

THE PLAN FOR STAFFORD BOROUGH 2 – EXAMINATION

HEARING STATEMENT ON BEHALF OF BADEN HALL ENTERPRISES LTD

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INSPECTOR KEY ISSUE 1 – SCOPE OF PART 2 OF THE LOCAL PLAN

1. The purpose of this statement is to ensure that Policy SP7, which is proposed to be taken through from the adopted PSB 1 in to PSB2, has proper effect.
2. This statement sets out the details of why it is necessary for the Part 2 LP to expand upon the text of SP7 and how this can be achieved.
3. These changes are required to SP7 to enable the policy perform its' intended enabling function and thereby promote positive planning.
4. Issue 1.2 (i) - Is the scope of PSB2 in line with the role for the Plan as set out in paragraph 1.2 [second bullet point] of the submitted Plan?
5. Stafford Borough Council's Response to the Inspector's Introductory Note states;

"Taking the above into consideration, it is not necessary for Part 2 of the Local Plan to make specific allocations for additional sites. Furthermore, adopted Part 1 policies Spatial Principle 3 and Spatial Principle 4 establishes the Sustainable Settlement Hierarchy and the percentage of growth distribution across Stafford, Stone, the Key Service Villages and The Rest of Borough Area. To support this hierarchy, and to ensure the level of growth remain consistent with the proportions of Spatial Principle 4, settlement boundaries have been established for each settlement in the hierarchy, based upon Spatial Principle 7 of the adopted Plan".
6. It is considered that the role of the Part 2 plan on this basis fails to accord with the purpose of an allocations Local Plan. It therefore lacks accordance with the route policy, 'Spatial Principle 7 (SP7) – Supporting the Location of New Development'.
7. The Part 2 Plan is of little utility in terms of providing certainty in terms of positive land use planning.
8. SP7 is properly supportive of the reuse of brownfield land in principle, and specifies that brownfield regeneration opportunities that can be found in sustainable locations within or adjacent to existing settlements. The promoted land at Cold Meece lies adjacent to the settlement of Yarnfield (a Key Service Village) and constitutes a major brownfield mixed-use regeneration opportunity that can provide significant social, environmental and economic benefit to the area if planned cohesively.
9. It has strong links to the market town of Stone, the surrounding settlements of Yarnfield and Eccleshall and significant major employment locations situated in close

proximity at 'Cold Meece Estate', 'Brookside Business Park', Raleigh Hall Business Park' and the HMP Drake Hall.

10. As part of proposals, set out clearly in Plan representations, serviced plots to meet demand for self-build and custom house-building.

11. The Part 1 Plan identifies 'Key Issues and Challenges'. It states;

"Bringing necessary regeneration benefits to the Borough, including those that will contribute to the success of its town and other settlements... strengthening and enhancing, where appropriate, localised services and facilities of the appropriate villages".

12. 'Spatial Principle 7 (SP7) – Supporting The Location of New Development' enshrines positive policy support for the regeneration of identified brownfield land. In order to provide a proper and considered policy basis for the regeneration proposals for Cold Meece, this Part 2 Local Plan should identify the land including that identified within the plan attached at appendix 1 as a major brownfield regeneration opportunity.

13. The wording of SP7 that is transposed into the Part 2 Plan should be built upon to provide the necessary positive planning and certainty.

14. The suggested Policy wording we promote is as follows;

"Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released".

"To accommodate growth, brownfield land and disused buildings will be brought back into beneficial use providing for a wide range of accommodation to meet the expanding needs of the Borough. Uses may include housing, employment, associated transport infrastructure and community infrastructure. Opportunities to secure biodiversity enhancements should also be secured wherever possible.

The following site(s) should be identified as a major brownfield regeneration opportunity.

Cold Meece - Former MoD land.

The comprehensive design of all major brownfield regeneration sites shall be brought forward based on development briefs that provide for high quality development and timing for implementation.

NB. Land already identified on the National Land Use Database should be added to the Council's brownfield register.

