

**The Plan for Stafford Borough Part
Two Examination**

**Response to Issue 3: Proposed
Settlement Boundaries**

On behalf of Commercial Estates Group

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July 2016

Indigo

The logo for Indigo Planning Limited, featuring the word "indigo" in a lowercase, serif font. The letter 'i' has a distinct dot, and the 'o' has a tail that loops back under the 'g'.

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1. Issue 3: Proposed Settlement Boundaries

Question 3.1 (i) Criteria for determining the proposed settlement boundaries - Are the criteria set out in paragraphs 2.11 – 2.33 appropriate to define the extent of the areas within settlement boundaries to accommodate the necessary development, so as to enable the delivery of the objectively assessed housing requirement as set out in PSB1?

- 1.1. The criterion relating to ensuring the scale of development for which provision needs to be made in the plan should not be limited to ensuring only the scale of development required by PSB1 is met.
- 1.2. Paragraph 47 of the NPPF encourages Local Planning Authorities (LPAs) to boost significantly the delivery of housing. Defining boundaries just to ensure the scale of development in the plan is met does not represent a positively prepared approach to defining the settlement boundaries or one that is consistent with national policy as it does not seek to boost housing supply. Conversely, basing boundaries to just meet identified need seeks to restrict housing growth.
- 1.3. The criteria used to determine the settlement boundaries currently set out in paragraphs 2.11 – 2.33 are therefore unsound.

Question 3.1 (ii) Are the boundaries drawn in accordance with these criteria?

- 1.4. The settlement boundaries as proposed have not been based on a strategy which seeks to meet the objectively assessed need (OAN) for future housing across the Borough; making the Plan as drafted unsound.
- 1.5. The proposed boundaries have been tightly drawn around existing settlements taking into account only specified commitments and do not allow for any additional sites to come forward. A plan that only seeks to meet the minimum levels of growth, as the Part Two Plan currently drafted does, has not been positively prepared. Aiming for the minimum levels of growth risk targets not being met if delivery of identified sites is delayed or they do not come forward at all.
- 1.6. In order for the settlement boundaries to reflect the scale of new development for which provision needs to be made in the Plan, a flexible approach needs to be adopted to allow additional sites to come forward to meet the OAN.
- 1.7. Including land that is not yet a commitment within the proposed settlement boundaries, i.e. by extending and re-drawing them, will ensure that there is opportunity to meet the scale of new development that will be required and provide flexibility to ensure growth is met.

- 1.8. Furthermore, should the OAN be revisited and it became apparent that a higher level of development than first anticipated is required, tightly drawn settlement boundaries will not allow for this. On this basis, the proposed boundaries do not reflect all the criteria for defining the boundaries.

Question 3.2 - Overall capacity within the proposed settlement boundaries: Is the overall capacity within the proposed settlement boundaries, having regard to the latest housing land supply situation, and taking into account constraints such as areas of importance for nature conservation, tree preservation orders and other environmental considerations, sufficient to satisfactorily accommodate the objectively assessed housing requirement for Stafford Borough, as set out in PSB1?

- 1.9. In addition to needing to demonstrate a five year supply of deliverable housing sites, paragraph 47 of the NPPF also requires LPAs to identify a supply of specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15.
- 1.10. Therefore, irrespective of the Council's current claims of being able to demonstrate a five year supply of housing, consideration should be given to sites that will assist in delivery of housing over the medium to longer term and the settlement boundaries drawn accordingly to allow for these sites to come forward.
- 1.11. The Statement of Five Year Housing Land Supply (as of 31 March 2016), sets out the Council's claims of being able to demonstrate a 7.02 years supply or 6.76 years supply depending upon the approach to the shortfall adopted; this being Liverpool and Sedgefield respectively; this is optimistic and based on the assumption that all sites come forward.
- 1.12. The two largest elements of the supply the Council is relying on are large sites with planning permission (1,785 dwellings) and Strategic Development Locations (SDLs) (1,988 dwellings).
- 1.13. As set out in previous representations (dated 25 January 2016), there is concern with the heavy reliance on the three SDLs in Stafford Town to deliver the necessary level of housing to meet the OAN of Stafford Town and also the wider Borough. The SDLs are estimated to deliver 84% of the total housing target for Stafford Town. Placing this heavy reliance on only three locations is not an effective strategy.
- 1.14. There are particular concerns with the deliverability of the SDLs to the north and west of Stafford Town, which are currently the largest of the three SDLs.
- 1.15. Whilst it is not a prerequisite for sites included in the five year supply to have planning permission, the table at appendix 6 of the Council's housing land supply report relating to Stafford North (Land North of Beaconside) estimates more housing to come forward from the remaining allocation as oppose to the parts of the site with planning permission in place.
- 1.16. Reserved matters have been granted for 409 dwellings at the site. However, it is estimated

that only 250 of these dwellings will be delivered in the five year period. This is in addition to 360 dwellings that the Council anticipates to come forward on the remainder of the allocation.

