

Background

These representations on the Stafford Borough Local Plan 2020-2040 - Issues and Options Consultation Document - February 2020 are made by the **Campaign to Protect Rural England (Staffordshire), registered charity number 219443**. CPRE promotes and encourages the protection and improvement of the countryside of Staffordshire, its towns, villages and rural environment.

We are pleased that you are making good progress on revising the current Local Plan and extending its end-date to 2040.

Thank you for notifying us of the consultation. Our response below follows the Council's ordering of sections.

Our representations on the consultation are summarised below, with more detailed representations in the Appendices.

Section 1 Introduction

We found the introductory chapter to be helpful and welcomed the work which has been done by the seven Scoping Panels. We agreed with almost all of the views expressed. We have particular concerns about the lack of reference to the new settlements and other aspects of the Settlement Assessment – were these considered by the Panels at all?

We welcome your statements in Paragraph 1.2 about the purpose of the plan and in Paragraph 1.3 on how you are responding to Government requirements. We think that it is prudent to accept the new regulations and revised NPPF and the standard housing methodology.

We have concerns, however, that you appear to go beyond your own brief in some sections of the consultation and we will look carefully at this issue when you publish preferred options and revised policies.

Section 2 Spatial Portrait

In the Spatial Portrait we were surprised to see the inclusion of proposals for development which do not have consent and the section titled a New Garden Settlement. These seem out of place in a spatial portrait which is otherwise focussed on what exists, is committed or is a major proposal by National Government affecting the Borough.

We were surprised to find the only reference to HS2 in the comment that it “may deliver an integrated station in Stafford” but with no reference to the impact of the line through the Borough - which we consider to be a fundamental issue. We would comment that, although the HS2 route runs across the Borough, its route and the implications are not referred to at all.

There is no new station proposed on the HS2 route through Stafford Borough and we think that this should be made clear – as should the major proposed construction and maintenance depot at Stone/Yarnfield. We find these omissions surprising.



Section 3 Vision and Strategic Objectives

We would not suggest that the Vision needs more than updating.

We think that it would be preferable to give real, measurable, targets for the Vision. We would also hope to see objectives with greater realism as to what the Council cannot/will not do, e.g. public transport provision, as well as being clear on what the Council is committed to and can demonstrate. We feel that doing this would be more honest, straightforward and realistic.

We do not consider that the Council is meeting aspects of the Vision and Objectives and have given examples in Appendix A of this response.

Section 4 Sustainability and Climate Change

The recognition of the Climate Emergency is referred to in the first paragraph. We think that in the last Local Plan the Council could have done much of what is now envisaged – but chose not to.

If the Council is now serious about countering Climate Change it could indicate that it now expects applicants to provide evidence of the attempt to move towards carbon neutrality and greater sustainability to be demonstrated by applicants in all new developments for which the Council considers planning applications. (See Paragraph 4.5 of the Consultation Document). We think that the Council does not need to delay for more than two years to await the adoption of the revised plan to make a start on this.

We will evaluate the Council's Preferred Options and later documents against the sustainability tests which follow from this section of the Consultation Document and by using the Council's Climate Change Adaptation and Mitigation study when this is available. (We welcome its production.)

Section 5 The Development Strategy

We think that an **appropriate, sustainable, Development Strategy** is the key both to the review of the existing plan and future reviews of the new plan in 2015 and 2020. Vital to this is the level of housing to be provided and **this is the main element of our representation.**

We believe that the **Council would be prudent in accepting the 2019 NPPF** (paragraphs 59-67) which requires local authorities to meet locally established needs. "This should be informed by a local housing needs assessment, conducted using the standard method in national guidance unless exceptional circumstances justify an alternative approach." **We agree with the Council that exceptional circumstances do not justify the deviation from the Standard Method.**

A Housing Requirement of 408 dwellings per annum (dpa) is calculated when using Standard Government Local Housing Need methodology 2019-2029 for Stafford Borough¹; **We accept that 408 dwellings per annum (dpa) is both defensible and achievable.** It will also generate new Homes Bonus payments to the Council in a similar range as currently (£2 million to £3 million).

