



**The Plan for Stafford Borough –  
Publication**

**Examination Statement –  
Stafford Town**

**October 2013**

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## STAFFORD TOWN (Policies STAFFORD 1 – 4)

### 1. 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?**

- 1.1. Stafford Borough Council has an established growth agenda for the Borough over the Plan period. It is intended that the County Town of Stafford will play the key role in this, and provides the means of delivering sustainable development across the Borough for the future. This will continue the process established under the previous Government, when Stafford was recognised as a new Growth Point. **Stafford's geographic** position and established economic base means that the town has the potential to play a more significant role within the West Midlands region in terms of housing and employment growth, without undermining the regeneration of the North Staffordshire conurbation. Stafford Borough Council, with support from Staffordshire County Council, has a vision of a town which is attractive and prosperous but which is not afraid to embrace change and where residents can fully access a wide range of quality local services including employment, retail, leisure, health and education. To this end the Council will continue to build on the strong track record of effective and practical joint working to realise its potential as a vibrant County Town with a high quality town centre to meet the needs of the local community. Going forward the Council is committed to delivering growth in ways which benefit the town and its residents and the broader environment.
- 1.2. The Borough Council considers that the development strategy for Stafford Town is soundly based, informed by a robust, credible and proportionate evidence base, 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 assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore the development strategy is considered to be in conformity with national policy through the National Planning Policy Framework (NPPF) (F1), by delivering the overall scale and location of new housing and employment development for Stafford town, the strategy for the town centre and the proposed Strategic Development Locations (SDLs) which are sustainable and achieve the key requirements as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 1.3. The development strategy for Stafford Town is considered to be appropriate in that it supports the delivery of the Spatial Vision and Key Objectives of the Plan for Stafford Borough – Publication (A1) through the delivery of new development at Stafford town over the Plan period to 2031. The Plan for Stafford Borough – **Publication (A1) is hereafter referred to as "The Plan (A1)".** Further details regarding the process of establishing the development strategy for Stafford Town through the Spatial Principles are set out in Background Statement (K1) Topic Paper A, whilst the Sustainable Settlement Hierarchy and the distribution of development to Stafford Town is set out in Topic Paper D. The evidence base and infrastructure requirements for Stafford Town and the proposed SDLs, together with the national planning policy context, are set out in Background Statement (K1) Topic Paper E.
- 1.4. The overall scale and location of new housing and employment development at Stafford Town is considered to be sustainable and appropriate to achieve the Development Strategy requirements set out through the Spatial Principles, as detailed in Examination Statement 3 and Background Statement (K1) Topic Papers A to D. Furthermore, based on extensive local evidence, the development

strategy for Stafford Town is soundly based in terms NPPF para. 17 (F1), by delivering new development in sustainable locations at Stafford through a clear vision and strategy for the Borough to encourage growth.

- 1.5. Justification for the development strategy for Stafford Town has been informed from the start of preparing the plan in 2008 and the process of public consultation and engagement with the Plan for Stafford Borough – Borough-wide Development Strategy (G9), 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). Furthermore following representations to the Plan (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative locations at Stafford Town through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13), to ensure potential alternative sites to deliver the future development strategy for Stafford town could be properly assessed and considered. 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).
- 1.6. The development strategy for Stafford Town is considered to be sustainable, deliverable and appropriate as demonstrated through an extensive evidence base developed through the plan-making process from 2008 to 2013. Further information regarding key aspects of the evidence base to support the development strategy for Stafford Town is set out in response to the main policy elements below for Policy Stafford 1 – Stafford Town. Throughout the plan-making stages the development strategy for Stafford Town has been 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).
- 1.7. The Plan (A1) identifies Settlement Boundaries for Stafford through the Policies Map (A2) and its Inset (A3). These Settlement Boundaries were established through the Stafford Borough Local Plan 2001 (F14) and adopted in 1998. The Borough Council considers that the Settlement Boundary for Stafford 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, the importance of securing early and sustained delivery of the Strategic Development Locations. The SDLs in Stafford have been identified as the main means of delivering significant new development for the town 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's urban area,** in a piecemeal fashion, which would inevitably have less capacity to deliver strategic infrastructure.
- 1.8. The Plan (A1) provides the approach for the development strategy at Stafford Town to deliver the vision set out through the Growth Point Programme of Development, supported by both Stafford Borough Council and Staffordshire County Council:

*“Our vision is to make Stafford Borough a place which continues to be a highly attractive location whilst delivering growth in ways which benefit its residents, the region and the broader environment. The vision for Stafford is of a County town which is attractive, prosperous and embraces change where residents can fully access a wide range of quality local services including employment, retail, leisure, health and education.”*

## **2. POLICY STAFFORD 1 – STAFFORD TOWN:**

**Is the development strategy for Stafford Town appropriate, effective, deliverable, sustainable, fully justified and soundly based, including:**

### **Housing:**

**The overall amount, range, type, delivery and accessibility of new housing, including provision at the Strategic Development Locations and other locations, and the impact on the surrounding landscape;**

- 2.1. The overall amount, range, type, delivery and accessibility of new housing development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for Stafford Town through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2), having been tested through the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4). The overall amount of new housing development, including the provision at the SDLs, has been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) and the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) in terms of delivery and effectiveness to meet the future requirements of Stafford town and achieve infrastructure provision.
- 2.2. In terms of the range and type of new housing the Stafford Borough Strategic Housing Market Assessment (SHMA) (D5) identifies the current dwelling stock and recent housing developments by dwelling type and range, in terms of number of bedrooms, within Stafford Town. The SHMA evidence identifies that a greater proportion of 1 and 2 bedroomed properties (56.7%) have been built in Stafford Town compared to elsewhere in the Borough in recent years. The SHMA recommends a greater balance in favour of larger family homes and appropriately priced homes for first-time buyers, and therefore there is a local need for a greater balance of 3 and 4 bedroomed properties in the future.
- 2.3. With regards to deliverability and accessibility the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) provides the phasing approach for the proposed SDLs for Stafford Town aligned to strategic infrastructure. Furthermore the Whole Plan Viability Report (D52) states that the development strategy for Stafford town, through the proposed SDLs, is viable in the context of the cumulative effects of policy requirements in the Plan (A1). The Viability and Delivery of Northern and Western SDLs, Stafford (D51) confirms that the proposed SDLs are deliverable and viable for housing development to deliver strategic infrastructure requirements alongside affordable housing. This is based on a coverage of 50% gross site area with a net development density of 40 dwellings per hectare to achieve the scale of housing development necessary through a mix of 2, 3 and 4 bedroomed houses tested by this report and established through the Stafford Borough Council Infrastructure Study Inputs report (D56). Turning to the issue of accessibility, potential new housing sites within or abutting the existing urban area benefit from proximity to existing infrastructure. Such sites are identified through the Strategic Housing Land Availability Assessment Review 2013 (D2) including the proposed SDLs at Stafford town. Furthermore the Stafford Borough Integrated Transport Strategy

2013 - 2031 (J15) and the Stafford Borough Council Local Development Framework Accessibility Appraisal (E33) demonstrates the accessibility of new housing to the existing transport network together with infrastructure requirements to ensure future integration of the proposed SDLs at Stafford Town to deliver the development strategy.

- 2.4. In terms of the impact of the surrounding landscape of new housing at Stafford Town, evidence for landscape and the historic environment is set out in the Historic Environment Character Assessment for Stafford (E80). This records that land west and east of Stafford is likely to have significant impact on the historic environment whilst land to the north of Stafford is likely to have least impact. As detailed later in the Examination Statement, issues of impact on the historic environment for land west and east of Stafford have been resolved through master planning and concept plans to provide suitably designed proposals respecting heritage assets. The detailed Policies for each of the proposed SDLs at Stafford address this issue in more detail. The Green Infrastructure Strategy for Stafford - The Strategic Plan (D34) sets out key actions in terms of new green infrastructure through the Stafford Town Local Area Framework: Key Recommendations. In addition the Strategic Flood Risk Assessment Level 1 Volume 1 Final (D46) together with the associated Strategic Flood Risk Plans (D47 & D49) identifies the flooding management issues for Stafford Town. As set out below further work has progressed with the Environment Agency regarding flooding issues and surface water run-off for proposed SDLs at Stafford Town.
- 2.5. The Borough Council considers that the overall amount, range, type, delivery and accessibility of the proposed new housing development, including provision at the SDLs and other locations for Stafford Town is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, as detailed in the subsequent sections below.

**The amount, location, timing and delivery of the proposed additional provision to meet the housing requirements of the Ministry of Defence (MOD).**

- 2.6. The amount, location, timing and delivery of the proposed additional provision to meet the housing requirements of the Ministry of Defence (MOD) personnel is considered to be appropriate, effective, deliverable, sustainable, fully justified and soundly based. The amount of proposed additional housing provision for the MOD was originally established through the West Midlands Regional Spatial Strategy Phase Two Revision process (F8) and subsequently set out in the West Midlands Regional Spatial Strategy Phase Two Revision Report of the Panel Volume 1 Report (F4) as being 1,000 new homes for Ministry of Defence (MOD) personnel. Throughout the plan-making process a number of representations have been received from the Defence Infrastructure Organisation, on behalf of the Ministry of Defence, seeking confirmation that the Plan (A1) would make provision for MOD personnel. The latest representations from the Ministry of Defence (MOD) support the requirement for 500 new houses at Stafford in representations to the Plan (A1) in February 2013 and identified through the Summary of Representations Received (A17).
- 2.7. By way of meeting the housing requirements for MOD, personnel planning consent was granted for 350 new houses on land within the Stafford urban area **and as part of the MOD's** landholdings at Stafford on 12 March 2013 to accommodate Service Family Accommodation. Furthermore, full planning consent was granted for 745 new Single Living Accommodation units on 5 July 2012. This land is currently being prepared in order to implement the planning permission granted. Therefore the Borough Council considers that the proposed additional provision in the Plan fully meets the MOD requirements, and this has been confirmed through a Duty to Co-operate pro-forma included in the Duty to Co-operate Statement Update (K2).

