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Dear Members

### **Cabinet**

A meeting of the Cabinet will be held on **Thursday 9 April 2026** at **6.30pm** in the **Craddock Room, Civic Centre, Riverside, Stafford** to deal with the business as set out on the agenda.

Please note that this meeting will be recorded.

Members are reminded that contact officers are shown at the top of each report and members are welcome to raise questions etc in advance of the meeting with the appropriate officer.

A handwritten signature in black ink, appearing to read "I. Curran".

Head of Law and Governance

## CABINET - 9 APRIL 2026

Chair - Councillor A T A Godfrey

### AGENDA

- 1 Minutes of 12 March 2026 as circulated and published on 13 March 2026
- 2 Apologies
- 3 Councillors' Question Time (if any)
- 4 Proposals of the Cabinet Members (as follows):-

	<b>Page Nos</b>
<b>(a) RESOURCES PORTFOLIO</b>	
(i) Anti-Fraud and Bribery, Money Laundering and Speaking-Up Frameworks	3 - 63
<b>(b) CLIMATE ACTION AND NATURE RECOVERY PORTFOLIO</b>	
(i) Staffordshire Sustainability Board Vision and Pledges	64 - 73
<b>(c) ENVIRONMENT PORTFOLIO</b>	
(i) Primate Licensing	74 - 77
<b>(d) TOWN CENTRES REGENERATION PORTFOLIO</b>	
(i) Stafford Town Centre Development Framework and Delivery Options	78 - 157

### Membership

Chair - Councillor A T A Godfrey

A T A Godfrey	- Leader
R Kenney	- Deputy Leader (Town Centres Regeneration Portfolio)
R P Cooke	- Resources Portfolio
I D Fordham	- Environment Portfolio
J Hood	- Community Portfolio
G P K Pardesi	- Leisure Portfolio
A N Pearce	- Climate Action and Nature Recovery Portfolio
A F Reid	- Economic Development and Planning Portfolio

**Agenda Item 4(a)i**

# Anti-Fraud and Bribery, Money Laundering and Speaking-Up Frameworks

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	9 April 2026
<b>Report of:</b>	Head of Business Support and Assurance
<b>Portfolio:</b>	Resources Portfolio

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The following matter was considered by the Audit and Accounts Committee at its meeting on 25 March 2026 and is submitted to Cabinet as required.

## **1 Purpose of Report**

- 1.1 To seek approval for the adoption of:
- the revised Speaking-up Framework (Formerly Confidential Reporting).
  - the revised Anti-fraud and Bribery Framework; and
  - the revised Anti-money Laundering Framework.
- 1.2 These three policies set out a framework for the identification, reporting and investigation of improper behaviour towards the Council.

## **2 Recommendations**

- 2.1 That the Anti-fraud and Bribery Framework, the revised Confidential Reporting Framework and the Anti-money Laundering Framework be adopted.

### **Reasons for Recommendations**

- 2.2 The Council has existing policies and arrangements in place for these areas, but they were last approved in 2014 and it is timely to now review - in particular due to the need to reference the changes brought in by the Economic Crime and Corporate Transparency Act (2023) which brought in a corporate offence of failure to prevent fraud.

- 2.3 The other policies have been reviewed and updated to follow current best practice and guidance. This has included the renaming of the Confidential Reporting Framework to the Speaking-Up Framework on the document to encourage people to speak-up if they have concerns or see things that are wrong.
- 2.4 These frameworks create strong reporting mechanisms which enable employees and others to report concerns safely and with confidence that they will be listened to and where necessary with protection from reprisals when concerns are raised in good faith.

### **3 Key Issues**

- 3.1 The Speaking-up framework puts in place a reporting route that can be used for a number of areas of concern, and which acts as a front-end reporting mechanism before referring the matters to the most appropriate investigation route. It also provides the route by which reports can be made in a confidential manner and provide assurance that the Council will provide employees with the statutory protection set out in the Public Interest Disclosure Act 1998.
- 3.2 The Anti-fraud and Bribery Framework sets out a reporting and investigation process for allegations of fraud and bribery as well as setting a positive anti-fraud culture for the Council.
- 3.3 The Anti-money Laundering Framework provides a reporting mechanism for concerns relating to money-laundering activities and allows for a nominated officer to give advice and collate reports to be submitted to other agencies.

### **4 Relationship to Corporate Priorities**

- 4.1 These policies support the Responsible Council/Effective Council priority.

### **5 Report Detail**

- 5.1 The Speaking-up, Anti-fraud and Bribery and Anti-money Laundering Frameworks are closely aligned policies provide key reporting frameworks which establish secure, independent mechanisms by which anyone can raise valid concerns in confidence relating to any improper, illegal or other unacceptable behaviour. They provide a key element of the Council's Corporate Governance arrangements.
- 5.2 The policies were last updated in 2014 and have been reviewed in detail to ensure that they are in line with the current legislation and best practice guidance.

- 5.3 Training and awareness raising will be carried out once the policies have been approved. It is anticipated that high level awareness training will be refreshed every 2 years with more specific and detailed training provided to key staff where this is needed such as some Housing Staff and Revenues and Benefits employees.

### **Speaking-up Framework**

- 5.4 The Council introduced a Whistleblowing policy in 1998 to comply with the Public Interest Disclosure Act 1998, and this was updated and expanded in 2009 and 2014 with the introduction of the Confidential Reporting Framework which provided a similar route by which anyone could raise concerns in addition to employees who had statutory protection.
- 5.5 A decision has been taken to rename this to Speaking-up Framework with this update as this is seen to have a more positive outlook than the previous names. The policy now seeks to create an environment where employees feel they can speak-up openly and without fear about anything they genuinely believe is not right from the way services are delivered, where health and safety may be being compromised and where residents, employees or contractors may not be acting with the best of intentions.
- 5.6 The policy looks to provide employees raising concerns with the statutory protection set out in the Public Interest Disclosure Act 1998 and Enterprise and Regulatory Reform Act 2013. However, the Council's framework still offers a wider avenue for genuine concerns to be raised about inappropriate, illegal and improper activity than those which can gain statutory protection.
- 5.7 The policy promotes an open route by which any employee, Member, contractor, supplier or the general public can raise concerns about any activity involving the Council which may be illegal, improper or dangerous. This includes theft, fraud, bribery, health and safety breaches, contract rigging, and inferior supply of work/goods etc.
- 5.8 The framework supplies a number of central points of contact who can take the concerns and pass them through to be investigated or dealt with by the most relevant policy or process. This could be disciplinary process, referral to the Police, investigation by the Health and Safety Officer etc. The framework includes protection of the individual who raised the concern from harassment and victimisation and allows their identity to be withheld where possible.
- 5.9 The Council introduced an Anti-fraud and Corruption policy in 1998 and this was updated and expanded in 2009 with the introduction of the Anti-fraud and Corruption framework.

## **Anti-fraud and Bribery Framework**

- 5.10 The policy original covered anti-fraud measures at the Council and provided a route for concerns to be raised and investigated. This was strengthened in 2014 after the Bribery Act 2010 came into force when the Council needed to revise the policy and make its stance in relation to bribery more explicit as well as providing clear guidance to staff on how to identify and avoid bribery offences.
- 5.11 With the Failure to Prevent Fraud offence contained in Economic Crime and Corporate Transparency Act (2023) the now taking effect the policy has been reviewed and refreshed to ensure that we have a sound anti-fraud culture and full buy-in from the top of the organisation down to prevent and detect fraud.

## **Anti-Money Laundering Framework**

- 5.12 The Anti-money Laundering Framework was a new policy and process in 2014 and has been reviewed and refreshed to take account of new best practice guidance and to update it in line with the other policies.

# **6 Implications**

## **6.1 Financial**

There are no direct financial implications arising from this report. Training has been requested to be funded through the Corporate Training Budget at an anticipated cost of £7,000.

## **6.2 Legal**

The Council is charged with various statutory duties and responsibilities and is further required to account for the manner in which it discharges those duties and responsibilities. The Failure to Prevent Fraud offence introduced by the Economic Crime and Corporate Transparency Act 2023 came into force on 1 September 2025. It imposes criminal liability on organisations if they fail to prevent fraud intended to benefit the organisation or their agents and is committed by employees or their agents. It is a defence for the organisation to prove that they had appropriate fraud prevention procedures in place. Failure to do so can result in prosecution with financial penalties and subsequent reputational. The adoption of these policies by the Council will assist in the good governance of the Council, combat fraud and corruption and mitigate the Council's risk of being exposed to financial loss and criminal liability.

### **6.3 Human Resources**

These policies will complement existing HR policies for dealing with grievance and disciplinary matters and the Council's Code of Conduct for employees.

### **6.4 Risk Management**

Managers are responsible for ensuring that there are adequate arrangements in place to prevent and detect fraud, bribery or other improper acts. Internal Audit also carries out reviews to assess the effectiveness of those internal controls. These policies will assist managers in providing a robust control environment as well as provide a number of ways that employees and others can raise concerns in confidence that they will be taken seriously. As such the risk of the Council becoming victim of fraud, bribery or other failings is reduced.

In addition, a Fraud Risk Register will also be developed to identify the areas of highest risk to allow the limited resources we have to be targeted efficiently.

### **6.5 Equalities and Diversity**

The policies have all been subjected to an Equality and Diversity Impact Assessment which has not highlighted any areas of concern. An ongoing review of the policies will be carried out to ensure that they remain open and accessible to all and no unforeseen equality and diversity implications arise.

### **6.6 Health**

There are no health implications within these policies

### **6.7 Climate Change**

There are no climate change implications within these policies

## **7 Appendices**

Appendix 1 - Speaking-up Framework

Appendix 2 - Anti-fraud and Bribery Framework

Appendix 3 - Anti-money Laundering Framework

## **8 Previous Consideration**

Audit and Accounts Committee – 25 March 2026 – Minute No TBC

## **9 Background Papers**

### Equality and Diversity Impact Assessments

**Contact Officer:** Stephen Baddeley

**Telephone Number:** 01543 464415

**Report Track:** Audit and Accounts Committee 25 March 2026

Cabinet 9 April 2026

**Key Decision:** No

# Speaking Up Framework

March 2026

## Contents

Policy Statement .....	1
1 INTRODUCTION.....	3
2 SCOPE OF THE POLICY .....	4
3 SAFEGUARDS – SUPPORT FOR THOSE RAISING CONCERNS .....	5
Council Responsibility.....	5
Anonymous Allegations .....	6
Unproved/Untrue Allegations.....	6
4 HOW TO RAISE A CONCERN .....	6
Employees.....	7
Members of the Public, Contractors, Suppliers.....	8
Members.....	8
Who to contact.....	8
5 INVESTIGATING A CONCERN .....	9
6 TAKING THE MATTER FURTHER.....	11
7 TRAINING & INFORMATION.....	11
8 MONITORING & REVIEW .....	13
9 RESPONSIBLE OFFICERS.....	13
10 ASSOCIATED POLICIES.....	13

**Policy Statement**

The Council is committed to ensuring that all of its activities are conducted ethically, honestly and with the highest possible standard of openness and accountability so as to protect everyone's safety and secure the proper use of public money.

It is recognised that employees, Members, the public and contractors/suppliers who deal regularly with the Council are often the first to realise that there may be something seriously wrong. This framework intends to encourage people to Speak Up and raise concerns that they may have that something is not right.

The Council expects its employees, Members and others that we deal with to come forward and raise their concerns about any Council activity.

The Council will seek to protect individuals raising concerns in the Public Interest from harassment or victimisation; confidentiality will be maintained as far as is possible and within any requirements of the law.

The Council is committed to investigating and responding to any concerns raised as fully as is possible.

**WHAT IS SPEAKING UP?**

**This Speaking Up Framework is intended to:**

- **create a safe culture and clear policies for employees of the Council to raise concerns without fear of reprisal.**
  - The Framework provides a clear and easily accessible reporting route for employees, the public and others who deal with the Council to raise concerns, and sets out a documented process that assures individuals their concerns will be handled appropriately and, where necessary, confidentially.

**The Speaking Up framework is intended to be an early warning system that can alert the Council to such things as:**

- **someone defrauding the Council;**
- **faulty machinery or unsafe working practices being used by employees or contractors;**
- **people abusing their positions via discrimination or harassment,**
- **illegal activities;**
- **concerns relating to the treatment of children and vulnerable adults; or**
- **employees or Members seeking or accepting payments in exchange for work or contracts to a specific supplier or for making a particular decision.**

**For employees there are other policies available which should be used in preference to the Speaking Up Framework depending on the circumstance. For example where they have complaints about harassment, grievances over their employment and health & safety concerns, the reporting routes set out in these policies should be followed.**

**Speaking Up is a valuable activity which can be used to inform those who need to know about fraud, corruption, cover-ups and many other problems. It is often only through the receipt of reports that this information comes to light and can be addressed before real damage is done.**

### 1 INTRODUCTION

- 1.1 Employees<sup>1</sup> and other people that the Council deal with are often in the best position to know when the interests of the public are being put at risk. The Council recognises that these people can act as useful early warning systems on matters of safety or to help uncover fraud and mismanagement within the Council. However, individuals may often not raise their concerns because they:
- feel that they are being disloyal to colleagues or the Council;
  - fear reprisals will be made through harassment or victimisation; or
  - they are unsure of the best way to proceed.
- 1.2 The Council aims to promote an open and honest culture and is committed to the highest possible standards of probity and accountability. The Council seeks to foster an environment which encourages anyone with serious concerns about any aspect of the authority's work to come forward and raise those concerns. Wherever possible the confidentiality of the individual raising the concern will be maintained.
- 1.3 This framework compliments the Council's Anti-fraud and Bribery Framework, and Disciplinary Policy. The Code of Conduct for Employees reinforces the message that concerns can be raised without fear of reprisal.
- 1.4 The Speaking Up framework is a mechanism by which concerns can be raised with the Council in a controlled and protected way; it is not a detailed investigation process in its own right. Concerns that are raised via the Speaking Up process will be reviewed and generally will be referred for investigation under the most relevant Council procedure. Examples of where the concern may be passed will include:
- disciplinary or standards investigation;
  - grievance investigation;
  - dignity at work investigation;
  - investigation by the Health & Safety Officer
  - referral under safeguarding policies; and
  - anti-fraud or bribery investigation.
- 1.5 Although this policy is predominantly aimed at employees of the Council who have statutory protection under the Public Interest Disclosure Act, the Council recognises that many other individuals and groups may also have concerns that they may wish to raise with the Council in a controlled and protected way. This framework applies equally, in terms of reporting, investigation and confidentiality to all individuals including employees, Members, agency workers, contractors, suppliers, partner organisations and the public.

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<sup>1</sup> The term employees covers Agency Staff, Temporary Workers, Consultants, Casual Staff and Volunteers.

## Speaking Up Framework

- 1.6 All individuals are encouraged to raise serious concerns within the Council without fear of retribution and irrespective of seniority, rank or status. For employees there may be other routes which should be used prior to making a report under this framework unless you feel that by raising a concern openly through the normal process would lead to harassment and victimisation.

## **2 SCOPE OF THE POLICY**

- 2.1 This policy is about creating an environment which:

- provides avenues for individuals to raise concerns and receive feedback on any action taken;
- acknowledges that individuals can take the matter further if dissatisfied with the Council's response; and
- reassures individuals that they will be protected from reprisals or victimisation.

- 2.2 Individuals are encouraged to report any serious concerns relating to an activity of the Council or the conduct of any employee or Member under this policy. Typical concerns include the following:

- conduct which is an offence or a breach of the law;
- a criminal offence has been, is being, or is likely to be committed;
- suspected or actual fraudulent or corrupt activity;
- harassment or bullying of employees or clients or the public;
- health and safety risks to employees, contractors or the public;
- damage to the environment;
- showing undue favour over a contractual or employment matter;
- a breach of the scheme of delegations, contract procedure rules or financial regulations;
- safeguarding issues relating to children and vulnerable adults; and
- a breach of the employees' or members' code of conduct.

This list is not exhaustive; the policy applies to any unethical or improper conduct.

- 2.3 This policy is **NOT** about employees lodging grievances about their employment or the public complaining about the level or quality of service that they have received. There are other policies and procedures in place to cover these situations.

- Dignity at Work Policy;
- Grievance Policy; and
- Customer Feedback and Complaints Policy.

### **3 SAFEGUARDS – SUPPORT FOR THOSE RAISING CONCERNS**

#### Council Responsibility

- 3.1 The Council recognises that the decision to report a concern is often a difficult one to make not least because of the fear of reprisal from those responsible for the malpractice. However, where there are genuine concerns the reporter has nothing to fear as they are fulfilling a duty to the Council and to those for whom it provides services.
- 3.2 Where a concern is raised the Council will be as supportive as possible. Harassment and victimisation (including informal pressure) will not be tolerated. If as a result of raising a concern in the public interest the reporter experiences any pressure, the Council will take action to protect them. Any employee or Member who is found to be victimising anyone who has raised a concern may face action under the disciplinary or Standards procedures.
- 3.3 All employees are entitled to protection under the Public Interest Disclosure Act which includes protection from harassment and victimisation due to raising a justified concern (one in the public interest). However, this does not mean that if an employee is already the subject of disciplinary or redundancy procedures, that this will be halted as a result of the employee making an allegation.
- 3.4 Where an allegation raised under this process leads to an investigation, this will be carried out in accordance with the relevant policies and legislation including the Regulation of Investigatory Powers Act, the Data Protection Act and also will act in accordance with the Human Rights Act, the Council's Anti-Fraud and Bribery Framework, the Standards Investigation Procedures for Members and the Disciplinary Policy for employees.
- 3.5 The Council will take all possible steps to maintain the confidentiality of the person making the allegation throughout the process where they have expressed a preference for their name not to be disclosed. However, it is recognised that this may not always be possible. In the event that the investigation requires confidentiality to be broken then the person will be informed in advance.
- 3.6 The Council will take steps to minimise any difficulties that the person making an allegation experiences as a result of raising a concern. For example, where the person is required to give evidence at a criminal or disciplinary proceeding then the Council will arrange for them to receive advice and support about the process that they will have to go through.
- 3.7 Any unwarranted breach of confidentiality by someone involved in the investigation of an allegation may be considered for disciplinary action. This could be where someone who is either being investigated or interviewed as part of the investigation becomes aware of the identity of the person who made the allegation and deliberately identifies them to others.

## Speaking Up Framework

### Anonymous Allegations

- 3.8 Generally, people are not encouraged to make allegations anonymously. This is because:
- being anonymous doesn't stop others from successfully guessing who raised the concern;
  - it is harder to investigate the concern if people cannot ask follow-up questions or seek clarification;
  - it is easier to protect employees/workers under the Public Interest Disclosure Act if concerns are raised openly; and
  - it can lead people to focus on the whistleblower, maybe suspecting that they might be raising the concern maliciously.
- 3.9 All allegations will be reviewed by the Council's Internal Audit Section and/or Human Resources Section in consultation with the Monitoring Officer, s151 Officer or Designated Officer for Safeguarding referrals where relevant. Where there is sufficient evidence to substantiate the allegation, it will be followed-up. However, it should be noted that anonymous allegations can be more difficult to action effectively.
- 3.10 Where an anonymous allegation is received the Council will take the following factors into account to determine the scope and depth of any investigation:
- the seriousness of the issues raised;
  - the credibility of the concern; and
  - the likelihood of confirming the allegation from the information provided and other sources in the face of a denial by the accused.