We believe that if 408 dpa is used as the baseline for housing allocations it would be possible to **accept additional housing on brownfield windfall sites above the baseline number.**

If the Council proposes a higher baseline number, it would have an adverse impact on the 5 year land supply - which is used by developers to argue for more greenfield development (as happened in the early years of the current local plan).

Earlier in the current plan period both your Council and Inspectors in appeals granted consents on unallocated greenfield sites leading to the over- provision which the Borough Council is now aware of. This has also happened last year in nearby Penkridge in South Staffordshire, where, despite an adequate allocation for housing having been accepted by the Local Plan Inspector less than a year earlier, a substantial unallocated greenfield site was allowed on appeal. **We think that by using the Government's requirement of 408 dpa as a baseline, your Council's 5 year supply will be retained and defensible on appeal.**

We recognise that Scenario D is rather higher than the best 'fit' to the baseline housing numbers above - but this could be reduced by the Council. As currently included in Scenario D this would mean an additional 18,653 in-migrants, translated into a housing requirement of 9,773 additional homes (489 dpa). **We would support this strategy but only with 408dpa as a baseline.**

We oppose the much higher numbers of 711 dpa (Scenario E) – 303 over baseline, 746dpa (Scenario F) - 338 over baseline, and 597dpa (Scenario G) – 189 over baseline. Growth Options

We accept Scenario A which accords with Government Local Housing Need methodology 2019-2029 as defined by 2019 PPG.

We recognise that the Council does not wish to pursue Scenarios B and C we accept the reasoning and do not oppose this.

We would prefer not to accept the PCU addition implicitly advocated in the document. (This does not appear to be identified as a requirement in the Housing Need Methodology.)

¹ As stated in Table 8A and elsewhere in the consultation.

We accept Scenario D as meeting the Council's wish for growth by increasing population by attracting 18,000 new migrants (net). This option could include the Stafford Gateway. We support the principle of the Stafford Gateway as it is a more sustainable location which would reduce the loss of greenfield sites.

Similarly, if the Council ultimately proposes a New Settlement at Meecebrook the early stages of this could also be accommodated under Option D - with development continuing well beyond 2040.

We consider that **Scenario E** requires excessively higher growth. We see no reason why the Stafford Gateway requires this level of growth.

We strongly oppose this option.

Scenario F involves inward migration of over 29,000 people, a growth in population of 21% based on major employment growth which is likely undesirable, unfeasible and unachievable within 20 years.

We oppose this option.

Scenario G involves significant numbers of new homes and a major growth in jobs. We question the justification for either.

We oppose this option.

Affordable Homes

It is considered laudable that Stafford Borough Council has a policy to 'Deliver 500 new homes including 210 affordable homes each year by working with developers and Registered Providers'. Under this policy 42% of new homes were to be affordable. Unfortunately, in relation to affordable housing, the Borough Council has failed to meet its target with only 27% of new homes being categorised as affordable (See Appendix C). This is despite significant numbers of affordable homes being completed on purely publicly funded schemes on publicly owned land.

We do not consider that increasing the amount of market housing will be the panacea for the continuing underperformance.

Discounting

In the first 8 years of the plan period the completion target was exceeded despite the inevitable lag in the early years following the adoption of the plan. In the last four years Land for New Homes 2019² shows that 3260 homes were completed. This shows that an annual average of more than 800 dwellings were completed - against a local plan target of 500 per annum.

² In Table 1

In Appendix B we demonstrate, using the Council's own published information, that build rates have exceeded the already high targets of the adopted Local Plan. On the basis of commitments in March 2019, 8 years into the plan period, the proposed 10,000 new homes number is projected to be exceeded by more than 16% and, if this continues, more than 13,000 new homes would be completed by 2031.

No evidence has been put forward by the Council to justify discounting and it is considered to be illogical and unreasonable to suggest that these committed developments, and many more, will not take place in the new plan period.

Planning commitments and outstanding Local Plan allocations should not be discounted, there is no justification for this.