- 2.8. The Homes Builders Federation and Maximus Strategic called for Policy Stafford 1 to provide clarification that Ministry of Defence provision will be in addition to new housing requirements at Stafford Town. The Borough Council considers that the Plan (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M28.
- 2.9. Some representations raised concerns about the protection of employment land undermining housing delivery, including removing the requirement at the west of Stafford SDL. A request for clarity of use classes acceptable on employment sites was made, indicating that these should include waste management. In terms of Stafford town centre amendments were sought to the Primary Shopping Area to **include Sainsbury's supermarket whilst other representations expressed concern** about vitality and viability due to new developments changing the balance as well as the need for car parking. A number of representations raised concerns about transport infrastructure capacity at Stafford town and the feasibility of delivering new road schemes. In particular it was suggested that the Eastern Distributor Road should not be identified beyond Baswich Lane, due to site restrictions and deliverability. Finally representations on the environment sought clarification on green infrastructure, water resources and achieving new open space, sport and recreation provision. The following sections within this Examination Statement address the matters raised by these representations.

### **Employment:**

#### **The overall amount, type, location and delivery of new employment development;**

- 2.10. The overall amount, type, location and delivery of new employment development is considered to be appropriate, effective, deliverable, sustainable, fully justified and soundly based. As set out in the Matter 3 Examination Statement the amount of new employment development at Stafford is 56% of the total provision, being 90 hectares. This amount of new employment land is considered to be appropriate at Stafford town due to the excellent scoring of existing employment sites in the town through the scoring matrix and results contained in the Employment Land Review (D14) and the quantum of existing sites in the area. The amount and location of new employment development 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 and location of new employment development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) in the context of new housing delivery, access to services and facilities as well as environmental constraints together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4). A range of employment provision for Stafford town together with a number of alternative sites have been considered through the process, in order to establish the amount and locations contained in the Plan (A1).
- 2.11. In terms of the type of new employment development 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 current employment types for each site at Stafford town in terms of B1, B2 and B8 uses. The future market supports continued provision for B1, B2 & B8 uses to meet future demand to ensure the Development Strategy for Stafford Borough is delivered but does not favour specific types of uses being targeted. In general terms it is noted, through the Employment Land Review (D14) that certain sectors will expand and other contract over the Plan period, with further elaboration in the Matter 3 Examination Statement. Background Statement (K1) Topic Paper A introduces the two different approaches within the **Employment Land Review (D14) and the Council's growth vision for the future**, based on 160 hectares over the Plan period of which 90 hectares are at Stafford to encourage

more employment in the most sustainable and deliverable location. To support this approach there are employment commitments at Stafford town for over 61 hectares of new land which are currently being delivered.

- 2.12. The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) confirms that new employment development proposed by Policy Stafford 1 is deliverable and viable, alongside the implementation of strategic infrastructure requirements. As set out in Background Statement (K1) Topic Paper E this has been demonstrated by the market bringing forward a planning application, which was subsequently approved in March 2013 for 21.9 hectares of new employment land east of Stafford, and is currently being developed with transport improvements at the junction of Weston Road and Blackheath Lane. These access works are supported by Local Pinch Point Funding. In addition, in October 2012, planning consent was granted for 28.19 hectares of new employment land north of Stafford, which is currently being delivered.
- 2.13. Therefore the Borough Council considers that the overall amount, type, location and delivery of new employment development for Policy Stafford 1 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

#### **Proposals for the Science & Technology Park at Beaconside;**

- 2.14. Policy Stafford 1 makes reference to supporting the existing Science and Technology Park at Beaconside, Stafford. This proposal has been considered through the process of public engagement and consultation since 2011, as being appropriate for the development strategy of Stafford Town through the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore the Science and Technology Park at Beaconside has also been assessed through the Sustainability Appraisal Report (H4) in the context of Policy Stafford 1.
- 2.15. In terms of the evidence base the Employment Land Review (D14) identifies the Science and Technology Park as a current employment site supporting the local economy of Stafford town. Alongside other employment sites across Stafford Town and the rest of the 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), the Borough Council would encourage proposals to enhance economic growth and diversification at the Science and Technology Park. Furthermore due to the scale of new development at Stafford Town it is important that the potential of existing employment areas should be maximised, in order to support the sustainable future of the town. However the Borough Council does not have any specific proposals for this area as part of Policy Stafford 1 within the Plan (A1). Within this context the Borough Council considers that future proposals at the Science and Technology Park, Beaconside within Policy Stafford 1 are appropriate, effective, sustainable, deliverable and soundly based.

#### **Proposals for further development at the MOD land as a military base;**

- 2.16. Policy Stafford 1 makes reference to further development on Ministry of Defence land relating to its use as a military base, which has been considered through the process of public engagement and consultation since 2011, as being appropriate for the development strategy of Stafford Town through the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore the Ministry of Defence land has also been assessed through the Sustainability Appraisal Report (H4) in the context of Policy Stafford 1.



- 2.17. It is recognised that the Ministry of Defence land is a source of significant employment for military and civilian personnel as part of Stafford Town and the wider Borough area. Alongside other employment sites across Stafford Town and the rest of the 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), the Borough Council would encourage proposals to enhance economic growth and diversification at the Ministry of Defence land in the future. Furthermore due to the scale of new development at Stafford Town and the additional housing provision for Ministry of Defence personnel, detailed in paragraph 1.9 – 1.11 above, the Borough Council considers that existing employment areas support the sustainable future of the town. However the Borough Council does not have any specific proposals for this area as part of Policy Stafford 1 within the Plan (A1). Within this context it is important that the potential of existing employment areas should be maximised, in order to support the sustainable future of the town, and thus future proposals on Ministry of Defence land supporting its use as a military base within Policy Stafford 1 would be appropriate, effective, sustainable, deliverable and soundly based.

### **New employment land allocations at North of Stafford and East of Stafford;**

- 2.18. The new employment land allocations at North and East of Stafford have been considered through the process of public engagement and consultation since 2009 as being appropriate SDLs within Policy Stafford 1 together with Policy Stafford 2 and Policy Stafford 4 through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new employment development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4). Through this process of assessment and evidence based analysis, the employment land north and east of Stafford are considered to be appropriate, soundly based and fully justified when compared to other sites at Stafford town. Furthermore evidence is contained within the Employment Land Review 2013 (D14) concerning the delivery of economic growth at Stafford, as described earlier in this Examination Statement, in line with the growth strategy approach through the Spatial Principles.
- 2.19. As set out in Background Statement (K1) Topic Paper E the employment allocations north and east of Stafford are considered to be deliverable and viable, which has been demonstrated by the market bringing forward new employment land north and east of Stafford as detailed above.
- 2.20. Therefore the Borough Council considers that the location and deliverability of new employment land allocations north and east of Stafford within Policy Stafford 1 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

### **The approach to safeguarding existing employment land.**

- 2.21. Policy Stafford 1 makes reference to safeguarding existing employment land, which has been considered through the process of public engagement and consultation since 2011, as being appropriate for the development strategy of Stafford Town through the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore this approach has also been assessed through the Sustainability Appraisal Report (H4) in the context of Policy Stafford 1.

- 2.22. In terms of the evidence base the Employment Land Review (D14) identifies a number of existing employment sites across Stafford Town which support the local economy. Alongside other employment sites across the rest of the 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), the Borough Council considers that it is important to safeguard existing employment land, particularly at Stafford Town in order to provide for a vibrant sustainable community in the future. As set out in Background Statement (K1) Topic Papers A to C, a significant level of new housing will be delivered over the Plan period to meet objectively assessed needs, including an element of in-migration. Whilst the NPPF (F1), para 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose, this is not the case for the existing employment areas at Stafford town, as demonstrated through the Employment Land Review (D14). The Borough Council considers that existing employment areas will support the sustainable future of the town and therefore considers that the approach to safeguarding existing employment land at Stafford town within Policy Stafford 1 is appropriate, effective, sustainable, deliverable and soundly based.

**Stafford Town Centre:  
Strengthening the role, viability and vitality of the town centre, including the extent of the Primary Shopping Area and primary/secondary frontages;**

- 2.23. Policy Stafford 1 seeks to strengthen the role, viability and vitality of Stafford town centre including redefining the extent of the Primary Shopping Area and the Town Centre boundary within the Plan for Stafford Borough – Stafford Area Inset (A3). These have 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). Furthermore this approach has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10) in the context of Policy Stafford 1. It is intended that the extent of the primary and secondary frontages will be identified within the forthcoming Sites and Allocations Development Plan Document, the timetable for which is included in the Stafford Borough Local Development Scheme (C7).
- 2.24. In terms of the evidence base the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assess the current role and capacity of Stafford town centre based on existing shopping patterns as well as setting out the future needs to be met by Stafford town centre for retail, office and leisure provision alongside recommendations for the town centre boundaries. In addition, the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) provides the most up-to-date position, published in May 2013, as detailed in the following section. The national planning policy context for town centres is set out in the NPPF (F1) para 23 and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), which indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. As set out in Background Statement (K1) Topic Papers A to C, a significant level of new housing will be delivered over the Plan period to meet objectively assessed needs, including an element of in-migration. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future. The Borough Council considers that Policy Stafford 1 will achieve a strong town centre to support the sustainable future of the town

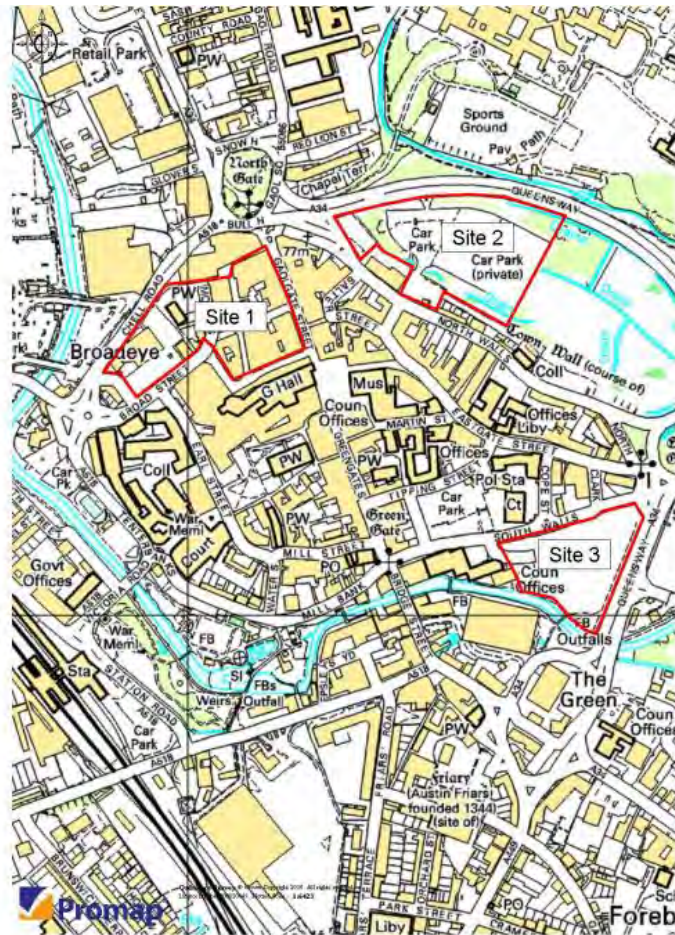
through planning consents detailed in the following section, and therefore considers that the approach to strengthening the role, viability and vitality of the town centre including the extent of the Primary Shopping Area is appropriate, effective, sustainable, deliverable and soundly based.