### Unproved/Untrue Allegations

- 3.11 If a genuine allegation is made but is not confirmed through investigation, no action will be taken against the reporter and the matter will be considered to be closed. However, if there is evidence that an allegation is malicious, vexatious or was made for personal gain then disciplinary action may be taken against the person making the allegation.

## **4 HOW TO RAISE A CONCERN**

- 4.1 The Council will consider concerns raised verbally or in writing provided that adequate information is provided. However, concerns are best advised in writing setting out the following:
- background and history to the concern;
  - names, dates and places (where possible); and
  - the reason you are particularly concerned about the situation.

## Speaking Up Framework

Although you are not expected to prove the truth of the allegation, you will need to demonstrate to the person you contact that there are sufficient grounds for your concern.

- 4.2 If you would prefer to discuss the issues directly with someone prior to putting them in writing then you can telephone or arrange to meet an appropriate officer from Internal Audit or Human Resources for further advice and guidance.
- 4.3 The earlier a concern is expressed the easier it will be for the Council to take action.

### Employees

- 4.4 Employees are encouraged to raise concerns that they may have with their immediate line-manager or their Head of Service through the day-to-day reporting processes. Where other policies are available to employees (such as grievance or Dignity at Work) these routes should be pursued. However it is recognised that the seriousness, sensitivity or the circumstances of the allegation may make it unwise to approach their line-manager; for example where the line-manager is believed to be involved. If an employee feels that they cannot raise the issue with their line-manager, they should contact one of the people listed at 4.11 below.
- 4.5 A concern should only be raised under this policy if the employee considers that, in their opinion, they have not had a satisfactory response from their line-manager or if circumstances make it unwise for the person to approach their line-manager. In addition, employees need to show they are raising the concern in the "Public Interest" in order to have the statutory protection offered by the Public Interest Disclosure Act.
- 4.6 It may be relevant for employees to discuss the matter with colleagues if they believe similar concerns are held as it may be easier for the matter to be raised where two or more individuals share the same concerns. However, once a concern has been raised under this Speaking Up Framework you should be mindful that any further discussions with other parties may affect the ability of the Council to maintain your confidentiality.
- 4.7 Employees can also approach their trade union to raise the concern on their behalf; this would normally be done through existing consultation routes. However, where relevant the Union can raise the concern directly with one of the named officers below.
- 4.8 Employees have the right to invite a trade union representative or workplace colleague to be present at any interviews or meetings held in relation to the concerns that they have raised.

## Speaking Up Framework

### Members of the Public, Contractors, Suppliers

- 4.9 Members of the public, contractors and suppliers to the Council can contact one of the designated officers set out in 4.11 directly if they have any concerns.

### Members

- 4.10 Members should address any concerns that they have to the Chief Executive, s151 Officer or Monitoring Officer (Head of Law & Governance). However, if they believe one of these people may be implicated then they can contact the Chief Internal Auditor or Head of Business Support & Assurance directly.

### Who to contact

- 4.11 The following people are the key contacts under this Speaking Up Framework and should be contacted if you wish to raise any concerns or for advice under this policy. They will be able to refer the matter to other employees for investigation if relevant:

- **Chief Internal Auditor – 01543 464415**
- **Head of Business Support and Assurance– 01543 464411**

- 4.12 Alternatively employees and Members may choose to approach one of the following directly for specific concerns:

- **Monitoring Officer (Head of Law & Governance) – 01785 619220**
- **Human Resources Manager - CCDC 01543 464426;**
- **Health & Safety Officer – CCDC 01543 464227; SBC 01785 619404**
- **s151 Officer – 01543 464334**

- 4.13 In certain circumstances employees may wish to contact an appropriate external body – e.g. Trade Union to raise the concern under this policy on their behalf. (See also section 6)

- 4.14 For Housing Benefit Fraud Allegations the National Benefit Fraud Hotline should be contacted on 0800 854 440.

- 4.15 For Council Tax fraud you can leave a message on the Authority's Fraud Hotline on 01785 619447 (this is a 24 hour answering machine), or to speak to someone directly, call 01785 619443.

## Speaking Up Framework

- 4.16 Issues relating to the Safeguarding of Children and Vulnerable Adults can be raised directly with Staffordshire Safeguarding Children's Board via the County Council:

To report a child safeguarding concern, please follow <https://www.staffordshire.gov.uk/Care-for-children-and-families/Childprotection/First-Response.aspx#Reportaconcern>

Alternatively, call 0300 111 8007 and select option 1 between Monday to Thursday 08:30 to 17:00 and Friday 08:30 to 16:30. Outside of these hours or on weekends and bank holidays, please contact the Emergency Duty Team by phoning 0345 604 2886.

To report an adult safeguarding concern, please follow <https://www.staffordshire.gov.uk/Advice-support-and-care-for-adults/reportabuse.aspx>

Alternatively, call 0345 604 2719 between Monday to Friday 09:00 to 17:00. Outside of the hours above, or on weekends and bank holidays, please contact the Emergency Duty Team by phoning 0345 604 2886.

If a child or vulnerable adult is in immediate danger, you must always call 999.

- 4.17 Employees can raise safeguarding concern to the Council's Designated Officer for Safeguarding – Head of Wellbeing 01543 464210 or 01785 619309

## **5 INVESTIGATING A CONCERN**

- 5.1 An initial review will take place by the Council's Internal Audit Section and/or Human Resources Section in consultation with the relevant Head of Service/Service Manager, s151 Officer, Monitoring Officer, or Designated Officer for Safeguarding (where they are not implicated in the allegation) to establish the facts of the allegation.
- 5.2 Where the concern raised is a Housing Benefit related matter then this will be referred to and be investigated by the DWP. Where the concern relates to Council Tax Reduction or Tenancy matters this will be investigated by the relevant internal service team. Where matters relate to safeguarding children and vulnerable adults the matter will be referred to the relevant agencies.
- 5.3 This initial review will determine whether the concerns are more appropriate to be addressed under one of the Council's other policies/procedures, such as Customer Feedback & Complaints or Grievance Policy. Where allegations fall under the scope of a specific policy/procedure they will normally be referred for consideration under those procedures by the Reviewing Officer after consultation with the person making the complaint.
- 5.4 The Reviewing Officer will determine the most appropriate action; this will depend on the nature of the concern but could include any of the following:

## Speaking Up Framework

- an internal investigation (for example a disciplinary investigation or an investigation under the Anti-fraud and Bribery Framework's fraud response plan);
  - referral to the Police
  - referral to Safeguarding agencies;
  - referral to the National Crime Agency (for potential money laundering allegations);
  - referral to the Council's External Auditor;
  - referral to the Health & Safety Executive or other regulatory body
  - referral to the Standards Committee.
- 5.5 The amount of contact between the person raising a concern and the Reviewing Officer will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the person who raised the concern in a discrete manner.
- 5.6 With the exception of anonymous allegations, the Reviewing Officer will write to the person raising the issue within 10 working days of a concern being received to:
- acknowledge that the concern has been received;
  - indicate how it is proposed to deal with the matter (e.g. referral under another policy, investigation etc);
  - inform whether further investigations will take place, and if not, why not.
- 5.7 It will often only be possible for the Reviewing Officer to offer an estimated timescale for any investigation as it may not be clear how much information will need to be reviewed to enable a full investigation to be concluded. However, wherever possible (and subject to constraints relating to confidentiality etc) the Reviewing Officer will keep the person who raised the concern informed of further progress at regular intervals throughout the course of any investigation.
- 5.8 The Council accepts that individuals who raise concerns under this process will want to be assured that the matter has been properly addressed. Therefore, the Council will provide the person raising a concern with information relating to the outcome of any investigations. However, the information provided may be limited due to confidentiality and data protection issues.
- 5.9 A full report of any findings will be provided at the conclusion of the investigation in accordance with the relevant policy. This will be to the relevant member(s) of Leadership Team unless they have been implicated in the allegation. In the event that the Chief Executive is implicated, the Leader of the Council will receive the report.

## **Speaking Up Framework**

- 5.10 Where allegations implicate Members, the Monitoring Officer will be informed throughout the process and if necessary the matter will be referred to the Standards Committee for their consideration and possible investigation of a breach of the Member's Code of Conduct.
- 5.11 Summaries of investigations and lessons learnt may also be reported to Leadership Team and the Audit & Governance Committee where internal process failures have been discovered as part of the investigation.

### **6 TAKING THE MATTER FURTHER**

- 6.1 This framework aims to provide employees and others with an avenue to raise concerns within the Council. It hopes that everyone who chooses to raise a concern under this process will be satisfied with the response to their concerns. However, if the individual is not satisfied with the outcome of the investigation they can make a complaint to the Council's Monitoring Officer.
- 6.2 Individuals may choose to seek advice in relation to the matter from outside the Council; the following are possible contact points:
- External Auditors;
  - relevant professional bodies/regulatory organisations;
  - the Local Government Ombudsman;
  - your Solicitor;
  - the Police;
  - Public Concern at Work;
  - Trade Unions;
  - Professional Associations.

### **7 TRAINING & INFORMATION**

- 7.1 The Council acknowledges the importance of ensuring that Members and employees are fully aware of their personal responsibilities
- 7.2 The Council will ensure periodic awareness reminders are issued to staff.
- 7.3 There are a number of key documents which set out those responsibilities and these include:
- Codes of Conduct for Members
  - Code of Conduct for Employees
  - Financial Regulations and Procurement Regulations
  - Anti-Fraud & Bribery Framework
  - Anti-Money Laundering Framework
  - The Constitution
  - Relevant Professional Ethical Codes or frameworks
  - Safeguarding Children and Vulnerable Adults Policy.

## Speaking Up Framework

- 7.4 All employees will be made aware of their responsibilities under this framework by their line managers as well as ensuring that they are aware of the relevant reporting procedures.
- 7.5 The Council recognises that the continuing success of this strategy and its general credibility will depend largely on the effectiveness of programmed training and responsiveness of employees throughout the organisation. Awareness training will be made available to managers and key employees.
- 7.6 The Council will also ensure that all contractors/suppliers are aware of the existence of this framework and their responsibilities under it as part of the tendering process.
- 7.7 This framework will also be made available to contractors and the public by publishing it on the Council's website.

## **8 MONITORING & REVIEW**

- 8.1 The Head of Business Support & Assurance will maintain a continuous overview of the operation of this Speaking Up Framework to ensure it is consistently applied and will report, as necessary, to the Council via the Audit & Governance Committee on the effectiveness of the framework.
- 8.2 This framework will be reviewed and updated periodically to follow best practice and other changes.
- 8.3 Monitoring on the application of the framework, including allegations not proven or false allegations will be carried out. This will include monitoring of equality and diversity issues in relation to the person who has an allegation made against them and in relation to the ultimate outcome of any investigations. Information that may be recorded includes age, gender, race, disability, etc. However, it may not be possible to obtain all information for all cases.
- 8.4 This information will be used to monitor trends and to ensure that the framework is applied equally to all and in particular that decisions to investigate or take other action are consistently applied.

## **9 RESPONSIBLE OFFICERS**

- 9.1 The Head of Business Support & Assurance has overall responsibility for the maintenance and operation of this policy.
- 9.2 The Chief Internal Auditor, Head of Business Support & Assurance, Head of Human Resources, s151 Officer and Monitoring Officer can be contacted to discuss any aspect of this policy in more detail or to offer advice and guidance.

## **10 ASSOCIATED POLICIES**

- 10.1 Other associated Council Policies:-
- Anti-fraud & Bribery Framework
  - Disciplinary Policy
  - Anti-Money Laundering Framework
  - Members & Employees Codes of Conduct
  - Regulation of Investigatory Powers Policy
  - Employee Grievance Policy
  - Customer Feedback & Complaints Policy
  - Dignity at Work Policy
  - Safeguarding Children & Vulnerable Adults Policy



# **Anti-Fraud and Bribery Framework**

March 2026

## Contents

Policy Statement .....	2
1 INTRODUCTION.....	3
2 CULTURE .....	5
Reporting Concerns – Employees / Elected Members.....	6
Reporting Concerns – Members of the Public, Suppliers, Contractors .....	6
3 PREVENTION.....	8
Employees .....	8
Managers (Service Managers & Leadership Team).....	10
Elected Members .....	10
Contractors/Suppliers.....	11
Role Conflict and Separation .....	11
Systems .....	11
Co-operation with Others .....	12
4 DETECTION AND INVESTIGATION .....	13
Fraud Response Plan ( <i>Excluding Housing and Council Tax Benefit Fraud</i> )	13
Employees .....	14
Elected Members .....	14
External Frauds.....	14
Housing & Council Tax Benefit Fraud .....	15
Prosecution Policy.....	15
Support for Witnesses During An Investigation/Prosecution .....	15
5 TRAINING & INFORMATION.....	17
6 Monitoring & Review .....	18
7 ASSOCIATED POLICIES.....	19

**Policy Statement**

**The Council has a zero tolerance to fraud and bribery.**

**The Council will take positive action regarding any improper practices that are identified and will deal with perpetrators from within and outside the Council.**

**The Council will consider taking legal and/or disciplinary action where there is evidence of fraud or bribery occurring. This will include referring matters to the Police for criminal investigations.**

**It is expected that Members and employees at all levels will adopt the highest standards of propriety and accountability and will lead by example in ensuring adherence to rules, procedures and agreed practices**

**Employees and Members will not pay bribes or offer improper inducements to anyone for any purpose; they will also not accept or solicit bribes or improper inducements.**

**The Council also expects that individuals and organisations (e.g. the public, suppliers/contractors), which it comes into contact with, will act towards the Council with integrity and without thought or actions involving fraud or bribery. The Council in turn will endeavour to ensure that all of its dealings will be on the same basis.**

**The protection of the public purse is everyone's responsibility.**

## **1 INTRODUCTION**

1.1 This framework represents a commitment by the Council to protect public funds and to ensure that all Council activities are carried out in accordance with the principles of openness, honesty and integrity.

1.2 In carrying out its functions and responsibilities the Council is fully committed to deterring fraud and bribery, whether it is attempted on or from within the Council. The Council is committed to an effective anti-fraud and bribery strategy designed to:

- limit, as far as possible, the opportunities to commit fraudulent acts – **prevention**;
- enable any such acts to be **detected** at an early stage; and
- deal with any subsequent **investigations** in a prompt, thorough and professional manner.

1.3 The Fraud Act 2006 defines fraud as :-

**“the intention to make gain or cause loss by false representation, failing to disclose information or abuse of position.”**

1.4 The Bribery Act 2010 defines bribery as:

**“the giving or taking of a reward in return for acting dishonestly and/or in breach of the law. The reward could relate to money, payment in kind, goods or services”**

1.5 There are four offences under the Bribery Act:

- The giving or offering of a bribe.
- The request for or acceptance of a bribe.
- Bribing a foreign public official.
- The failure of a commercial organisation to prevent bribery.

1.6 This framework outlines the mechanisms whereby the Council will deliver its policy commitment to its partners, customers, contractors and to the general public. It also contributes to the Council’s defence against an allegation of failure to prevent bribery. The framework covers a series of measures designed to frustrate any attempted bribery or fraudulent act; these are grouped under the following headings:

- Culture
- Prevention
- Detection and Investigation
- Training

## Anti-Fraud and Bribery Framework

- 1.7 This framework is designed to follow the national counter fraud and corruption strategy for Local Government set out in Fighting Fraud and Corruption Locally 2020 which sets out the following pillars of activity:



- 1.8 The Framework also recognises that the Council has a duty under the Economic Crime and Corporate Transparency Act (ECCTA) 2023 which created a “failure to prevent fraud” offence for large organisations. This means that the Council and its Senior Management could be prosecuted if they fail to take reasonable steps to prevent fraud committed by its employees, Members and others associated with it.
- 1.9 As a landlord Cannock Chase District Council also needs to comply with the requirements of the Prevention of Social Housing Fraud Act 2013.
- 1.10 The Council’s Speaking-up Framework also encourages everyone to disclose concerns about potential fraud and bribery and therefore should be read alongside this framework.
- 1.11 If Members, managers, employees<sup>1</sup> or members of the public are unsure of the appropriate action to take in relation to the items contained in the framework then they should contact one of the officers detailed at 2.12 for advice and guidance.

<sup>1</sup> The term employees covers Agency Staff, Temporary Workers, Consultants, Casuals and Volunteers.

## **2 CULTURE**

- 2.1 The culture and tone of the Council will continue to be one of honesty and opposition to fraud and bribery.
- 2.2 The culture and procedures established by the Council are intended to ensure that high standards in public life are embedded throughout the Authority. It is expected that Members and employees at all levels will adopt the highest standards of propriety and accountability and will lead by example in ensuring adherence to rules, procedures and agreed practices.
- 2.3 Some examples of the rules and procedures include:-
- Financial Regulations & Procurement Regulations
  - Codes of Conduct for employees and Members (including guidance on gifts & hospitality and declarations of interest)
  - Scheme of Delegations
  - HR Policies and Procedures
  - Departmental policies and working practices
- 2.4 The Council also expects that individuals and organisations (e.g. the public, suppliers/contractors), which it comes into contact with, will act towards the Council with integrity and without thought or actions involving fraud or bribery. The Council in turn will endeavour to ensure that all of its dealings will be on the same basis. The protection of the public purse is everyone's responsibility.
- 2.5 All Members and employees play an important part in creating and maintaining the culture within the Council. Everyone is therefore positively encouraged to raise any concerns that they may have regarding fraud and bribery in any of the activities of the Council in the knowledge that such concerns will, wherever possible, be treated in the strictest confidence and investigated properly.
- 2.6 All Members and employees should act appropriately in all dealings and guidance on appropriate behaviour is available in the form of Codes of Conduct for Members and employees and in some cases service specific policies and codes of practice. Departments will review the risk of fraud and bribery and where necessary and develop specific guidance to reduce the opportunities available or to increase the detection of offences.
- 2.7 The Council will take a robust approach in all cases of suspected financial malpractice, fraud or bribery and will always seek to refer cases of suspected fraud and bribery to the Police for investigation.

## Anti-Fraud and Bribery Framework

- 2.8 Any Member or employee who attempts to defraud the Council, who acts corruptly or who is involved in bribery will be dealt with swiftly. Where appropriate, following allegations of fraud or bribery the Council will implement its disciplinary procedures or make a referral under the Standards process for Members. Any investigation of an employee would follow the Council's disciplinary process, and any investigation of Members would follow the Standards Process.
- 2.9 Where it is found that fraud or bribery has occurred due to a breakdown in the Council's systems or procedures, Management will ensure that appropriate improvements in systems of controls are implemented in order to prevent a reoccurrence.
- 2.10 Unless there are good reasons to the contrary, any allegations received by way of anonymous letters or telephone calls will be taken seriously and investigated in an appropriate manner. Further information on the protection that is offered to employees and others who raise concerns is contained in the Council's Speaking-Up framework.
- 2.11 The Council needs to ensure that any investigation process is not misused and, therefore, any abuse of procedures such as raising malicious and unfounded allegations may be dealt with as a disciplinary matter.

