

1 SUMMARY

1.1 Overview

- 1.1.1 This statement has been prepared by Wardell Armstrong (WA) on behalf of David Wilson Homes. David Wilson Homes have an interest in the land to the west of Stone at Spode Close as identified in the attached plan. The site is included in the Council's Strategic Housing Land Availability Assessment (site reference 44). The SHLAA states that the site is currently suitable for residential development, available, achievable and deliverable, between 2018-2023. We have made representations throughout the plan making process in support of promoting this site for residential development. However, we recognise that the plan approach seeks to identify only Strategic Development Locations rather than smaller residential development opportunities.
- 1.1.2 Whilst we support sections of the emerging Plan for Stafford Borough, the plan should direct additional housing growth toward Stone (well in excess of the 800 dwellings for the plan period) in recognition of it being correctly identified as the second most sustainable settlement within the Borough and in light of its ability to deliver additional housing. We support the plans position that the west of Stone is an appropriate location for housing growth. However we would encourage greater policy flexibility encouraging housing growth to general areas to the west of sustainable settlement. This would reduce the plan dependency on identified Strategic Development Locations.
- 1.1.3 In light of the continued shortfall of housing provision (both market and affordable housing) within Stafford Borough to meet identified need, the emerging planning policy should ensure that greater housing provision occurs earlier in the plan. This would attempt to address the previous under provision of housing that has occurred in the past, along with the future housing need within the borough and therefore boost significantly the supply of housing in line with the NPPF.

3 RESPONSE TO MAIN MATTER 3 – DEVELOPMENT STRATEGY

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?

3.1 Spatial Principle 2 – Stafford Borough Housing & Employment Requirements

3.1.1 (Key Issue a) The NPPF, at paragraph 47, requires Local Planning Authorities (LPA) to use their evidence base to ensure that their Plan meets the full, objectively assessed need for market and affordable housing. Paragraph 159 of the Framework indicates that Local Planning Authorities (LPA) should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. It is therefore unclear if any unmet housing requirements from neighbouring authorities have been taken into account.

3.1.2 Stafford Borough Council has produced a Strategic Housing Market Assessment (SHMA) (September, 2012). It is significant to point out that there is nothing in the SHMA to indicate that the LPA has prepared the assessment working with neighbouring authorities housing market areas cross administrative boundaries. In addition, the SHMA does not test a range of options to test future housing growth within the borough but relies solely on CLG 2008 – based household projections.

3.1.3 Establishing the preferred option for housing growth should include the consideration of several factors which were outlined in the RSS Phase Two Revision Panel Report including;

- The consideration of household projections
- The need for affordable housing
- Addressing unmet housing need and backlog
- Environmental issues and sustainability considerations

3.1.4 The 2011 – based Interim Household Projections (see table below) were published in April 2013. There are a number of weaknesses associated with these projections which make them unsuitable for use as a basis of demonstrating housing need. Firstly they are based on previous trends since 2008 and reflect a failing housing market and an undersupply of housing. The projections also do not go beyond 2021

which is considerably less than 2031. Overall therefore it is concluded that 2011 – based Interim Household Projections represent insufficient evidence base for estimating housing demand and that CLG 2008 – based household projections offer a more suitable evidence base.

Table 2: Supporting Evidence for Housing Growth			
	Annual Increase	Households by (Year)	Increase
2011 Interim Household Projections	417 2011-2021	55,706 (2011) 59,874 (2021)	4,168 (2011 – 2021)
Stafford Borough - Strategic Housing Market Assessment 2012 – based on CLG 2008 – based household projections	500 (households - approx. 2010 to 2033)	53,000 (2010) 55,000 (2013) 61,000 (2023) 65,000 (2033)	12,000 (2010- 2033)
West Midlands Regional Spatial Strategy Phase Two Revision Panel Report – Stafford Borough Council - based on CLG 2008 – based household projections	550 (dwellings)	--	11,000 (2006 -2026) (dwellings)

3.1.5 The SHMA (page 55) indicates that analysis of Homesfirst data suggest that 234 newly forming households each year require affordable housing based on the number of applicants on the database. The current proposed development strategy for Stafford Borough seeks to provide 500 dwellings per year which would result in the provision of only 150 affordable housing dwellings (based on provision of affordable housing at 30%). Therefore such provision is inadequate to address affordable housing needs and in light of this total housing provision figures should be revised upward from that currently proposed.

