

Background

These representations on the Stafford Borough Local Plan 2020-2040 – Preferred Options Consultation Document – November 2022 are made by CPRE Staffordshire (Campaign to Protect Rural England), registered charity number 219443. CPRE promotes and encourages the protection and enhancement 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. Our representations have been updated from those to the Issues and Options consultation of 2020. More detailed representations are made in the Appendices.

Spatial Portrait

Preferred Options

Addition of Key Issues and Challenges, now a mixture of statements with some quasi-policy comments.

HS2 comments are still potentially misleading and inadequate. It should be made clear that HS2 passes through the borough. A major railhead has been approved between Yarnfield and Stone, but this is not even mentioned.

Development Strategy and Climate Change response

We oppose, in major ways, Policy 1:

- We see no case for the number of new homes proposed (see Appendix A).
- There is no justification for the provision of over 80 hectares of new employment land.
- We are opposed to the development of Meecebrook which is now indicated to be primarily on greenfield and is wholly unjustified (see Appendix B).
- There is no need for additional greenfield housing allocations.
- The allowance for windfalls is unjustifiably low (see Appendix C)
- We disagree with the spatial distribution of new housing.
- We see no justification for the new site allocations on greenfield land under Policy 12.
- We are opposed to the greenfield development now called Meecebrook (see Appendix B).

In relation to the text below Policy 12:

- We oppose the significant uplift in housing number from the those in the New Standard Method. (Paragraph 1.2)
- We oppose the additional allowance of 2000 homes as being wholly unjustified. (Paragraph 1.3).
- We oppose the greenfield development of 3000 new homes at Meecebrook in the plan period. (Paragraph 1.4)
- We oppose the intended commitment of a further greenfield development of more than 3000 new homes at Meecebrook after the plan period. (Unstated but clearly intended.)
- We oppose the EHDNA projection as being too high and are even more opposed the proposed 50% uplift to the provision of employment land in the plan period. (Paragraph 1.4)

From the representations above it will be apparent that we see no justification for new greenfield sites at Stafford, Stone, Meecebrook and the villages of Tier 4 (see Appendix A).

Policies

Policy 4 Climate Change

Support.

Policy 5 Green Belt

Support.

Policy 6 Neighbourhood Plans

We see difficulties e.g. at Stone, Gnosall and Woodseaves.

Policy 7 Meecebrook Site Allocation and Policy 8 Masterplanning and design

We are opposed - see Appendix B.

Policy 9 North of Stafford

Policy 10 West of Stafford

Existing Allocations

Policy 11 Stafford Station Gateway

Please refer to [our previous response](#) to the specific consultation.

Policy 12 Other Housing and Employment Land Allocations

Opposed to further greenfield development - see Appendix A.

Policy 13 Local Green Space

No comment

Policy 14 Penk and Sow Countryside Enhancement Area

Support

Policy 15 Stone Countryside Enhancement Area

Support

Policy 16 Protection of Employment Land

Support

Policy 17 Recognised Industrial Estates

Support

Policy 18 Home Working

Accepted

Policy 19 Town centres

Meecebrook is not supported.

Stafford Town Centre is of real concern due to record vacant floorspace including Guildhall Centre, the former Co-op building, former M&S and many others.

Policy 20 Agricultural and Forestry development

We are aware of the difficult balance.

Policy 21 Tourism Development

From cases elsewhere in the county we have concerns that Policy B is too loose.

Policy 22 Canals

Support

Policy 23 Affordable Housing

We regret the failure to deliver on the previous policy and oppose the reduced requirements of the proposed policy.

Policy 24 Homes for Life

We strongly support this policy and regret that the Council dropped this policy in the current Local Plan.

Policy 25 Rural Exception Sites

We appreciate the difficulties caused by the Council's interpretation of its current policy, as found in the appeal at Saddler Avenue in Stone.

We regret that so few homes (if any?) have been built under the current policy.

Policy 26 New Rural Dwellings

Despite an apparently restrictive policy, many new dwellings are permitted and seem to be built.

Policy 27 Replacement Dwellings

Despite policy, small cottages seem to be replaced by mini-mansions.

Policy 28 Extension of dwellings

Policy is too generous in C.

Policy 29 Residential sub-division and conversion

We have insufficient knowledge on these policies.

Policy 30 Gypsy and traveller accommodation

We have insufficient knowledge on these policies.

Policy 31 Housing mix and density

We oppose further unnecessary greenfield housing. The policy is generally very vague and difficult to use in practice.