- 1.17. If only part of the reserved matters consents are to be built out within the five year period, this would suggest slow delivery of units. Therefore, this casts doubt on the ability of the remaining allocation that does not yet have to planning permission to contribute to the five year supply.
- 1.18. Applications are slow to come forward on the Stafford West site; therefore, it is way behind the plan target. Factoring in time for planning permission to be secured means it is unlikely this SDL will deliver its plan target requirement within the plan period.
- 1.19. The above demonstrates that there is an over-reliance on the ability of Stafford North and Stafford West to deliver significant levels of housing over the next five years.
- 1.20. On this basis, given the question marks over the extent of housing that the Stafford North and Stafford West SDLs will deliver over the next five years, flexibility needs to be incorporated into policy and the settlement boundaries that allow additional sites to come forward.
- 1.21. The capacity within the proposed settlement boundaries is not sufficient to satisfactorily accommodate the OAN housing requirement set out in PSB1.
- 1.22. Continuing with the proposed settlement boundaries is not a positively prepared or justified approach, making the plan unsound.

Question 3.3 Flexibility within the proposed settlement boundaries: Is there a case for flexibility within the proposed settlement boundaries in light of the likely delivery of housing requirement as set out in PSB1?

- 1.23. There is a strong case for incorporating flexibility into the proposed settlement boundaries. As set out above, there is a risk that the capacity allowed for based on the proposed settlement boundaries as currently drawn will not be sufficient to meet the OAN.
- 1.24. Given how tight the proposed settlement boundaries have been drawn around Stafford Town, there is no flexibility or contingency allowed for should development not be delivered as quickly as anticipated at Stafford North and Stafford West.

Question 3.3 (i) What should the appropriate level of flexibility be for Stafford Borough?

- 1.25. Rather than put a figure to the appropriate level of flexibility to be incorporated to the proposed settlement boundaries, the approach should be to include sustainable and deliverable sites/areas that have the ability to make a real contribution to housing delivery

over the plan period and meet the criteria set out in the Local Plan Part Two at paragraph 2.11.

- 1.26. Meeting the OAN requirement is not a ceiling and there are a range of benefits to be generated from additional housing growth in a settlement. What is important is to ensure there is sufficient land available to deliver future development over the plan period.
- 1.27. Extending the settlement boundaries around Stafford Town to include land further eastwards of the Stafford East extension will provide the flexibility needed. Further details on the suitability of this site are set out below.

Question 3.3 (ii) Do the proposed settlement boundaries provide for this level of flexibility?

- 1.28. The proposed settlement boundaries, especially around Stafford Town do not provide any flexibility and have not been positively prepared.

Question 3.3 (iii) If not, which settlements should have their boundaries extended to provide the required level of flexibility and where / by what amount?

- 1.29. The settlement of Stafford Town should have its boundaries extended. The response to question 3.4 below explains why Stafford Town represents the most logical settlement for flexibility to be incorporated into the settlement boundaries as it already has the necessary infrastructure and is sustainably located.
- 1.30. In particular, the response below identifies the continued extension of the Stafford East SDL as being a sustainable and logical place to revise the settlement boundaries.