Windfalls

The consultation document has failed to take account of the scale of windfall development permitted but not allowed for in the plan. Where these sites have been on brownfield land we can understand the granting of consent and we have not opposed this. Land for New Homes 2019 showed that in the 8 years from the current plan's adoption 56% of completions were on windfall sites with 44% on allocated sites³. We regret that, despite this, **no allowance is being made for windfall sites.**

Green Belt

We welcome the Council's stance on defending the existing Green Belt.

Brownfield v Greenfield

We regret that all of the housing allocations in the existing plan are on greenfield sites and none at all on brownfield. We also greatly regret that in the Local Plan Review no indication is given of the **intention to give priority to brownfield sites** despite the statement made in paragraph i. of the Council's Vision statement and National Policy in NPPF.

As with the previous issue of the NPPF, the most recent version sets out the need to maximise the use of previously developed sites and affords "substantial weight" to the use of brownfield sites within local policies and planning decisions to meet development needs. As well as maximising the use of these sites, Paragraph 119 in the NPPF also notes that Local Authorities should be proactive in identifying and helping to promote brownfield sites. **We question the Council's commitment, when assessed by its actions in the previous Local Plan, and hope that this will be given higher priority in future.**

³ Figure 3

Settlement Hierarchy

We are strongly **opposed to the changes in the Settlement Hierarchy** and the new categorisation of settlements. We have given reasons for this in the attached Appendix A. We are also against the Borough Council making new, additional, housing allocations in smaller settlements as we consider that this is more appropriately a matter for local people and elected parish councils to consider.

If parish councils and their residents wished to see new housing in uncategorised settlements this could be done more appropriately through Neighbourhood Plans and Neighbourhood Development Orders - as could changes to development boundaries included in Part 2 of the existing Local Plan.

New villages/settlements/town on greenfield sites

We see no tenable case for any of the six new settlements on primarily greenfield sites at:

Section 5.34

- i. Land north and east of Gnosall: up to 3,500 new homes and supporting employment. **We oppose this location.**
- ii. Land between Gnosall and Haughton north of the A518 between Stafford and Newport. This area of land could accommodate up to 3,250 new homes and supporting employment. **We oppose this location.**
- iii. Seighford, a largely agricultural site with an airfield and established employment land either side of the B5405 to the west of Stafford town. This area of land could accommodate up to 5,250 new homes and supporting employment. **We oppose this location.**

Some of these sites are on land currently belonging to the county farm estate. In a letter to CPRE Staffordshire dated 19 March 2020, Cllr Mark Winnington stated that "Staffordshire County Council has been renting farms since 1908 and still cherishes the role the county farms estate plays within our rural community." A recent report by the national CPRE charity noted that county farms are a 'vital first rung on the farming ladder' for newcomers to a sector that has high up-front capital costs, and it is therefore important that such sites are retained and not sold off for development.

https://www.cpre.org.uk/wp-content/uploads/2019/12/December-2019_Reviving-county-farms.pdf

- iv. Land to the north of Redhill Business Park and to the west of the A34 near to M6 Jn14 Stafford North. A large tract of land that could

accommodate up to 5,000 new homes and supporting employment land. **We oppose this location.**

Meecebrook, focussed around Cold Meece south of Swynnerton. This has the potential for up to 11,500 new homes and supporting employment land raises different issues.

We acknowledge that the Council now seems committed to this as a proposal and await consultation on what is actually envisaged. **We acknowledge that this site appears to be predominantly or entirely on PDL (brownfield land) but have numerous questions regarding sustainability, accessibility etc.**

- v. Hixon. An ex-WW2 airfield located to the east of the Borough. Much of the site is currently unused and is partly developed as an industrial park. The site on the edge of Hixon could be expanded to accommodate up to 2,750 new dwellings and supporting employment land. We question whether this site could be fairly regarded as PDL. **We oppose this location.**
- vi. Land East of Weston. There are a number of environmental constraints in this area but there is potential to bring forward up to 2,000 new homes and supporting employment land. **We oppose this location.**

Potential Spatial Strategies

These strategies and their accompanying diagrams appear to have been taken from an undergraduate planning textbook - more relevant to academic than real world consultation in the circumstances of the review and rolling forward of Stafford Borough Council's already adopted Plan.

We are very disappointed in the Council's adoption of this approach.

