial Principle 6.

6. 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?**

- 6.1. The Borough Council considers that the approach proposed in Spatial Principle 7 (SP7) – Supporting the Location of New Development takes account of a robust, credible and proportionate evidence base, and reflects the scope for sustainable and viable development from potential housing land identified through the Strategic Housing Land Availability Assessment (D5). The SHLAA identifies scope for sufficient sites related to the settlement hierarchy to deliver the quantum of housing proposed by the strategy. Furthermore, the Infrastructure Delivery Plan (IDP) parts 1 and 2 (D58 & D57) concludes that the infrastructure to support the quantum of development is achievable, whilst the Settlement of Services and Facilities (D54), the Assessment of Facilities and Services

Stafford (E68) and Stone (E69), and the Revised Settlement Assessment of Services and Facilities (D54) demonstrate that there is adequate provision for sustainable local communities to facilitate the distribution of housing growth.

- 6.2. The Borough Council considers that SP7 provides an effective means of directing development within the sustainable settlement hierarchy. The merits of the approach of defining a line, compared with alternative approaches (e.g. relying solely on criteria, during the plan period) were considered during the formulation of the Plan, and are considered in Background Statement (K1) Topic Paper A (paras. A2.29-32). The purpose of establishing settlement boundaries to define settlement limits is to establish what development will be acceptable either side of the boundary through the use of specific criteria. The establishment of settlement boundaries provides a decision making tool to enable a different approach to development to be implemented on either side. Within the boundary there would be a presumption in favour of sustainable development; whilst outside the boundary development that ensure encroachment into the countryside is actively managed, and considered against strict criteria. This establishment of settlement boundaries provides a practical means to achieve the Spatial Hierarchy approach detailed in Spatial Principle 3.
- 6.3. This approach to establish settlement boundaries is consistent with the plan led approach advocated by NPPF para 17 (F1). Taking this into account, the Borough Council considers that the approach set out in the Plan (A1) will help to achieve a plan led approach to development within the settlement hierarchy. The Plan (A1) identifies Settlement Boundaries for Stafford and Stone through the Policies Map (A2) and its Inset (A3 & A4). These Settlement Boundaries were established through the Stafford Borough Local Plan 2001 (F14) and adopted in 1998. The Borough Council considers that the Settlement Boundaries for Stafford and Stone should be retained at this stage, but reviewed through the preparation of the Sites and Allocations Development Plan Document, to better reflect the current and appropriate future development area. This approach is preferred to withdrawal of the Settlement Boundary, and reliance on consideration of proposals against Spatial Principle SP7 for the period until the Boundary is replaced in the Sites and Allocations DPD process – which is the intention for the Key Service Villages. The different approach reflects, in the case of Stafford and Stone, the importance of securing early and sustained delivery of the Strategic Development Location as the main means of delivering significant new development for the towns together with strategic infrastructure provision, as detailed in the Plan (A1). It is essential that priority is given to their delivery, which is critical **to the implementation of the Plan's Development Strategy**. In that context, getting construction of the SDLs underway is much preferable to the prospect of bringing forward, under the operation of Spatial Principle **SP7, smaller sites on the edge of Stafford and Stone's urban area, in a piecemeal fashion, which would inevitably have less capacity to deliver strategic infrastructure.**

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

- 6.4. The Borough Council considers that the detailed criteria set out in Spatial Principle 7 (SP7) – regarding the establishment of New Settlement

Boundaries are effective and will provide sufficient guidance to establish new settlement boundaries over the plan period. The criteria set out to establish new settlement boundaries are consistent with the formation of sustainable communities as set out in NPPF (F1) para. 55.