### **Reporting Concerns – Employees / Elected Members**

- 2.12 Employee concerns should be raised in the first instance directly with your supervisor, Service Manager or a member of Leadership Team. If the individual feels that this is not appropriate, then any of the following people may be approached:-

Post	Telephone
Chief Internal Auditor & Risk Manager	01543 464415
Head of Business Support & Assurance	01543 464411
S151 Officer (Deputy Chief Executive - Resources)	01543 464334
Monitoring Officer (Head of Law & Governance)	01785 619220

- 2.13 Elected Members may choose to raise their concerns with any of the above or the Chief Executive.
- 2.14 In certain circumstances you may wish to contact an appropriate external body – e.g. Trade Union to raise the concern on your behalf.

### **Reporting Concerns – Members of the Public, Suppliers, Contractors**

- 2.15 Members of the public and the Council's suppliers/contractors are also encouraged to report concerns to the Council via any of the contacts in the table at 2.12.

## Anti-Fraud and Bribery Framework

2.16 For Council Tax fraud you can leave a message on the Authority's Fraud Hotline on 01785 619447 (this is a 24-hour answering machine), or to speak to someone directly, call 01785 619443.

2.17 Housing Benefit Fraud should be reported to:

National Benefit Fraud Hotline (NBFH)

Telephone: 0800 854 440

Or visit: <https://www.gov.uk/report-benefit-fraud>

### **3 PREVENTION**

3.1 The Council is required to establish procedures for the scrutiny of its own functions to ensure that there are proper arrangements in place to administer the Council's financial affairs. This internal scrutiny occurs as a result of:

- Responsibilities arising from section 151 of the Local Government Act 1972 responsibilities and Section 114 Local Government Finance Act 1988;
- the establishment of a sound Internal Audit function in accordance with the Accounts and Audit Regulations 2015; and
- the responsibilities placed on the Monitoring Officer under Section 5 of the Local Government and Housing Act 1989.

3.2 Internal scrutiny occurs through management monitoring, Internal Audit work and the Audit Committee.

3.3 The Council's activities are also subjected to a high degree of external scrutiny by others including:

- Local Government Ombudsman;
- National Audit Office;
- External Auditors
- Central Government Departments;
- HM Revenues and Customs; and
- The general public.

3.4 In order to ensure the Council is able to effectively target its resources and not create overly burdensome procedures in areas where the risk of fraud or bribery is low each service area will conduct an assessment of its risk in these areas. These risk assessments will be documented by the Service Manager and periodically reviewed to ensure that they reflect any changes in the level of exposure.

3.5 Internal Audit will review risk registers and will also have oversight of a corporate Fraud Risk Register.

#### **Employees**

3.6 The Council recognises that a key preventative measure in dealing with fraud and bribery is to take effective steps at the recruitment stage to establish, as far as possible, the honesty and integrity of potential employees. This applies to permanent, temporary and casual posts where identity checks and immigration, asylum and nationality checks are performed as part of the pre-employment checks process.

## Anti-Fraud and Bribery Framework

- 3.7 The Council has a formal procedure for recruitment and it is important that this is complied with, especially in relation to the verification of all qualifications and the obtaining of written references to ascertain the honesty and integrity of potential employees. The Council will follow an open and fair recruitment process without favouritism or canvassing for all posts.
- 3.8 The Council's Financial Regulations, Procurement Regulations and Code of Conduct for Employees govern all employees. In addition to the Council's rules many employees will also be required to comply with the standards and ethical requirements laid down by their professional bodies. These key policies provide the operational framework for the Council and create a culture which seeks to minimise the risk of fraud or bribery occurring.
- 3.9 All employees must ensure that they declare all outside interests in accordance with the Code of Conduct for Employees and any departmental policies. Employees need to ensure personal integrity in all transactions. Where a conflict of interest may occur then the employee should not become involved in the transaction and should inform their line-manager.
- 3.10 All private employment/outside commitments performed by employees must be declared to the Council and approved in advance. Private work should be carried out in hours when the employee is not employed by the Council and should not be conducted from Council Premises or using Council tools and equipment. Further details on private work can be found in the Code of Conduct for employees.
- 3.11 Public duties are slightly different, and the Council has a separate policy which allows a set amount of paid time off to conduct these duties where they are recognised public duties (e.g. School Governors, Magistrates). However public duties must still be declared as an outside interest.
- 3.12 Employees need to ensure that declarations relating to outside interests and private works are kept up to date with any changes as and when they occur.
- 3.13 Employees must never accept gifts of cash regardless of the value. It is a serious criminal offence for an employee to receive any fee or reward other than their proper remuneration for carrying out their duties.
- 3.14 Employees also need to follow the Council's rules set out in the Code of Conduct on the giving and receiving of gifts, hospitality and sponsorship to other individuals and organisations.
- 3.15 An employee should not seek or offer any incentive or reward in return for acting in a particular way or reaching a particular decision as this would constitute a criminal offence under the Bribery Act.

**Managers (Service Managers & Leadership Team)**

- 3.16 All Managers should lead by example and ensure that there is a zero-tolerance approach to fraud and bribery within the Council. Managers should ensure that their staff and all suppliers, contractors and partner organisations that they work with are aware of this policy and any responsibilities that are placed on them.
- 3.17 Managers are responsible for ensuring that all internal controls within their area of responsibility are effectively maintained. They should investigate any potential weakness in these controls due to factors such as the level of vacancies, sickness absence or annual leave and where possible look to ensure controls remain effective and operational.
- 3.18 The Council has developed and is committed to continually improving systems and procedures incorporating efficient and effective internal controls, including the provision of adequate separation of duties. Managers have a responsibility to ensure that all systems of internal control, are operating effectively and documented adequately.
- 3.19 All processes and activities need to be designed to be open and transparent and be designed to reduce the opportunities for fraud, bribery or corrupt acts to occur. Managers are encouraged to consult with Internal Audit when they are looking to change working methods to ensure appropriate controls are built into systems and processes.

**Elected Members**

- 3.20 The activities and conduct of Members are governed by :-
- the Council's Constitution;
  - Code of Conduct for Members;
- 3.21 These matters are specifically brought to the attention of Members in the Induction pack and include the declaration and registration of potential areas of conflict. Members are advised of new requirements on them as and when they occur by the Monitoring Officer and Democratic Services.
- 3.22 Members must ensure that they act appropriately in all circumstances and should not seek or offer any incentive or reward in return for acting in a particular way or reaching a particular decision. Members may be acting corruptly if they attempt to use their position as an elected member for their own or anybody else's personal gain or loss. This could also constitute an offence under the bribery act.
- 3.23 It is important that all Members promptly complete and return their Declaration of Interests upon election and at any time when there are changes to their outside interests in accordance with the Code of Conduct. Any failure to declare an interest may lead to action being taken against the Member under the Standards process.

- 3.24 Members must also comply with the rules relating to the receipt of gifts and hospitality when considering if they can be accepted or not. Any gift must be declared in the gifts & hospitality register in accordance with the Council's Code of Conduct for Members.

#### **Contractors/Suppliers**

- 3.25 The Council expects contractors and suppliers to have a zero-tolerance approach to fraud and bribery and to establish appropriate procedures to ensure that their dealings with the Council are open and honest. We expect all contractors delivering services on behalf of the Council to establish appropriate anti-fraud & bribery policies and to have reporting routes for concerns to be raised.
- 3.26 Prospective contractors and suppliers will be vetted as part of the Procurement selection process. The Council has a mandatory obligation under Schedule 6 of the Procurement Act 2023 to exclude suppliers of work, goods, materials or services from bidding for public sector contracts when they or a director has been convicted of a fraud or bribery offence for a period of up to 5 years.

#### **Role Conflict and Separation**

- 3.27 Members and employees must always ensure that they avoid situations where there is a potential role conflict. Such situations can arise where there is externalisation of services or tendering situations. Members or employees' close friends/relations may work for companies tendering for work being let by the Council and it is therefore necessary to be open and honest where such conflicts occur. A role conflict can also occur within the Council. For example a housing tenant, family member of a housing tenant or close friend may work within the Housing Department.
- 3.28 The relevant declarations of interest should be made, and you should consider withdrawing yourself from the decision making process or not have access to relevant records where this could be seen as a role conflict. Members and employees are encouraged to seek advice and to err on the side of caution if they feel that they may have a conflict of interest in a decision being made that would benefit themselves or a close friend or relation.
- 3.29 Effective role separation will ensure that the decisions made by the Council are based upon impartial advice and avoid questions about the improper disclosure of confidential information. This is particularly important where one part of the Council may be tendering for a Council contract in competition with external companies.

#### **Systems**

- 3.30 The Council's Code of Conduct for Employees and Financial Regulations along with other Council documents and policies require employees to act in accordance with best practice.
- 3.31 The Deputy Chief Executive (Resources) has a statutory responsibility under Section 151 of the Local Government Act 1972 to ensure the proper administration of the Council's financial affairs. The Council's Financial Regulations and Procurement Regulations which outline, procedures and responsibilities should be complied with at all times.
- 3.32 The Internal Audit Section independently monitors and reviews the internal control systems established by Managers in accordance with the Audit Plan. Internal Audit also carry out investigations into alleged breaches of the Council's policies and procedures.

#### Co-operation with Others

- 3.33 Arrangements are in place to encourage the exchange of information on national and local fraud and bribery activity in relation to Local Authorities with external agencies such as:
- the Police;
  - Internal Audit Groups;
  - National Audit Office;
  - the National Anti-Fraud Network;
  - The National Fraud Authority;
  - the National Crime Agency; and
  - Government Departments and Agencies.
- 3.34 The Council is a statutory participant in the National Fraud Initiative (NFI). The Council submits data that it holds on various systems such as Housing Benefits, Insurance Claims, Creditor Payments and Housing Rents. This data is then matched with data provided by other public sector bodies to identify potential frauds. More information on the NFI can be found on the Council's website:

<http://www.cannockchasedc.gov.uk/NFI>  
<https://www.staffordbc.gov.uk/nfi>.

#### **4 DETECTION AND INVESTIGATION**

- 4.1 There are numerous systems of control in place to deter fraud and bribery, but it is often the vigilance of employees and members of the public that aids detection. Frauds are often discovered by chance or following a “tip-off” and arrangements are in place to enable such information to be dealt with appropriately. The process for following up information is contained in the Fraud Response Plan below.
- 4.2 All cases of suspected or proven fraud, bribery or other impropriety (with the exception of Housing Benefit Frauds or Social Housing Fraud) must be notified to the Chief Internal Auditor as soon as possible to ensure that a central record is maintained and to determine whether further work is needed to examine the appropriateness of the control framework in place in the area concerned. Any suspected fraud, bribery or corrupt practice involving elected members will be reported to the Monitoring Officer by the Chief Internal Auditor.
- 4.3 Early reporting is essential to the success of this strategy and the swift referral of cases of suspected fraud or bribery to the Chief Internal Auditor will:
- ensure the consistent treatment of information regarding fraud and bribery;
  - ensure the proper implementation of a fraud investigation in accordance with the Council’s Fraud Response Plan; and
  - allow for the identification of any implications in relation to Money Laundering/Proceeds of Crime Act and the relevant external notifications to be made.

#### **Fraud Response Plan**

*(Excluding Housing Benefit and Council Tax Reduction Fraud)*

- 4.4 Usually, an initial investigation will be carried out which will aim to confirm or disprove the initial suspicion or allegation by obtaining and thoroughly evaluating all material evidence to establish the facts. Where observations or surveillance are required this will be properly authorised and carried out in accordance with the Regulation of Investigatory Powers Act and the Council’s own policy.
- 4.5 The investigation will aim to:
- identify all those involved;
  - collect and record all evidence to support the allegation, and ensure that it is held securely;
  - liaise as necessary with the relevant member of Leadership Team and outside agencies where appropriate

## Anti-Fraud and Bribery Framework

- 4.6 The Chief Internal Auditor in consultation with the s151 Officer Head of Business Support & Assurance or Monitoring Officer, has the authority to determine whether to refer allegations of suspected fraud and bribery to the Police for prosecution. In most cases the Police will be invited to carry out a fraud or bribery investigation. Where the Police decide to investigate the Internal Audit section will work with alongside them to conduct an internal investigation and disciplinary action will be taken at the appropriate time.
- 4.7 At the conclusion of the investigation a report will be made to the Chief Executive, the relevant member(s) of Leadership Team and the s151 Officer/Monitoring Officer. If one of these Officers is potentially implicated in the investigation then they will be excluded from the reporting process.
- 4.8 All employees engaged in the investigation of potential fraud and bribery will ensure that the strictest standards are adhered to, in particular regarding the confidentiality of the investigation. This is especially important due to the fact that:
- Allegations and suspicions may turn out to be unfounded and hence embarrassment for the accused and the Council is spared;
  - Where fraud has occurred breaches in confidentiality could alert the suspect and give them the opportunity to cover their tracks or destroy evidence.

### Employees

- 4.9 In accordance with the Council's Disciplinary Policy & Procedures, management has the prime responsibility for investigations into the conduct of employees. However, in accordance with Financial Regulations, the s151 Officer (Deputy Chief Executive - Resources) has responsibility for organising the investigation of suspected fraud or bribery. In most cases an appropriate officer and/or the Chief Internal Auditor /the Head of Business Support & Assurance will be appointed as joint Investigating Officers and the investigation will be conducted and reported to management in accordance with the Council's Disciplinary Scheme.

### Elected Members

- 4.10 Investigation of Members will be carried out by the Head of Business Support and Assurance/Chief Internal Auditor in consultation with the Monitoring Officer. The outcome of investigations will be referred where relevant to the Standards Committee.

### External Frauds

- 4.11 Where the allegation of fraud does not implicate an employee the Head of Business Support & Assurance or the Chief Internal Auditor will conduct the investigation.

**Housing Benefit & Council Tax Reduction Fraud**

- 4.12 Housing Benefit frauds are normally investigated by the DWP.
- 4.13 Council Tax Reduction Frauds are investigated by the Revenues & Benefits' Compliance Team.

**Social Housing Frauds (CCDC only)**

- 4.14 Social Housing Fraud will be investigated by the Housing Tenancy Services Team.

**Prosecution Policy**

- 4.15 The Council will look to prosecute all those accused of committing fraud, theft, or bribery against the Council. In most cases the Council will refer the matter to the Police for an independent prosecution.
- 4.16 Where an employee is found to have been involved in fraudulent or corrupt activity or bribery the Council will look to take further action in accordance with the Disciplinary Policy. Where Members are found to be involved in fraudulent or corrupt activity the Monitoring Officer will be informed and the matter will be referred for a Standards Investigation.
- 4.17 Where a genuine mistake or error is discovered, the Council will not look to prosecute but will provide training and advice to the employee/Member and consider how systems and procedures could be improved to prevent similar actions occurring in the future.

**Support for Witnesses During An Investigation/Prosecution**

- 4.18 The Council recognises that the decision to report a concern or to give evidence as part of an investigation is often a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. However, where there are genuine concerns then the witness has nothing to fear as they are fulfilling a duty to the Council and to those for whom it provides services.

## Anti-Fraud and Bribery Framework

- 4.19 The Council will be as supportive as possible to witnesses during an investigation. Harassment and victimisation (including informal pressure) will not be tolerated. If as a result of providing evidence in good faith the witness experiences any pressure the Council will take action to protect them. Any employee or Member who is found to be victimising anyone who is providing evidence to an investigation may face action under the disciplinary or Standards procedures.
- 4.20 The Council will take all possible steps to maintain the confidentiality of a witness throughout the process where they have expressed a preference for their name not to be disclosed. However, it is recognised that this may not always be possible. In the event that the investigation requires confidentiality to be broken then the witness will be informed in advance.
- 4.21 The Council will take steps to minimise any difficulties that the witness may face as a result of providing evidence to an investigation. For example, where the person is required to give evidence at a criminal or disciplinary proceeding then the Council will arrange for them to receive advice and support about the process that they will have to go through.

## 5 TRAINING & INFORMATION

- 5.1 The Council will review its services to identify those most at risk of fraud and bribery and where necessary develop additional guidance and procedures to address any significant risks identified and to inform our training requirements.
- 5.2 The Council acknowledges the importance of ensuring that Members and employees are fully aware of their personal responsibilities and will ensure appropriate training is provided.
- 5.3 There are a number of key documents which set out responsibilities and these include:
- Codes of Conduct for Members
  - Code of Conduct for Employees (including Gifts and Hospitality Guidelines)
  - Financial Regulations & Procurement Regulations
  - Speaking-Up Framework
  - The Constitution
  - Relevant Professional Ethical Codes or frameworks
  - Service specific guidance, where relevant.
- 5.4 The Chief Internal Auditor will ensure that all employees are made aware of their responsibilities under this policy as part of their induction process as well as ensuring that they are aware of the relevant reporting procedures.
- 5.5 Fraud Awareness training will be provided to employees and elected Members on a every 2 years. Staff working in areas where there is a higher risk of fraud should receive annual more targeted training.
- 5.6 The Council recognises that the continuing success of this strategy and its general credibility will depend largely on the effectiveness of programmed training and responsiveness of employees throughout the organisation.
- 5.7 Managers will also ensure that all contractors/suppliers are aware of the existence of this framework and their responsibilities under it.
- 5.8 This framework will also be made available to contractors and the public by publishing it on the Council's website.

**6 Monitoring & Review**

- 6.1 The Council has in place a clear network of systems and procedures to assist it in dealing with fraud and bribery.
- 6.2 The Head of Business Support & Assurance will maintain a continuous overview of the arrangements in place to ensure that they are consistently applied and that all action taken is proportional. This framework will be reviewed and updated periodically to follow best practice and other changes.
- 6.3 This information will be used to monitor trends and to ensure that the policy is applied equally to all and in particular that decisions to prosecute or take other action are consistently applied.

7 **ASSOCIATED POLICIES**

7.1 Other associated Council Policies:-

- Speaking-Up Framework
- Disciplinary Policy
- Anti-money Laundering Framework
- Codes of Conduct for Members & Employees
- Regulation of Investigatory Powers Policy

# Anti-money Laundering Framework

March 2026

**Anti-Money Laundering Framework**

**Contents**

Policy Statement ..... 3

1 INTRODUCTION ..... 4

2 SCOPE OF THE FRAMEWORK ..... 5

3 WHAT IS MONEY LAUNDERING? ..... 6

What Are The Obligations On The Council? ..... 7

The Money Laundering Contact Officer (MLCO) ..... 7

4 DISCLOSURE PROCEDURE ..... 8

Reporting Concerns to the Money Laundering Contact Officer (MLCO) ..... 8

Consideration of the disclosure by the Money Laundering Contact Officer ..... 9

5 CLIENT IDENTIFICATION PROCEDURE ..... 11

6 Administrative Arrangements ..... 12

APPENDIX 1 - Report to Money Laundering Contact Officer - Suspicious Activity ..... 13

## Anti-Money Laundering Framework

### Policy Statement

Money Laundering is a generic term which covers various illegal activities used to conceal the proceeds of criminal activities and to try and make it look like the proceeds have come from a legitimate source. It can also include more specific offences relating the Financing of Terrorism.

Criminals often target legitimate organisations such as Councils to assist them in their money laundering activities. Anyone who knowingly assists or suspects that they may be assisting someone in money laundering may be prosecuted for their part in the activity.