3.1.6 In Stafford Borough there has been a continued unmet need and backlog of both market and affordable housing. As can be seen in the tables below previous housing rates have not kept pace with identified requirements.

3.1.7 Since 2006, there is an accumulated shortfall of 914 dwellings within the Borough.

Table 3: Housing Completion Since 2006 Stafford									
	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15
Requirement	550	550	550	550	550	550	550	550	550
Completions*	449	581	518	193	220	425			
+/-	-101	+31	-32	-357	-330	-125			

Source: *Stafford Borough Council Land for New Homes 2012

3.1.8 There has also been a continued under provision of affordable housing within borough against established need which has been identified by the 2007 Strategic Housing Market Assessment for Stafford Borough.

Table 4: Affordable Housing Requirements and Completion in Stafford									
	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15
Affordable Housing Requirement*	293	293	293	293	293	293	229	229	229
Affordable Housing Completions**	0	42	100	46	65	83	--	--	--
+/-	- 293	- 251	- 193	- 247	- 228	- 210			

Source: *Stafford Borough Council Strategic Housing Market Assessment 2007

**Stafford Borough Council Strategic Housing Market Assessment 2012

*** Stafford Borough Council Annual Monitoring Report 2011/2012

3.1.9 Between 2006 and 2012 there has been a combined shortfall of 1,422 affordable homes within Stafford Borough.

3.1.10 While it is difficult to provide a precise figure that should be put forward to address this unmet need and backlog it can be concluded that such a position would require the proposed total housing figure to be revised upward.

3.1.11 The Submitted Plan proposes housing development of 500 dwellings per annum between 2013 and 2031. However there it is doubtful whether this level of housing growth is consistent with the NPPF (par. 47) objective to “boost significantly” the supply of housing land. In light of the appropriate consideration of household projections, the need for affordable housing and addressing unmet housing need the

housing requirement for the borough should be increased as a minimum to 550 dwelling per annum in line with the RSS Phase Two Panel Report.

3.1.12 Stafford Borough Council has clarified their position with regard to housing land supply and has recently published the following document Stafford Borough Council 5 year Housing Land Statement 2013 (D3). It is recognised that currently Stafford Borough Council cannot demonstrate a five year supply of specific, deliverable sites. The Statement also applies a 20% buffer in light of the persistent under delivery of housing within the local planning authority. At present the statement indicates that Stafford Borough Council have a 2.2 years supply of housing site. Therefore The Plan does not identify a sufficient supply of specific, deliverable sites for the first five years of the Plan period.

3.1.13 In light of the limited housing land supply and the ongoing under provision of housing that has occurred within the Borough, the Plan should plan for greater housing provision earlier in the plan period through increased housing allocations.

3.1.14 The plan seeks to deliver housing provision through identifying a number of Strategic Development Locations. However it is important that the Local Plan seeks to bring forward a range of flexible sites within the settlement hierarchy in order to achieve housing provision targets which will continue to be challenging in light of currently poor housing market condition in line with the NPPF (PAR. 157). There is an over dependence on Strategic Development Locations for housing. For example, there is only one Strategic Development Location for housing identified in Stone which is the second most sustainable settlement within the borough but has also demonstrated a more buoyant housing market than Stafford Town.

3.1.15 As outlined above both the Sustainability Appraisal and the Strategic Housing Market Assessment has not considered or tested a sufficient range of alternative levels of housing development.

3.2 **Spatial Principle 3, 4 and 5**

3.2.1 (*Key Issue b*) It is considered that policy SP4 which outlines the distribution of housing growth within Stafford Borough with regard to housing growth between Stafford, Stone, Key Service Villages and other areas is not appropriate, effective, sustainable or soundly based.