Section 6 Delivering Economic Prosperity

Scale of land for Employment Development

We have major concerns about the EDHNA and the scale of new floorspace envisaged in the various scenarios with the largest (176,548m² being more than 10 times the floorspace of the lowest (17,548m²)⁴.

We regret that the consultation document does not convert the scenarios to an estimated hectareage of 'new Greenfield land' to be developed. This would have allowed a comparison with the scale of development of the current local plan and an indication of the additional land area proposed.

⁴ Paragraph 5.7 of the consultation

Unlike what has been done in respect of housing we have not found any assessment of the take up of employment development land since the beginning of the current plan period. There does appear to be anecdotal evidence, however, that some large areas of land have generated few jobs or other benefits e.g. the JLR storage area at Stone.

There does not appear to have been any reference made in the document to the number of new jobs expected to be created under the various scenarios - which do not appear to be linked to the scenarios for increasing population by inward migration and, as a consequence, to the number of additional dwellings which would be required. We would welcome employment and housing provision being clearly linked.

As in the current plan it would appear that further major greenfield loss would be envisaged. **We would oppose the high levels of development included in the scenarios** (as we do for new housing).

Section 7 Delivering Town Centres that Address Future Needs

Stafford Town Centre

We have particular concerns in relation to Stafford Town Centre, where the vacancy rate of shops, offices and public buildings, such as the Magistrates' Courts, is at a historic high. Many of the vacancies are long term and buildings and streets, e.g. Market Square, are showing a lack of maintenance, with parts of the centre feeling run-down.

We accept that retail has changed and the loss to the centre of shops like Next, Currys and Halfords to retail parks was inevitable. The relocation of M&S, several Burton Group retailers and others is regrettable because it has increased an already high vacancy rate, but at least the stores have stayed in the town for now.

We also accept that the impact of the Internet on retailers and high street users, such as banks and building societies, is being strongly felt as companies fail or contract. The Council cannot prevent this. We are aware that the high costs of bricks and mortar retailing is showing at the high rate of retailers closing and very few new companies seeking new premises in town centres. This is likely to continue and increase as a result of the long-term impact on the country of Covid-19.

We think that the Council's focus now, and in the future, should be to stop the decline, facilitate better maintenance of the public realm and encourage the use of shop windows. Boarding up is hastening the decline. Other centres are putting displays in shops etc – as the Borough Council has done in some cases, such as in the vacant units under the Council's offices.

We feel, however, that the Council has now allowed too much new retail and that this has hastened the decline of the historic centre (especially as a number of shops have re-located to the Riverside development) - yet the TCCA appears to seek to continue this overprovision and encourages yet more retail and other development on the edge of the centre - while vacancies continue to increase and vibrancy is lost.

We find the decline of the centre to be very sad and hope that the Council will try act to attract new retailers to existing vacant premises, to reduce vacancy levels, and carry out improvements to frontages. We do not believe that significant population increases will reverse the trend.

In particular, we hope that the Council will not encourage more new retail development, such as new retail parks and other out-of-centre retailing, which detracts from the centre itself and will hasten decline elsewhere. Perhaps this could form the basis for policy?

Section 9 Delivering Housing

Whilst we welcome the emphasis given in para 8.5 to 'Making Preferential Use of Brownfield Land', we regret that, despite what is said about giving priority to brownfield, **all that we find in the existing allocations are greenfield sites** - in a plan which makes **no allowance for brownfield sites**. We think that this is a real issue where the Council is being led to 'turn a blind eye' to the role of windfalls; despite Land for New Homes 2019 saying in paragraph 3.5, "Since the start of the plan period **54% of completions have been on PDL.**" (PDL- previously developed land - is also described as 'brownfield'; the terms are synonymous).

We are disturbed to note that the consultation document implies that, with the exception of Meecebrook and near Stafford station (these seem to be accepted as 'done deals'), all new housing and employment allocations will be on greenfield sites; we regret and continue to oppose this approach.