**Provision of additional comparison (34,000 sq m) and convenience (2,000 sq m) retail floorspace, and whether this is supported by the Retail Capacity Studies;**

- 2.25. Policy Stafford 1 makes provision for additional comparison (34,000 sq m) (net) and convenience (2,000 sq m) (net) retail floorspace to support strengthening the role, viability and vitality of Stafford town centre, which 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), the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore this approach has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10) in the context of Policy Stafford 1.
- 2.26. In terms of the evidence base the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17), covering the period 2011 to 2026, assesses the current role and capacity of Stafford town centre based on existing shopping patterns, as well as setting out the future needs for additional comparison and convenience retail floorspace to be met in Stafford town centre. The Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) provides the most up-to-date position, published in May 2013 updating for the Plan period 2011 to 2031, with the requirements for a range of 14,000 to 28,300 sq m (net) additional comparison and a range of 3,400 to 7,500 sq m (net) convenience retail floorspace from those included in the Plan (A1) Policy Stafford 1 of 34,000 sq metres (net) for comparison and 2,000 sq metres (net) for convenience. The floorspace ranges are based on the existing market share being retained over the plan period, these do not allow for any enhancement (or reduction) of market share so are the minimum, or the status quo. The key reason for the change in these figures is due to changes in expenditure forecasts (more suppressed) since 2009 (D16) was completed, whilst a range is provided for flexibility to enable for a large budget retail store to be accommodated at Stafford town centre should this be considered beneficial. Based on the current range of comparison and convenience provision at Stafford town centre together with the vitality and viability of the town centre the Council does not consider it is appropriate to establish a higher range figures. The Borough Council considers that the Plan for Stafford Borough – Publication (A1) would benefit from an update concerning the latest retail evidence. Therefore the Council sets out in the Schedule of Further Additional Modifications (A27) that criterion i under the Stafford Town Centre section of Policy Stafford 1 **should be amended to read as follows: "Encouraging the development and expansion of the town centre to provide an increase of 14,000 square metres (net) of non-food (comparison) retailing and 3,400 square metres (net) of food (convenience) retailing and include the level and quality of the offer as well as establish new development opportunities:"** listed as FAM18.
- 2.27. The national planning policy context for town centres is set out in the NPPF (F1) para 23 and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), which indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. As set out in Topic Background Statement (K1) Topic Papers A to C, a significant level of new housing will be delivered over the Plan period to meet objectively assessed

needs, including an element of in-migration. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future.

- 2.28. Three key locations are identified through the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) within Stafford town centre (see map below): Site 1 at Princes Street, Site 2 at Kingsmead Car Park and Site 3 at Riverside which provide scope for future development and are currently available.



- 2.29. Recently the retail market has brought forward the Kingsmead proposal which received planning consent on 22 February 2012 for 4,910 square metres (net) of retail (comparison & convenience) space and 465 total car parking spaces on a site of 3.16 hectares in total area, together with the Riverside proposal which was granted planning permission on 19 August 2013 for 13,002 square metres (net) of retail (comparison & convenience) with car parking for 1,205 spaces with the retail on a site of 1.6 hectares in total area. In addition a third significant location within Stafford town centre, at Princes Street totalling 2.6 hectares, is also identified as providing further capacity for new uses as part of a re-development scheme during the Plan period as well as other smaller town centre locations. The evidence base and access to available sites within Stafford town centre demonstrates that there is scope for additional floorspace to meet the future town centre uses. The Borough Council considers that Policy Stafford 1 will support the sustainable future of the town and therefore considers that the approach to providing the additional comparison and convenience retail floorspace is supported by the Retail Capacity Studies and should be delivered to

strengthen the role, viability and vitality of the town centre. This approach is therefore appropriate, effective, sustainable, deliverable and soundly based.

### **The provision of new office and commercial development (45,000 sq m);**

- 2.30. Policy Stafford 1 makes provision for new office and commercial development (45,000 sq m) to support strengthening the role, viability and vitality of Stafford town centre, which 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), the Plan for Stafford Borough – Draft Publication (G2) prior to inclusion in the Plan (A1). Furthermore this approach has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10) in the context of Policy Stafford 1.
- 2.31. In terms of the evidence base the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assess the current role and capacity of Stafford town centre as well as setting out the future needs for new office and commercial development to be met by Stafford town centre. From the review of existing commitments and the level of vacant office accommodation at Stafford town, set out in paragraph 6.57 of D16, sites for further offices are not anticipated to be necessary over the Plan period to achieve the new office and commercial development requirements (45,000 sq m).
- 2.32. The national planning policy context for town centres is set out in the NPPF (F1) para 23 and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), which indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. As set out in Background Statement (K1) Topic Papers A to C a significant level of new housing will be delivered over the Plan period to meet objectively assessed needs, including an element of in-migration. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future. The Borough Council considers that Policy Stafford 1 supports the sustainable future of the town and therefore considers that the approach of providing the new office and commercial development, which has already been committed, strengthens the role, viability and vitality of the town centre, as being appropriate, effective, sustainable, deliverable and soundly based.
- 2.33. Whilst Policy Stafford 1 seeks to ensure that new office development will be focused on Stafford town centre, in line with the NPPF para 24 (F1) Staffordshire County Council, Stoke on Trent Council and Newcastle under Lyme Borough Council called for the wording of Policy Stafford 1 to be amended to express this approach more clearly in terms of office development on employment sites outside of town centres. The Borough Council considers that the Plan (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M30.

### **Proposals for mixed-use development at Kingsmead and Riverside.**

- 2.34. Policy Stafford 1 includes proposals for mixed-use development at Kingsmead and Riverside, identified on the map above, within the Plan for Stafford Borough – Stafford Area Inset (A3) Town Centre Boundary, which has been considered through the process of public engagement and consultation since 2009, as being

appropriate for the development strategy of Stafford Town. This process involved comparison of reasonable alternative sites in the town centre and assessed through the Sustainability Appraisal process, recorded in the Revised Sustainability Appraisal Report (A10).

- 2.35. In terms of the evidence base the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and its Appendices (D17) assess the current role and capacity of Stafford town centre based on existing shopping patterns as well as setting out the future needs to be met by Stafford town centre for retail and leisure provision alongside recommendations for the town centre boundaries. In addition the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) provides the most up-to-date position, published in May 2013. These evidence base reports identify and support the delivery of proposals at Kingsmead and Riverside to meet the future requirements of the Borough through new development at Stafford town centre. The Kingsmead proposal received planning consent on 22 February 2012 for 5,289 square metres gross retail space and 465 total car parking spaces, together with the Riverside proposal which was granted planning permission on 19 August 2013 for 13,490 square metres of comparison retail with car parking for 1,205 spaces.
- 2.36. The national planning policy context for town centres is set out in the NPPF (F1) para 23 and detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4), which indicates that town centres should be positively promoted as competitive areas to deliver growth over the Plan period. As set out in the Background Statement (K1) Topic Papers A to C, a significant level of new housing will be delivered over the Plan period to meet objectively assessed needs, including an element of in-migration. Therefore a strong town centre will be vital to provide for a vibrant sustainable community in the future. The Borough Council considers that the proposals for mixed used development at Kingsmead and Riverside will support the sustainable future of the town and therefore considers that this new development is appropriate, effective, sustainable, deliverable and soundly based.

### **Infrastructure:**

**Is the scale, nature and timing of proposed infrastructure necessary, justified, deliverable, viable and appropriate, including the Western, Northern and Eastern Access Improvement Schemes, water, sewerage and other utilities, public transport, education, cycling/walking, green infrastructure, waste facilities, leisure, recreation and open space?**

- 2.37. The scale, nature and timing of proposed infrastructure requirements for Policy Stafford 1 is detailed in the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57), as well as Appendix D of the Plan (A1). Furthermore the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Whole Plan Viability Report (D52) confirm that the proposed infrastructure is necessary, deliverable and viable and will support the new development at Stafford Town. This evidence base was prepared and completed following significant engagement with key statutory agencies and other stakeholders to ensure that the proposed infrastructure requirements were appropriate and effective for the proposed SDLs in particular.
- 2.38. The Stafford Borough Integrated Transport Strategy 2013 – 2031 (J15) sets out the future transport infrastructure requirements to be delivered through the development strategy for Stafford Town. Delivery of the Eastern Access Improvement Scheme required through Policy Stafford 4 has been achieved, in part, through the planning consent and Section 106 agreements for the housing and employment development at land east of Stafford. Furthermore, to

demonstrate how the scale of new development can be achieved at the Strategic Development Locations (SDLs) to the north and west of Stafford as part of the existing and future transport network for Stafford town including public transport, walking and cycling, Staffordshire County Council produced the Plan for Stafford Borough: Transport Evidence to Support a Western Direction of Growth (D26) in 2012 and the Plan for Stafford Borough: Transport Evidence to Support a Northern Direction of Growth (D25) in 2013 which set out specific proposals and output solutions. Through the plan-making process of engagement with the developer representatives for the Western and Northern Strategic Development Locations, as detailed later in this Statement, the Council considers that these proposals and solutions are currently the most effective in terms of delivering the scale of development for these areas, and referenced in the Plan (A1) Appendix D. The conclusions for the Western and Northern SDLs, respectively, are set out below:

