

SOUTH STAFFORDSHIRE LOCAL PLAN – PREFERRED OPTION

STAFFORD BOROUGH COUNCIL RESPONSE - 6 DECEMBER 2021

Thank you for the opportunity to respond to the South Staffordshire Local Plan Preferred Option 2018 – 2037 consultation document.

As Stafford Borough is a neighbouring authority to South Staffordshire District a number of the strategic key issues and growth options could have development and infrastructure implications for the Borough, although it is worth noting that Stafford Borough is not within the Greater Birmingham Housing Market Area, the same Functional Economic Market Area nor the Greater Birmingham & Solihull LEP area.

It is important to ensure that a balanced approach takes place between the development requirements of neighbouring areas and the focus for new infrastructure, housing and employment growth within the South Staffordshire District area. On this basis, in terms of the future housing provision, Stafford Borough considers that the preferred option of meeting the current local housing need of 4,881 plus 4,000 new homes towards the Black Country shortfall is the most appropriate approach, noting the impact on the West Midlands Green Belt covering much of South Staffordshire District and the need to minimise infrastructure implications for neighbouring areas.

Furthermore it is considered that the preferred option is appropriate in terms of addressing the employment land provision. In general it is considered that the preferred option will facilitate a mix of urban and rural housing solutions to deliver economic growth whilst seeking to protect the high quality environments across the Local Plan area. With regards the delivery of new housing locations, the Borough Council supports the preferred option as an appropriate balance across Tiers 1 to 3 based on access to services and facilities together with a focus on maximising the use of brownfield land. This will ensure future sustainable development by utilising existing and new infrastructure provision due the Green Belt position.

Nevertheless it should be noted that the Borough Council has significant concerns in terms of Policy DS3 and Table 8 regarding an urban extension of Stafford Town arising from new development being identified on the southern boundary of Stafford Borough for a minimum of 168 houses in the A34 corridor, Weeping Cross south of Stafford as part of Locality 1, Site 036c. This would not appear to accord with Strategic Objective 2 of the New Local Plan Preferred Option as a sustainable approach to meeting the needs of the Greater Birmingham Housing Market Area. In particular it is considered that this location is less sustainable and deliverable than other sites in South Staffordshire adjacent to or in close vicinity to the Black Country authorities where housing need is originating. Therefore reference to this new development should be removed from the New Local Plan process and subsequent iterations of the Plan, including reference in Policy DS3, Table 8, Policy SA5, paragraph 4.24 and Appendix F.

Furthermore such a development does not demonstrate it would provide appropriate infrastructure to mitigate the impact. There is no relationship to the existing urban form. The site is remote from any settlement or services in South Staffordshire, with the occupiers of the development looking to Stafford to provide their services. Accordingly this will impact on roads, schools and leisure provision in Stafford, which have a number of capacity issues. To date further details have not been provided to demonstrate the following, with very limited information in the latest Infrastructure Delivery Plan published alongside the Local Plan preferred option:

- that highways and education impacts in Stafford Borough can be acceptably mitigated;
- that contributions to meeting Stafford's affordable housing need and providing for leisure facilities in Stafford would be secured; and
- that impacts on the landscape, including the setting of the Cannock Chase Area of Outstanding Natural Beauty (AONB), would be acceptable.

With regards to future provision outside of South Staffordshire District, the Borough Council can confirm it is not in a position to meet any of the shortfall arising from the Black Country at this stage and furthermore can not provide for any unmet gypsy, traveller & travelling show-people needs within Stafford Borough.

The Borough Council also notes the area of search along the A449 corridor for a new settlement beyond the plan period, after 2038 in Policy DS4 which includes the area around Dunston south of the Stafford Borough boundary. However this option, when previously assessed through the GBHMA Strategic Growth Study 2018 was not one of the recommended areas of search for strategic development. Any development in this location would have significant impacts on Stafford Borough. The Strategic Growth Study identified north of Penkridge as a recommended area of search for a strategic urban extension. In our view this warrants further investigation, as an alternative to a new settlement or to new homes south of Stafford. We would therefore be grateful if you could ensure that we are kept updated on the consideration of new settlement options and would welcome the opportunity to comment further, and consider infrastructure implications.

The adopted Plan for Stafford Borough (June 2014) focuses the majority of new housing and employment provision at Stafford Town, without releasing Green Belt areas, and a number of significant development sites are now being delivered. As you may be aware the Borough Council has recently initiated a New Local Plan to set out the future development strategy beyond the adopted Plan period of 2031.

In particular the Habitat Regulations Assessment of future housing growth in South Staffordshire District will need to be addressed in order to provide mitigation measures for the Cannock Chase Special Area of Conservation (SAC) together with implications for the wider Cannock Chase Area of Outstanding Natural Beauty. The Borough Council will continue to work alongside South Staffordshire District through the Cannock Chase SAC Partnership.

The Borough Council would welcome an acknowledgement of this response and the opportunity to enter into a Duty to Co-operate Statement with South Staffordshire District Council as part of preparing the new Local Plan to support delivery of housing and employment requirements in the context of the wider area.

I look forward to hearing from you in due course.

Kind regards

Alex Yendole
Strategic Planning & Placemaking Manager
Stafford Borough Council