- 6.5. The justification for a criteria based policy that will guide decisions takes into account the Strategic Housing Land Availability Assessment (D5) which identifies sufficient sites within the settlement hierarchy necessary to deliver the quantum of housing in sustainable locations to deliver the rural strategy; and the Infrastructure Delivery Plan (IDP) parts 1 and 2 (D58 & D57) which concludes that sufficient infrastructure to support the quantum and location of development is achievable; and the Settlement of Services and Facilities (D54), the Assessment of Facilities and Services Stafford (E68) and Stone (E69), and the Revised Settlement Assessment of Services and Facilities (D54), which demonstrate that there is adequate provision for local services and facilities to provide for sustainable communities to facilitate that distribution of housing growth. As part of the policy, there is a requirement that establishing settlement boundaries will not adversely impact on the special character of the historic environment which is consistent with the approach set out in NPPF paras 132-134 (F1). Criterion i regarding the approach to open space is considered to accord with that set out in NPPF (F1) para 73, whilst the approach to flood risk set out in criterion j is consistent with the NPPF para 94 (F1).

c. Are the criteria set out for considering development in other locations appropriate, justified, effective, soundly based and consistent with Policies E2, E5 & C5 and national policy, including the balance between brownfield and greenfield sites?

- 6.6. The Borough Council considers that the detailed criteria set out in Spatial Principle 7 (SP7) – regarding development in other locations (criteria i-iv) are in line with the NPPF (F1), and consistent with other Plan policies, specifically Policy E2 – Sustainable Rural Development, Policy E5 – Major developed sites in the Green Belt and Policy C5 – Residential Proposals outside the Settlement Hierarchy. Further detailed consideration of these policies is included in Examination Statements 6 and 8. NPPF para. 28 details the presumption in favour of sustainable development by balancing social, environmental and economic aspects. This approach to providing sustainable rural development is reflected through criteria (i – iv) of Spatial Principle SP7 for Stafford Borough.
- 6.7. Stafford Borough has an extensive rural area and therefore requires planning policy to ensure sustainable local communities are achieved over the Plan period. The criteria set out in SP7 will facilitate rural sustainability by ensuring that new development does not conflict with national policy on Green Belt policy as detailed in NPPF paras. 88-91 (F1). Policy E5 provides strong support for rural sustainability through the reuse of existing major developed sites within the greenbelt. This approach is considered to be consistent with NPPF para 28 (F1), which provides for the presumption in favour of sustainable development and NPPF para 89 (F1) which supports the reuse of brownfield land within the Green Belt.

- 6.8. The criteria set out in SP7 are consistent with policy E2 and C5 through the provision of sustainable re-use of agricultural buildings, and support for appropriate new employment development, as well as for conversions and an appropriate new housing mix of smaller 2 & 3 bedrooed properties to meet local requirements as evidenced through the Strategic Housing Market Assessment (D5). These are all matters which are vital to achieving the sustainability of existing rural areas. This approach is consistent with NPPF para 28 (F1) which supports sustainable rural development and through the sustainable settlement hierarchy as detailed in Spatial Principle 3 (SP3) and further elaborated upon in the Background Statement (K1) Topic Paper D . The approach to brownfield development is consistent with Policies E2 and E5 through seeking to redevelop existing buildings and brownfield sites within existing settlements to reduce the need for greenfield sites as set out in NPPF para 111 (F1). The Council considers that provision at the Key Service Villages within the Settlement Hierarchy will ensure sustainable rural development in accordance with NPPF para 54 & 55 (F1).
- 6.9. Many of the representations to Spatial Principle 7 supported the approach to defining settlement boundaries to include new sites rather than replicating existing Residential Development Boundaries. Concern was raised about Neighbourhood Plans delivering new housing with some representations supporting smaller housing types outside of boundaries. Some representations provided support for brownfield land development whilst other representations sought to achieve greenfield development to secure delivery. Other representations were concerned about the loss of Residential Development Boundaries undermining sustainable development in rural areas. Taking into account NPPF (F1) para. 28, which encourages local planning authorities to support a prosperous rural economy, the Borough Council considers that the approach in the Plan (A1) will help to achieve rural sustainability. Therefore no changes are proposed to Spatial Principle 7.

7. GENERAL:

a. Is the Development Strategy sufficiently flexible to respond to a variety of unexpected or changing circumstances in the future, and when will the Plan be reviewed?

