

THE PLAN FOR STAFFORD BOROUGH DEVELOPMENT PLAN DOCUMENT

EXAMINATION 2013

HEARING STATEMENT ON BEHALF OF MAXIMUS STRATEGIC LAND

MATTER 4: POLICY STAFFORD 1 – STAFFORD TOWN

Key issue:

Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including the overall scale and location of new housing and employment development, the strategy for the town centre, and the proposed Strategic Development Locations?

POLICY STAFFORD 1 – STAFFORD TOWN

1. The development strategy for Stafford Town, as set out in Policy Stafford 1 and supported by Policy Stafford 2, 3 & 4, is inherently justified and sound.
2. The County Town of Stafford is without question the most sustainable settlement in the Borough providing the necessary services and facilities required to support development.
3. Furthermore, in a wider sub-regional context the town's location means that expansion would not undermine or jeopardise the housing market and regeneration initiatives for the Black Country and North Staffordshire conurbation. Consequently a strategy focused on growth in Stafford town would not adversely affect the strategic priorities of neighbouring authorities.
4. Fundamentally, one the Core Planning Principles, as defined by paragraph 17 of the NPPF, is that planning should "*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*". Policy Stafford 1, supported by Policies SP2, SP3 and SP4 is clearly in accordance with the NPPF in this regard.
5. It is considered that the emphasis of focusing the greatest level of growth towards Stafford town is fully justified and soundly based. A full range of alternative options have been considered during the preparation of The Plan, particularly the Issues and Options (published February 2009) stage in which there was consultation on a range

of growth scenarios and distribution options, following which housing figures for the Borough were more ambitious and reflective of the Council's designation than as a 'Growth Point'. With strategic railway connections and in terms of highway infrastructure there were no significant issues that would indicate that the growth of the town would be constrained in its ability to accommodate growth in a sustainable manner.

6. The Council has prepared a substantial amount of evidence, covering issues such as landscape, transport, infrastructure and the environment. This evidence supports the Strategic Development Locations (SDLs) to the north, east and west of the town. These options have been the subject to Sustainability Appraisal at various stages of the Plan process. This appraisal work and supporting evidence supports the case that the growth options identified in The Plan for Stafford are sound, and has found the SDLs to be the most appropriate given the reasonable alternatives, including land at Clarkes Farm which has only recently emerged.
7. It is quite clear that the Clarkes Farm site would be completely divorced from the Stafford town. Consequently, any development would fail to integrate with existing communities, would be remote from the urban area, and would require significant infrastructure improvements to support any development. On this basis it would fail to achieve the economic, social and environmental dimensions required to deliver sustainable development.
8. The options for growth identified in The Plan for Stafford on the other hand have emerged following extensive public consultation, and would offer logical extensions to the settlement that are supported by evidence produced by the Borough Council and the site promoters. Their inclusion in The Plan is therefore fully justified and sound.
9. In respect of land North of Stafford in particular Maximus Strategic Land has prepared and submitted a range of technical evidence to underline the sustainability credentials of this part of the northern growth option, and have worked with the Borough Council and along with the adjoining landowner, Akzo Nobel, in relation to the delivery of the SDL.
10. We have also carefully taken account of the relationship between the Maximus site and Stafford Barracks, and discussions have taken place previously regarding the possibility of providing housing for MoD personnel as part of the proposal. The MoD is currently indicating that they have no requirement beyond their own ownerships for housing but, having been kept closely informed of the emerging proposals, are not objecting to the Maximus scheme as currently envisaged.

a. Housing

11. The Table associated with paragraph 6.54 of The Plan provides a breakdown of the housing provision in the Borough over the Plan period. For Stafford town, taking into account completions and commitments, the Table confirms a need to provide 5,560 new homes. This figure should exclude any additional requirements for military housing, as The Office for National Statistics, in estimating their sub-national projections, clearly treats Armed Forces stationed outside England and forces stationed at home separately from the civilian population. Likewise Draft Policy SP2 also clearly distinguishes MoD housing as a separate requirement from the 500 dwellings per annum intended to meet market and affordable needs. Consequently Policy Stafford 1 should correspond with the requirement outlined at paragraph 6.54 and in policy SP2 and separate any additional housing required for MoD personnel from the general market and affordable housing target.
12. With regards deliverability, whilst The Plan for Stafford confirms Stafford Town as having 'Growth Point' status, the distribution of housing set by Policy SP4 is largely consistent with the approach adopted in previous Plans (Local, Structure and Regional Plans). In which case, the apportionment proposed (by SP4) should not be seen as ground-breaking or pioneering, it is a well established strategy and one which has clearly been found to be appropriate in the past. If anything, the housing target proposed for the town is on the conservative side, particularly when considering the range of growth options that have been consulted on and in the face of key evidence contained in the Council's Strategic Housing Market Assessment (SHMA), published September 2012 (see Appendix 1, Table A1) which indicates that household formation may well be higher than the Plan allows for.
13. Notwithstanding the above, in order for policy Stafford 1 to achieve its many objectives it is vital that measures are put in place so that new housing development does not leak to rural areas, and away from Stafford town. This is a historic problem that is recognised at paragraph 6.41 (of The Plan) and is an issue that needs to be addressed if the spatial strategy is to succeed.
14. Certainly restraining the Strategic Development Locations in Stone (see Policy Stone 1) until 2021 could help increase the effectiveness of Stafford 1. However, given that there has been such a large proportion of new building taking place elsewhere in the Borough (i.e. outside Stafford and Stone), it is clear that there does need to be a mechanism for addressing circumstances where less sustainable rural areas start to see a disproportionate level of growth, contrary to Policies SP3 and SP4.
15. Notably Paragraph 6.49 states that the Council may impose a moratorium in situations where there is an exponential growth in new housing outside of Stafford. It