Policy 32 Residential Amenity

Supported.

Policy 33 Extension to curtilage

Support.

Policies 34 to 45

Support.

Policy 46 Green and blue infrastructure network

We regret that although over 6000 new houses have been built in the current plan period no new playing fields have been provided for their 14,000 residents. We support the Borough Council's intentions in this policy.

Policy 47 Biodiversity

We strongly recommend that A and B are amended and strengthened to require the 10% net positive gain to be provided within a stated distance of not more than 5 miles from the site. Without this in the Policy, net gain could be provided anywhere in England and would be virtually impossible to enforce.

Policy 48 Cannock Chase SAC

Supported.

Policy 49 Trees

We regret the major loss of hedgerows in almost all new developments in the Borough with virtually no replacement. The policy is very weak.

Policy 50 Pollution

Supported.

Policy 51 Air quality

Supported.



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Policy 52 Transport

It is regrettable that in most new developments Stafford Borough Council has failed to achieve the objectives of this policy.

Policy 52 Parking Standards

It is regrettable that Stafford Borough Council has failed to achieve the objectives of this policy in most new developments



Appendix A

The amount of new housing proposed

Summary

Over the 20 years of the Plan the Government's requirement, using the New Standard Method, is for the provision of 391 houses per year, giving a requirement for 7820 dwellings over the 20 year period.

However, the Preferred Options document proposes the development of 12580 new dwellings over the plan period (see Table 1). This total includes an addition of 2000 dwellings to provide for additional migration, above that already built into the Government's New Standard Method, presumably to allow the Council to try to justify the development of a new settlement at Meecebrook.

The remaining number of 10,580 new homes is assumed to relate to Stafford Borough's requirements. (We also consider that the numbers seriously underestimate 'windfalls'.)

Accepting the Council's proposed numbers in Table 1, but completely excluding Meecebrook, the numbers proposed would still exceed the Government's New Standard Housing Method requirements by 2760 (10580 – 7820).¹

We consider that the proposals for additional housing numbers are fundamentally unsound and Meecebrook is unjustified and unnecessary to meet any of the housing requirements of Stafford Borough in the current plan.

¹ Note: we recognise that in Paragraph 1.2 the Council referred to an alternative employment growth method from Lichfields which indicates a number of 435 dwellings per year.

Housing numbers

Current Adopted Plan 2011 to 2031

In the current statutory Local Plan 2011-2031, adopted in June 2014, the Council says:

“6.11 With regards to the future demand for new housing in the Stafford Borough area, national statistics from the Government provide information on population growth forecasts and the number of new households likely to form. For Stafford Borough, the latest 2010 population projections show an increase of 19,900 residents from 126,100 to 146,000 people in 2035. These figures include natural change and migration from other areas. The 2008 household projections to 2033 showed an increase of 11,523 households, from 52,999 to 64,522 households who will be looking for houses in our area. This is an average of approximately 461 new houses per year over the period 2008 to 2033. **However the 2011 interim household projections covering the period 2011 to 2021 identify an increase from 55,706 in 2011 to 59,874 in 2021, which is an average of approximately 417 new houses per year.**

6.12 **It should be noted that the household projection figure is made up of ‘local need’ (i.e. natural change: the balance of births over deaths and reduction in average household size) and ‘in-migration’ elements, with the split for Stafford Borough being approximately 30% local need and 70% in-migration mainly from surrounding areas, the majority being from Cannock Chase District, South Staffordshire District and the City of Stoke-on-Trent. The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term. In light of meeting objectively assessed needs it is sensible to plan for these, not least because it is consistent with the growth aspirations for Stafford town, and its developing sub-regional role, as set out in the Spatial Vision and Key Objectives earlier.” (Our emboldening.)**

We have failed to find any local authority, neighbouring or elsewhere which has asked, acknowledges, or has made, a reduction in their housing requirements due to migration of households to Stafford Borough.

Housing Delivery

Stafford Borough Council has exceeded, and continues to substantially exceed the numbers of houses proposed in the Plan (500 per year) principally because it made no allowance for ‘windfall’ housing. Numbers of new houses

completed from 2011 to 2022 have averaged over 600 per year² – 20% over the Plan’s intentions³.

New Housing numbers 2020 - 2040

The Government’s New Standard Method

Lichfields, Stafford Borough Council’s consultants, explain the Standard method for local housing needs⁴ as follows:

The introduction of a standard method for assessing housing needs for planning purposes (first consulted on in 2017, then adopted in 2018) intended to shift time, resources and debate at examination away from the ‘numbers’ question and towards the ‘how’ and ‘where’ of building new homes...