- 7.1. The broad strategy for the distribution of new development across Stafford Borough was established early in the plan-making process through the Borough-wide Development Strategy (G9) and Delivering the Plan for Stafford Borough – Issues and Options (G6). The overall Development Strategy approach, from 2008, has proved to be flexible to respond to major changes in national planning policy through the introduction of the NPPF (F1) and revocation of the West Midlands Regional Spatial Strategy (F7). The plan-making process has also responded to significant implications for new development arising from the Habitat Regulations Assessment in relation to the Cannock Chase Special Area of Conservation (A25). Furthermore the Development Strategy is supported by neighbouring local authorities, as recorded in the Duty to Co-operate Statement (B3).

- 7.2. Throughout the plan-making process from the Borough-wide Development Strategy (G9) to the Plan (A1), the new Local Plan has been prepared through extensive public consultation and engagement, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15). During this process the strategy has proved to be robust and flexible enough to continue through subsequent plan-making stages without significant adjustment. This supports the conclusion that the Plan (A1) is flexible enough to deal with changing circumstances during the Plan period 2011 to 2031. The development strategy set out within the Plan is intended to be long lasting and capable of enduring throughout the Plan period, supported through the delivery of the Stafford and Stone SDLs as detailed in Background Statement (K1) Topic Paper E together with Examination Statements 4 and 5 for Stafford and Stone.
- 7.3. The Spatial Principles set in the Plan (A1) provide a broad and robust framework to guide future change. The general approach, and indeed the proportionate shares of development to continue to achieve sustainable settlements, should remain largely valid whether or not the precise scales of development proposed come forward (which may be influenced by wider economic conditions). They should therefore provide a resilient structure, which is likely to cope with most potential unforeseen events in the short term at least. Consequently it is considered that a review of the Local Plan will not be necessary in the short term. Furthermore, delivery of the SDLs will take some time, and needs to be seen through to a conclusion. The supporting evidence base provides the comfort that this will be possible. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) which assesses the delivery of infrastructure and affordable housing of the SDLs at Stafford within the current and projected economic climate states that the build rate will be approximately 110 new homes per year, although this may increase as the new market develops for these large-scale sites. However at this stage the actual delivery and completions from the SDLs, in terms of new housing development, has not started. Therefore monitoring of progress and delivery of the development strategy and these SDLs will be needed to ensure that the Plan for Stafford Borough is being implemented. Clearly if a significant delay arose in terms of the SDLs being delivered this may lead to a Local Plan Review or partial review being started.
- 7.4. However, the Plan (A1) cannot be viewed in isolation from changes in the national planning policy context and circumstances with neighbouring local authorities or the wider West Midlands region. Two key external issues could lead to a review of the Plan (A1). Firstly Birmingham City Council has raised the issue that there is insufficient land within the City to **deliver Birmingham's future housing requirement**. A Joint Strategic Housing Needs Study is currently being prepared through the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) which may lead to other local authorities in the West Midlands being asked to support achieving future housing needs for Birmingham City. This issue is detailed in the Duty to Co-operate Statement – Update pro-forma with Birmingham City Council (K2). Therefore this issue will not be resolved during the timescale of preparing the Plan (A1), but in the context of the Stafford Borough no specific requirement has been stated. Therefore, for Stafford Borough any requirement is unlikely to be significant (certainly in comparison with other authorities much closer to Birmingham) - and in any case Stafford has adopted an approach of relative growth for the

Borough, thus providing for potential region-wide unmet needs. Secondly, further studies on site searches as part of the Regional Logistics Site project as the next stage, having established need and demand through the URS Black Country and Southern Staffordshire Regional Logistics Site Study – Final Report (E18), may lead to a review of the Plan (A1) if a site was identified within Stafford Borough.

- 7.5. At this stage a number of the factors highlighted above have uncertain timescales and therefore it is not possible for Stafford Borough Council to give a precise timescale for any review of the Local Plan. However any review would be subject to full and extensive public consultation and engagement, an updated evidence base including detailed monitoring of policies and delivery within the Plan as well as Sustainability Appraisal and Habitat Regulation Assessments processes.

b. Does the Development Strategy give sufficient strategic guidance and spatial direction about the scale, location, timing and implementation of new development, in order to guide subsequent Local Plan Documents and development decisions?