Analysis of councils' brownfield land registers by the national CPRE charity suggests that there is enough suitable brownfield land in England for more than 1 million homes across over 18,000 sites and over 26,000 hectares.
<https://www.cpre.org.uk/resources/state-of-brownfield-2019/>

Section 9 Delivering Quality Development

We welcome the changes to policy suggested by this section.

You may wish to refer to a new report by CPRE and the campaigners Place Alliance, based at UCL, called A Housing Design Audit for England. This found that, overall, 75% of new housing development should not have gone ahead due to 'mediocre' or 'poor' design. Less affluent communities are ten times more likely to get worse design, even though better design is affordable

– and 94% of developments in the rural areas audited should never have been given approval to go ahead.

Good housing design includes well-designed access roads, provision of storage, spaces for bins, suitable car parking provision and local community facilities. In good housing design, architecture is in keeping with the local area and the new developments have character, bring about a sense of place and are energy-efficient and sustainable – including making space for people to walk and cycle.

<https://www.cpre.org.uk/news/housing-design-2020/>

Section 10 Environmental Quality

We would have hoped for a policy of improvement - rather than maintenance.

Section 11 Health and Wellbeing

We would like to see this taken more seriously in the reviewed plan.

Section 12 Connections

We hope that more positive action is taken in the future to meet the stated aims rather than the current approach - e.g. **from now on** requiring new housing and employment to be designed for, and served by, public transport - and also to try to redress this omission on the large developments which have taken place in the last nine years.

Section 13 Viability and Delivery of Development

We regret that the Council has totally failed to deliver CIL.

We are disappointed that, despite its robust policy on affordable housing, the Council has, in most cases, manifestly failed to deliver this.

Local infrastructure such as transport improvements are almost totally absent. This is a broader issue than just transport and should include, for example, redressing inadequate community and medical facilities.

New open space to serve additional housing is massively below national standards and could be seen as a major failure.

We really hope that the Council will take these issues much more seriously in the future and will consider using at least an appreciable part of the national Government's 'New Homes Bonus' - of more than £11,000,000 paid to Stafford Borough Council in the last 5 years - to provide targeted funding for the existing deficiencies.



Appendix A

The Vision

Question 3A

a. retained and enhanced its high quality unique character made up of the County Town of Stafford, the market town of Stone and extensive rural area containing smaller towns and historic villages;

Has this happened, what is the evidence?

b. provided high quality designed developments including recreation, open space and sport provision;

Perhaps the Council could identify examples of developments of high design quality. Despite the number of new homes completed since the start date for the plan – around 4,000 - recreation, open space and sport provision does not appear to have increased proportionately but has, in reality, declined.

c. a range of housing types and tenures to meet the needs of the Borough, including for the ageing population, affordable housing and provision for gypsies and travellers;

Affordable housing has failed to meet the Council's stated targets and this situation seems likely to worsen. Has the Council made any new provision at all for gypsies and travellers?

d. reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas;

Services and facilities in and to serve surrounding rural areas appear to have declined rather than increased.

The need to travel appears to have increased, yet even those areas that have seen major growth, such as Eccleshall and the Haywoods, have not seen improvements in public transport.

e. addressed issues of climate change, including a reduction of carbon emissions and flood risk with sensitively delivered renewable energy schemes;

Little seems to have been done to address climate change, such as requiring new developments to move towards carbon neutrality. No new housing, employment or other developments appear to have been required to meet higher than minimum permitted insulation standards, install solar panels or EV facilities. New housing and employment developments continue to primarily use carbon-based fuel, primarily gas, for heating and hot water, and do not use rainwater harvesting.

f. improved accessibility to services and facilities by providing safe, attractive and convenient sustainable connections from and to new developments;

It is unclear what is intended here; virtually none of the new developments have public transport provided or safe cycle routes built.

g. been protected, conserved and enhanced to provide an exceptionally high quality of environmental, historic and landscape character;

Little seems to have been done to provide environmental improvement or to enhance historic or landscape character – perhaps what has been done could be identified in the Review?

i. delivered new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough's selected villages;

All of the existing housing and employment allocations in the plan are on greenfield sites of environmental value. The plan made no allowance for the development of brownfield sites. Because no provision was made for windfall (unallocated) brownfield sites, more greenfield land has, and will be, developed than was/is appropriate.