The Council will do all it can to:

- prevent, wherever possible, the organisation, its employees and Members from being exposed to money laundering;
- identify the potential areas where money laundering may occur and take appropriate action to minimise the risk; and
- comply with all legal and regulatory requirements, especially with regard to the reporting of actual or suspected cases of Money Laundering.

Every employee and Member also has a personal responsibility to be vigilant.

## Anti-Money Laundering Framework

### 1 INTRODUCTION

- 1.1 Money laundering is any activity used to conceal or disguise the nature, source, location, ownership or control of currency or assets. It is most often an attempt to hide the proceeds of dishonest or criminal activity and to try to give the impression that the income is from a legitimate source so that it can be used.
- 1.2 It is often associated with large scale crime such as drug trafficking, terrorist funding and financial crimes involving fraud but the UK legislation also applies to any level of activity used to conceal the source of income which is of benefit to the individual. This can be anything from the proceeds of petty theft or from hiding income to commit benefit fraud up to larger corporate crimes which can involve complex and well planned linked transactions.
- 1.3 The Council is at risk of being used in money laundering activity as many of our activities could appear attractive to someone looking to launder money. For example we collect many sources of income including rents (housing and commercial) business rates and council tax. These could be deliberately overpaid, possibly in cash and then a refund requested which would generate a cheque/bank transfer from the Council and provide a legitimate source for the income. Other areas at risk include property deals either right to buy transactions or larger regeneration/development schemes, partnerships with private sector firms and treasury management activities.
- 1.4 The UK legislation puts a personal responsibility on all individuals to report suspicions of money laundering. This framework aims to provide all employees<sup>1</sup>, Members partners and contractors with a structured, supported process by which they can raise concerns of money laundering and to provide information on how they could be affected by the legislation.

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<sup>1</sup> The term employees refers to Consultants, Temporary and Agency Staff as well as volunteers.

## Anti-Money Laundering Framework

### 2 SCOPE OF THE FRAMEWORK

- 2.1 This policy applies to all Members and employees of the Council and aims to maintain the high standards of conduct, which currently exist within the Council by preventing criminal activity through money laundering. The framework sets out the procedures, which must be followed to enable the Council to comply with its legal obligations. An accompanying Guidance Note sits alongside the framework document giving a brief summary of the impact of the legislation on employees and Members.
- 2.2 Both this framework and the Guidance Note compliment the Council's Speaking Up framework and Anti-Fraud and Bribery framework.
- 2.3 Members and employees have a personal responsibility under the Proceeds of Crime Act 2002 (POCA) and therefore failure to comply with the procedures set out in this framework may lead to criminal prosecution. In addition employees could face disciplinary action in accordance with the Council's Disciplinary Policy and Procedures if they become involved in or fail to report suspicious transactions. Members could also face allegations of breaching their Code of Conduct and be subjected to investigation by the Standards Committee if they fail to comply with these procedures.
- 2.4 In addition failure to implement effective Money Laundering Rules could lead the Council open to prosecution under the Failure to Prevent Fraud offences in the Economic Crime (Transparency and Enforcement) Act 2023

## Anti-Money Laundering Framework

### 3 WHAT IS MONEY LAUNDERING?

3.1 The Money Laundering offences are:

- **concealing, disguising, converting, transferring criminal property or removing it from the UK (section 327 of POCA).** This covers hiding an item or its source, removing serial numbers, or changing an item for something else. For example a person using illegally earned money to buy a house or piece of land could claim that a large cash payment is from the death of relative or a lottery win;
- **entering into or becoming concerned in an arrangement which you know or suspect facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person (section 328 of POCA).** This is the actual involvement in or helping to cover up an act – e.g. an employee arranges a refund to be made in relation to a significant overpayment of Business Rates when they suspect the overpayments have been deliberately made by the bill payer;
- **acquiring, using or possessing criminal property (section 329 of POCA) accepting stolen items knowingly or knowingly taking advantage of them or accepting items paid for by the proceeds of crime.** This could be paying significantly less than the value of an item with the suspicion or knowledge that it may be stolen; or
- **becoming concerned in an arrangement facilitating concealment, removal from the jurisdiction, transfer to nominees or any other retention or control of terrorism property (section 18 of the Terrorism Act 2000).** This is about hiding income or other items which are being used to fund or carry out terrorist activities.

These are the primary money laundering offences and are thus prohibited activities under POCA.

3.2 There are two 'third party' offences relating to the Regulated Sector –

- **failure to disclose one of the primary offences (section 330-332 of POCA),** and
- **'tipping-off' (Section 333A of POCA).** Tipping off is where someone informs a person or people who are, or are suspected of being, involved in money laundering, in such a way as to reduce the likelihood of an investigation or of prejudicing an investigation.

3.3 Most employees of the Council do not fall into the "Regulated Sector" and these offences are unlikely to be committed. The "Regulated Sector" covers activities carried out by organisations who are regularly dealing with large monetary transactions such as financial institutions, lawyers, accountants, estate agents, casinos etc.

3.4 However, all Members and employees could commit the offence of **"doing something which might prejudice an investigation" (Section 342 of POCA)** if they have knowledge of or a suspicion of a Money Laundering Offence being committed and fail to report it so that it can be investigated.

## Anti-Money Laundering Framework

- 3.5 Criminal Property is defined in Section 340 (3) of POCA as “property”<sup>2</sup> that is or represents the person’s benefit from illegal actions in whole or part and the person knows or suspects that it is the proceeds of a criminal act.
- 3.6 Potentially any employee could be caught by the money laundering provisions if he/she knows or suspects money laundering and either becomes involved with it in some way and/or does nothing about it. This framework sets out how any concerns should be raised.
- 3.7 Whilst the risk to the Council of contravening the legislation is low, ***it is extremely important that all employees and Members are familiar with their personal legal responsibilities; serious criminal sanctions may be imposed for breaches of the legislation.***

### What Are The Obligations On The Council?

- 3.8 The Council’s business is classed as being outside of the “Regulated Sector” for the purposes of the legislation which means we do not need to implement fully the rules around appointing a Money Laundering Reporting Officer and setting up detailed client identification procedures for all clients. However, the Council has voluntarily adopted some of the procedures to help to identify and report any suspicious activity as we may be targeted by people wishing to carry out money laundering activity.

### The Money Laundering Contact Officer (MLCO)

- 3.9 Although the Council is not required to formally appoint a Money Laundering Reporting Officer we have nominated people to act as Money Laundering Contact Officers (MLCO). The MLCOs will receive disclosures about money laundering activity within the Council and are aware of the information required and the mechanisms to pass the information on to the relevant bodies. The MLCOs are:

<b>Stephen Baddeley</b> <b>Chief Internal Auditor &amp; Risk Manager</b>	<b>Judith Aupers</b> <b>Head of Business Support &amp; Assurance</b>	<b>Chris Forrester</b> <b>Deputy Chief Executive (Resources) &amp; S151 Officer</b>
<b>Tel – 01543 464415</b>	<b>Tel – 01543 464411</b>	<b>Tel – 01543 464334</b>

<sup>2</sup>Defined by Section 340 (9) of POCA - “Property is all property wherever situated and includes-

- (a) money;
- (b) all forms of property, real or personal, heritable or moveable;
- (c) things in action and other intangible or incorporeal property.”

## Anti-Money Laundering Framework

### 4 DISCLOSURE PROCEDURE

#### Reporting Concerns to the Money Laundering Contact Officer (MLCO)

- 4.1 Where you know or suspect that money laundering activity is taking/has taken place, or become concerned that your involvement in a matter may amount to a prohibited activity under POCA as defined in paragraph 3.1, you must disclose this as soon as practicably possible to the MLCO. **Delays or failure to report may leave you personally liable to prosecution.**
- 4.2 Your disclosure should be made to the MLCO **initially verbally (in person or by telephone)**. You will need to provide as much detail as possible, for example: -
- Full details of the people involved (including yourself, if relevant), e.g. name, date of birth, address, company names, directorships, phone numbers, etc;
  - Full details of the nature of their/your involvement - if you are concerned that your involvement in the transaction would amount to a prohibited act under sections 327 – 329 of POCA (see section 3.1 above for details), then you will need consent from the National Crime Agency (NCA), via the MLCO, to take any further part in the transaction. You should therefore make it clear in the report whether there are any deadlines for giving such consent e.g. a completion date or court deadline;
  - The type of money laundering activity involved. The MLCO can help identify this.
  - The dates of such activities, including whether the transactions have happened, are ongoing or are imminent;
  - Where they took place;
  - How they were undertaken;
  - The (likely) amount of money/assets

**All available information needs to be given to the MLCO to enable them to make a sound judgement as to whether there are reasonable grounds for knowledge or suspicion of money laundering and to enable them to prepare their report to NCA, where appropriate.**

- 4.3 Following the initial contact, you should promptly complete the "Report to Money Laundering Contact Officer" Form (with the assistance of the MLCO where necessary) which is attached as Appendix 1. You should also enclose copies of any relevant supporting documentation.
- 4.4 Once you have reported the matter to the MLCO you must follow any directions they may give you. **You must NOT make any further enquiries into the matter yourself;** any necessary investigation will be undertaken by the NCA. Simply report your suspicions to the MLCO who will refer the matter on to the NCA if appropriate. All employees will be required to co-operate with the MLCO and the Police during any subsequent money laundering investigation.

## Anti-Money Laundering Framework

- 4.5 Similarly, **at no time and under no circumstances should you voice any suspicions to the person(s) whom you suspect of money laundering or tell them you have reported the transaction**, even if the NCA has given consent to a particular transaction proceeding; **otherwise you may commit a criminal offence by prejudicing the investigation which carries a maximum penalty of 5 years imprisonment and an unlimited fine.**
- 4.6 Do not, therefore, make any reference on a client file in any form e.g. record of telephone conversation, e-mails etc to a report having been made to the MLCO – should the client exercise their right to see the file, under the Data Protection or Freedom of Information Act, then such a note will obviously tip them off to the report having been made and may render you liable to prosecution. The MLCO will keep the appropriate records in a confidential manner.

### Consideration of the disclosure by the Money Laundering Contact Officer

- 4.7 Upon receipt of a disclosure report, the MLCO must note the date of receipt on his/her section of the report and acknowledge receipt of it. He/she should also advise you of the timescale within which he/she expects to respond to you.
- 4.8 The MLCO will consider the report and any other available internal information he/she thinks relevant e.g.:
- reviewing other transaction patterns and volumes;
  - the length of any business relationship involved;
  - the number of any one-off transactions and linked one-off transactions;
  - any identification evidence held;

he/she will undertake such other reasonable enquiries he/she thinks appropriate in order to ensure that all available information is taken into account in deciding whether a report to the NCA is required (such enquiries being made in such a way as to avoid any appearance of tipping off those involved). The MLCO may also need to discuss the report with you.

- 4.9 Once the MLCO has evaluated the disclosure report and any other relevant information, he/she must make a timely determination as to whether:
- there is actual or suspected money laundering taking place; or
  - there are reasonable grounds to know or suspect that is the case; and
  - whether he/she needs to seek consent from the NCA for a particular transaction to proceed.
- 4.10 Where the MLCO concludes a referral is needed then he/she must disclose the matter as soon as practicable to the NCA on their standard Suspicious Activity Report (SAR) form and in the prescribed manner<sup>3</sup>, unless he/she has a reasonable excuse for non-disclosure to NCA (for example, the reporter is a lawyer and wishes to claim legal professional privilege for not disclosing the information).

<sup>3</sup> The preferred manner is via the online reporting facility on National Crime Agency website, the designated MLCOs will have accounts set-up for them to use this facility at <https://sarsreporting.nationalcrimeagency.gov.uk/>

## Anti-Money Laundering Framework

- Where the MLCO suspects money laundering but has a reasonable excuse for non-disclosure then he/she must note the report accordingly. he/she can then immediately give their consent for any ongoing or imminent transactions to proceed. In cases where legal professional privilege may apply, the MLCO must liaise with the Monitoring Officer to decide whether there is a reasonable excuse for not reporting the matter to the NCA.
  - Where consent is required from the NCA for a transaction to proceed, then the transaction(s) in question must not be undertaken or completed until the NCA has specifically given consent, or there is deemed consent through the expiration of the relevant time limits<sup>4</sup> without objection from the NCA.
- 4.11 Where the MLCO concludes that there are no reasonable grounds to suspect money laundering then he/she shall mark the report accordingly and give his/her consent for any ongoing or imminent transaction(s) to proceed.
- 4.12 All disclosure reports referred to the MLCO and reports made by them to the NCA must be retained by the MLCO in a confidential file kept for that purpose, for a minimum of five years.
- 4.13 ***The MLCO could commit a criminal offence if he/she knows or suspects, or has reasonable grounds to do so, through a disclosure being made to them, that another person is engaged in money laundering and he/she does not disclose this as soon as practicable to the NCA.***

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<sup>4</sup> The time limit after which the transaction can be processed is 7 days from the day after the SAR is submitted if no refusal is received or 31 days from the day the refusal is given if notice to proceed has not been issued earlier.

## Anti-Money Laundering Framework

### 5 CLIENT IDENTIFICATION PROCEDURE

- 5.1 Where a cash payment of over £2,000 is received, or where any form of payment from an unknown organisation exceeding €15,000 is received, officers dealing with the matter will need to establish the identity of the individual/company involved to seek to ensure that the risk of receiving the proceeds of crime can be minimised. An unknown person/organisation is someone who the Council has not had any dealings with prior to the transaction e.g. it could be a new developer we have not worked with before on a regeneration scheme.
- 5.2 For individuals, their passport or photo driving licence should be provided, together with one of the following:
- Utility bills i.e. electricity, water etc. however mobile phone bills are not acceptable
  - Mortgage/building society/bank statements
  - Credit card statements
  - Pension or benefit confirmation letters
- If a passport or photo driving licence is not available, then two of the other items listed above will need to be produced.
- 5.3 For companies, a Companies House Search should be undertaken to confirm the existence of the company and identify who the directors are. Personal identification should then be obtained for the representatives of the company together with proof of their authority to act on behalf of the company. Care should be taken if it becomes clear that the individual has only recently become a director of the company or if there has been a recent change in the registered office.
- 5.4 For any other type of organisation, for example a sole trader or partnership, personal identification should be obtained for the individuals together with documents indicating their relationship to the organisation.
- 5.5 Copies of any evidence provided in support of the identification of an individual or organisation should be kept on a central file by the Head of Transformation & Assurance so that it can be referred to later if necessary. Records should be kept for 5 years after the end of the transaction

Commented [JA1]: Should this be me or should it be Finance?

## Anti-Money Laundering Framework

### 6 Administrative Arrangements

- 6.1 The Head of Business Support and Assurance has overall responsibility for this framework.
- 6.2 The Council has in place a clear network of systems and procedures to assist it in dealing with fraud and corruption. These arrangements will keep pace with any future developments in both preventative and detection techniques regarding fraudulent or corrupt activity that may affect its operation. The Head of Business Support & Assurance will maintain a continuous overview of the arrangements in place.
- 6.3 This framework will be reviewed and updated periodically to follow best practice and other changes.
- 6.4 The legislative requirements concerning anti-money laundering procedures are lengthy and complex. This framework has been written to enable the Council and all of its employees/Members to meet the legal requirements in a way that is proportionate to the low risk to the Council and its employees of contravening the legislation.
- 6.5 Should you have any concerns whatsoever regarding any transactions then you should contact one of the MLCOs.

**Commented [JA2]:** I'm not sure I'm comfortable with saying we will keep pace given we have such limited resources. Can we discuss please

**Anti-Money Laundering Framework**

**CONFIDENTIAL**

**APPENDIX 1 - Report to Money Laundering Contact Officer - Suspicious Activity**

From \_\_\_\_\_ Tel \_\_\_\_\_

Section \_\_\_\_\_ Date of Report \_\_\_\_\_

**Details of Suspected Offence**

**Main Subject (Person)**

Surname:		Forename(s):		Title:	
Date of Birth:		Gender:			
Occupation:		Employer			
Address (in full inc Postcode) Please state if Home/Business/etc Current or Previous					

**Or**

**Main Subject (Company)**

Company Name:		Company No:	
Type of Business:		VAT No:	
Country of Reg:			
Address (in full inc Postcode) Please state if Current or Previous			

**Bank Account Details**

Account Name:			
Sort Code:		Account No:	

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<b>Anti-Money Laundering Framework</b>
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**Other Information**

Any knowledge/evidence held to confirm identification and/or address i.e. passport/driving licence etc:

**Connected Subject Person (if any)**

Surname:		Forename(s):		Title:	
Date of Birth:		Gender:			
Occupation:		Employer			
Address (in full inc Postcode) Please state if Current or Previous					

**Or****Connected Subject Company (if any)**

Company Name:		Company No:	
Type of Business:		VAT No:	
Country of Reg:			
Address (in full inc Postcode) Please state if Current or Previous			

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**Anti-Money Laundering Framework**

**Bank Account Details**

Account Name			
Sort Code:		Account No:	

**Other Information**

Any knowledge/evidence held to confirm identification and/or address i.e. passport/driving licence etc:

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**Anti-Money Laundering Framework**

**Reason for the Suspicion**

Please set out the reason for the suspicion.

Please continue on separate sheet if required

**Have you discussed your suspicions with anyone else?**       Yes  No  
Please tick relevant box

**If yes please include details below**

**Anti-Money Laundering Framework**

Please set out below any other information that you feel is relevant:

Signed \_\_\_\_\_ Date \_\_\_\_\_

**Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described.**

**Anti-Money Laundering Framework**

**Appendix 2**

**Actions Taken by MLCO on receipt of a report**

Date report received \_\_\_\_\_

Date receipt of report acknowledged \_\_\_\_\_

**Consideration of Disclosure**

**Action Plan**

**Outcome of Consideration of Disclosure**

**Are there reasonable grounds for suspecting money laundering activity?**

**Commented [JA3]:** Would it be better to split the form and make this Appendix 2

**Anti-Money Laundering Framework**

**If there are reasonable grounds for suspicion, will a report be made to NCA?**  
Please tick relevant box  Yes  No

**If yes, please confirm full date of report to NCA: \_\_\_\_\_  
and complete the box below:**

**Details of liaison with NCA regarding the report**

**Who Reported to or Online SAR reference number \_\_\_\_\_**

**Notice Period \_\_\_\_\_ to \_\_\_\_\_.**

**Moratorium period \_\_\_\_\_ to \_\_\_\_\_.**

**Is consent required from NCA to any ongoing or imminent transactions  Yes  No  
which would otherwise be prohibited acts?**

**If yes, please confirm full details in the box below**

**Date consent received from NCA \_\_\_\_\_**

**Date consent given by you to employee / Member \_\_\_\_\_**

**Anti-Money Laundering Framework**

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to NCA, please set-out below the reason(s) for non-disclosure:

Date consent given by you to employee for any prohibited act \_\_\_\_\_  
transaction to proceed where no disclosure made.