Transport Evidence to Support a Western Direction of Growth (D26), page 47

*"A sustainable transport option with no new highway infrastructure will not solve traffic problems created by the level of development proposed for Stafford and an access only link to Doxey Road will deliver minimal wider benefits.*

*The Stafford Western Access Improvements (including sustainable transport measures), funded by a combination of public and private sector funds during the plan period, will enable the delivery of 2,200 new houses to be delivered in the west, on the most sustainable greenfield location in Stafford. It will help to minimise the number of likely congested links and junctions particularly along Newport Road, making Stafford an easier and safer place to access.*

*There is expected to be congestion on the network in 2016 although it is considered that there is likely to be just sufficient capacity to accommodate a first phase of development in the west if it is developed in line with Core Policy 5 (Draft Publication policy reference – G2). In 2016:*

*100 additional dwellings accessing onto the Newport Road will begin to place unacceptable pressure on Station Road and on the Newport Road, particularly at the Station Road / Newport Road junction and near to Tesco and Bridge Street  
No capacity issues will arise from the construction of 300 dwellings off Doxey Road, although there may be significant environmental and community concerns  
400 additional dwellings will create an adverse affect on Chell Road and Tenterbanks*

*To go beyond 400 homes, the development consortium will need to construct part of the Western Access Route between Martin Drive, Castlefields, and Doxey Road to provide a second means of access to the Castlefields and Burleyfields sustainable urban extension."*

Transport Evidence to Support a Northern Direction of Growth (D25), pages 45 - 47

*"Staffordshire County Council recommends that significant enhancements to the highway network are required in the North of Stafford if Stafford Borough Council's plan to deliver 3,100 new homes by 2031 is to be realised.*

*Evidence shows that the option currently being proposed by the developer will not satisfactorily mitigate the impact of additional vehicular demand in 2031. Extending the dual carriageway will provide some improvements, but the provision of a new local distributor road to Sandon Road (north) is likely to have additional benefits in terms of reduced flows on Beaconside. Logically a local distributor road will also provide a more attractive route for commercial bus services compared to the other*

*access arrangements under consideration. However, even with a new distributor road there still remain problems at key junctions that can only be resolved through further junction improvements.*

*Evidence also shows that infrastructure alone will not remove all potential delays on the highway network. This means that it is important that any physical improvements are complemented by a change in travel behaviour and less reliance on the car for journeys, particularly in peak periods."*

- 2.39. Evidence relating to water, sewerage and other utilities as well as waste management is detailed in the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57). Proposed infrastructure for education provision is set out through the Plan for Stafford Borough: Spatial Plan for Education report (D53). Furthermore the Green Infrastructure Strategy for Stafford – The Strategic Plan (D34) includes the Stafford Town Local Area Framework which sets out the scale, nature and appropriateness of green infrastructure. Subsequently this evidence has been updated by the Green Infrastructure, Green Space and Sport and Recreation Provision Strategy (D28) and the Open Space, Sports and Recreation Assessment Update (D29) which specifies infrastructure requirements for Stafford Town and each of the proposed SDLs. Through the schedule of meetings, detailed below, the requirements and delivery of green infrastructure, open space, sport and recreation provision have been incorporated into the master planning for each of the SDLs, evidenced by the Northern SDL – Illustrative Framework Plan (E91), the Concept Plan (E92) and the Public Consultation Document (E93) together with the Burleyfields Development Concept Plan (E88) and the Burleyfields Development Character Areas – Plan (E89). Further details will be available through the subsequent planning application process including the latest evidence base through the Green Infrastructure, Green Space and Sport and Recreation Provision Strategy (D28) and the Open Space, Sports and Recreation Assessment Update (D29). Delivery of the infrastructure requirements through Policy Stafford 4 have been achieved by the planning consent and Section 106 agreements for the housing and employment development at land east of Stafford
- 2.40. Through the plan-making process a series of meetings have been held with developers and promoters of the SDLs at Stafford Town, recorded within the Plan for Stafford Borough Land North of Stafford SDL Meeting Notes 2012 – 2013 (E94), Plan for Stafford Borough Land West of Stafford SDL Meeting Notes 2011 – 2013 (E95) and the Plan for Stafford Borough Land East of Stafford SDL Meeting Notes 2012 – 2013 (E96). These have helped to develop the evidence base and ensure the proposed infrastructure requirements will be delivered through the development strategy for Stafford Town.
- 2.41. Taking into account the evidence base and pro-active engagement with developers of the proposed SDLs the Borough Council considers that the scale, nature, and timing of proposed infrastructure requirements for Policy Stafford 1 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.
- 2.42. A number of representations called for Policy Stafford 1 to provide clarity in terms of the new road infrastructure for Stafford Town, including the Eastern Distributor Road in particular. The Borough Council considers that the Plan for Stafford Borough – Publication (A1) is sound but would benefit from amendments relating to these concerns. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the changes, listed as M27, M29, and M31. The Environment Agency called for Policy Stafford 1 to be amended to ensure watercourses are enhanced. The Borough Council considers that the Plan for Stafford Borough – Publication (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M32.



**Have other potential Strategic Development Locations been properly assessed, including Clarkes Farm.**

- 2.43. Justification for the development strategy at Stafford Town and the appropriateness of the proposed SDLs 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). However, following representations to the Plan (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative locations at Stafford through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13). 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) alongside the Sustainability Appraisal Addendum Representations Received (A21) and the Planning Strategy Statement Representations Received (A23).
- 2.44. The Borough Council considers that other potential SDLs at Stafford Town have been properly assessed through extensive public engagement and consultation as part of the plan-making process. In addition, all reasonable alternatives and proposals have been thoroughly tested through the Sustainability Appraisal process within the Sustainability Appraisal Commentary Volume 2 (H7), the Sustainability Appraisal Report (H4), the Revised Sustainability Appraisal Report (A10) and subsequently in the Revised Sustainability Appraisal Report – Addendum (A12). Therefore the development strategy for Stafford Town is considered to be appropriate, effective, deliverable, sustainable, fully justified and soundly based as demonstrated through an extensive evidence base developed through the plan-making process from 2009 to 2013.
- 2.45. For Policy Stafford 1 a number of representations stated that the housing provision should be increased to meet full objectively assessed needs with additional sites allocated outside the settlement boundary, and indeed argued that the settlement boundary should be removed. Promoters of the SDLs advocated delivery of infrastructure and further new development, although this would require more land. However, conversely other developers challenged implementation of these locations citing transport capacity problems and other risks, leading them to suggest other areas be identified. A new SDL at Clarke’s Farm, north east of Stafford was promoted, more recently, for consideration.
- 2.46. In the context of the evidence base and public engagement, as set out above, the Borough Council considers that the proposed development through Policy Stafford 1 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based in relation to the impact on the environment.

**3. POLICY STAFFORD 2 – NORTH OF STAFFORD**

**Is the Strategic Development Location at North of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:**

- 3.1. The Borough Council considers that Policy Stafford 2 – North of Stafford is soundly based, informed by a robust, credible and proportionate evidence base; by 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 by assessments through the Sustainability Appraisal process recorded

in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore Policy Stafford 2 is considered to be in conformity with national policy through the NPPF (F1), by delivering new development for Stafford town which is sustainable and achieves the key requirements as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).

- 3.2. Policy Stafford 2 is considered to be appropriate in that it supports the delivery of the Spatial Vision and Key Objectives of the Plan (A1), through the delivery of new development at Stafford town over the Plan period to 2031. Further details regarding the site selection process, the evidence base and infrastructure requirements for new development north of Stafford together with the national planning policy context, is set out in Background Statement (K1) Topic Paper E . The scale of new development through Policy Stafford 2 is considered to be sustainable and appropriate to achieve the Development Strategy requirements set out through the Spatial Principles, as detailed in Examination Statement 3 and Background Statement (K1) Topic Papers A to D . Based on extensive local evidence the SDL at north of Stafford is soundly based in terms of NPPF (F1) para. 17 by delivering new development in sustainable locations at Stafford through a clear vision and strategy for the Borough to encourage growth.
- 3.3. Justification for Policy Stafford 2 and the appropriateness of new development at this location 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). Furthermore, following representations to the Plan (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative locations at Stafford through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13). 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).
- 3.4. Policy Stafford 2 is considered to be sustainable, deliverable and viable as demonstrated through an extensive evidence base developed through the plan-making process from 2009 to 2012, as detailed in Background Statement (K1) Topic Paper E. Further information regarding key aspects of the evidence base to support Policy Stafford 2 is set out in response to the main policy elements below. Throughout the plan-making stages the SDL north of Stafford has been 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).

**The overall amount, mix, location, deliverability, viability and timing of new housing development (3,100 houses), including affordable housing;**

- 3.5. The amount and location of new housing development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for north of Stafford through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new housing development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 3.6. For Policy Stafford 2 – North of Stafford a number of representations raised concerns including landscape impacts, flooding and surface water run-off, loss of open countryside, pressure on existing services and facilities such as health, the viability of the development, ecological and historic environment implications as

well as the scale of new transport infrastructure needed, and requirements for new schools. Other site promoters challenged the delivery of the new developments with a reduction in scale called for and other locations identified. The site promoter questioned the need for master planning and a new perimeter road whilst seeking a larger development area to ensure sufficient housing is delivered, taking account of the High Speed 2 route. Further information as a response to the representations received is set out below through the detailed matters for Policy Stafford 2, in the context of Background Statement (K1) Topic Paper E.