The Borough will have a rich natural environment which is resilient to the effects of climate change, is well maintained and enhanced with more people enjoying the area through a greater sense of health and well being. A high-quality strategic network of accessible green space will have been developed in and around Stafford, Stone and other areas as well as enhanced and managed historic environment and natural resources providing a clean, safe and enjoyable place to live and visit, facilitated by an improved road and public transport network.

No evidence seems to be available in respect of the first sentence. There is no visible evidence of the development of a strategic network of accessible green space, or a managed historic environment.

Despite the scale of new development, the public transport network has not improved – many residents consider that, in reality, it has declined in the borough. Major new housing and employment sites are unserved by public transport. Congestion and pollution are perceived as having increased.

Question 3B

The problem of the current Vision is not its length but its lack of achievement.

It would be preferable to give real, measurable, targets for the Vision. If this means abandoning the current Vision and Objectives to have one with greater

realism as to what the Council will not do (the abandoned elements of the Vision) as well as what it will actually commit to doing, this would at least be more honest, straightforward and realistic.

Question 3C

It should maintain a commitment to appropriate growth and require new development to be carbon-neutral.

Questions 3D, 3E and 3F

The objectives are as vague, woolly, unquantified - and as largely unmeasurable as the existing Vision. Making them thematic would not help.

Question 4A

Yes.

The Council could have done much of this in the last plan – but chose not to. If the Council is serious, it could indicate that it now expects evidence of the attempt to move towards carbon neutrality and greater sustainability to be demonstrated by applicants in all new developments for which the Council considers planning applications. It does not need to delay two years for the adoption of the revised plan.

Question 4C

Yes.

Section 5

The Strategy should first consider the appropriate level of growth for the Borough.

Question 5A

There is no need or purpose in repeating Government Policy – which changes much more regularly than a Local Plan. Government has previously advised against repetition.

Question 5B

- a. Option A as it provides both for local need and inward migration and would meet Government requirements.
- b. No, because the current Local Plan allowed for 30% of new housing for local need and 70% for inward migration of households. The identified total of 10,000 new homes by 2031 will clearly be exceeded due, in part, to the scale of new windfall developments - which were not allowed for at all in the plan.

Question 5C

All current commitments and allocations should be included in the calculation baseline for the new plan period 2020 to 2040 and those allocations not yet completed should be included as allocations in the revised plan.

Then, additional requirements should be identified and allocated as well as existing outstanding commitments and allocations.

Allowance should, in future, also be made for potential new 'windfall' sites; based on past trends - as has been done by other LPAs.
(Note:- Figure 3 of Land for New Homes 2019 shows that 56% of all housing completions 2011 – 2019 were on 'windfall' sites.)

No 'double counting' would be involved using this method.

Question 5D

i. No. There seems little purpose in identifying additional categories of settlements unless it is intended to include allocations and revised settlement boundaries.

ii. No.

Rural exception policies could still be applied to existing settlements (including those in Green Belt).

If parish councils and their residents wished to see new housing in unclassified settlements this could be done through Neighbourhood Plans and Neighbourhood Development Orders.

Note:- Including housing numbers without defining boundaries and allocations leads to over-provision of housing as has occurred in the first 9 years of the current plan period, for example at Gnosall and Eccleshall.

The areas identified in Tier 3 are already defined by Green Belt Boundaries and it would be inappropriate to use other boundaries - for the reasons given in Paragraphs 5.3 and 5.4 of the consultation document. For the most part these areas are contiguous with adjacent authorities - Clayton with Newcastle-under-Lyme, Meir Heath / Rough Close with Stoke on Trent and Blythe Bridge with Staffordshire Moorlands and Stoke-on-Trent.

Describing Tier 3 settlements as North Staffordshire Urban Areas is potentially misleading as there are other, similar, suburban areas in adjacent Councils' areas - which would meet the description but are not in Stafford Borough or its jurisdiction.

Question 5F

Intensification of Town and District Centres

- ***Commonly encouraged in Local Plans in line with NPPF but unlikely to provide sufficient brownfield land to meet needs.***

Accepted, but this should be encouraged where appropriate e.g. Stafford Borough Council's ideas around the station.