Other relevant information:

Signed \_\_\_\_\_ Date \_\_\_\_\_

**THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS**

**Agenda Item 4(b)i**

## **Staffordshire Sustainability Board Vision and Pledges**

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	9 April 2026
<b>Report of:</b>	Head of Regulatory Services
<b>Portfolio:</b>	Climate Action and Nature Recovery Portfolio

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### **1 Purpose of Report**

- 1.1 To update Members on the Vision of the Staffordshire Sustainability Board (SSB) (See **APPENDIX 1**)
- 1.2 To provide an update to Members on the SSB pledges (see **APPENDIX 2**) and to request to adopt.

### **2 Recommendations**

- 2.1 That Cabinet note the pledges adopted.

#### **Reasons for Recommendations**

- 2.2 Stafford Borough Council is a member of the Staffordshire Sustainability Board (SSB), alongside 9 other Staffordshire authorities. The SSB facilitates the collaborative forum, to work together as democratically elected bodies in Staffordshire, to influence change and to encourage organisations and individuals to ensure Staffordshire is Net Carbon Zero by at least 2050 or before. The SSB Vision and Pledge asks each member and council of the SSB to agree to the same 7 commitments.

### **3 Key Issues**

The Staffordshire Leaders Board and the Chief Executives Group have committed to work collaboratively to successfully achieve Net Carbon Zero in line with each authority's climate change declarations. This collaboration is to enable and facilitate change, where possible, throughout the geographic area of Staffordshire as a whole. As an organisation, our active role in the SSB and work to respond to the climate and nature crisis, helps us satisfy environmental legislation and show we are having due regard to biodiversity.

## **4 Relationship to Corporate Priorities**

### **4.1 Priority 1 - Prosperous Economy**

Being a member of the Staffordshire Sustainability Board (SSB), Stafford Borough Council will be playing an active role in a collaborative forum to respond to the climate and nature crisis, which will reflect on the organisation's reputation positively as a good place to live work and play.

### **Priority 2 - Communities and Wellbeing**

This collaboration is to enable and facilitate change, where possible, throughout the geographic area of Staffordshire bringing into discussion and actions, climate change adaptation and sustainable environment concerns. Sustainability and habitat biodiversity will be reviewed throughout to ensure that our communities have access to clean green public spaces.

### **Priority 3 - Climate Change, Nature Recovery and the Environment**

By adopting the SSB Vision and Pledge, Stafford Borough Council will act towards implementing the commitments articulated within the document, which will positively impact the environment and respond to the climate and nature crisis.

## **5 Report Detail**

The commitments help the council work towards Net Zero targets and help halt and reduce the impacts of Climate Change. The SSB is an active group that has already created actions and work that make a difference. It is in the council's best interest to sign up to the Vision and Pledges, for the council to stay up to date and involved with the ongoing work of the SSB, demonstrating our willingness to respond to the climate and nature crisis, in a collaborative way with the rest of the county.

Approving and adopting the SSB Vision and Pledges sets the council's ambition to halt and combat the impacts of climate change, and work to become a more sustainable organisation. Remaining an active member of the SSB allows us to work collectively with other Staffordshire authorities sharing data, opportunities and resources, whilst helping achieve our own targets for the organisation (Net Zero by 2035), all of which will positively enhance and protect the environment and help halt and reverse damage being caused.

Not approving the SSB Vision and Pledge, will require Stafford Borough Council to define their own commitments, separate to those of the rest of the county, and respond to the climate and nature crisis independently. This may lead to lesser outcomes that aren't as significant and more difficult to achieve, than if the work is accomplished collaboratively.

## **6 Implications**

### **6.1 Financial**

There are no direct financial implications from adopting these overarching pledges. The councils budget for climate change principally relates to staffing resource and as such if funding is required for projects to deliver on these pledges they will require additional reports.

### **6.2 Legal**

National government has a specific statutory duty to achieve net zero status by 2050. At present that does not apply to local authorities. However, existing planning and environmental legislation does require the Council to consider climate change so it is arguable that the obligation is inherent.

The Environmental Targets (Public Authorities) Bill currently at the House of Lords report stage aims to make provision for a statutory objective requiring public bodies to contribute to delivery of targets set under the Environment Act 2021 and the Climate Change Act 2008; to place a duty on public bodies to meet this objective in the exercise of their functions. Therefore, it should be noted that it is possible in the coming years, parliament may expand the Council's legal duties.

### **6.2 Human Resources**

No direct HR implications

### **6.3 Risk Management**

There is a reputational risk if we were not to accept the pledges as we will be detached from the Staffordshire Sustainability Board (SSB) and disconnected from the other Staffordshire authorities who are working together to become more sustainable and respond to the climate crisis in a more joined up, collaborative approach.

By remaining a member of the Staffordshire Sustainability Board (SSB), Stafford Borough Council will be playing an active role in a collaborative forum to respond to the climate and nature crisis, which will reflect on the organisation's reputation positively.

We could fail to achieve corporate objectives on climate change with the added risk we fail to react to the impact of climate change or fail to appropriately plan for anticipated issues.

### **6.4 Equalities and Diversity**

People who are more deprived are especially vulnerable to climate change because they usually have fewer assets and less access to funding meaning

fewer resources to adapt to climate change impacts. Climate change impacts tend to worsen inequalities because they disproportionately affect disadvantaged groups. This in turn further increases their vulnerability to climate change impacts and reduces their ability to cope and recover.

## **6.5 Health**

Climate change is worsening existing inequalities, including health inequalities. As climate change progresses, the health impacts will not be distributed equally. The mental health impacts will be greater for some groups than for others including:

- children and young people
- people with existing health conditions
- occupational groups (such as farmers and emergency responders)
- people living in deprived areas
- ethnic minority groups
- inclusion health populations (such as migrants and individuals experiencing homelessness)

## **6.7 Climate Change**

By adopting the SSB Vision and Pledge, Stafford Borough Council will act towards implementing the commitments articulated within the document, which will positively impact the environment and respond to the climate and nature crisis

## **7 Appendices**

Appendix 1: Vision

Appendix 2: Pledges

## **8 Previous Consideration**

Cabinet 9 June 2022 - Staffordshire Sustainability Board - Vision Base Pledge 2022

## **9 Background Papers**

None

**Contact Officer:** Martyne Manning

**Telephone Number:** 01543 462621

**Ward Interest:** N/A  
**Report Track:** Cabinet 9 April 2026 (Only)  
**Key Decision:** No

## Appendix 1

### Vision

The Staffordshire Sustainability Board (SSB) is a collaborative forum for the democratically elected bodies of Staffordshire and Stoke-on-Trent. Together, we aim to influence positive change and empower communities, organisations, and individuals to secure a sustainable future for our County.

The board supports and champions resource efficiency to deliver long term value for money and environmental benefit, where there is alignment with individual organisations Net Zero commitments this will further enhance and potentially increase pace on deployment of green technologies.

The board will deliver environmental improvements within our remits to ensure resilience is achieved in line with our key strategies.

The board will support waste services in delivering efficient, value driven operations with consideration of waste minimisation through reduction, reuse and recycling, contributing to a cleaner, greener future.

This vision will be refreshed in 2028.

### Context

The Staffordshire Leaders and Chief Executives Group has committed to work collaboratively to successfully achieve waste and sustainability targets in line with local opportunities and best practice within the region.

Collectively, the Councils have an influence on a significant proportion of activities and operations within the geographical area and agree that we should come together, collectively for the benefit of our communities and to realise cost saving mechanisms for the benefit of our residents.

This collaboration is to enable and facilitate change, where possible, throughout the geographic area of Staffordshire and Stoke on Trent as a whole. Work in the longer term will also bring into the discussion and actions, waste management and environmental concerns.

Throughout all the activities and discussions that resonate from the SSB, we shall actively engage with external organisations that can bring specialist knowledge, understanding and facilitation to the board.

The SSB will comprise senior members of each authority and supported by a team of advisors drawn from across the authorities.

## Appendix 2

### Council Commitments

It is proposed that as a commitment, the combined councils will within their own boundary initiate the following but acknowledge that the larger scope of environmental change and resilience is within the wider community of Staffordshire and Stoke on Trent.

1. **Powering a Sustainable Future** - Councils will collaborate to shape a shared energy vision that supports sustainability, resilience, and economic growth, including transitioning to cleaner, low-emission energy sources such as renewables.

We will:

- Promote energy efficiency across homes, businesses, and public buildings.
- Support access to affordable and cleaner energy options.
- Engage with National Grid and energy operators to align future supply with local development needs.
- Identify local energy needs and explore funding opportunities for community-based energy projects.
- Share best practice and technical insights to strengthen local energy resilience.

Each authority will tailor its approach to reflect local priorities and capacity.

2. **Working together for a Sustainable Staffordshire** - Councils will collaborate with local partners to deliver practical, cost-effective approaches that benefit communities across Staffordshire and Stoke-on-Trent.

We will:

- Explore joint models for delivering multi-agency EV infrastructure, attracting investment and supporting local jobs.
- Integrate adaptation measures into council services and planning, including flood resilience, heat preparedness, and emergency response.
- Coordinate clear, consistent messaging to help communities build resilience and take informed action.

Each authority will tailor delivery to local needs while contributing to shared goals through partnership and knowledge exchange.

3. **Local Nature Recovery** - Councils will work together and with communities to restore, enhance, and protect Staffordshire's natural environment, supporting biodiversity, climate resilience, and the well-being of current and future generations.

We will:

- Support community groups in creating roadmaps for action to address biodiversity loss, climate change, and human well-being by increasing natural spaces and the connections between them.
- Create, restore, enhance, and protect biodiverse habitats and ecological functions across all landscapes.
- Develop ecological corridors and networks to link habitats, enabling the free movement of species, nutrients, and natural processes.
- Ensure that education and engagement with future generations are integral to all nature recovery activities.

Each authority will tailor its approach to local priorities while contributing to shared regional goals through partnership and knowledge exchange.

4. **Sustainable Travel Planning** - Councils will work together to promote and enable sustainable travel across Staffordshire and Stoke-on-Trent, supporting healthier communities and cleaner environments.

We will:

- Support the delivery of Local Cycling and Walking Infrastructure Plans.
- Support the implementation of the new Local Transport Plan.
- Identify and pursue funding opportunities for sustainable travel projects, including active travel and low-emission transport.
- Share best practice and collaborate with partners to improve connectivity and reduce transport-related emissions.

Each authority will tailor its approach to local needs while contributing to shared regional goals.

5. **Communications** - Councils will contribute to coordinated, countywide communications that actively engage communities and support the Board's sustainability, environmental, and waste objectives.

We will:

- Commit to the shared 3-year communications plan, reviewed annually, with flexibility for authorities to adapt based on governance structures. The plan will be covering key themes such as transport, biodiversity, waste and adaptation.
- Ensure messaging is clear, consistent, and accessible to help communities build resilience and take informed action.
- Work collaboratively to ensure communications activity delivers value for money and reflects local priorities.

Each authority will tailor its communications to local audiences while contributing to shared regional messaging.

6. **Baseline Reporting** - Councils will prepare and publish annual baseline analyses of their organisational carbon footprints to support transparency, accountability, and informed decision-making.

We will:

- Publish carbon emissions data from the previous financial year by October each year.
- Use consistent reporting methods to enable comparison and shared learning across authorities.
- Share tools, templates, and expertise to improve data quality and reporting capacity.

Councils will support tracking and achieving progress against their environmental goals, including the Councils adopted Net Zero ambitions. Each authority will retain flexibility to set and pursue its own targets, while contributing to a shared understanding of regional progress.

7. **Recycling and Residual Waste** - Councils will work together to deliver efficient, customer-focused recycling and waste services, in collaboration with the Staffordshire Waste Partnership.

We will:

- Promote waste reduction and support residents to reduce, reuse, and recycle.

- Apply the waste hierarchy consistently across services and communications.
- Develop a Joint Resource and Waste Strategy by summer 2026, setting shared principles for the next 20 years.
- Ensure services are financially efficient, legally compliant, and responsive to local community needs.
- Encourage circular economy practices through education, engagement, and partnership working.

Each authority will contribute to shared goals while tailoring delivery to local priorities.

**Agenda Item 4(c)i**

## Primate Licensing

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	9 April 2026
<b>Report of:</b>	Head of Regulatory Services
<b>Portfolio:</b>	Environment Portfolio

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### 1 Purpose of Report

- 1.1 Cabinet is asked to note that, from 6 April 2026, the Animal Welfare (Primate Licences) (England) Regulations 2024 (the 2024 Regulations) (<https://www.legislation.gov.uk/uksi/2024/296/made>) made it unlawful to keep primates as pets without a licence from the local authority. Private keepers of primates must meet strict, zoo-level welfare standards, effectively banning the keeping of monkeys, lemurs, and other primates in unsuitable domestic conditions.
- 1.2 This report requests that Cabinet endorse and recommend to Council a fee for primate licensing applications and delegate, to the Head of Regulatory Services, authority to administer and enforce the new legislation.

### 2 Recommendations

Cabinet is asked to:

- 2.1 Note the introduction of the new legislation;
- 2.2 Endorse and recommend to Council the setting of initial fees of £300 for both new applications and renewals under the regime, in line with those fees for existing animal activity licences;
- 2.3 Endorse and recommend to Council that the Head of Regulatory Services (in consultation with the Cabinet Member – Environment Portfolio) be delegated authority to grant and/or revoke licences, refuse applications, attach conditions, serve relevant notices and agree any full or partial refunds of fees.

## **Reasons for Recommendations**

- 2.4 Authority to agree and set fees for administering new licensing requirements is not delegated to your Officers.
- 2.5 It is recommended that this function be delegated to the Head of Regulatory Services due to the service's experience and expertise in dealing with animal licensing matters.

## **3 Key Issues**

- 3.1 There is provision within the 2024 Regulations for licensing authorities to charge an application fee and a fee in respect of any inspections.
- 3.2 The licensing of primates is a new function. The proposed fees estimate the recovery costs of undertaking the licensing function, including an inspection. Fees are based on those set by the Council in administering and enforcing other animal welfare licensing.
- 3.3 Should the proposed fee be found to not cover the costs of undertaking this licensing function, the fee will be reviewed.
- 3.4 It is not known at present whether there are any primates being kept within domestic environments in the Borough. The need for such licences, and the demands on Council resources, cannot therefore be quantified at this time.

## **4 Relationship to Corporate Priorities**

- 4.1 The licensing process contributes to the Council's priority of The Community.

Effective licensing of primates kept as pets will ensure both higher standards of animal welfare and the protection of the public (and keepers) from safety and health related risks.

## **5 Report Detail**

- 5.1 From 6 April, 2026, anyone in England who owns a primate without a licence will be committing a criminal offence under s13(6) Animal Welfare Act 2006, the penalty for which can include up to 6-months in prison, an unlimited fine, or both. A Dangerous Wild Animal Licence may also be needed if primate owners don't already have one in place.
- 5.2 The new licensing requirements are being introduced as part of the Animal Welfare (Primate Licences) (England) Regulations 2024 (the 2024 Regulations) which aim to improve welfare standards for primates kept as pets.
- 5.3 In order to get a licence, owners will have to prove they are meeting zoo-level welfare standards such as building the right size enclosures, providing the right diet and proving the primate is free from pain, injury and suffering. Licences will

last three years with inspections carried out by a licensing officer along with a specialist vet or zookeeper.

- 5.4 Whilst the Government estimates up to 5,000 primates may currently be kept as pets in homes across England, your Officers are not currently aware of any such animals being kept in domestic homes in the Borough.
- 5.5 The Regulations set out the application process and the conditions that must be placed on the licence if granted - further conditions may be stipulated in statutory guidance.
- 5.6 An inspection must be carried out prior to an application being determined, and a further inspection is required on at least one occasion during the duration of the licence, if a licence is issued for more than twelve months. These inspections must be conducted by a "suitable person" which is defined by the Regulations as being: a) a veterinarian; or b) any other person who, in the view of the local authority, is suitably qualified and competent to carry out the inspection.
- 5.7 A licence must be granted for a period of three years or, where the applicant has requested a licence for a period of less than three years, for such shorter period that the applicant has requested.
- 5.8 There are provisions in the Regulations for the holder of a primate licence to request to vary or surrender the licence. There are also provisions in the Regulations for licensing authorities to revoke or vary the licence.
- 5.9 An application fee may be charged, and a fee can be charged in respect of any inspections. Proposed fees below are based on those already in place for animal activity licensing in the Borough.

<b>Application/Renewal Fee</b>	<b>£300.00</b>
<b>Officer Site Inspection Fee</b>	<b>£150.00</b>
<b>Veterinary Fees</b>	<b>At Cost</b>

## **6 Implications**

### **6.1 Financial**

Officers have used experience gained when processing previous applications to estimate the likely time, and therefore costs, involved in processing new licence and renewal applications.

### **6.2 Legal**

The statutory provisions relating to primate licences came into full effect on 06 April 2026 and the Council is therefore required to make appropriate arrangements for administration and enforcement. The Regulations allow the Council to charge fees to recover the costs of an application, including renewal,

variation or surrender and for any relevant inspection. The fees must be fair and reasonable. The Council will also have annual reporting obligations to the Secretary of State in respect of the number of licences in force and the fees charged.

### **6.3 Human Resources**

There are no additional human resource requirements. Applications, compliance and enforcement will be managed within existing resources.

### **6.4 Risk Management**

There are risks that some keepers or owners of such animals may seek to evade the new licensing requirements. Officers will ensure that the Council promotes awareness of these new requirements both to members of the public and the trade (pet shops etc.) with a view to minimising such risks. Appropriate resources will be made available to ensure compliance.

### **6.5 Equalities and Diversity**

None.

### **6.6 Health**

None

### **6.7 Climate Change**

None

## **7 Appendices**

None

## **8 Background Papers**

None

**Contact Officer:** David Prosser-Davies

**Telephone Number:** 01543 464202

**Ward Interest:** All

**Report Track:** Cabinet 9 April 2026

Council 14 April 2026

**Key Decision:** Yes

**Agenda Item 4(d)i**

# Stafford Town Centre Development Framework and Delivery Options

<b>Committee:</b>	Cabinet
<b>Date of Meeting:</b>	9 April 2026
<b>Report of:</b>	Head of Economic Development and Planning
<b>Portfolio:</b>	Town Centre Regeneration

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## 1 Purpose of Report

- 1.1 To update Cabinet on the progress made on the Stafford Town Centre Regeneration Programme, to present the Stafford Town Centre Development Framework and propose next steps in delivering the redevelopment of the town centre.

## 2 Recommendations

- 2.1 That Cabinet approve the Stafford Town Centre Development Framework as set out in **APPENDIX 1**.
- 2.2 That Cabinet approve a public engagement exercise on the Development Framework with local residents, businesses and other stakeholders.
- 2.3 That Cabinet approve the use of a framework agreement to appoint a development partner, as the preferred delivery option, for the Residential/Mixed Use North, Residential South, Mixed Use Gaolgate and Public Realm (Various) development parcels.
- 2.4 That Cabinet note that business cases on the preferred delivery models in respect of the Market Hall and Broad Street (former Wilko site) will be brought back to Cabinet for consideration and decision.
- 2.5 That Cabinet delegate authority to the Deputy Chief Executive (Place) in consultation with the Deputy Chief Executive (Resources), the Head of Law and Governance, the Leader of the Council and the Deputy Leader (Town Centres Regeneration Portfolio) to commence a formal procurement/developer selection process for the residential development parcels (and public realm elements where appropriate), limited to market engagement, tender preparation and evaluation.