- 3.7. An outline planning permission and section 106 agreement was granted in August 2012, with full consent in August 2013, regarding 409 new houses on part of the Policy Stafford 2 SDL, relating to site of the Stafford Borough Local Plan 2001 Housing Proposal HP13 (F14) north of Parkside. This scheme to deliver 409 new houses has now commenced. In terms of the timing of new housing development the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) provides the phasing approach for Policy Stafford 2 in the context of infrastructure requirements. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) confirms that Policy Stafford 2 is deliverable and viable. The situation with regard to the Eastern SDL helps to demonstrate the strength of the market being viable and deliverable at Stafford town, since planning consents and Section 106 agreements for 634 new homes have been granted in August 2013, on the majority of that SDL, covered by Policy Stafford 4. It is important to note that the delivery of housing through Policy Stafford 4 provides a clear indication about the potential for the northern and western SDLs at Stafford.
- 3.8. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) is based upon delivery of the housing development plus strategic infrastructure requirements, alongside affordable housing, and assumes coverage of 50% gross site area with a net development density of 40 dwellings per hectare, with a mix of 2, 3 and 4 bedroomed houses established through the Stafford Borough Council Infrastructure Study Inputs report (D56). The total hectareage of the Northern SDL for housing provision is 130.35 hectares which will deliver 2,607 new houses using this approach. However the final design of the project through the outline planning application process will provide more definitive figures, which are likely to lead to a higher delivery of new housing. For example the land east of Stafford has planning consent for 634 new homes on 23.67 hectares, whilst based on the calculation above only 473 new homes would be achievable. Therefore the Council considers that a greater quantity of housing may well be delivered than might be assumed using the approach above.
- 3.9. Therefore the Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new housing development, including affordable housing, for Policy Stafford 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The overall amount, nature, location, deliverability, viability and timing of new employment development (36ha);**

- 3.10. The amount and location of new employment development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for the SDL of Policy Stafford 2 through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new employment development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4). Furthermore evidence within the Employment Land Review 2013 (D14) considered the means of delivering economic growth at Stafford. Background Statement (K1) Topic Paper A considers this, in relation to the development of Spatial Principle 5.

- 3.11. In terms of the timing of new employment development, the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) provides the general phasing approach for Policy Stafford 2 in the context of infrastructure requirements. Furthermore the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) confirms that new employment development as part of Policy Stafford is deliverable and viable alongside the implementation of strategic infrastructure requirements. As set out in Background Statement (K1) Topic Paper E this has been demonstrated by the market bringing forward a planning application, which was subsequently approved in October 2012 for 28.19 hectares of new employment land north of Stafford and is currently being developed.
- 3.12. Therefore the Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new employment development for Policy Stafford 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Northern Access Improvement Scheme), drainage and flood management works, utility and telecommunication services, education and health facilities, and mitigation of the impact of development on Cannock Chase SAC (including SANGS);**

- 3.13. The scale, nature, delivery, funding and timing of proposed infrastructure requirements for Policy Stafford 2 is detailed in Table 8.1 of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) as well as Appendix D of the Plan (A1). The Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Whole Plan Viability Report (D52) confirm that the new development north of Stafford is viable and able to deliver the proposed infrastructure requirements. This evidence base was prepared and completed following significant engagement with key statutory agencies and other stakeholders to ensure that the proposed infrastructure requirements were appropriate and effective for the SDL north of Stafford. With regards to highway capacity and public transport improvements, Staffordshire County Council produced the Plan for Stafford Borough: Transport Evidence to Support a Northern Direction of Growth (D25) in 2013 which set out specific proposals and outputs for Policy Stafford 2, based on a detailed transport model, to demonstrate how the scale of new development can be achieved as part of the existing and future transport network for Stafford town. The developer representatives for land north of Stafford have been engaged in preparing the transport proposals and output solutions detailed in D25. Evidence concerning the impact of development on the Cannock Chase Special Area of Conservation (SAC) is detailed in Background Statement (K1) Topic Paper F, whilst the mitigation measures for Policy Stafford 2 are included in Policy N6 of the Plan (A1), assessed through the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Footprint Ecology Cannock Chase Visitor Impacts Mitigation Report (D32).
- 3.14. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL north of Stafford, recorded within the Plan for Stafford Borough Land North of Stafford SDL Meeting Notes 2012 – 2013 (E94), to develop the evidence base and ensure the proposed infrastructure requirements will be delivered through Policy Stafford 2. Subsequently the developers held public exhibition events in December 2012 and January 2013 presenting material, as detailed in the Northern SDL – Illustrative Framework Plan (E91), the Concept Plan (E92) and the Public Consultation Document (E93).

- 3.15. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) confirms that Policy Stafford 2 is deliverable and viable for new development to implement the strategic infrastructure requirements, further supported through the Whole Plan Viability Report (D52). Therefore the Borough Council considers that scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements for Policy Stafford 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The design of the proposed development, including the "neighbourhood" approach, provision of retail, education, health and other facilities, integration with the rest of Stafford, and provision of on-site renewable/low carbon energy solutions;**

- 3.16. The design of the proposed development, including the 'neighbourhood' approach, provision of retail, education, health and other facilities with integration to the rest of Stafford and provision of on-site renewable / low carbon energy solutions, has been considered through the process of public engagement and consultation since 2011 as being appropriate for north of Stafford through the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan (A1). Both of these documents contained a policy and map for the SDL north of Stafford, together with a concept diagram included in the Plan (A1). The development of Policy Stafford 2 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 3.17. In terms of the provision for education, health and other facilities this has been established in the context of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) with detailed engagement with education, health and other key social infrastructure providers. The Plan for Stafford Borough: Spatial Plan for Education (D53) specifies the education requirements for the SDL north of Stafford as part of the proposed development. The provision of on-site renewable / low carbon energy solutions was assessed to be viable and deliverable for the scale of development proposed in the Policy Stafford 2 SDL in the Staffordshire County Wide Renewable / Low Carbon Energy Study (D45) and the Staffordshire Development Specific Sustainable Energy Strategies Worked Examples (E65). The requirement for new retail provision at Stafford town is set out in the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and revised by the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15), with capacity for new small scale retail development at neighbourhood centres of up to 500 square metres for a convenience store.
- 3.18. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL north of Stafford, recorded within the Plan for Stafford Borough Land North of Stafford SDL Meeting Notes 2012 – 2013 (E94) to develop the design of the proposed development including the **'neighbourhood' approach and the SDL's integration with the rest of Stafford**. Subsequently the developers held public exhibition events in December 2012 and January 2013 presenting material, as detailed in the Northern SDL – Illustrative Framework Plan (E91), the Concept Plan (E92) and the Public Consultation Document (E93), to demonstrate the approach.
- 3.19. An outline planning permission and section 106 agreement was granted in August 2012, with full consent in August 2013, regarding 409 new houses on part of the Policy Stafford 2 SDL, relating to site of the Stafford Borough Local Plan 2001 Housing Proposal HP13 (F14) north of Parkside. This scheme to deliver 409 new houses has now commenced. As part of the planning consent transport proposals were included to ensure integration of the new development with the rest of Stafford particularly through increasing the permeability across Beaconside road to the existing Parkside estate. In terms of the Policy Stafford 2 proposals this matter has been further considered through the report produced by Staffordshire County Council: Plan for Stafford Borough - Transport Evidence to Support a Northern Direction of Growth (D25) in 2013.

- 3.20. In the context of the evidence base and public engagement, the Borough Council considers that the design of the proposed development through Policy Stafford 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**Impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services;**

- 3.21. The impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services has been considered from the start of the plan-making process, as set out in Background Statement (K1) Topic Paper E. Areas of development constraint for the northern area of Stafford town were considered prior to the **location options being identified through the 'Delivering the Plan for Stafford Borough: Issues and Options' document (G6)**. The SDL for north of Stafford was subsequently considered through the process of public engagement and consultation within the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan (A1). Both of these documents contained a policy and map for the SDL north of Stafford, together with a concept diagram included in the Plan (A1) identifying the broad location for proposed development within the environmental context. The development of Policy Stafford 2 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 3.22. In terms of the impact of proposed development on the environment a number of evidence based reports have informed Policy Stafford 2 and the scale of provision. Landscape and the historic environment for land north of Stafford are set out in Historic Environment Character Assessment for Stafford (E80) through a series of zones. The zones identified as having the least impact upon the historic environment mostly lie to the north of the town, with the exception of SHECZ 17 which scores highly for the survival of historic environment assets associated with the small settlement of Marston. The Stafford Borough Local Development Framework Ecological Desk Study 2008 (D37) sets out that there are a number of protected species on land north of Stafford which should be mitigated for ecological implications as part of the proposed development north of Stafford whilst the Green Infrastructure Strategy for Stafford – The Strategic Plan (D34) sets out a Stafford Town Local Area Framework for land north of Stafford in the context of the surrounding countryside. In addition the Strategic Flood Risk Assessment Level 1 Volume 1 Final (D46) together with the associated Strategic Flood Risk Plans (D47 & D49) provides the flooding management issues for Policy Stafford 2.
- 3.23. The issues set out in the paragraph above were all addressed through the plan-making process by a series of meetings held with developers and promoters of the SDL north of Stafford, recorded within the Plan for Stafford Borough Land North of Stafford SDL Meeting Notes 2012 – 2013 (E94). In terms of impact of proposed development on the environment both Natural England and the Environment Agency have been engaged in the process to address matters including green infrastructure, nature conservation, implications on the Cannock Chase Special Area of Conservation and flood management initiatives. The evidence base prepared by Stafford Borough Council and other reports produced by the developers for land north of Stafford have assessed the impact of the proposed development. Subsequently the developers held public exhibition events in December 2012 and January 2013 presenting material, as detailed in the Northern SDL – Illustrative Framework Plan (E91), the Concept Plan (E92) and the Public Consultation Document (E93) to demonstrate the approach. Therefore the Council considers that the scale of development north of Stafford is appropriate and can be delivered within the existing landscape whilst providing environmental mitigation measures for ecology and flooding issues. However clearly there will be landscape implications for such a scale of new development

north of Stafford, which should be mitigated through new green infrastructure provision.

- 3.24. The Environment Agency called for Policy Stafford 2 to be amended to ensure sufficient flooding and drainage measures would be delivered at land north of Stafford. The Borough Council considers that the Plan for Stafford Borough – Publication (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M39. In the context of the evidence base and public engagement, as set out above, the Borough Council considers that the proposed development through Policy Stafford 2 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based in relation to the impact on the environment.

**Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?**

- 3.25. As set out above and within Background Statement (K1) Topic Paper E , Stafford Borough Council considers that the infrastructure and other evidence (including the transport assessment) has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development. In particular the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) provides the evidence base for Appendix D within the Plan (A1) regarding infrastructure requirements and the impact of the proposed development. The assessment of proposed development to deliver the infrastructure requirements is detailed in the Viability and Delivery of Northern and Western SDLs, Stafford (D51) whilst the Whole Plan Viability Report (D52) establishes the viability of SDLs against the cumulative effect of all policies within the Plan (A1) as required the NPPF (F1) para 173. Therefore the Borough Council considers that the infrastructure and other evidence has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development.

**Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and the associated infrastructure?**

- 3.26. As part of the Viability and Delivery of Northern and Western SDLs, Stafford (D51), the Whole Plan Viability Report (D52) and the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57), delivery of the scale of development proposed on the areas identified through the Plan (A1) were considered and assessed. Based on a gross to net developable area of 50% and the current market for the Stafford SDLs being capable of providing 40 dwellings per hectare, the evidence base concludes not only that Policy Stafford 2 is viable but also that it is deliverable in terms of achieving the scale of proposed development and associated infrastructure.
- 3.27. Taking into account the NPPF (F1), the Borough Council considers that Policy Stafford 2 in the Plan (A1) is fully justified and sustainable. Furthermore in light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Policy Stafford 2 is appropriate, effective and soundly based in terms of delivering sustainable and viable new development for Stafford Town over the Plan period.

#### **4. POLICY STAFFORD 3 – WEST OF STAFFORD**

**Is the Strategic Development Location at West of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:**

- 4.1. The Borough Council considers that Policy Stafford 3 – West of Stafford is soundly based, informed by a robust, credible and proportionate evidence base; by 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 by assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore Policy Stafford 3 is considered to be in conformity with national policy through the NPPF (F1), by delivering new development for Stafford town which is sustainable and achieves the key requirements as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 4.2. For Policy Stafford 3 – West of Stafford representations raised concerns about the impact on Stafford Castle, loss of green infrastructure and wildlife sites, implications for the Cannock Chase Special Area of Conservation (SAC) to be addressed and impact on the existing road network. Furthermore it is argued there is a lack of evidence to demonstrate delivery of the Western Access Route section and access points from Newport Road to serve the new development. Alternative promoters of land challenge deliverability and the scale of development. The site promoters challenge the need for new transport infrastructure and master planning, addressing flooding issues, removing employment requirements due to the locality of Stafford town centre and provision for the Cannock Chase SAC. Further information as a response to the representations received is set out below through the detailed matters for Policy Stafford 3, in the context of Background Statement (K1) Topic Paper E.
- 4.3. Policy Stafford 3 is considered to be appropriate by supporting the delivery of the Spatial Vision and Key Objectives of the Plan (A1) through the delivery of new development at Stafford town over the Plan period to 2031. Further details regarding the site selection process, the evidence base and infrastructure requirements for new development west of Stafford together with the national planning policy context, is set out in Background Statement (K1) Topic Paper E . The scale of new development through Policy Stafford 3 is considered to be sustainable and appropriate to achieve the Development Strategy requirements set out through the Spatial Principles, as detailed in Examination Statement 3 and Background Statement (K1) Topic Papers A to D . Based on extensive local evidence the SDL at west of Stafford is soundly based in terms of NPPF (F1) para 17 by delivering new development in sustainable locations at Stafford through a clear vision and strategy for the Borough to encourage growth.
- 4.4. Justification for Policy Stafford 3 and the appropriateness of new development at this location 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). In addition, following representations to the Plan for Stafford Borough – Publication (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative locations at Stafford through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13). 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).



- 4.5. Policy Stafford 3 is considered to be sustainable, deliverable and viable as demonstrated through an extensive evidence base developed through the plan-making process from 2009 to 2012, as detailed in Background Statement (K1) Topic Paper E. Further information regarding key aspects of the evidence base to support Policy Stafford 3 is set out in response to the main policy elements below. Throughout the plan-making stages the SDL west of Stafford has been 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).

**The overall amount, mix, location, deliverability, viability and timing of new housing development (2,200 houses), including affordable housing;**

- 4.6. The appropriateness of the amount and location of new housing development has been considered through the process of public engagement and consultation since 2009, as described above, specifically through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new housing development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 4.7. In terms of the timing of new housing development the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) provides the phasing approach for Policy Stafford 3 in the context of infrastructure requirements. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) confirms that Policy Stafford 3 is deliverable and viable for housing development. The situation with regard to the Eastern SDL helps to demonstrate the strength of the market being viable and deliverable at Stafford town, since, planning consents and Section 106 agreements for 634 new homes were granted in August 2013, on the majority of the SDL – Housing for Policy Stafford 4. It is important to note that the delivery of housing through Policy Stafford 4 provides a clear indication about the potential for the northern and western SDLs at Stafford.
- 4.8. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) is based upon delivery of the housing development plus strategic infrastructure requirements, alongside affordable housing, and assumes coverage of 50% gross site area with a net development density of 40 dwellings per hectare, with a mix of 2, 3 and 4 bedroomed houses tested by this report, and established through the Stafford Borough Council Infrastructure Study Inputs report (D56) and the Stafford Borough Strategic Housing Market Assessment (D5). The total hectareage of the Western SDL for housing provision is 95.13 hectares up to 108.85 hectares if mixed use is added, which will deliver 1,902 to 2,177 new houses using this approach. Nevertheless the developer consortium for land west of Stafford have consistently supported the delivery of 2,100 new houses for the Western SDL, demonstrated through the public engagement event in July 2013. The final design of the project through the outline planning application process will provide more definitive figures, which are likely to lead to a higher delivery of new housing. For example the land east of Stafford has planning consent for 634 new homes on 23.67 hectares, whilst based on the calculation above only 473 new homes would be achievable. Therefore the Council considers that a greater quantity of housing will be delivered than might be assumed using the approach above.
- 4.9. Therefore the Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new housing development, including affordable housing, for Policy Stafford 3 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health and other facilities, and provision of small-scale employment areas (5ha) and on-site renewable/low carbon energy solutions;**

- 4.10. The design of the proposed development, including the ‘neighbourhood’ approach, provision of retail, education, health and other facilities, and provision of small-scale employment areas (5 hectares) and on-site renewable / low carbon energy solutions, has been considered through the process of public engagement and consultation since 2011 as being appropriate for west of Stafford through the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan (A1). Both of these documents contained a policy and map for the SDL west of Stafford, together with a concept diagram included in the Plan (A1). The development of Policy Stafford 3 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 4.11. In terms of the provision for education, health and other facilities this has been established in the context of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) with detailed engagement with education, health and other key social infrastructure providers. The Plan for Stafford Borough: Spatial Plan for Education (D53) specifies the education requirements for the SDL west of Stafford as part of the proposed development. The provision of on-site renewable / low carbon energy solutions is assessed as being viable and deliverable for the Policy Stafford 3 SDL scale of development in the Staffordshire County Wide Renewable / Low Carbon Energy Study (D45) and the Staffordshire Development Specific Sustainable Energy Strategies Worked Examples (E65). The requirement for new retail provision at Stafford town is set out in the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and revised by the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) with capacity for new small scale retail at neighbourhood centres of up to 500 square metres for a convenience store. Evidence for the need to deliver new small-scale employment development for the land west of Stafford **to contribute to the Borough’s provision** is detailed in the Employment Land Review 2013 (D14) to deliver economic growth at Stafford, through Spatial Principle 5 and detailed in Topic Paper A of the Background Paper (K1).
- 4.12. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL west of Stafford, recorded within the Plan for Stafford Borough Land West of Stafford SDL Meeting Notes 2011 – 2013 (E95), to develop the design of the proposed development including the ‘neighbourhood’ approach, new infrastructure requirements and the SDL’s integration with the rest of Stafford. Subsequently the developers held public exhibition events in July 2013 presenting material, as detailed in the Burleyfields Development Concept Plan (E88), the Burleyfields Development Character Areas – Plan (E89) and the Burleyfields Development Existing Site Sections (E90) to demonstrate the approach.
- 4.13. In the context of the evidence base and public engagement the Borough Council considers that the design of the proposed development through Policy Stafford 3 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements, (including Western Access Improvement Scheme) drainage works, utility and telecommunication services, education facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), open space and green infrastructure;**

- 4.14. The scale, nature, delivery, funding and timing of proposed infrastructure requirements for Policy Stafford 3 is detailed in Table 8.2 of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) as well as Appendix D of the Plan (A1). Furthermore the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Whole Plan Viability Report (D52) confirm that the new development west of Stafford is viable and able to deliver the proposed infrastructure requirements. This evidence base was prepared and completed following significant engagement with key statutory agencies and other stakeholders to ensure that the proposed infrastructure requirements were appropriate and effective for the SDL west of Stafford. With regard to highway capacity and public transport improvements Staffordshire County Council produced the Plan for Stafford Borough: Transport Evidence to Support a Western Direction of Growth (D26) in 2012 which sets out specific proposals and outputs for Policy Stafford 3, based on a detailed transport model, to demonstrate how the scale of new development can be achieved as part of the existing and future transport network for Stafford town. The developer representatives for land west of Stafford have been engaged in preparing the transport proposals and output solutions detailed in D25. Evidence concerning the impact of development on the Cannock Chase Special Area of Conservation (SAC) is detailed in Background Statement (K1) Topic Paper F . The mitigation measures for Policy Stafford 3 are included in Policy N6 of the Plan (A1), and have been assessed through the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) and the Footprint Ecology Cannock Chase Visitor Impacts Mitigation Report (D32). The Plan for Stafford Borough: Spatial Plan for Education (D53) specifies the education requirements for the SDL west of Stafford as part of the proposed development.
- 4.15. The Viability and Delivery of Northern and Western SDLs, Stafford (D51) confirms that Policy Stafford 3 is deliverable and viable for new development to implement the strategic infrastructure requirements, further supported through the Whole Plan Viability Report (D52). Therefore the Borough Council considers that scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements for Policy Stafford 3 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, including the setting of Stafford Castle and St Mary's Church, nature conservation, flooding, and existing services;**

- 4.16. The impact of the proposed development on the environment, including the landscape, ecology, historic environment and surrounding countryside, and existing services, has been considered from the start of the plan-making process, as set out in Background Statement (K1) Topic Paper E . Areas of development constraint for the western area of Stafford town were considered prior to the location options being identified through the '**Delivering the Plan for Stafford Borough: Issues and Options**' document (G6). The SDL for west of Stafford was subsequently considered through the process of public engagement and consultation within the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan (A1). Both of these documents contained a policy and map for the SDL west of Stafford, together with a concept diagram included in the Plan (A1) identifying the broad location for proposed development within the environmental context. The development of Policy Stafford 3 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 4.17. In terms of the impact of proposed development on the environment a number of evidence based reports have informed Policy Stafford 3 and the scale of provision. The Stafford Borough Local Development Framework Ecological Desk Study 2008 (D37) sets out that there are a number of protected species on land west of Stafford which should be mitigated for ecological implications as part of the proposed development, whilst the Green Infrastructure Strategy for Stafford

- The Strategic Plan (D34) sets out key actions in terms of green corridors for land west of Stafford in the context of the surrounding countryside. In addition the Strategic Flood Risk Assessment Level 1 Volume 1 Final (D46) together with the associated Strategic Flood Risk Plans (D47 & D49) establishes the flooding management issues for Policy Stafford 3. As set out below further work has progressed with the Environment Agency on flood issues west of Stafford.