- ***Focus on housing and economy may conflict with other important functions of these centres***

The focus would not be solely on housing and the economy. For example, Stafford has a declining centre with the highest ever vacancy rates for retail uses. It needs re-vitalisation and better maintenance.

- ***Townscape character may be affected***

Good design would be expected in the future.

- ***There are usually good existing transport links, although they may already be at capacity***

In towns as small as Stafford and Stone this would not be an issue.

Garden Communities

- ***Depending on location, it may or may not be close to existing high quality transport corridors.***

The locations identified in Stafford Borough are not close to such corridors.

- ***Would need to be of sufficient scale to support provision of appropriate new infrastructure***

This really should be defined in terms of scale, financial assessment, facilities and programming.

- ***May have a negative environmental impact but could be designed to deliver environmental gains***

There is little evidence of environmental gains in previous cases in Stafford. The same could be said for any location.

- ***Designing a settlement from scratch provides opportunities for urban design principles to be followed throughout, such as Garden Towns principles.***

As they could have been for recent major urban extensions at Stafford - if urban design principles had been followed. The designation of a new

settlement does not, of itself, result in higher standards than are accepted by the Council on other sites.

- ***A New Settlement would take a long time to be delivered.***

It would, and it is expensive to provide, often leaving residents lacking facilities such as schools, shops, community facilities and employment and being marooned without public transport or private cars to travel to other settlements.

Dispersal of development

This would involve spreading new development across the Borough including in smaller settlements.

- ***Smaller sites are unlikely to generate infrastructure needs alone so are unlikely to significantly contribute to improvements in infrastructure.***

Agreed, despite CIL.

- ***The character of smaller settlements might be adversely affected by new development***

Accepted.

- ***Expanding some smaller settlements can support local shops, pubs, bus services etc.***

There is very little evidence of this happening in practice. Shops have closed and pubs and bus services have been lost; even in larger settlements in the borough, despite growth.

- ***Smaller sites can improve deliverability rates.***

Is there any evidence of this at any scale?
Affordable housing is more difficult to deliver.
New developments are less sustainable.

Intensification around the edges of larger settlements and strategic extensions

- ***Can link into public transport networks***

But, unfortunately, in Stafford and Stone this does not seem to have been expected or required by the Council.

- ***Focuses development close to, and supports, existing services and connections.***

But can overstretch facilities such as doctors' surgeries and schools. Does not appear to lead to improvement.

In CPRE's view, intensification around the edges of larger settlements and strategic extensions is probably the best of the options canvassed by this consultation.

"String" settlement / settlement cluster: where development is focussed on a number of linked settlements. It could involve new and/or existing and/or expanded settlements.

- ***Need to be close to existing high-quality transport corridors.***

We do not agree that string settlements are a good option, given that this has the undesirable effect of separate settlements increasingly merging into one another, threatening the character of the community and surrounding landscape. For example, developing greenfield land between Gnosall and Haughton, opposed in 5.34 (ii) above, potentially turns a large and medium settlement into an out-of-town urban area. This is likely to result in further pressure on local amenities, reduced open spaces and their associated benefits for health and wellbeing, and increased traffic and air pollution.

- ***Relies on there being suitable broad locations available for this type of development.***

No evidence of this.

- ***May involve promoting development at some existing, small settlements which may significantly alter their character.***

Agreed.

- ***A number of smaller settlements could collectively be of sufficient scale to be served by shared infrastructure.***

We doubt that there is evidence for this. Evidence and examples?

"Wheel" settlement cluster

Focus on Stafford and surrounding settlements

- ***Similar to the "string" cluster approach allowing strong links between the towns but with less reliance on the encouragement of a "development corridor".***

-
If this is being put forward as a serious option, the settlements should be identified – as has been done elsewhere in the consultation.



- ***Would build on existing settlements and their relationships***

Which settlements, what relationships?

- ***A number of smaller settlements in the same locality could be grown to generate sufficient supporting infrastructure***

Evidence for this? What supporting infrastructure?

- ***Character of the settlements and surrounding area might be adversely affected***

As in most of the options.