- 2.5 That Cabinet note that a final decision on the appointment of any development partner(s), including approval of the preferred scheme and business case, will be brought back to Cabinet prior to any contractual commitments being made.
- 2.6 That Cabinet note that a further report will be brought setting out:
- (i) the governance arrangements to underpin the delivery and decision making needed to support the procurement process and the wider delivery of the project;
  - (ii) an outline timeline for delivery of the next phase of the town centre regeneration project; and
  - (iii) details of the revenue budget needed for additional resources to support delivery of the programme.

### **Reasons for Recommendations**

- 2.7 Agreement of the Development Framework and next steps is essential to ensure that momentum is maintained in progressing the regeneration of Stafford Town Centre.

## **3 Key Issues**

- 3.1 The Council is now entering a critical and exciting phase in the delivery of the Stafford Town Centre Transformation process with a need to move forward at pace and to secure development partner(s) that share the Council's vision.
- 3.2 Considerable progress has been made to date in assembling land, securing regulatory approvals, procuring contractors and clearing sites. It is now essential to plan for the next steps and develop tangible proposals with a clear timeline for build out.
- 3.3 An analysis of the various sites in terms of opportunities and constraints, has been undertaken, along with the production of concept designs and these have been fed into an overall Development Framework for the town centre. This is included at **APPENDIX 1**.
- 3.4 The aim of the Development Framework is to be clear about the ambition of the Council and the type and scale of development being sought. At this stage, the images contained in the Framework are illustrative only and the detail will come later.
- 3.5 A public engagement exercise will be undertaken with residents, businesses and stakeholders to share the proposals in the Development Framework and talk about what the plans mean in practice for Stafford people.

## 4 Relationship to Corporate Priorities

4.1 The Stafford Town Centre Transformation Programme supports delivery of the following priorities within the Council's Corporate Plan 2025-28:

- Prosperous Economy
- Communities and Wellbeing

By leading on site assembly and clearance works the regeneration programme is addressing longstanding issues around deliverability that could otherwise continue to deter investment in Stafford town centre.

Redevelopment opportunities that offers the potential for a variety of uses can support both the local economy and the delivery of both market and affordable housing.

4.2 The Programme is also consistent with the development strategy as set out in the adopted Local Plan, the Plan for Stafford Borough 2011-2031.

## 5 Report Detail

5.1 With the continued rise of online shopping, the economic impact of the pandemic and the associated fundamental changes to the way that people live, work and choose to spend their free time, high streets up and down the country have struggled to adapt. Since the Council was awarded just over £14.3 million from the Future High Streets Fund on 26 December 2020 the Stafford Town Centre Regeneration Programme has progressed with two main priorities - creating a welcoming environment in the County town and unlocking redevelopment opportunities via a strategic land acquisition programme. The aim has always been for the Council to lead the transformation of the town centre into a vibrant, well designed and well used place.

5.2 The refurbishment of the Market Square was completed in October 2023 and the redesigned approach and entrance to Stafford Railway Station was completed in May 2025. Feedback on both schemes has been positive with residents and potential development partners enthusiastic about the welcoming environment created ahead of the long term changes that are planned for the high street itself.

5.3 For the Council to be at its most effective in attracting investment, removing third party land interests was key. The land assembly process has now concluded with the former Guildhall Shopping Centre, the former Co-op department store, vacant retail and upper floor studio space at 10-12 Gaolgate Street and the former Wilko store all now within Council ownership. As landowner of these strategic sites across the town centre the Council can better control and influence the type, scale, design and function of new buildings and public spaces.

- 5.4 The Council has utilised the grant funding to progress a programme of demolition and site clearance works. The demolition of the former Guildhall Shopping Centre and former Co-op are now largely complete, and officers are seeking to progress the demolition of the units at 10-12 Gaolgate Street and former Wilko site, subject to planning consent being granted. Cabinet should note that the cost of purchasing the former Wilko leasehold and associated demolition works is now allocated to the FHSF grant and this was agreed by Council in February 2026 as part of the General Fund Capital Programme.
- 5.5 To move from demolition to development delivery, architects Arkle Boyce and development management consultancy Continuum were commissioned to develop concept designs, plans and 3D visuals that demonstrate the development potential of the Council owned town centre sites. Underpinning this is an analysis of the various sites in terms of opportunities and constraints that feeds into an overall Development Framework, included at **APPENDIX 1**.
- 5.6 The Framework is guided by the fundamental principles of the Future High Streets Fund which seeks to address the long term changes to town centres following a shift away from an over-reliance on traditional retail. The proposals also reflect the types of development that the market (the private sector) can and will deliver and this is based on discussions with interested developers and operators over the last 12 months.
- 5.7 The purpose of the Framework is to provide the Council with a flexible, practical and deliverable route to achieve the following:
- Comprehensive regeneration of the cleared sites
  - A new destination which is complementary to and integrated within the wider town centre function
  - High quality development, with a mix of uses, which encourage activity and footfall within the town centre
  - A robust solution which is:
    - Viable
    - Deliverable
    - Appropriately phased
    - Has the support of the wider community
    - Is flexible in response to market demand to ensure longevity
- 5.8 The aim of the Framework is to be clear about the ambition of the Council, the type and scale of development being sought, the most appropriate sites in which to deliver that development and how new buildings must relate to the existing environment. The Framework document has two audiences - firstly the Stafford residential and business communities and secondly prospective developers and operators. The plans and images contained in the Framework are for illustrative purposes at this stage - decisions around design and

materials will be managed via the planning application process, as they would with any other scheme.

5.9 The Framework identifies six development areas as follows:

<b>Development Area</b>	<b>Location</b>	<b>Proposed Development Type(s)</b>
Market Hall	The former Guildhall shopping mall, to the rear of the retained arcade	Market Hall: food and beverage, retail
Residential/Mixed Use North	The former multistorey car park and indoor market hall at the Guildhall	Residential: town houses and apartments Commercial/business/service use Associated parking
Residential South	The former Guildhall management suite, gym and car park off Earl Street	Residential: terraced houses and apartments
Mixed Use, Gaolgate	Former Co-op and 10-12 Gaolgate Street	Residential: apartments
Broad Street	Former Wilko, Shopmobility unit and public toilets	Education
Public Realm (Various)	Spaces within the development areas listed above	High quality, connected spaces to strengthen the County Town identity

5.10 Whilst the plans are intended to guide more detailed discussions, if fully realised the town centre could see up to:

- 200 new homes;
- over 3,000m<sup>2</sup> of commercial space including a new Market Hall,
- 6,000m<sup>2</sup> education space to support the expansion of Stafford College and
- just under 3,000m<sup>2</sup> of improved public spaces

5.11 The new market hall sitting right in the heart of the town centre will complement the existing retail offer to attract footfall, support businesses and act as a community hub. Earmarking the former Wilko site for the College reinforces Stafford's role as a hub for learning and skills. The proposals will result in a change to the way the town centre looks and feels and will see a shift away from tired and vacant shopfronts in a high street that operates primarily in the daytime to a place that people are proud to live in and, equally importantly, want to spend their time in.

5.12 With the Development Framework setting the scene the Council now needs to move into the delivery phase of the programme - selecting the right developers to build the right things in the right places for Stafford Town

Centre. A number of routes to achieve this are available and options for consideration are as follows:

- (i) Disposal of the cleared sites to a developer with no planning consent for redevelopment
- (ii) Disposal of the cleared sites to a developer with outline planning consent for redevelopment
- (iii) Direct delivery (the Council acting as Developer)
- (iv) Appointment of a Development Partner(s) to deliver a redevelopment scheme
- (v) Joint Venture Partnership

5.13 In order to maintain pace, the time required to complete the process will be a key consideration. With this consideration central to the selection of a delivery route **APPENDIX 2** recommends a blend of delivery options. This includes the use of relevant procurement frameworks, land deals and the potential for direct delivery by the Council.

5.14 The Framework identifies the former Wilko site on Broad Street for educational use. Members will be aware that the Newcastle and Stafford College Group continues to grow with their Institute of Technology campus within the Stafford Station Gateway opening in 2025 and the recent acquisition of a former bank on Greengate Street earlier this year which will support their adult learning curriculum. Despite these new facilities coming into use the demand for places at the College means space is still needed. It is therefore recommended that the former Wilko site is earmarked for redevelopment in partnership with the College, with a further business case to be presented to a future Cabinet meeting.

5.15 For those sites that the Council wishes to retain in the longer term (principally the former Guildhall shopping centre and the former Co-op department store) developer selection via a suitable procurement framework, either by direct award or mini competition is the most appropriate delivery mechanism. This avoids a lengthy and drawn out process whilst maintaining the integrity of the Framework principles. Within this, the space identified in the Framework for a new Market Hall could be scoped as part of the development specification but equally could be delivered directly by the Council. The evaluation of the different delivery models will provide a final recommendation on this.

5.16 To support this next phase of the regeneration programme additional professional expertise and support will be required to move forward an accelerated programme and to deliver a significant amount of private sector investment and economic benefits that will accrue from the re-development scheme. It is anticipated that this will include:

- (i) Consultancy support for the development of specifications and assistance with the procurement of a development partner and

assistance with the business cases for the Market Hall and Broad Street sites.

- (ii) Legal support to advise on and draft the contract with the development partners and agreements relating to the other two development sites.
- (iii) Additional support for the in-house communications and marketing team both in terms of capacity and the tools to be used to engage with the public.
- (iv) Support for the Finance Team.

Further work is needed to finalise the additional expertise required and the anticipated cost of this. This will be the subject of a future report to Cabinet along with details of the timeline for the delivery of the next phase of the town centre regeneration project.

- 5.17 The next steps for the programme fall broadly into three categories - regulatory approvals, demolition contractor mobilisation and developer selection. As mentioned above, planning permission is sought for demolition at the former Wilko store site (which includes the former Shopmobility unit and public toilets) and two further demolition applications have been submitted for 10-12 Gaolgate Street and residual works at the Guildhall site. The latter relates to a canopy area off Crabbery Street and two substations that, due to lease constraints, could not be addressed as part of the main demolition works.
- 5.18 Alongside this a procurement exercise began in February 2026 to select a demolition contractor for the three remaining sites as set out in 5.17. The selection process concluded in March enabling work to start promptly in the event that planning permission is granted. Whilst this is not anticipated, should the applications not be approved the demolition contract is strictly subject to planning permission, so works will not start until that is in place.
- 5.19 Members will also recall that as part of the purchase of the Guildhall Shopping Centre in 2024 a number of retail units (and the associated upper floors) along Crabbery Street came into Council ownership. Of these, 27 and 30 Crabbery Street (which are located on the first and second floors above ground floor retail units) are capable of renovation works to deliver affordable housing as envisioned in the original Future High Streets Fund programme. The two properties have most recently been in use as offices however they were in residential use until the late 1980s meaning that the layouts support the conversion back to living accommodation. Officers have scoped out a scheme for up to 6 units of affordable housing which responds to local housing demand. Regulatory approvals (planning and building regulations) can be managed within the contractor award which will now be progressed via the County Council's Framework Agreement IA3047 for the Provision of

Planned and Reactive Maintenance and Minor Works  
(Building/Mechanical/Electrical).

- 5.20 It's important that the momentum built to date with the developers who have shown such strong interest in Stafford is maintained. Officers will be attending the UK Real Estate, Investment and Infrastructure Forum (UKREiiF)<sup>1</sup> in May 2026. If Members are minded to approve the Development Framework officers will take the opportunity to launch the Development Framework there ahead of the formal selection process getting underway with the aim of securing the first contractual arrangements by the end of the year.
- 5.21 In tandem, the team will carry out a public engagement exercise with residents, businesses and stakeholders to share the proposals in the Development Framework and talk about what the plans mean in practice for Stafford people. For example, what changes will there be to the parking offer both during and as a result of construction. Whilst the document is intended to guide and inform the comprehensive regeneration of the cleared sites and to provide the Council with a route map to delivery and isn't a detailed planning application, it may be necessary to update it to reflect any significant changes that come about from the engagement exercise.
- 5.22 Although the Council owned sites represent a significant amount of redevelopment potential the aim has always been to act as the catalyst for private sector investment in the town. As such, sitting alongside the Development Framework a Stafford Town Centre Masterplan has also been jointly commissioned with Staffordshire County Council which looks further ahead at other regeneration opportunities over a much wider area. Once complete the Masterplan will be presented to Cabinet for consideration.
- 5.23 In conclusion, the Council is now entering a critical and exciting phase in the delivery of the Stafford Town Centre Transformation process. It is intended that the Council moves forward at pace, to secure development partner(s) that share the Council's vision and this will act as a catalyst for the wider regeneration of the town centre creating confidence in Stafford as the County town as a place to live, work, invest and visit.

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<sup>1</sup> [UKREiiF - The UK's Real Estate Investment & Infrastructure Forum](#)

## **6 Implications**

### **6.1 Financial**

There are no direct financial implications arising from this report. The additional resources needed to deliver the next phase of the town centre regeneration project will be the subject of a future report to Cabinet alongside the governance arrangements and timeline.

### **6.2 Legal**

Procurement of any works, or services, enabling development will need to be conducted in accordance with rules set out in the Council's Procurement Regulations and the Procurement Act 2023.

### **6.3 Human Resources**

None

### **6.4 Risk Management**

The most significant risk to the Council is being unable to secure a development partner to bring investment into the land acquired and subsequently cleared by the Council and this has been identified as a High Risk in the Council's Strategic Risk Register. The proposed framework route for developer selection mitigates the risk of losing momentum with those developers who have indicated they are keen to be considered.

There are inherent risks in the selection of a development partner and this will be managed through professional development advisers and legal advice to ensure a robust contract with the developer.

The risks will change as we move into the next phase and the project risk register will be reviewed and updated to reflect this.

### **6.5 Equalities and Diversity**

An initial Community Impact Assessment has been completed and is enclosed at **APPENDIX 3**. This will be further informed and developed through the engagement which is planned. To date, impacts have been identified across a number of protected characteristics. Proposed mitigations acknowledge that further consideration will form part of the developer and development selection process. Immediate mitigation is deliverable in respect of the retention of the public toilets for the short/medium term.

Communication of impacts and mitigations are to be shared in advance and during works whilst recognising that most mitigations cannot be progressed until the details of the redevelopments are known.

## 6.6 Health

It is recognised that a redevelopment of this scale will have significant impacts on many of the wider determinants of health and the Programme Delivery Team will work with colleagues and partners to ensure opportunities to reduce health inequalities are maximised.

## 6.7 Climate Change

Climate Change and sustainability are both core considerations within the developer selection process.

## 5 Appendices

Appendix 1: Development Framework

Appendix 2: Development Framework: Next Steps

Appendix 3: Community Impact Assessment

## 6 Previous Consideration

Council 23 February 2021, minute C100

Cabinet 5 October 2023, minute CAB26

Cabinet 7 December 2023, minute CAB43

Cabinet 7 July 2025, minute CAB12 and CAB13

## 7 Background Papers

None.

<b>Contact Officer:</b>	Michelle Smith
<b>Telephone Number:</b>	01785 619 335
<b>Ward Interest:</b>	Forebridge
<b>Report Track:</b>	Cabinet 9 April 2026 only
<b>Key Decision:</b>	Yes



ArkleBoyce.

# Stafford Town Centre

## DEVELOPMENT FRAMEWORK

Contact Details

Client: Stafford Borough Council  
Project Contact: ArkleBoyce Architects

Status: FINAL  
Date: March 2026  
Prepared: MB  
Checked: JA  
Revision: B

# Contents

Executive Summary	5
The Vision	7
1. Introduction	9
2. Context	10
3. Challenges and Opportunities	20
4. The Development Framework	22
5. Development Areas	30
6. Next Steps	43



# Executive Summary



*The Development Framework for Stafford is a guide for developers, operators and investors, describing the opportunity that has been created within the Regeneration Area, located in Stafford's northern Town Centre. The document has been prepared to guide the future comprehensive regeneration of the area and the vision described in this Development Framework will help deliver Stafford's growth, productivity and quality of life.*

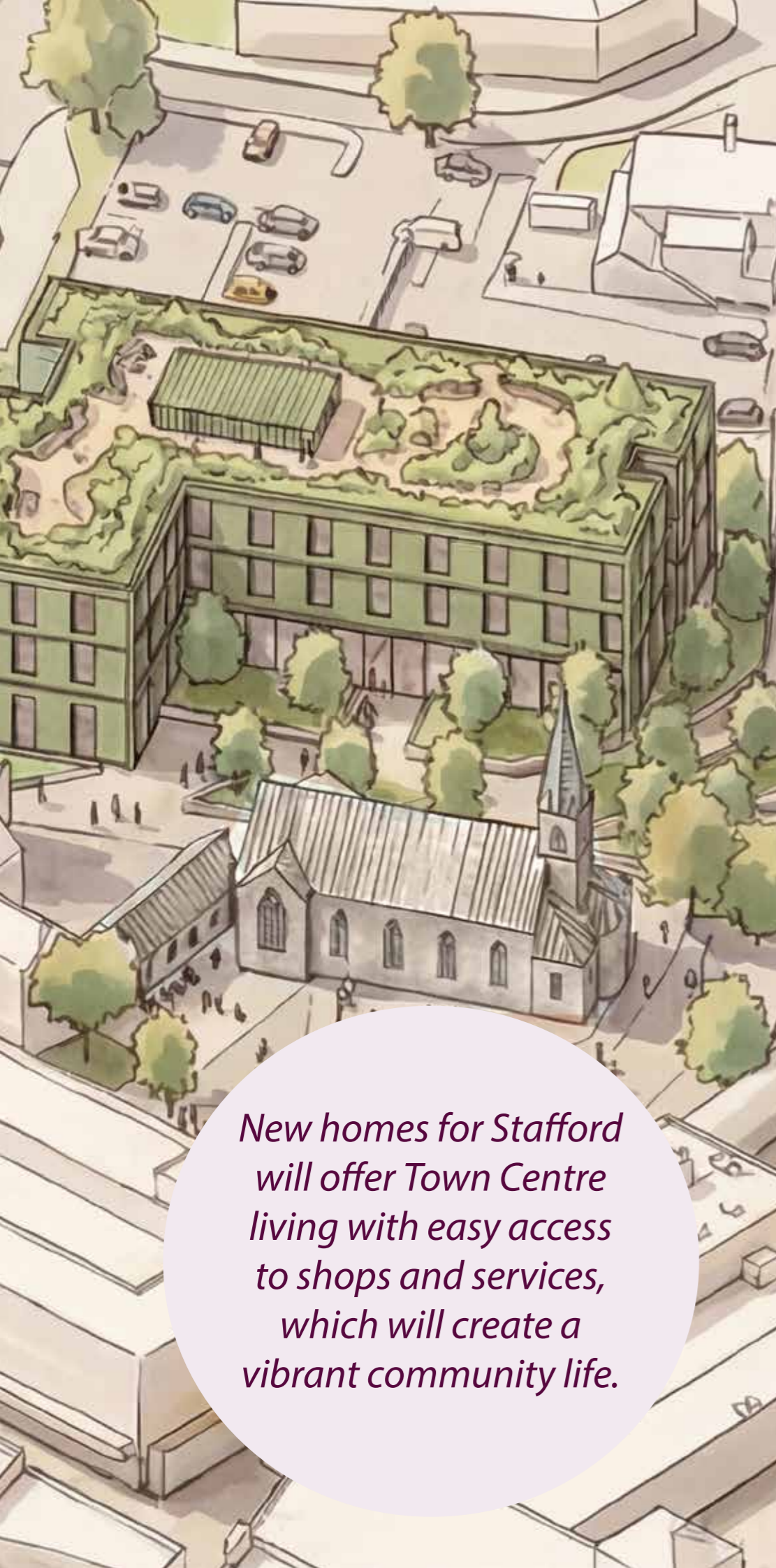
The development sites identified within this document are strategically positioned adjacent to key town centre assets. The planned regeneration will form strong physical and functional connections with the existing built environment, which will support continued development and success.