- 4.18. Landscape and the historic environment for land west of Stafford is set out in Historic Environment Character Assessment for Stafford (E80) through a series of zones. The zones identified as having a more significant impact from new development upon the historic environment lie to the west of the town. Clearly this is a key issue to be addressed through any new development taking place in this part of Stafford town, although the Council does not consider that this would prevent such development taking place. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL west of Stafford, recorded within the Plan for Stafford Borough Land West of Stafford SDL Meeting Notes 2011 – 2013 (E95). In terms of impact of proposed development on the historic environment a specific report has been prepared by the developers to assess and provide design measures to reduce the impact on Stafford Castle detailed in Burleyfields Historic Environment Assessment – EDP Report (E86) and a subsequent update (J41). The EDP Report concludes that, in summary, the assessment work demonstrates that in principle the allocation of the site for residential development is sound and appropriate. However, it also concludes that additional assessment will be required, as the process moves forward, to inform the completion of a master plan and thereby confirm that detailed proposals will not have a negative effect upon the setting of the scheduled castle. A further meeting took place with the developers and English Heritage on 1 October 2013 to progress this work leading to a Statement of Common Ground which will be submitted with the Examination Statements.
- 4.19. In terms of other environmental issues both Natural England and the Environment Agency have been engaged in the process to address matters including green infrastructure, nature conservation, implications on the Cannock Chase Special Area of Conservation and flood management initiatives. Details are set out in the Land West of Stafford SDL Meeting Notes 2011 – 2013 (E95) which provide the approach to be adopted through the master planning exercise to ensure the environmental issues are addressed. Subsequently the developers held public exhibition events in July 2013 presenting material, as detailed in the Burleyfields Development Concept Plan (E88), the Burleyfields Development Character Areas – Plan (E89) and the Burleyfields Development Existing Site Sections (E90).
- 4.20. The Environment Agency called for Policy Stafford 3 to be amended to ensure sufficient flooding and drainage measures would be delivered at land west of Stafford along with enhanced watercourses. The Borough Council considers that the Plan (A1) is sound but would benefit from these amendments. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M40 and M41. In the context of the evidence base and public engagement, as set out above, the Borough Council considers that the proposed development through Policy Stafford 3 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based in relation to the impact on the environment.

**Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing and other development in terms of infrastructure requirements and impact of the proposed development?**

- 4.21. As set out above, and within Background Statement (K1) Topic Paper E , Stafford Borough Council considers that the infrastructure and other evidence (including the transport assessment) has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure

requirements and impact of the proposed development. In particular the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) provides the evidence base for Appendix D within the Plan (A1) regarding infrastructure requirements and the impact of the proposed development. The assessment of proposed development to deliver the infrastructure requirements is detailed in the Viability and Delivery of Northern and Western SDLs, Stafford (D51) whilst the Whole Plan Viability Report (D52) establishes the viability of SDLs against the cumulative effect of all policies within the Plan (A1) as required NPPF (F1), para 173. Therefore the Borough Council considers that the infrastructure and other evidence has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development.

**Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and associated infrastructure?**

- 4.22. As part of the Viability and Delivery of Northern and Western SDLs, Stafford (D51), the Whole Plan Viability Report (D52) and the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) delivery of the scale of development proposed on the areas identified through the Plan (A1) were considered and assessed. Based on a gross to net developable area of 50% and the current market for the Stafford SDLs being capable of providing 40 dwellings per hectare, the evidence base concludes not only that Policy Stafford 3 is viable but also that it is deliverable in terms of achieving the scale of proposed development and associated infrastructure.
- 4.23. However, taking into account the details regarding the evidence base and extensive public engagement, as set out above, and the requirements of the NPPF (F1), the Borough Council considers that Policy Stafford 3 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**5. POLICY STAFFORD 4 – EAST OF STAFFORD**

**Is the Strategic Development Location at East of Stafford appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based, including:**

- 5.1. The Borough Council considers that Policy Stafford 4 – East of Stafford is soundly based, being informed by a robust, credible and proportionate evidence base; by 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 by assessments through the Sustainability Appraisal process recorded in the Revised Sustainability Appraisal Report (A10) and its associated Technical Appendices (A11). Furthermore Policy Stafford 4 is considered to be in conformity with national policy through the NPPF (F1), by delivering new development for Stafford town which is sustainable and achieves the key requirements as detailed in the Stafford Borough Soundness Self-Assessment Checklist (B4).
- 5.2. For Policy Stafford 4 – East of Stafford key issues of concern raised by representations were the loss of open countryside, flooding issues, green infrastructure provision to address Cannock Chase SAC mitigation and achieving deliverability due to the requirement for the Eastern Distributor Road to address transport pressures. Adjacent sites were suggested by other promoters including deleting sections of the Eastern Distributor Road beyond Baswich Lane. Further information as a response to the representations received is set out below through the detailed matters for Policy Stafford 4, in the context of Background Statement (K1) Topic Paper E

- 5.3. Policy Stafford 4 is considered to be effective by supporting the delivery of the Spatial Vision and Key Objectives of the Plan (A1), through the delivery of new development at Stafford town over the Plan period to 2031. Further details regarding the site selection process, the evidence base and infrastructure requirements for new development east of Stafford together with the national planning policy context, is set out in Background Statement (K1) Topic Paper E . The scale of new development through Policy Stafford 4 is considered to be sustainable and appropriate to achieve the Development Strategy requirements set out through the Spatial Principles, as detailed in Examination Statement 3 and Background Statement (K1) Topic Papers A to D . Based on extensive local evidence the SDL at east of Stafford is soundly based in terms of NPPF (F1) para 17, by delivering new development in sustainable locations at Stafford through a clear vision and strategy for the Borough to encourage growth.
- 5.4. Justification for Policy Stafford 4 and the appropriateness of new development at this location 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). Furthermore following representations to the Plan (A1) a further stage of public engagement took place in April and May 2013 to consider new alternative locations at Stafford through the Revised Sustainability Appraisal Report – Addendum (A12) and the Planning Strategy Statement (A13). 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).
- 5.5. Policy Stafford 4 is considered to be sustainable, deliverable and viable as demonstrated through an extensive evidence base developed through the plan-making process from 2009 to 2012, as detailed in Background Statement (K1) Topic Paper E. Further information regarding key aspects of the evidence base to support Policy Stafford 4 is set out in response to the main policy elements below. Throughout the plan-making stages the SDL east of Stafford has been 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).
- 5.6. Taking into account the NPPF (F1), the Borough Council considers that Policy Stafford 4 in the Plan (A1) is fully justified and sustainable. Furthermore in light of the evidence base, representations received and the plan-making process described above the Borough Council considers that Policy Stafford 4 is appropriate, effective and soundly based in terms of delivering sustainable and viable new development for Stafford Town over the Plan period. Further information as a response to the representations received is set out below through the detailed matters for Policy Stafford 4, in the context of Background Statement (K1) Topic Paper E .
- 5.7. To provide the most up-to-date context for Policy Stafford 4 it should be noted that planning consent was granted for 21.9 hectares of new employment development in March 2013 for the SDL - Employment area identified within the Plan (A1). Furthermore in August 2013 planning permission was granted and a Section 106 agreement signed to deliver a total of 634 new homes for the SDL – Housing as part of Policy Stafford 4. Therefore in terms of meeting the policy requirements for Policy Stafford 4 these have currently been met by the planning consents and signed Section 106 agreement. One further area of land totalling 1.35 hectares, part of Policy Stafford 4 next to the Weston Road roundabout, identified for new housing development which may deliver 20-30 new homes, is yet to be delivered as part of the proposal.

**The overall amount, mix, location, deliverability, viability and timing of new housing development (600 houses), including affordable housing;**

- 5.8. The amount and location of new housing development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for east of Stafford through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new housing development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 5.9. Planning consents and Section 106 agreements for 634 new homes have been granted in August 2013, on the majority of the SDL – Housing for Policy Stafford 4 thus demonstrating the amount, mix, location, deliverability, viability and timing of new housing development, including affordable housing at this location. It is important to note that the delivery of housing through Policy Stafford 4 provides a clear indication about the potential for the northern and western SDLs at Stafford.
- 5.10. Therefore the Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new housing development, including affordable housing, for Policy Stafford 4 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The overall amount, nature, location, deliverability, viability and timing of new employment development (20ha);**

- 5.11. The amount and location of new employment development has been considered through the process of public engagement and consultation since 2009, as described above, as being appropriate for the SDL of Policy Stafford 4 through Delivering the Plan for Stafford Borough: Issues and Options (G6) and the Plan for Stafford Borough – Draft Publication (G2). The amount and location of new employment development has also been assessed through the Stafford Borough Infrastructure Strategy: Stage 1 Final Report (D58) together with the Sustainability Appraisal Commentary Volume 2 (H7) and the Sustainability Appraisal Report (H4).
- 5.12. In terms of the timing of new employment development the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) provides the general phasing approach for Policy Stafford 4 in the context of infrastructure requirements. Furthermore the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) confirms that new employment development as part of Policy Stafford 4 is deliverable and viable alongside the implementation of strategic infrastructure requirements. As set out in Background Statement (K1) Topic Paper E, this has been demonstrated by the market bringing forward a planning application, which was subsequently approved in March 2013 for 21.9 hectares of new employment land east of Stafford, and is currently being developed through transport improvements at the junction of Weston Road and Blackheath Lane.
- 5.13. Therefore the Borough Council considers that the overall amount, mix, location, deliverability, viability and timing of new employment development for Policy Stafford 4 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The design of the proposed development, including the “neighbourhood” approach, provision of retail, education, health, cemetery, other facilities and on-site renewable/low carbon energy solutions;**