The New Standard Method includes both local need and migration assessments.

Most councils in England use the Government’s New Standard Method as the basis for housing numbers in their Local Plans. Locally, in their most recent plans, the adjacent authorities ahead of Stafford in plan preparation (Lichfield Council - Examination in Public, and South Staffordshire Council - Regulation 19 Publication for Submission to Inspectorate for Examination in Public) have both used the Government’s New Standard Method for their housing calculations.

In the Preferred Options document the Council says in Paragraph 1.2 “ ..the minimum figure for local housing need set by national guidance (calculated in accordance with the standard methodology outlined in the Planning Practice Guidance) of 391 new homes per year (2022)”. Over the plan period 2020 – 2040 this would give a total new housing requirement of 7820.

We think that the Government’s New Standard Method is the most appropriate baseline to use⁵.

² Land for New Homes – the Housing Monitor 2022 SBC.

³ The overprovision of housing before 2020 is not taken account of in the new plan.

⁴ Standard method for local housing needs April 2022.
<https://lichfields.uk/standard-method-for-local-housing-needs-april-2022/>

⁵ Note: we recognise that in Paragraph 1.2⁵ the Council referred to an alternative employment growth method from Lichfields which indicates a figure of 435 dwellings per year. This would give a housing total of 8700 over the plan period.

New Housing Allocations

Allocation totals

We have added the number of houses in each of the proposed allocations in Policy 12A which totals 1379 new homes. We have seen the note to the table in the Policy but consider it almost certain that additional school provision can be made in the plan period as part of the development of the nearby Land North of Stafford Strategic Housing site, which includes schools on the site.

We cannot explain why the Allocations from Policy 12 is given as a total of only 885 in Table 1 (Sources of housing supply) on page 22. (Adding the Housing Allocations in Policy 12A on pages 54 and 55 gives a total of 1379.)

We assume that the list of housing allocations included on the Preferred Options is correct and that these are as mapped.

Allocations Proposed

We have read the list of proposed allocations for housing in Policy 12A.

Stafford

We see no case for the allocation of another greenfield site beyond the boundary of Stafford at Ashflats, South of Stafford.

We are not objecting to the other allocations at Stafford, which involve brownfield sites.

Stone

All but two of the proposed allocations on sites at Stone are greenfield on the periphery of the town, in countryside to the south and west of the site. Two of the other sites are outside the established development boundary but are also greenfield.

We see no justification for these allocations which involve the inappropriate and unnecessary loss of greenfield.

We are not opposed the development of brownfield sites in Stone.

Larger Settlements

Tier 4 larger settlements of Barlaston, Blythe Bridge, Eccleshall, Gnosall, Great Haywood, Haughton, Hixon, Little Haywood and Colwich, Meir Heath/Rough Close, Weston, Woodseaves and Yarnfield.

Gnosall

We fail to understand why there is any justification for yet another edge of village greenfield site allocation for 100 homes at Gnosall which has experienced significant new housing development in the current Adopted Local Plan 2011-2031.

We oppose the proposed allocation.

Woodseaves

We are perplexed⁶ by the apparent lack of justification for the allocation of 5 sites at Woodseaves, including a greenfield site for 88 houses on the edge of the village and a total allocation of 125 homes. Woodseaves is one of the smallest villages in the Tier 4 list of 12 settlements.

We see no case for greenfield housing allocations at Woodseaves. In general, small housing sites for genuine local need in rural settlements would be covered by the Council's Rural Exceptions policy in its current adopted plan - which would apply across the Borough. We are not aware of any rural exception housing being approved in rural villages in Stafford Borough.

Note:

We did not find that the Revised Settlement Assessment and Profiles Topic Paper (Preferred Options Stage) was helpful in explaining the allocations at Gnosall and Woodseaves.

Summary

We cannot see a case for the additional greenfield housing allocations including at Meecebrook New Town.

Even without the allocations referred to above, Stafford Borough Council will exceed its requirements by a considerable margin - as evidenced by our representations on Housing Land Supply, windfall allowances, housing allocation numbers etc.

We consider that to propose Meecebrook at this stage is inappropriate. At present it is unjustified, and relevant information on phasing, funding, viability affordable housing, as well as infrastructure needs and costs, has not been made available.