Stafford is ideally positioned with excellent connectivity to several major cities, including Birmingham and Manchester. With strong transport links and a growing local economy, the Development Framework outlines the opportunity to deliver high-quality, commercially attractive development that will enhance the wider town centre offer for current and future generations.

An aerial architectural rendering of a town center development. The scene shows a mix of existing and proposed buildings. In the foreground, there are several large, multi-story buildings with flat roofs and some with green roofs. A prominent feature is a large, open public space with a green roof and a central courtyard area. The surrounding area includes various residential and commercial buildings, some with red roofs and others with more modern, light-colored facades. The overall style is a detailed line drawing with soft shading and a color palette of earthy tones and greens.

*The Development Framework sets out opportunities for new residential, commercial and educational uses set within high quality public realm.*

*The new market hall will act as an anchor for the north of the Town Centre, creating space for independent vendors, retail and events to boost footfall and activity.*



# The Vision

*The vision for the Regeneration Area is to build on the town's significant successes to deliver further transformational change to the north of the Town Centre, creating a vibrant, inclusive and future-ready destination at the heart of Staffordshire.*

*Through public sector intervention, we have unlocked landmark development opportunities that reimagine the area as a thriving hub of commercial, cultural and community life.*

*Through a diverse mix of uses, including market and food hall spaces, town centre living, commercial, business and service spaces and education, Stafford's northern Town Centre will be reinvigorated with uses and development that celebrate its heritage and create resilience that meets the needs of today and tomorrow.*

*Our aim is to create a new destination, where visitors want to shop, where people want to socialise, learn, spend time and where businesses want to invest.*

*New homes for Stafford will offer Town Centre living with easy access to shops and services, which will create a vibrant community life.*



# I. Introduction

## About this Document

Stafford Borough Council has commissioned ArkleBoyce to produce a Development Framework for the Regeneration Area in the north of the Town Centre.

The aim of the Development Framework is to provide clarity for prospective investors about the long-term vision for Stafford's transformation.

The Development Framework seeks to:

- Set out a background and context for development opportunities and public realm proposals;
- Articulate a clear vision and identity for the northern part of Stafford Town Centre; and
- Provide guidance for development proposals coming forward including appropriate uses and design principles for the built form, public realm and landscaping within the area.

## Background

As with many town centres, Stafford has experienced challenging conditions over recent years which has culminated in a decrease in footfall and an associated reduction in retail offer. A number of retail units within the northern Town Centre have been vacated with little chance of those units being re-occupied.

The Government has promoted key initiatives to deal with challenges faced by town centres in the 21st century. In 2025, the Local Government Association published a paper on the transformative impact of housing led regeneration.

The paper, titled **“The role of town centre housing in town centre revitalisation”** states the following:

*Housing-led regeneration has emerged as a key strategy to help address these challenges. By leveraging housing development as a driver of investment and renewal, local leaders are meeting immediate housing needs while delivering broader economic and social benefits. Working with central government and private sector partners, they are pioneering new approaches to overcome viability barriers and attract investment.*

Following the Government's lead and best practice in the revitalisation of town centres, this Development Framework has been informed by discussions with a number of operators and developers who have shown an interest in the development opportunities offered in Stafford's northern Town Centre.

The process started with the launch of the Stafford Prospectus at UKREiiF in May 2025 and market leaders in the investment and delivery of town centre regeneration programmes have been engaged through a soft marketing exercise.

This has informed all aspects of the Development Framework process, including development mix and uses, quantum, scale and massing. All of which are key elements of modelling and subsequently delivering commercially viable proposals.

Phase I of the project, which is the demolition of the Guildhall and Co-op Department store, will shortly conclude. After this, the Council will continue to lead on demolition across the area with a number of sites within the Regeneration Area being progressed.

# 2. Context

## Strategic Context

The Regeneration Area lies within the County Town of Stafford, a historic market town located in the Staffordshire, in the West Midlands region of England.

Occupying a strategic position, the town is well connected by the M6 motorway and the West Coast Main Line, making it a key node between the North West and the Midlands.

Stafford acts as a central hub for economic activity, public services and cultural life and is located nearby some of the UK's major cities, including 16 miles north of Wolverhampton, 18 miles south of Stoke-on-Trent and 30 miles north-west of Birmingham.

This accessibility underpins major regeneration programmes such as the Stafford Station Gateway and Town Centre revitalisation initiatives supported by national funding streams, signalling sustained confidence in Stafford's long-term growth potential.

Stafford also benefits from exceptional access to high-quality natural environments, with Cannock Chase National Landscape, the Trent Valley and the Shropshire Hills forming its natural landscape. The River Sow, Doxey Marshes and the Staffordshire & Worcestershire Canal are local waterways and natural features that are in close proximity to the Town Centre. As such, the town offers residents and visitors ample access to the countryside and wildlife.

This blend of urban opportunity and rural proximity strengthens Stafford's identity as a sustainable, liveable, and well-connected County Town.



## Stafford Town Centre

Stafford Town Centre is a large regional centre. The traditional Town Centre was focussed around Market Square, Gaolgate Street and Greengate Street, however in more recent years, the Town Centre has grown outwards to the north east with the development of Kingsmead Retail Park and to the east with the development of Riverside, which includes national retailers, restaurants and a cinema.

The Town Centre is currently undergoing significant transformation, guided by a number of regeneration initiatives around Station Gateway, Eastgate, expansion of NSCG College and the Market Square.

The Town Centre and its immediate surroundings has a rich heritage, containing the Stafford Town Conservation Area and a number of significant Listed Buildings.

The wider Town Centre environment is varied, with high-quality public realm evident in the traditional shopping areas of Market Square, Greengate Street and Gaolgate Street.



Greengate Street



St Mary's Church



Market Square

# Site Context

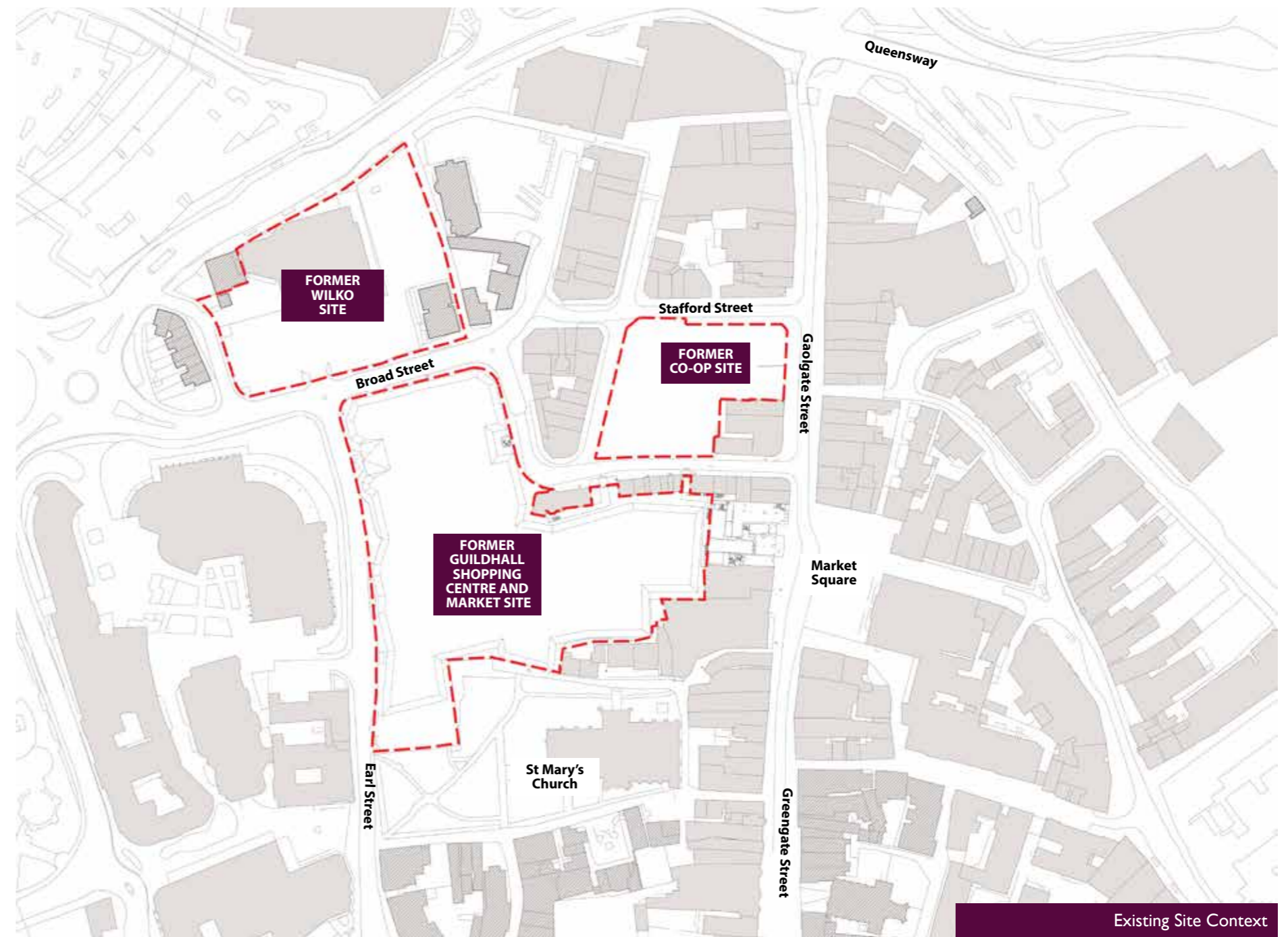
## The Regeneration Area

The Development Framework covers a portion of the northern Town Centre, this spans 2.4 hectares and includes:

- The former Guildhall Shopping Centre and Stafford Market.
- The former Co-op Department Store.
- The former Wilko site.

These sites are suitable for a range of uses, including residential, commercial, retail, service uses and education. The delivery of the Development Framework will also unlock the opportunity for new public realm within the Town Centre.

In addition to the development opportunities identified within this Framework, a wider Town Centre Masterplan is nearing completion, which aligns with the vision and principles of this document.



## Movement and Accessibility

The wider Town Centre benefits from a clear and permeable street network, with pedestrian-friendly streets and alleys. Extensive pedestrianisation and restrictions on vehicle movement have created a pleasant environment.

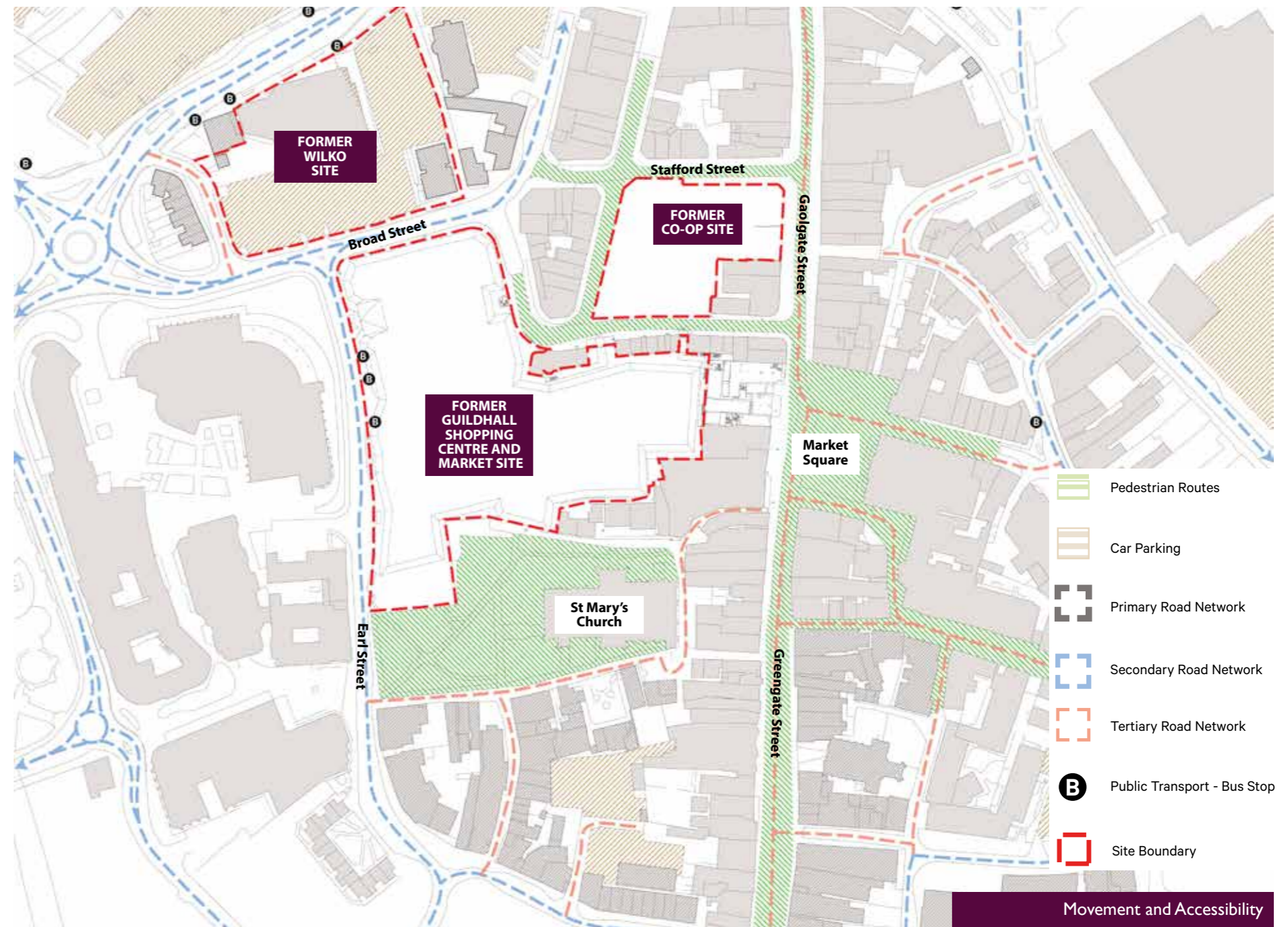
The Town Centre is well connected by multiple transport modes. Stafford Rail Station, located approximately 250m to the west of the Regeneration Area, provides services to destinations including Crewe, Birmingham, Liverpool, London, and Manchester.

Gaol Square Bus Interchange offers links to Eccleshall, Stone, Cannock, Hanley, Lichfield, Newcastle-under-Lyme, Newport, Rugeley, Stoke, Telford, Uttoxeter, and Wolverhampton. The majority of bus routes can be accessed from the edge of the Town Centre with a number of routes running into the centre along Eastgate Street and Earl Street.

Vehicle access is strong, with the Town Centre positioned off the A34 and A518.

National Cycle Route 5 and Route 55 provide good access into the Town Centre from the West, North West and East.

The main shopping areas, including Greengate Street, Market Square, Gaolgate Street, Riverside are pedestrianised and have high accessibility.



## Statutory Designations

The Regeneration Area is located within Flood Zone I, having a low probability of flooding.

The majority of the Development Framework area is located within the Stafford Town Conservation Area and the sites fall within the setting of a number of Listed Buildings.

The Development Framework lies close to the Cannock Chase National Landscape. Part of Cannock Chase is designated as a Special Area of Conservation (SAC). All development that leads to a net increase in dwellings within 15km of the site must take all necessary steps to avoid or mitigate any adverse effects upon the SAC's integrity.

## Heritage, Landscape and Public Realm

The majority of the Development Framework area is located within the Stafford Town Conservation Area, with the development sites falling within the setting of a number of Listed Buildings.

These assets are set within a compact network of streets and alleys, where most buildings follow a strong three-storey building line. The Council's appraisal of the Stafford Town Conservation Area, currently on the heritage at risk register, highlights the former shopping centre as negative infill development that has undermined the historic character of the County Town.

As the Framework sites lie within the setting of several heritage assets, the height and massing of future development proposals is an important consideration.

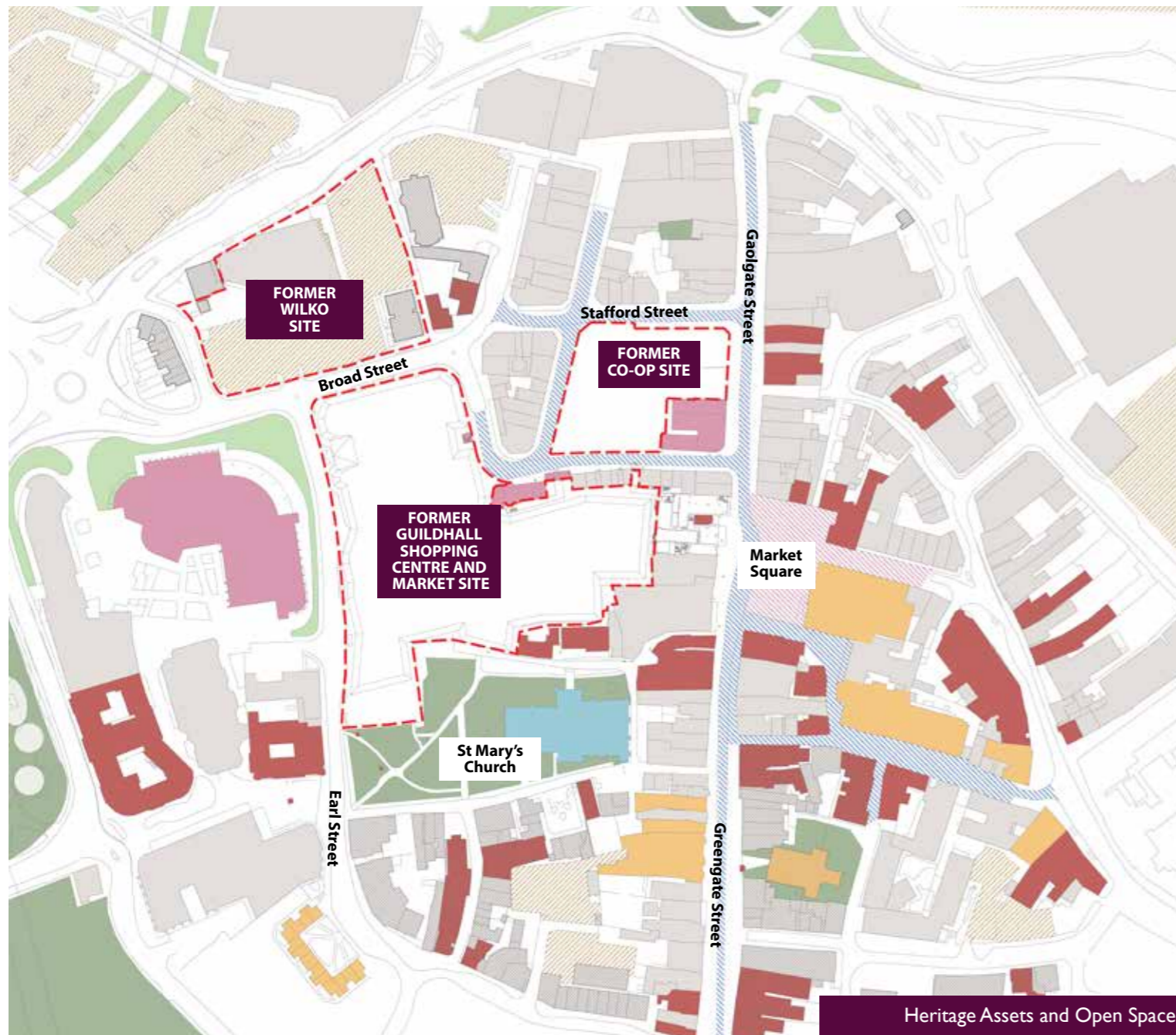
Heritage assets within and adjoining the Regeneration Area include:

- Stafford Town Conservation Area
- Grade I Church of St Mary
- Grade II Foundations of Bertelin's Chapel
- Grade II Fry Headstone
- Grade II Dale Monument
- Grade II 5-8 St Mary's Grove
- Grade II County Education Offices
- Grade II Stafford Borough War Memorial
- Grade II 2-3 Church Lane
- Grade II Church Lane Evangelical Church
- Grade II 56-58 Greengate Street
- Grade II Former Noah's Ark Inn
- Grade II 18 Market Square
- Grade II St Bernard's House
- Grade II 2 Mount Street
- Grade II 34-37 Gaolgate Street

Victoria Park is a key asset within Stafford, providing a green gateway for visitors arriving by train. It forms part of a series of open spaces along the River Sow, creating a high-quality waterfront setting that is easily accessible from the Town Centre. The river is well maintained, and many buildings benefit from their location along its banks.