3.2.2 Paragraph 6.39 of The Plan for Stafford Borough Publication [Pre-Submission] indicates that the rationale behind the policy seeks to “ensure that the right

proposition of development is directed to the most appropriate settlements with access to sufficient services and facilities to support development”. Paragraph 6.45 indicates that the new “Plan for Stafford Borough” is proposing to ensure that the distribution of development is delivered to reflect the level of services and facilities available through the Sustainable Settlement Hierarchy. However, the planning policy choice above (SP4) is not backed up by fact and a credible robust evidence base and does not respond to the principles above.

3.2.3 There should be greater housing growth in the Town of Stone as this settlement is the second most sustainable settlement within the borough within a concentration of supporting community facilities and services and where strong housing market conditions are evident. Such an approach would promote housing delivery and boost supply of housing while at the same time help to tackle previously dispersed development patterns.

3.2.4 While Stone remains the second largest settlement within the Borough, population growth within the town between 2001 and 2011 has been more limited.

Table 5: Housing Growth in Stafford Borough					
	2001 Population (a)		2011 Population (b)		Population Increase 2001 -2011
Stafford	60,493	50%	65,716	50%	5,223
Stone	14,555	12%	16,385	13%	1,830
Other Areas	45,622	38%	48,768	37%	3,146
Total	120,670	100%	130,869	100%	10,199

Sources: (a) Census 2001 and (b) Census 2011

3.2.5 A Revised Settlement and Assessment of Services and Facilities was carried out in June 2012. The assessment did not collect information for Stafford and Stone but simply focused on smaller settlements.

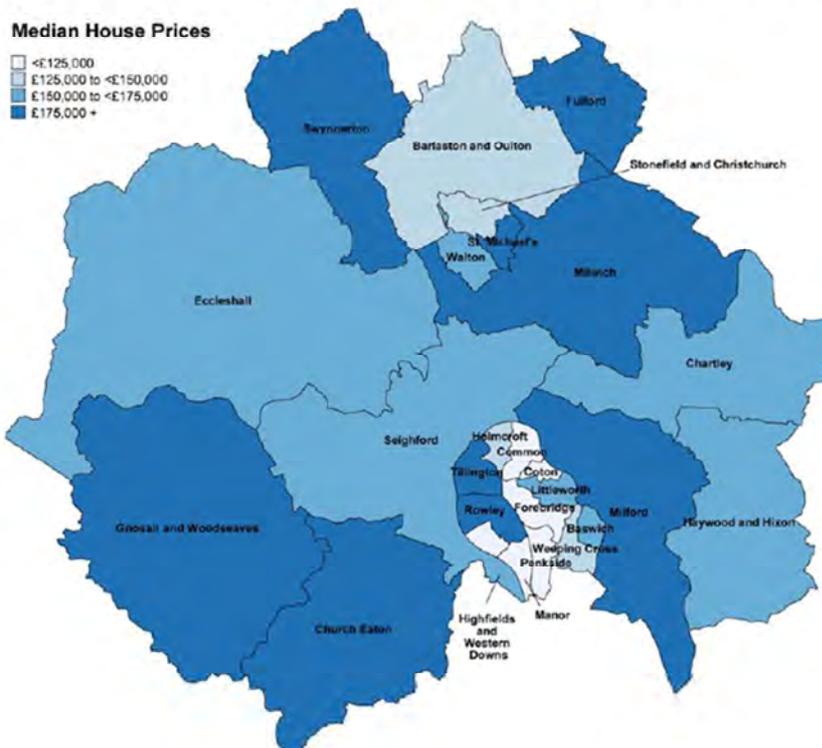
3.2.6 The table below focuses on the five basic services for each settlement. What it demonstrates is that Stone, after Stafford, can be considered the second most sustainable settlement within the borough with a concentration of primary and secondary schools, medical facilities and retail provision. Both Stafford and Stone provide the only railway stations within the borough.