Note:

⁶ We are aware of the abandonment of the Neighbourhood Plan in the light of the Inspector's questions to the Parish and Borough Councils.

In general, small housing sites for genuine local need in rural settlements would be covered by the Council's Rural Exceptions policy in its current adopted plan - which would apply across the Borough. We are not currently aware of any rural exception housing having been approved in rural villages in Stafford Borough.



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Appendix 9 reads:

“Meecebrook Garden Community concept masterplan, design and development principles and infrastructure delivery schedule These documents are under preparation and will be included at the Regulation 19 stage after the preferred options consultation.”

We think that this approach, to produce additional relevant new information at the very last stage before the Examination in Public is not in accordance with good practice and could be seen as an abuse of process.

Appendix B

Meecebrook New 'Garden' Town/Village/Community/Settlement

We do not consider that Meecebrook can be justified by the need to deliver additional housing and employment land in the Borough for the reasons given in the representations above.

We have found no evidence to support the additional housing numbers (more than 6,000 homes are referred to in the Preferred Options) put forward to justify including the new town in the Plan proposals.

The plan appears to include a land area larger than that of Stone with potentially a similar population to that of Stone.

We have not found any reference to the area (amount) of land included in the proposal, or the amount of this which is greenfield, or the proportion of the area which is currently in agricultural use.

Neither Staffordshire County Council, which is reported to be supporting the new town, nor Stafford Borough Council has indicated in the published how much they already have contributed and intend to contribute in the future to the promotion and development on the new town of Meecebrook and the cost to taxpayers.

The Government agreed to include the proposal for a new settlement of 10,000 new homes at Meecebrook, which was announced by the Ministry of Housing and Local Government in March 2019⁷ in its list of five new towns that 'will receive a share of £3.7 million of funding to fast-track specialist survey work and planning works necessary for each new town's development'. Stafford Borough Council has reported that it has "received over £1million of government funding to help with this opportunity, supporting the development of visionary and evidence based documents."⁸

It is reported that:

"The concept of locating a new settlement at Coldmeece is not a new one and has been mentioned since munition production at MOD Swynnerton ceased after WW2. The concept for this new settlement was revisited in 2015, gaining further momentum when it was included

⁷ Press release. £3.7 million to fund 5 new garden towns across the country
<https://www.gov.uk/government/news/37-million-to-fund-5-new-garden-towns-across-the-country>

⁸ <https://www.staffordbc.gov.uk/meecebrook-new-garden-settlement>

in the HS2 inspired Constellation Partnership Growth Strategy which was submitted to Government in early 2017”⁹

The WW2 munitions factory, a brownfield site, which was included in the proposal put to Government in the funding bid, has now been removed from the proposals. However, no reason has been given for this. The proposed site is now predominantly greenfield.

Although the scheme has been developed over a number of years, with a great deal of money spent on staff time, consultants and other costs, there still seems to be no evidence presented to demonstrate that the new town is viable or deliverable as proposed.

From what has been presented to the public we consider that evidence has not been presented to demonstrate that:

- The new town has the support of neighbouring authorities or those in the wider region;
- The proposal has the support of more than 10% of residents within 10 miles of the town;
- The Council has apparently not given any consideration to phasing of the proposed development of the new town and this is not referred to in the Vision Document and Masterplan prepared by JTP¹⁰ for the Council;
- Network Rail may not previously have been consulted on the construction of a new station as proposed;
- How many trains would use the station, if/when a station would be built, how/when it would be committed to and how it would be funded, its cost and its future viability – this is only partially covered by the Meecebrook Rail Study – Pre-feasibility Report¹¹;
- “Meecebrook’s vision will be for a garden community that is sustainable in all forms by reducing carbon use and being a self-sufficient community”¹² - but no detail is given of how this will be achieved.
- The impact of significantly increased traffic on places such as Yarnfield and Eccleshall does not appear to have been considered by the Borough Council, any of its consultants or Staffordshire County Council as Highway Authority.

