

HEARING STATEMENT

MATTER 13: Community Services, Facilities & Infrastructure

BLOOR HOMES LTD, CAMERON HOMES LTD, LOVELL HOMES LTD, FOUR ASHES ROAD LTD

1. ISSUE 1

Whether the approach of Policy EC8 to retail development proposals is justified, effective and consistent with national policy.

Question 1: In terms of being positively prepared, justified and consistent with national policy what is the basis of this policy approach?

f. Is it clear whether the net floorspace requirements for the provision of impact assessments will apply to Strategic Development Locations? How have the potential effects of the retail proposals for sites allocated by Policies SA1 and SA2 on nearby local centres been assessed in the absence of any specific floor space requirements?

- 1.1 The Policy is not clear on whether net floorspace thresholds should apply to Strategic Development Locations. However, both Strategic Development Locations are now subject to planning applications (currently pending determination).
- 1.2 The Land East of Bilbrook SDL outline planning application (24/00793/OUTM) makes provision for a Local Centre to contain up to 1,000m² of commercial/community floorspace, including up to 500m² of retail provision.
- 1.3 The Land North of Penkridge SDL outline planning application (24/00427/OUTMEI) also includes provision for a Local Centre to contain up to 1,000m² of commercial/community floorspace incorporating up to 500m² of retail uses.
- 1.4 Therefore, both SDLs comprise a level of retail floorspace that do not exceed the net retail floorspace thresholds contained within Policy EC8 and are not required to undertake an impact assessment.

Question 3: Are any modifications necessary in the interests of soundness?

- 1.5 No. In respect of potential effects of the retail proposals for sites allocated by Policies SA1 and SA2 this has been resolved through the development management process.

2. Issue 4

Whether the approach of Policy EC11 to infrastructure is justified, effective and consistent with national policy?

Question 1: In terms of Policy EC11:

- a. *What is the basis of this policy approach, and is it justified and consistent with national policy?*
- 2.1 The policy seeks to ensure planned growth is supported by necessary infrastructure, delivered in a timely fashion.
 - b. *Is the approach of Policy EC11 justified and is it consistent with the preferred infrastructure led strategy that focuses development towards larger and better-connected settlements? What evidence exists to demonstrate that the effects of the planned growth on local infrastructure capacity have been identified; fully considered; and can be adequately mitigated by the developer?*
 - 2.2 The approach is consistent with the infrastructure led strategy, which focuses development towards larger and better-connected settlements. It is recognised that the Policy should be read in conjunction with Policies SA1 and SA2 which set out specific infrastructure requirements to support the identified strategic growth locations.
 - 2.3 In determining the required infrastructure to support the Strategic Development Locations, the Council has undertaken a thorough exercise in determining infrastructure gaps and exploring infrastructure improvements to support planned growth. In preparing a comprehensive site-wide Master Plan (SMP) for both sites, Bloor Homes has worked collaboratively with the Council, Staffordshire County Council, other infrastructure providers and neighbouring LPAs. This exercise determined the effects of planned growth on local infrastructure capacity and the form and timing of any appropriate mitigation.
 - 2.4 Consideration of required supporting infrastructure has been further tested through pre-application community engagement and discussion with the Council and key stakeholders.
 - c. *To what extent does Policy EC11 provide sufficient clarity on when each of the relevant infrastructure requirements are triggered; how these will be calculated; and how they will be secured, so that Policy EC11 can be satisfied?*

- 2.5 Policy EC11 doesn't provide clarity on when each of the relevant infrastructure requirements are triggered or how these will be calculated. Whilst signposting to other policies and processes is identified in respect of the Strategic Development Locations, the policy remains vague in respect of other proposed allocations.

d. In terms of effectiveness, is the penultimate sentence of the policy up to date?

- 2.6 The penultimate sentence refers to the infrastructure requirements for the Strategic Development Locations being set out within Policies SA1 and SA2, the IDP and through the masterplanning process.
- 2.7 With regard to both SDLs, the masterplanning process has been completed. Applications submitted in respect of both sites make provision for infrastructure in line with Policies SA1 and SA2.
- 2.8 It should be noted however, that consultee responses to the applications to date identify revised requested contributions and triggers. In many cases the requested infrastructure contributions are significantly higher than those assumed within the Viability Study Stage 2 report [EB40] and these costs have not been revisited through the Further Note on Viability [EB39].

g. Are any modifications necessary in the interests of soundness?

- 2.9 The Policy should signpost the IDP and provide a commitment to regularly updating this 'living document' to provide up to date infrastructure requirements, costings and delivery mechanisms. This is necessary to provide a level of certainty to the development industry.
- 2.10 As the whole plan viability assessment was undertaken in 2022 it is recommended that a review is undertaken to take account of more up to date infrastructure costs alongside a review of baseline costs including build costs which have increased markedly since 2022.