15. **The Housing & Planning Bill 2016** introduces the need for local brownfield registers to help to measure progress against the Government's commitment of having planning permission in place for 90% of suitable brownfield land by 2020. These registers will in fact be used as a mechanism for granting permission in principle for development of brownfield sites.
16. It is clear that the Framework remains the prime material consideration in suitability considerations. Further Regulations will include further details of the process including how to assess the suitability of sites 'which will be drawn from the Framework and PPG' (CLG Policy Fact Sheet: Brownfield Register – 2016).
17. The measure of the Government's commitment is that progress against the above target will be measured from 2017 – next year – and 'the need for a policy based sanction is under review'. The Government state that the last verified figures for brownfield land were published in 2011, and the new registers and process will help to ensure that in future information is up to date and publicly known.
18. The site promoted is in fact one of 8 sites within Stafford Borough included in the latest version of the National Land Use Database. It is referenced as Site Ref: 342500040 'Land at Cold Meece' and properly acknowledged as previously developed former defence land now in private ownership.
19. Interestingly, 2 of the 8 sites make up the former Meaford Power Station, being promoted in the Plan for re-development as a site within the Green Belt.
20. The Council's Housing Monitor 'Land for New Homes 2016' (the 2015 Monitor within the Examination Library is P2-E5) draws an interesting fact in Table 3 that the percentage of housing completions has fallen from 80% in 2012/13 to 50% in 2015/16. This can be attributed to pure economics, but can equally be argued that brownfield development needs greater priority in the Borough.
21. There is specifically no direct criticism directed at the apparent underperformance of the PSB1's Strategic Development Locations, particularly those identified at Stafford. What would however be eminently sensible and robust in policy terms would be to have a contingency policy approach whereby as the SDL's encounter delivery issues over the planned growth at the rate necessary there is a mechanism to secure the successful implementation of the plan.
22. Assessment of the Council's Plan Monitoring documents does demonstrate significant 'slippage' to the development trajectory since being first set through the PSB process in 2014, and the nature of the development climate is such that a flexible approach is required to development promotion going forward. PSB2 needs to embrace all opportunities to promote sustainable development rather than restrict it.

23. Therefore, the promoted modification to the Part 2 Local Plan is as follows: -





Suggested Policy Wording

Should monitoring indicate that an on-going, 5 years' deliverable and a subsequent 5 years' supply of developable housing land can no longer be sustained or where it can be demonstrated that housing need cannot be met within the Borough, the Council will in a timely fashion review its housing land provision, and bring on-stream additional sites as required, with priority given to encouraging the reuse of previously developed land and avoiding sites in the Green Belt where possible.

24. Issue 1.2 (iii) - Are there any valid Part 2 issues which PSB2 has failed to address?
25. SP7 (Brownfield Regeneration Policy) is too vague in itself if left in its current form. The approach set out provides the necessary clarity of the proposed Plan through committing to a Policy more closely aligned with the Framework (Paragraph 47, footnotes 11 and 12).
26. This would commit the Council to actively encourage additional sites as required. Implementation of the policy would be based on whether monitoring indicated that an ongoing supply of deliverable land could no longer be sustained. The Council's statement that 'at least 10,800 houses are either completed, committed or allocated through the SDL's, with more houses likely to be delivered' cannot be seen as robust against a Plan context going forward to 2031. As will be dealt with in detail under Issue 9, Plan flexibility is clearly required.
27. The above Policy would commit the Council to bring on-stream additional sites as required. Priority would then properly be given to Brownfield land and avoiding Green belt sites. PPG Para 025 Ref. ID: 10-025-20140306 reinforces the message of one of the core planning principles in the Framework (paragraph 111) that planning policies should encourage the effective use of land by re-using Brownfield land provided it is not of high environmental value. This would properly introduce positive planning for provision to last for the entire Plan period.

Appendix 1

KEY

-  The site: Land at Coldmeece
-  Town
-  Deployable Land
-  Road



Baden Hall Enterprises LTD
Land at Coldmeece