Question 5F

- a. These seem to have been drawn from a planning textbook
- b. & c. The first three seem to be preferable to the last three – see comments on each above.

Question 5G

- a. No.
- b. Unnecessary to meet the appropriate level of growth for Stafford Borough

Appendix B

Housing Numbers

Land for New Homes

Table 2 - Completion Rates Plan Period

Number of Cumulative Completions	(2011 - 2019)	4,830
Remaining Balance	(2019 - 2031)	5,170
(Balance from the 10,000 in the Local Plan 10,000 – 4830)		

Stafford and Stone Allocated Locations

Land for New Homes 2019 Table 4 –

Number of outstanding net commitments as at 31st March 2019	4,591
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Land for New Homes 2019 Table 5 -

Summary of Allocated sites in Stafford and Stone at 31 March 2019

- Remaining Allocation (without Planning permission)	2,224
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Summary

Number of Cumulative Completions	(2011 - 2019)	4,830
Number of outstanding net commitments as at 31st March 2019		4,591
Remaining Allocation (without Planning permission)		2,224
TOTAL		11,645

Note:-

As at 31 March 2019 the completions, commitments and outstanding allocations exceeded the provision proposed in the Adopted Local Plan by 1645 (16.4% of 10,000). This number and percentage is likely to increase in the remaining 12 years of the Plan Period (e.g. from new windfall sites) - but no estimate of the increase seems to have been made in the current consultation document.

Supplementary Note:-

Key Service Villages

Adding the number of dwellings identified in:-

Table 5.3 - Growth experienced by the Key Service Villages - in the current Local Plan (April 2011- March 2019) shows -

Number of Dwellings granted during the adopted Plan for Stafford Borough 2011-2031 as at 31st March 2019 totals as 1390 ie after 8 years against an allocation of 1,200⁵ over a 20 year period. This is 15% over allocation with 12 years still to run.

During the remaining 12 years of the current Local Plan there will also be additional consents for residential development granted within the

⁵ (12% of 10,000 new dwellings in SPATIAL PRINCIPLE 4 (SP4) – STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION in the current Adopted Local Plan 2011 – 2031)



Key Service Villages' development boundaries. This does not appear to have been mentioned or estimated in the Consultation Document. 'Other Rural Areas'/'Rest of the Borough'/'Rest of Borough Area' The Local Plan indicated that 'Other Rural Areas' were anticipated to provide 8% of the total housing provision of 10,000 Local Plan for (Spatial Principle 4).

Land for New Homes 2019 Figure 2 of Land for New Homes shows that from 2011 – 2019 'Rural Areas' comprised 9% of 4830 completions in Table 2 (434 completed dwellings).

Land for New Homes 2019 (Page 82) identifies a total of an additional 220 dwellings - all windfalls – with unimplemented planning permissions (this does not include the permissions that were completed 2011 – 2019).

Given the 12 years remaining it appears highly likely that the remaining allowance for 'Other Rural Areas' 2011 – 2031 of 146 new dwellings (800 – 434 – 220) will be exceeded

Notes:

- a. In the Local Plan 2011 – 2031 'Other Rural Areas' were anticipated to provide 8% of the total housing requirement of 10,000. This also appears to equate with 'Other Rural Areas' used in Land for New Homes.
- b. Figures for 'Other Rural Areas' used in Land for New Homes appears to equate with the description 'Rest of the Borough' which is used in the current consultation document.



Appendix C

Affordable Housing

It is considered laudable that Stafford Borough Council has a policy to 'Deliver 500 new homes including 210 affordable homes each year by working with developers and Registered Providers'. Under this policy 42% of new homes were to be affordable.

(The Council's published 'Housing Strategy 2015-2019
<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Policy%20and%20Plans/Housing-Strategy.pdf>)

In fact there were 3638 new homes completed in the 5 years to April 2019, of which 1065 were categorised as being 'affordable'.

The Plan for Stafford Borough 2011-2031 Authority Monitoring Report 2018-2019 - Tables 4.1 and 4.5.

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Misc/Authority%20Monitoring%20Report%202019%20FINAL.pdf>