Table 6: Services in Settlements				
	Medical Facility	Educational Facility	Retail Net Floorspace (sqm)	Railway Station
Stafford	20 (a)	31 (a)	19,055 (b)	1 (a)
Stone	6 (a)	9 (a)	4,118 (b)	1 (a)
Key Service Villages (d) 11 villages	7(c)	12 (c)	5,993 (b)	0 (a)
Rest of Rural Area	2 (c)	19 (c)		0 (a)

Sources: (a) Staffordshire County Council Local View Mapping / (b) Stafford and Stone Town Centre Capacity Assessment January 2011 - page 32 Table 5.1/ (c) Revised Settlement Assessment of Services and Facilities June 2012) (d) Includes Eccleshall, Gnosall, Haughton, Great Haywood, Little Haywood and Colwich, Hixon, Weston, Barlaston, Tittensor and Yarnfield.

- 3.2.7 The SHMA (2012) for Stafford Borough Council examines the difference in house prices (see map below) throughout the Borough. What is evident is that lower houses prices are evident within Stafford Town with higher house prices existing within Stone Town and wider rural areas. While this is just one indicator of housing market demand, it does suggest that Stafford Town has a more challenging housing market than Stone Town or other rural locations.
- 3.2.8 The Plan (Paragraph 6.24) indicates that “major development at Stone could have implications for the North Staffordshire urban regeneration initiatives and therefore it will be necessary both to constrain the overall quantity of new development and to phase it until after 2021”.
- 3.2.9 The SHMA (2012) recognises that “Stafford Borough is part of a broader functional market which extends sub-regionally and particularly into Stoke on Trent”. However there is no reference in the SHMA to any negative relationship between housing development within Stone and its impact on North Staffordshire urban regeneration initiative.
- 3.2.10 Furthermore, the SHMA (2012) does provide a breakdown of the workplaces of Stafford residents by ward area. Using this data, (See Table below) what is evident is that there is a higher percentage of residents living in Northern Rural Wards which commute to Stoke-On-Trent than Stone Town Wards. In addition, Stone Town Wards have a much higher level of self containment than Northern Rural Wards in that a high percentage of people that live in Stone, work in Stone. In consideration of the above there is no evidence that additional housing growth above what is currently proposed for Stone would undermine the North Staffordshire urban regeneration initiative.

Map 3.1 Stafford Borough median house prices by ward Feb 12 to May 12



Source: Land Registry Feb 2012 to May 2012

This data covers the transactions received at land Registry in the period 1 Feb 12 the month to 25 May 2012 © Crown copyright 2012."

Table 7: Workplace of Stafford residents by ward			
Residence	Workplace (Row %)		
	Stafford	Stoke-on-Trent	Newcastle- under-Lyme
Northern Rural Wards			
Fulford	35.8	41.1	4.8
Barlaston and Oulton	51.3	31.1	5.9
Swynnerton	48.0	25.3	9.9
Stone Town Wards			
Stonefield & Chirstchurch	67.7	13.5	3.7
St Michael's	60.0	15.5	5.3
Walton	74.6	11.3	3.9
Stafford Borough	68.2	8.5	2.3

Sources: (a) Stafford Borough 2012 Strategic Housing Market Assessment – Page 31 / Census 2001

3.2.11 In light of the above it is considered that policy SP5 – Stafford Borough Housing Growth Distribution should be amended with the distribution of housing growth within Stone from 8% to 20%.

3.3 **Spatial Principle 7:**

3.3.1 (*Key Issue a*) Rather than seeking to define the settlement boundaries of Stafford and Stone within this Plan the Plan could simply define broad development locations for both settlements. This would also effectively deliver the scale and distribution of proposed development. This would allow more flexibility to ensure a range of housing sites of different scales and locations are considered as part of the Site Allocations & Policies Document.

3.3.2 It is unclear through the associated plan provided as to the proposed settlement boundaries of Stafford Town and Stone Town. Despite this, if the definition of the settlement boundary is pursued through the Plan then the boundary for Stone should provide sufficient scope and scale to accommodate housing and employment growth appropriate to its position in the settlement hierarchy. The current approach is highly prescriptive providing a somewhat inflexible framework for Stone Town. The settlement boundary should be amended to include more land to the west of Stone, including SHLAA site reference 44.

APPENDIX 1 – SITE LOCATION PLAN

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