⁹ Planning Context Page 10

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Vision-Accessible.pdf>

¹⁰

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Vision-Accessible.pdf>

¹¹

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Rail-Study-Pre-Feasibility-Report.pdf>

¹²

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Development/Meecebrook/Meecebrook-Leaflet-Accessible.pdf>



- The highways infrastructure needs, the location and nature of the improvements required, the cost of the works and how they are to be funded have been considered;
- The provision of public transport in the new town has been considered;
- The location and cost of new sewage treatment facilities (now generally called water reclamation works) - and how they will be phased and funded;
- The provision of a water supply - and how it will be funded;
- The avoidance of increased flooding;
- The cost of new schools (primaries and secondary - or three tier) – their phasing and how they will be funded;
- The cost of construction of surgeries for doctors, dentists, other health workers – their phasing and how they will be funded;
- How new retail facilities are to be provided and how it can be ensured, in practice that they will be built and brought into use when required.;
- How the open spaces, public playing fields, community buildings and similar facilities are to be provided, laid out, phased and paid for. How subsequent maintenance will be funded;
- Any assessment has been made of land values and the contributions to infrastructure which will be required to be made by landowners and developers;
- The proportion of landowners with land owned on the proposed site of the new town who have agreed the proposals and are supportive of its phasing. (It is reported that Borough Council staff have been visiting landowners during this consultation but the purpose of the visits, or even whether they have been made, has not been disclosed by the council);
- The funding mechanism to be used to secure comprehensive development in accordance with the Masterplan;
- The Vision Document is useful as a checklist of good practice and a vision of utopia - but does have a number of omissions.

Appendix C

Windfall sites

NPPF¹³ definition of windfall sites: Sites not specifically identified in the development plan.

We welcome the proposed inclusion of an allowance for windfall housing, particularly as no windfall allowance was made in the currently adopted Local Plan 2011-2031. This has resulted in housing permissions and completions well in excess of the plan's proposed numbers (20% over by 2022).

NPPF extract

69. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved; b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward; **c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes;**

NPPF extract

71. Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. **Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.** Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

The Borough Council is very good at monitoring housing commitments, and completions, their sources (for example whether greenfield or brownfield (Previously Developed Land), windfalls and allocations, site size, etc. Each year the Council produces a document entitled 'Land for New Homes - The Housing Monitor'. We agree with the Council's statement that "*It is important*

¹³ 20 Jul 2021 — The **National Planning Policy Framework** was revised on 20 July 2021 and sets out the government's planning policies for England.
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

*to monitor windfall provision as an assessment of past trends, and to be able to derive some indication as to likely future supply.*¹⁴

Using the percentages quoted in Land for New Homes for each year 2012-2022 it is clear that an average of significantly over 400 dwellings per year were built on windfall sites - and these completions exceeded numbers of homes built on allocated sites.

Conclusion

We consider that the proposed total allowance of only 750 windfall homes for the new plan is unjustifiably low and should be re-considered in the light of meeting NPPF guidance.

¹⁴ **Land for New Homes** 2021 Section 6 Page 21.
<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Monitoring/Land%20for%20New%20Homes%202021%20FINAL.pdf>

From Land for New Homes. The Housing Monitor.

Published annually by Stafford Borough Council.

SBC data		Our calculation using SBC data	
Year	Completions total	Total for windfalls*	Total for allocations
2022 completions	506 (windfalls 56%)	283	223
2021 completions	620 (windfalls 49%)	303	317
2020 completions	752 (windfalls 53%)	398	354
2019 completions	699 (windfalls 56%)	391	308
2018 completions	863 (windfalls 74%)	638	225
2017 completions	1010 (windfalls 77%)	777	33
2016 completions	863 (windfalls 74%)	505	278
2015 completions	428 (windfalls 90%)	385	43
2014 completions	411 (windfalls 100%)	411	0
2013 completions	306 (windfalls 100%)	306	0
2012 completions	425 (windfalls 100%)	425	0
Total		4822	1981

* Rounded down.

In the period 2012 to 2022 the average rate of windfall completions was 438 per year (4822 divided by 11).

In the same period the average rate of completions on allocated sites has been 165 per year. (1981 divided by 11).

Notes:

It may be argued that these numbers have been 'skewed' by windfall permissions which were granted to extend a number of 'Key Service Villages' - where no allocations were made but a total allowance of 1200 was made in Part 1 of the Adopted Local Plan 2011 to 2031.

However, Part 1 of the plan did not identify village boundaries and Stafford Borough Council granted many permissions on unallocated sites.

Taking 1200 from windfall numbers:

1. As if they had been allocated sites completed in the period 2012 to 2022 and assuming that they had all been built;
2. Transferring 1200 from windfalls to allocations would give a total on allocated sites and Key Service Villages of 3181 (1981+1200) and average completion rates would be 289 p.a.
3. The new 'residual number' of windfalls would be 3622 (4822-1200) and average completion rates would be 329 p.a.

Part 2 of the plan identified village boundaries. Part 2 was adopted some years later than Part 1.