would seem sensible to ensure some safeguards are in place; however unless this is framed in policy there will remain a degree of uncertainty in terms of the circumstances that any restraint on growth elsewhere in the Borough would kick-in. This in turn could undermine effectiveness of the spatial strategy.

16. Whilst any safeguards may be best dealt with under Policy SP3 or SP4, setting a minimum housing requirement for Stafford would help the town 'catch-up' should the spatial distribution (Policy SP4) begin to falter. Rather than focusing solely on policies of restraint, it is important that the Council acts proactively to ensure as far as possible the growth aspirations on Stafford are realised. There should certainly be no policies in place which could constrain the delivery of housing in Stafford town itself, either within the built up area or the identified Strategic Development Locations and every effort should be made to encourage sustainable development. Certainly, in reflecting this focus on delivery in Stafford town itself, the policy would be more effective if a 'minimum' housing requirement was set to deal with this situation.
17. With regards to the Strategic Development Locations identified under Policy Stafford 1, it is considered that these are entirely appropriate and sustainable locations for the town's expansion. An array of evidence produced not only by the Borough Council but also by the site promoters demonstrates deliverability. Certainly in respect of the northern growth option, and in particular the Maximus land holding, there are no constraints that would prevent development coming forward for the level of housing envisaged by Stafford BC.

e. Alternatives

18. It is contended that the spatial strategy of the Local Plan is positively prepared, justified, effective and consistent with National Policy. As such it is considered that the Plan is sound.
19. The spatial strategy, and in particular the strategy for Stafford town, is robust and justified in its approach of directing development to sustainable locations on edge of the settlement with good access to services and facilities and opportunities to integrate new development with existing communities. On this basis, the need for the Inspector to consider "alternative sites" at this stage, to those proposed in the Local Plan as part of the spatial strategy is not, in our view, necessary.
20. The consideration of alternative sites should only be triggered in circumstances whereby the Local Plan, as submitted includes a spatial strategy containing a site or sites that are not justified in the context of consistency with the NPPF or if it is found that the Plan would not be justified by not making adequate provision for the

objectively assessed needs of the Borough. Neither circumstance would apply in our view. Even if it is found that there is a requirement to provide additional housing it would be necessary to explore the capacity of the proposed Strategic Development Locations in the first instance, as these locations have clearly been identified as the most sustainable locations for growth.

21. Notwithstanding the above, the Council have prepared an Addendum to their Sustainability Appraisal to consider three alternatives, in particular a site referred to as Clarkes Farm which emerged late in the process. The overall findings of the SA Addendum process found that the alternatives raised a number of sustainability concerns and therefore did not represent sustainable or preferable alternatives to the locations outlined in The Plan for Stafford Borough. We strongly support this view.
22. In light of the above it is not, in our view, incumbent on the Inspector to consider the sustainability, deliverability and viability of alternative sites in respect of this Local Plan. It is not a reasonable or necessary approach in the circumstances of the Local Plan to determine whether alternative locations would be more sustainable or more deliverable or more viable than the submitted spatial strategy and the SDLs contained within it, which clearly we contend they are not. In short, therefore, if other sites put to the Inspector might have merits or make claims that they are sustainable and appropriate for allocation, this will only be of any relevance in circumstances where the SDLs contained within the Local Plan were found by the Inspector to be unsound.
23. In our view this is not the case with The Plan for Stafford Borough and the identification of the SDLs as locations for sustainable growth is soundly based and justified by the raft of evidence produce by the Council and site promoters in support of the Plan. If, however, the Inspector were to find that additional as opposed to alternative sites were required to meet the need for development over the plan period then in the first instance the capacity of the SDLs to accommodate additional levels of growth, as the most sustainable locations for development, should be assessed.