- 7.6. The Borough Council considers that the Development Strategy does give sufficient strategic guidance and spatial direction for the scale, location, timing and implementation of new development across Stafford Borough to guide subsequent Local Plan Documents and development decisions. Spatial Principle 2 sets out the overall scale of new development for housing and employment across the Borough, supported by Spatial Principle 3 which details the Stafford Borough Sustainable Settlement Hierarchy, and detailed through Spatial Principle 4 providing the proportionate distribution of housing development and Spatial Principle 5 establishing the employment distribution across Stafford Borough. Subsequent chapters and Appendix D within the Plan (A1) relating to Stafford town and Stone town set out specific policies for the scale, location, timing and implementation of new development in these settlements, and specifically for the SDLs. Further information about the evidence based work regarding the Stafford and Stone SDLs is included in Examination Statements 4 and 5 together with Background Statement (K1) Topic Paper E.

- 7.7. In terms of subsequent Local Plan Documents, the Plan (A1) sets out that the scale, location, timing and implementation of new development outside of Stafford and Stone, where new SDLs for housing are not identified, should be delivered in accordance with Spatial Principle 4 as strategic guidance. However the precise scale and location of new development for particular Key Service Villages within the Sustainable Settlement Hierarchy identified in Spatial Principle 2 is intended to be determined through the Neighbourhood Planning process or a subsequent Sites and Allocations Development Plan Document. Furthermore Spatial Principle 7 of the Plan (A1) sets out criteria for determining planning decisions for Key Service Villages prior to Neighbourhood Plans or the Sites and Allocations Development Plan Document being adopted. The Borough Council considers that this is an appropriate approach to the provision of strategic guidance and spatial direction for housing development outside of Stafford and Stone by providing local communities with the opportunity to determine the location of new development in their areas, as advanced through the Localism Act 2011.

c. Various alternative strategies were considered during the preparation of the Plan. Is the proposed Development Strategy the most appropriate, effective and sustainable strategy for Stafford Borough, having considered reasonable alternatives?

7.8. The Borough Council considers that the proposed Development Strategy within the Plan (A1) is the most appropriate, effective and sustainable strategy for Stafford Borough having considered reasonable alternatives. Throughout the plan-making process from January 2008 with the Borough-wide Development Strategy (G9), Delivering the Plan for Stafford Borough – Issues and Options (G6), the Plan for Stafford Borough: Draft Publication (G2) and the Plan for Stafford Borough – Strategic Policy Choices (G1) various alternative strategies have been subject to extensive public consultation and engagement with a significant number of responses received, as detailed in the Plan for Stafford Borough – Submission Consultation Statement (A14) and the Plan for Stafford Borough – Consultation Statement Appendices (A15). Furthermore alternatives have been assessed through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11) together with the Habitat Regulations Assessment in respect of Natura 2000 sites (A24) and the Habitat Regulations Assessment in respect of the Cannock Chase Special Area of Conservation (A25). Further details in terms of preparing the Development Strategy and consideration of reasonable alternatives is included in Background Statement (K1) Topic Paper A regarding the Spatial Principles and Topic Paper D regarding the Sustainable Settlement Hierarchy and the distribution of development.

7.9. **To demonstrate the Borough Council's resolve to ensure all reasonable alternatives have been adequately assessed, following a representation received to the Plan for Stafford Borough – Publication (A1) during the period of seeking representations on soundness and legal compliance, January and February 2013, a further engagement exercise took place in April and May 2013 regarding a Planning Strategy Statement (A12) and a Revised Sustainability Appraisal Report – Addendum (A13) to ensure a further reasonable alternative identified at Clarkes Farm, Stafford was assessed. Therefore the Borough Council considers that the appropriate, effective and sustainable strategy for Stafford Borough has been achieved through the Plan (A1), having considered the reasonable alternatives.**

d. Does the Key Diagram properly illustrate the main elements of the Development Strategy, including the future pattern of development (including proposed housing and economic development), the settlement hierarchy and role of centres?