- 5.14. The design of the proposed development, including the 'neighbourhood' approach, provision of retail, education, health, cemetery and other facilities, and provision of on-site renewable / low carbon energy solutions has been considered through the process of public engagement and consultation since 2011 as being appropriate for east of Stafford through the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan for Stafford Borough – Publication (A1). Both of these documents contained a policy and map for the SDL east of Stafford, together with a concept diagram included in the Plan (A1). The development of Policy Stafford 4 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).
- 5.15. In terms of the provision for education, health and other facilities this has been established in the context of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery (D57) with detailed engagement with education, health and other key social infrastructure providers. The Plan for Stafford Borough: Spatial Plan for Education (D53) specifies the education requirements for the SDL east of Stafford as part of the proposed development. The provision of on-site renewable / low carbon energy solutions has been assessed as being viable and deliverable for the Policy Stafford 4 SDL scale of development by the Staffordshire County Wide Renewable / Low Carbon Energy Study (D45). The requirement for new retail provision at Stafford town is set out in the Stafford and Stone Town Centre Capacity Assessment – Final Report (D16) and revised by the Stafford and Stone Town Centre Retail Capacity – Update Final Report (D15) with capacity for new small scale retail at neighbourhood centres, although no such facilities are required as part of Policy Stafford 4.
- 5.16. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL east of Stafford, recorded within the Plan for Stafford Borough Land East of Stafford SDL Meeting Notes 2012 – 2013 (E96) to develop the design of the proposed development including the 'neighbourhood' approach for public open space, social and physical infrastructure. Subsequently the developers held public exhibition events in February 2013 prior to submitting planning applications, which includes provision for a cemetery extension for Stafford Crematorium.
- 5.17. As previously stated planning consent for 634 new homes, was granted in August 2013, on the majority of the SDL – Housing for Policy Stafford 4 and the Section 106 agreement which meets the policy requirements set out in the Plan for Stafford Borough – Publication (A1). In the context of the planning consent, the evidence base and public engagement, the Borough Council considers that the design of the proposed development through Policy Stafford 4 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**The scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements, including highway capacity and public transport improvements (including Eastern Access Improvement Scheme, Eastern Distributor Road and other road improvements), drainage works, utility services, education and health facilities, mitigation of the impact of development on Cannock Chase SAC (including SANGS), and green infrastructure;**

- 5.18. Planning consents and Section 106 agreements for 634 new homes have been granted in August 2013, on the majority of the SDL – Housing for Policy Stafford 4 which meets the scale, nature, delivery, funding and timing of proposed infrastructure requirements for Policy Stafford 4 as detailed in Table 8.3 of the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) as well as Appendix D of the Plan (A1). Natural England has been actively engaged with the planning application process to deliver mitigation measures of the impact of development on the Cannock Chase SAC. The latest position regarding planning consents confirms that the new development east of Stafford is viable and able to deliver the proposed infrastructure requirements set out in



the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57), with the feasibility of new development in the context of the Whole Plan Viability Report (D52). The evidence base supporting the Plan (A1) was prepared and completed following significant engagement with key statutory agencies and other stakeholders to ensure that the proposed infrastructure requirements were appropriate and effective for the SDL east of Stafford.

- 5.19. With regards to highway capacity and public transport improvements, the implications for Policy Stafford 4 have been addressed through the planning consent and Section 106 agreement as described above. Nevertheless an outstanding issue remains in terms of the Staffordshire County Council protected route east of Stafford, with a number of representations calling for sections of the proposed route to be removed from the Plan (A1) due to lack of evidence to demonstrate viability and deliverability. In May 2013 Staffordshire County Council published a report by ATKINS entitled 'Stafford Eastern Distributor Road: Indicative Economic Assessment' (D24). As a result of this new evidence the Borough Council acknowledges that the extent of the Eastern Distributor Road should be amended, with the section from the junction with Baswich Road and Cornwall Drive through to Milford Road being removed from the Plan for Stafford Borough – Stafford Area Inset (A3). The Borough Council considers that the Plan for Stafford Borough – Publication (A1) would benefit from this amendment concerning the Stafford Eastern Distributor Road, which the Council sets out in the Schedule of Further Additional Modifications (A27), listed at FAM19.
- 5.20. A number of representations called for Policy Stafford 4 to be amended to provide the most up-to-date context regarding the Eastern Access Improvement Scheme associated directly with the proposed development for housing and employment. The Borough Council considers that the Plan (A1) is sound but would benefit from these amendments. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the changes, listed as M44 and M45.
- 5.21. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL east of Stafford, recorded within the Plan for Stafford Borough Land East of Stafford SDL Meeting Notes 2012 – 2013 (E96) to develop the evidence base and ensure the proposed infrastructure requirements will be delivered through Policy Stafford 4. The developers held public exhibition events in February 2013 prior to submitting planning applications, which subsequently lead to planning consent being granted for 634 new homes through a Section 106 Agreement in August 2013. Therefore the Borough Council considers that scale, nature, delivery, funding, viability and timing of proposed infrastructure requirements for Policy Stafford 4 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.

**Impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, nature conservation and existing services;**

- 5.22. The impact of the proposed development on the environment, including the landscape and surrounding countryside, historic environment and heritage assets, nature conservation and existing services has been considered from the start of the plan-making process, as set out in Background Paper (K1) Topic Paper E . Areas of development constraint for the eastern area of Stafford town were considered prior to the location options being identified through the 'Delivering the Plan for Stafford Borough: Issues and Options' document (G6). The SDL for east of Stafford was subsequently considered through the process of public engagement and consultation within the Plan for Stafford Borough – Draft Publication (G2) and subsequently the Plan (A1). Both of these documents contained a policy and map for the SDL east of Stafford, together with a concept diagram included in the Plan (A1) identifying the broad location for proposed development within the environmental context. The development of Policy

Stafford 4 has also been assessed through the Sustainability Appraisal Report (H4) and recorded in the Revised Sustainability Appraisal Report (A10).

- 5.23. In terms of the impact of proposed development on the environment a number of evidence based reports have informed Policy Stafford 4 and the scale of provision. The Stafford Borough Local Development Framework Ecological Desk Study 2008 (D37) sets out that there are two protected species on land east of Stafford which should be mitigated for ecological implications as part of the proposed development east of Stafford whilst the Green Infrastructure Strategy for Stafford – The Strategic Plan (D34) sets out key actions in terms of the Penk & Sow Natural Parklands for land east of Stafford in the context of the surrounding countryside. In addition the Strategic Flood Risk Assessment Level 1 Volume 1 Final (D46) together with the associated Strategic Flood Risk Plans (D47 & D49) provides the flooding management issues for Policy Stafford 4. Through the planning consent and Section 106 agreement for delivery of housing land east of Stafford the ecological and flooding implications have been addressed whilst new green infrastructure will be provided on implementation to meet the necessary requirements for new development at this location.
- 5.24. Landscape and the historic environment for land east of Stafford is set out in Historic Environment Character Assessment for Stafford (E80), which records that land east of Stafford is likely to have significant impact on the historic environment. Through the plan-making process a series of meetings have been held with developers and promoters of the SDL east of Stafford, recorded within the Plan for Stafford Borough Land East of Stafford SDL Meeting Notes 2011 – 2013 (E96). In terms of impact of proposed development on the historic environment the planning consent has been granted for housing development which includes areas of public open space to mitigate for the most sensitive parts of the SDL – **Housing around St Thomas’ Priory, following engagement with English Heritage**. In terms of other environmental issues both Natural England and the Environment Agency have been engaged in the process to address matters including green infrastructure, nature conservation, and implications on the Cannock Chase Special Area of Conservation.
- 5.25. The Environment Agency called for Policy Stafford 4 to be amended to ensure sufficient flooding and drainage measures would be delivered at land east of Stafford. The Borough Council considers that the Plan (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M43. Severn Trent Water called for Policy Stafford 4 to be amended to provide the most up-to-date position regarding potable water resources. The Borough Council considers that the Plan (A1) is sound but would benefit from this amendment. Therefore the Schedule of Additional (Minor) Modifications (A26) identifies the change, listed as M46. In the context of the evidence base and public engagement, as set out above, the Borough Council considers that the proposed development through Policy Stafford 4 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based in relation to the impact on the environment.

**Does the infrastructure and other evidence (including transport assessment) properly assess the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development?**

- 5.26. As set out above and within Background Statement (K1) Topic Paper E , Stafford Borough Council considers that the infrastructure and other evidence (including the transport assessment) has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development. In particular the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) provides the evidence base for Appendix D within the Plan for Stafford Borough – Publication (A1) regarding infrastructure requirements and the impact of the proposed development. The assessment of proposed development to deliver the

infrastructure requirements is detailed in the Whole Plan Viability Report (D52) which establishes the viability of SDLs against the cumulative effect of all policies within the Plan (A1) as required by NPPF (F1), para 173. Therefore the Borough Council considers that the infrastructure and other evidence has properly assessed the likely level of proposed housing, employment and other development in terms of infrastructure requirements and impact of the proposed development.

**Is the extent of the proposed allocation sufficient to deliver the scale of proposed development and associated infrastructure; or should other additional/alternative sites be allocated to ensure the delivery of the proposed development?**

- 5.27. As part of the Viability and Delivery of Northern and Western SDLs, Stafford (D51), the Whole Plan Viability Report (D52) and the Stafford Borough Infrastructure Strategy: Stage 2 Infrastructure Delivery Plan (D57) delivery of the scale of development proposed on the areas identified through the Plan (A1) were considered and assessed. Based on a gross to net developable area of 50% and the current market for the Stafford SDLs being capable of providing 40 dwellings per hectare the evidence base concludes not only that Policy Stafford 4 is viable but also that it is deliverable in terms of achieving the scale of proposed development and associated infrastructure. This has been subsequently demonstrated by the planning consents for employment development in March 2013 and housing development in August 2013.
- 5.28. Taking into account the details regarding the planning consents, the evidence base and extensive public engagement, as set out above, the Borough Council considers that Policy Stafford 4 is appropriate, effective, sustainable, viable, deliverable, fully justified and soundly based.