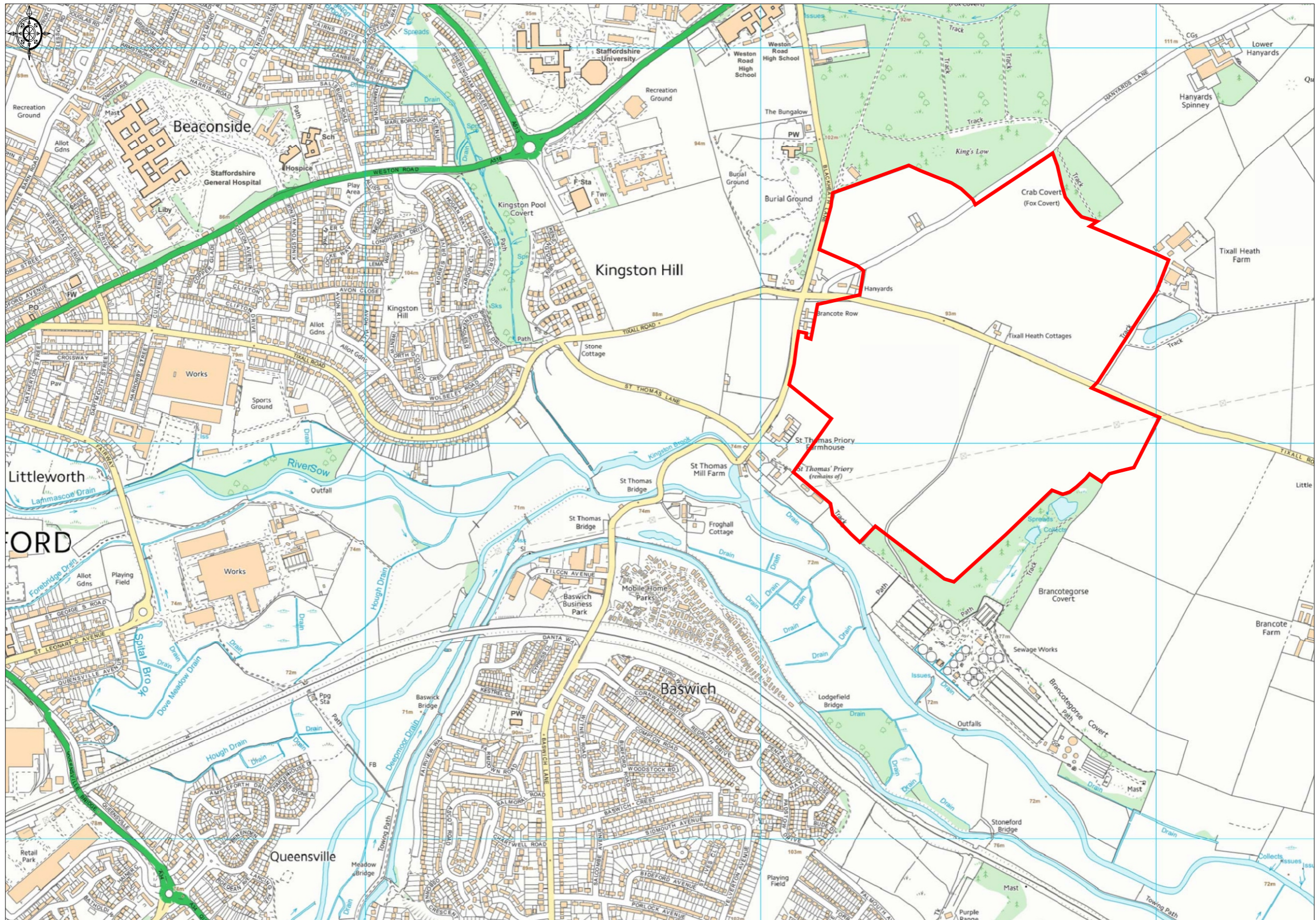
Question 3.4 Specific settlement boundaries: In light of the above considerations, are any of the proposed settlement boundaries inadequately drawn? If so, which of the following settlement boundaries should be re-drawn, in terms of specific sites and development capacity?

- 1.31. The proposed settlement boundary around Stafford Town is inadequately drawn and does not allow any flexibility for additional housing sites to come forward.
- 1.32. PSB1 identifies Stafford Town as being the main focus for future development across the Borough. It is the main settlement in the sustainable settlement hierarchy set out in policy SP3 of the PSB1. It is, therefore, capable of accommodating the most growth.
- 1.33. The Part Two Local Plan sets out at table 2 that Stone and the Key Service Villages are over stacked in terms of the level of completions, commitments and allocations when compared to the minimum housing targets; at 10.5% and 10.83 respectively.
- 1.34. These settlements are smaller than Stafford Town and by virtue of their size contain less services, facilities and general infrastructure, making them less preferable locations to

accommodate additional growth.

- 1.35. Stafford Town represents the most logical settlement to receive additional growth and have its settlement boundaries re-drawn in order to provide opportunities for new sites to come forward.
- 1.36. Within Stafford Town, the most appropriate direction for future growth is the extension of the Stafford East SDL, making use of the land being promoted by CEG.
- 1.37. The deliverability of this SDL is demonstrated by the fact the whole SDL has planning permission and that development has already commenced. The accessible nature of this area and close proximity of local amenities, it makes a sustainable location that could accommodate additional housing.
- 1.38. The current commitments at Stafford East are already assisting in the delivery of much needed highways and infrastructure improvements in this area (i.e. Beaconside Extension). The added benefit of extending the boundary in this location would increase the opportunities for future investment in transport/highway infrastructure and improvements.
- 1.39. On this basis, the settlement boundary for Stafford Town should be revised and extended further eastwards beyond the Stafford East SDL. The extent of the extra land to be included within the re-drawn settlement boundary is illustrated on the enclosed plan at **Appendix 1**.
- 1.40. Re-drawing the settlement boundary line to include the additional land beyond the Stafford East SDL will make the plan sound as it will mean the plan has been positively prepared and is consistent with national planning policy by allowing flexibility to effectively manage and accommodate additional growth in a sustainable location.

Appendix 1



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Promap

Key — Site boundary

Project Land east of Stafford
Title Site location plan
Client Commercial Estates Group

LPA Stafford Borough Council
Date: July 2015
Scale: 1:10,000
Project No: 01920164
Drawing No: 001
Drawn By: KN

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