7.10. As part of the Plan (A1) Chapter 6: Development Strategy contains the Stafford Borough Key Diagram on page 35 which is intended to be easily accessible to illustrate the following main elements of the Development Strategy, listed below, within the context of the Stafford Borough boundary, neighbouring local authority boundaries, key urban centres and settlements outside of Stafford Borough in neighbouring Districts, Strategic Transport Routes and the Strategic Rail Network:

- Location within the Borough of Stafford and Stone urban areas where the majority of new housing and employment development will take place.
- Other key areas for housing development within the Borough at the Key Service Villages of Eccleshall, Gnosall, Haughton, Hixon, Great Haywood, Little Haywood, Weston and Woodseaves.
- Other key areas for rural employment development outside of Stafford and Stone, within the Borough, at Raleigh Hall north of Eccleshall and Ladfordfields west of Woodseaves.
- Areas of Green Belt to the north of the Borough as part of the North Staffordshire Green Belt including Barlaston, Tittensor and Yarnfield, and Green Belt to the south of the Borough as part of the West Midlands Green Belt.
- Cannock Chase Area of Outstanding Natural Beauty (Policy N7) which includes the Cannock Chase Special Area of Conservation (Policy N6).

- 7.11. The Borough Council considers that the Key Diagram, described above, properly illustrates the main elements of the Development Strategy including the future pattern of development (including proposed housing and economic development), the settlement hierarchy and the role of centres.
- 7.12. The Plan (A1) Chapter 7: Stafford Town contains the Stafford Town Key Diagram on page 42 to illustrate the main elements of new development at Stafford, to be considered in conjunction with Stafford Town Policy 1 on pages 37 – 40. Taken together, the Key Diagram and the Policy are intended to provide a complete illustration of the local implications for Stafford Town for the plan period. Further details are contained on the Plan for Stafford Borough – Stafford Area Inset (A3). The Key Diagram for Stafford shows the proposed strategic sites for housing and employment, the location of the town centre and neighbourhood centres, and proposed new green infrastructure to be supported over the plan period as well as the Stafford Urban area, existing employment areas, the motorway junctions, and the road and rail network with Stafford rail stations. Constraints to development including the Cannock Chase Area of Outstanding Natural Beauty, river corridors and existing green infrastructure are also shown together with local features such as the Ministry of Defence land and Stafford Castle.
- 7.13. The Plan (A1) Stone Town Key Diagram within Chapter 7: Stone Town (page 66) illustrates the main elements of new development to be considered in conjunction with Stone Town Policy 1 on pages 62 – 64. Taken together the Key Diagram and the Policy are intended to provide a complete illustration of the local implications for Stone Town for the plan period. Further details are contained on the Plan for Stafford Borough – Stone Area Inset (A4). The Key Diagram for Stone shows the proposed strategic sites for housing and employment, the location of the town centre and neighbourhood centre, to be supported over the plan period as well as the Stone Urban area, existing employment areas, and the road and rail network with Stone rail station. Constraints to development including the Green Belt, river corridors and existing green infrastructure are also shown.
- 7.14. As set out in the Plan for Stafford Borough Publication – Representations Received (A18) and the Plan for Stafford Borough Publication – Summary of Representations received (A17), two representations were made to the

Stafford Town Key Diagram. Concerns were raised by the Staffordshire Wildlife Trust and the Environment Agency regarding the lack of clarification in terms of green infrastructure and the river corridors illustrated at Stafford Town. The Borough Council considers that the Plan (A1) is sound but would benefit from such clarification and illustration on the Stafford Town Key Diagram. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies proposed changes, listed as M35.

- 7.15. As set out in the Plan for Stafford Borough Publication – Representations Received (A18) and the Plan for Stafford Borough Publication – Summary of Representations received (A17), two representations were made to the Stone Town Key Diagram. Concerns were raised by the Sport England, expressing the need to amend the proposed SDL for housing to exclude Manor Hill school playing fields, and by the Staffordshire Wildlife Trust regarding the lack of clarification in terms of green infrastructure illustrated at Stone Town. The Borough Council considers that the Plan (A1) is sound but would benefit from such clarification and illustration on the Stone Town Key Diagram. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies proposed changes, listed as M52 and M53.