The Town Centre also features a range of high-quality public realm and pedestrian areas, offering an attractive environment for retail and leisure activity. Market Square, which has recently been refurbished, sits at the heart of the centre and regularly hosts markets and civic events, reinforcing its role as a focal point for community life.

Together, the scale and quality of the building fabric, public realm and green spaces make Stafford an appealing place to walk and cycle. The River Sow's open spaces further enhance provision of accessible green areas. Stafford also holds a number of annual events, including the Stafford Food Festival, Spring Fair, Half Marathon and Christmas Lights switch on.



# Planning Context

## National Policy and Guidance

### The National Planning Policy Framework

The requirements for Local and Neighbourhood Plans are laid down in the National Planning Policy Framework (NPPF 2024). This states that the purpose of the planning system is to contribute to the achievement of sustainable development. Furthermore, the planning system should take into account local circumstances to ensure that economic, social and environmental gains can be delivered in a sustainable manner according to the needs and opportunities of different areas.

The NPPF outlines that a positive approach should be taken to the growth, management and adaptation of town centres and that the efficient use of land should be promoted, with substantial weight given to the value of using previously developed and under-utilised land for homes and other identified needs.

### Draft National Decision Making Policies (December 2025)

The Draft National Planning Policy Framework is currently out to consultation. This sets out clearer policies for planning and decision making, with the intention that decision making policies will not be repeated in development plans.

There is continued support for the effective use of land within proposed Policy LI. For town centres, there is a greater emphasis within proposed Policy TC1 on the need to set out a clear strategy and vision to ensure all needs are considered, including the scope to accommodate additional floorspace, broaden the mix of uses, and bring vacant sites back into use.

Proposed Policy TC2 promotes continued support to strengthening the vitality and viability of town centres, where this can be achieved through the diversification of uses, intensification and provision of residential accommodation and improving access to local shops and facilities which provide day-to-day services for the local communities.

### Planning Practice Guidance

The Planning Practice Guidance (PPG) is the government's online resource that explains how to apply the National Planning Policy Framework (NPPF) in practice. It provides detailed, topic-based guidance for local authorities, developers, and communities, ensuring consistency and clarity in how planning policies are interpreted and implemented.

Unlike the NPPF, the PPG is continuously updated online to reflect new policies, case law, and government priorities.

Key themes from the PPG on Town Centres emphasise vitality, adaptability, and sustainable growth. The guidance highlights how planning authorities can support Town Centres in responding to economic change, diversifying uses, and ensuring they remain attractive, accessible, and resilient.

### National Design Guide

The National Design Guide sets out the government's vision for creating well-designed places that are beautiful, sustainable, and enduring. It explains what good design means in practice and provides a framework for local authorities, developers, and communities to follow. The guide identifies principles to ensure that new developments respond to local character, support social interaction, promote active travel, and integrate green infrastructure.

It forms part of national planning practice guidance and is intended to support the National Planning Policy Framework. The guide helps local authorities assess design quality, informs the preparation of local design codes, and encourages developers to deliver schemes that enhance heritage, improve wellbeing, and foster resilience. By setting a clear benchmark for design quality, the National Design Guide aims to ensure that future growth contributes positively to communities, strengthens identity, and creates places that are attractive, inclusive, and adaptable over time.

### National Model Design Code

The National Model Design Code provides detailed guidance to help local authorities, communities, and developers define what good quality design looks like in their area. It sets out clear design parameters and expands on the ten characteristics of well-designed places identified in the National Design Guide. The Code is intended to ensure that new development reflects local character, supports sustainable growth, and delivers high-quality places that are attractive, functional, and resilient.

### Draft Design and Placemaking Planning Practice Guidance.

The four existing guidance documents (National Design Guide, Design PPG and National Model Design Code Parts 1 and 2) have been consolidated into a single streamlined resource, "The Draft Design and Placemaking PPG".

The PPG is intended to support the application of policies in the Draft NPPF 2025. It outlines and illustrates the government's priorities for well-designed places, including the seven features of well-designed places:

- Liveability – healthy, mixed and integrated communities.
- Climate – mitigating and adapting to change.
- Nature – enhanced and optimised.
- Movement – accessible and easy to move around.
- Built Form – a compact and connected pattern of development.
- Public Space – safe, social and inclusive.
- Identity – attractive and distinctive.

## Planning Policy for Stafford

In preparing the Development Framework, consideration has been given to national, regional and local planning policy. This includes both adopted and emerging policies in order to establish a full picture of the planning context and emerging evidenced requirements and needs.

A synopsis of the key policies which are relevant to and have informed the Development Framework proposals are contained below.

- Part 1 of the Local Plan contains a vision, spatial principles and specific policies which will guide development across the Borough.
- Part 2 of the Plan details settlement and Recognised Industrial Estate boundaries together with a policy protecting community / social facilities.

### Part 1 Local Plan

The 2014 Plan for Stafford Borough (Part 1) contains a vision, spatial principles and specific policies which will guide development across the Borough.

Since the adoption of the Local Plan there have been significant changes in National Planning Policy and in particular, housing targets for Stafford.

The following Local Plan Policies are relevant to this Development Framework:

- **Policy SP3 and 4 Stafford sustainable settlement hierarchy** - which outlines the County Town of Stafford as the primary settlement within the Borough to accommodate 70% of the housing development within the plan.
- **Policy SP5 Stafford Borough Employment Growth Distribution** - which outlines 56% of the employment land should be directed at Stafford.
- **Policy Stafford I** - the anchor policy for shaping Stafford's future - summarised opposite.
- **Policy E8 Town Centre** - outlines Town Centre policy considerations, summarised overleaf.
- **Policy N1 Design** - seeks to secure enhancements in design quality, through set design principles on use, form, space and movement.
- **Policy N2 Climate Change** - all development must incorporate sustainable design features to facilitate a reduction in the consumption of natural resources, improve the environmental quality and mitigate against the impact of climate change.
- **Policy N9 - Historic Environment** - requires new development to respect Stafford's Conservation Areas and Listed Buildings and encourages high-quality design that enhances the setting of heritage assets.
- **Policy T1 Sustainable Transport** - Supports connectivity between the railway station, bus interchange, and Town Centre.
- **Policy C1, C2 and C3 Housing Policies** - Encourages a mix of residential development and outlines affordable and specialist housing requirements.

## Stafford Town Centre Policy

Policies that are relevant to Stafford and its Town Centre are contained within Part 1 of the Local Plan and are summarised in more detail below and overleaf.

### Policy Stafford I - Stafford Town

The regeneration of Stafford Town Centre is supported through **Policy Stafford I** which is the anchor policy for shaping Stafford's future. It ensures that growth is concentrated in the town, rather than dispersed across the Borough; regeneration projects are aligned with heritage and sustainability priorities; and Stafford remains competitive against regional centres.

In summary, the policy:

- Establishes Stafford as the County Town and the primary settlement within the Borough, where the majority of new housing, employment, retail, and infrastructure will be directed.
- Identifies significant levels of housing and employment land to be delivered in Stafford, reflecting its role as a sub-regional centre.
- Supports a range of uses in Stafford Town Centre to strengthen vitality and viability, including retail, leisure, and cultural development.
- Requires improvements to transport networks, sustainable travel options, and community facilities to support growth.
- Ensures development respects Stafford's historic character and environmental assets, integrating green infrastructure and protecting conservation areas.
- Highlights strategic locations as priorities for regeneration and mixed-use development.
- Embeds principles of low-carbon design, reduced car dependency, and resilience to climate change.

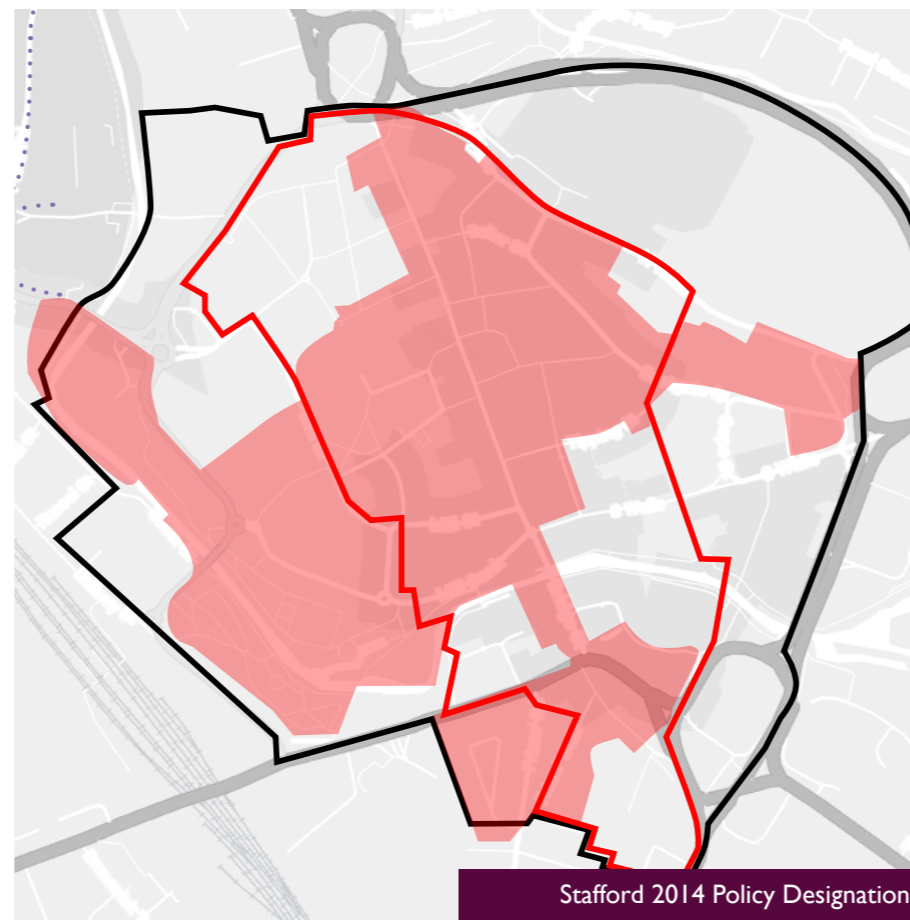
## Town Centre Policy - Policy E8 - Town Centres

### Policy E8 outlines:

*“Stafford Town Centre is the primary comparison and convenience shopping destination serving Stafford Borough as a whole, with a vibrant night time economy including arts and cultural activities, attracting significant numbers of trips from adjoining parts of the Borough as well as developing a key role as a tourist destination within Staffordshire.”*

In summary, the policy seeks to:

- Maintain and improve the quality and diversity of retail provision.
- Maintain and promote a diversity of uses.
- Retain and increase the amount of attractive residential provision in town centres, through new build and conversion.



- Town Centre Boundary
- Primary Shopping Area Boundary
- • • Western Access Improvement
- Stafford Town Conservation Area Boundary

## Local Plan Part 2

Part 2 of the Plan for Stafford Borough sets out boundaries for the settlements of Stafford, it also includes a policy on protecting social and community facilities, and the employment areas in Stafford.

The Plan for Stafford Borough - Part 2 was adopted by the Council on the 31 January 2017.

- **Policy SP3 Stafford Borough Sustainable Settlement Hierarchy** - The majority of future development will be based on a sustainable settlement hierarchy with the County Town of Stafford being first.
- **Policy SP4 Housing Growth Distribution** - 70% of housing target will be directed at Stafford.
- **Policy SB1** - details Settlement Boundaries for Stafford (bar employment use).
- **Policy SB2** - outlines social and community facilities are protected unless it can be demonstrated through evidence, the use is no longer required.
- **Policy SB3** - outlines those protected employment areas within Stafford.

## Supplementary Planning Documents

### Design SPD (2018)

The Design Supplementary Planning Document (SPD) was adopted in April 2018 and provides detail on how Local Plan policies should be applied in planning applications.

It outlines the following Core Design Principles:

- Development must respond to local distinctiveness, heritage assets, and landscape setting.
- Promotes permeability, pedestrian priority, and integration with existing street patterns.
- Ensure buildings respect human scale, with appropriate massing, height, and proportion.
- Separation distances to safeguard privacy and outlook.
- Encourage high-quality streets, squares, and green spaces that foster community activity.
- Incorporate energy efficiency, green infrastructure, and climate resilience into design.
- Standards for spacing, garden sizes, and orientation to ensure good living conditions.
- Emphasis on creating mixed, inclusive neighbourhoods with varied housing types.
- Guidance on scale, materials, and detailing to ensure changes respect the character of existing dwellings and streets.

## Emerging Local Plan

### New Local Plan 2025-2045

Following a Cabinet decision on 6 March 2025, Stafford Borough Council are currently preparing their evidence base for a new Local Plan 2025 to 2045 which will start a new plan-making process for the area.

The Local Plan 2025 - 2045 will fully replace the Local Plan for Stafford Borough with a new development strategy, site allocations and Development Management policies.

There have been significant changes in national policy and legislation since the adoption of the current Local Plan that the new Local Plan will be considering in its preparation. Relevant to this Development Framework and providing a robust context to this document include:

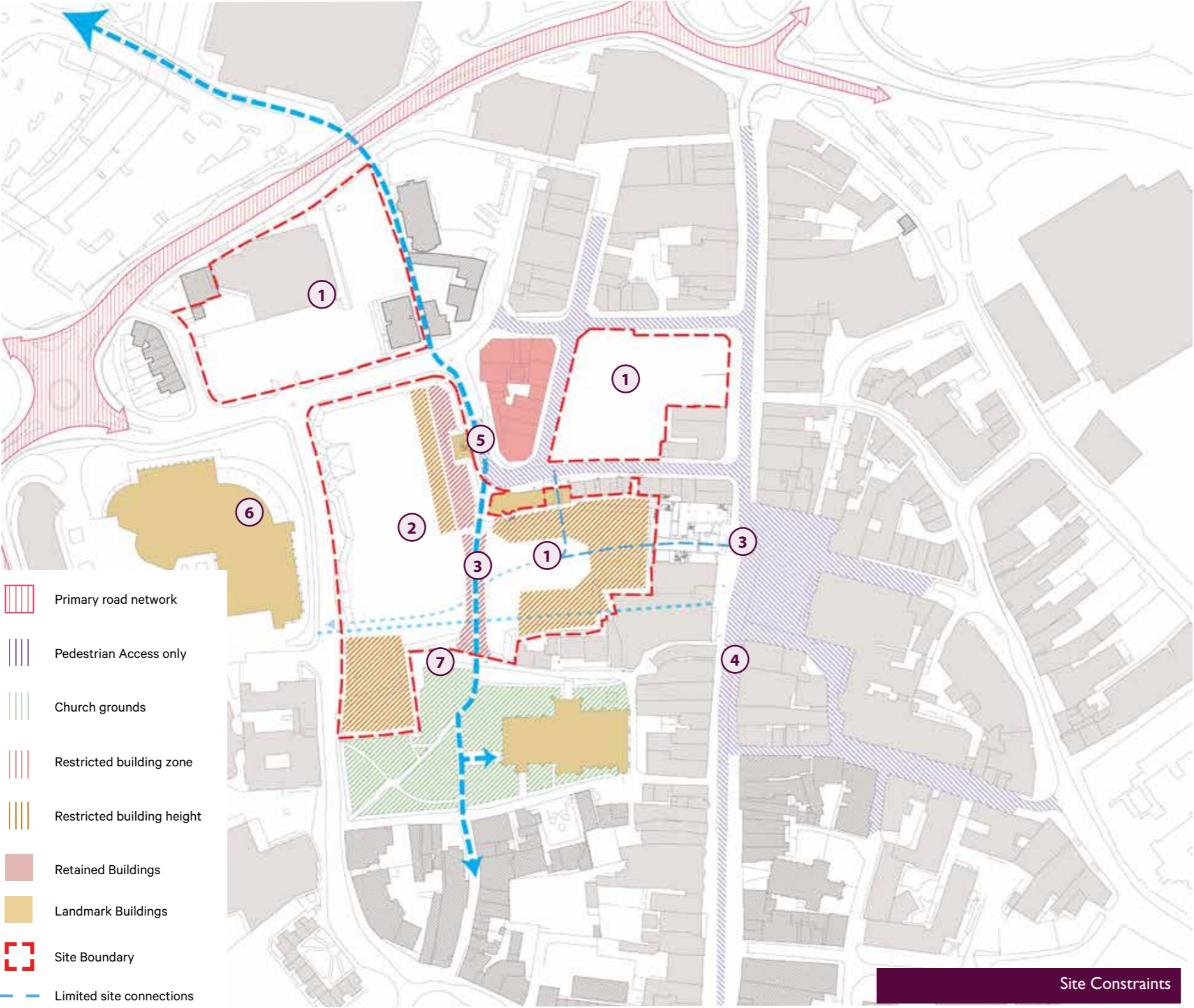
- The housing need for the area and the substantial increase in the housing requirement for the Borough;
- The sustained support for brownfield-first development to achieve higher housing targets and support urban regeneration; and
- The recognition that town centres must are no longer solely defined by retail and need to evolve.

## Other Relevant Guidance

Other relevant guidance documents that have informed the Framework and should inform development proposals include:

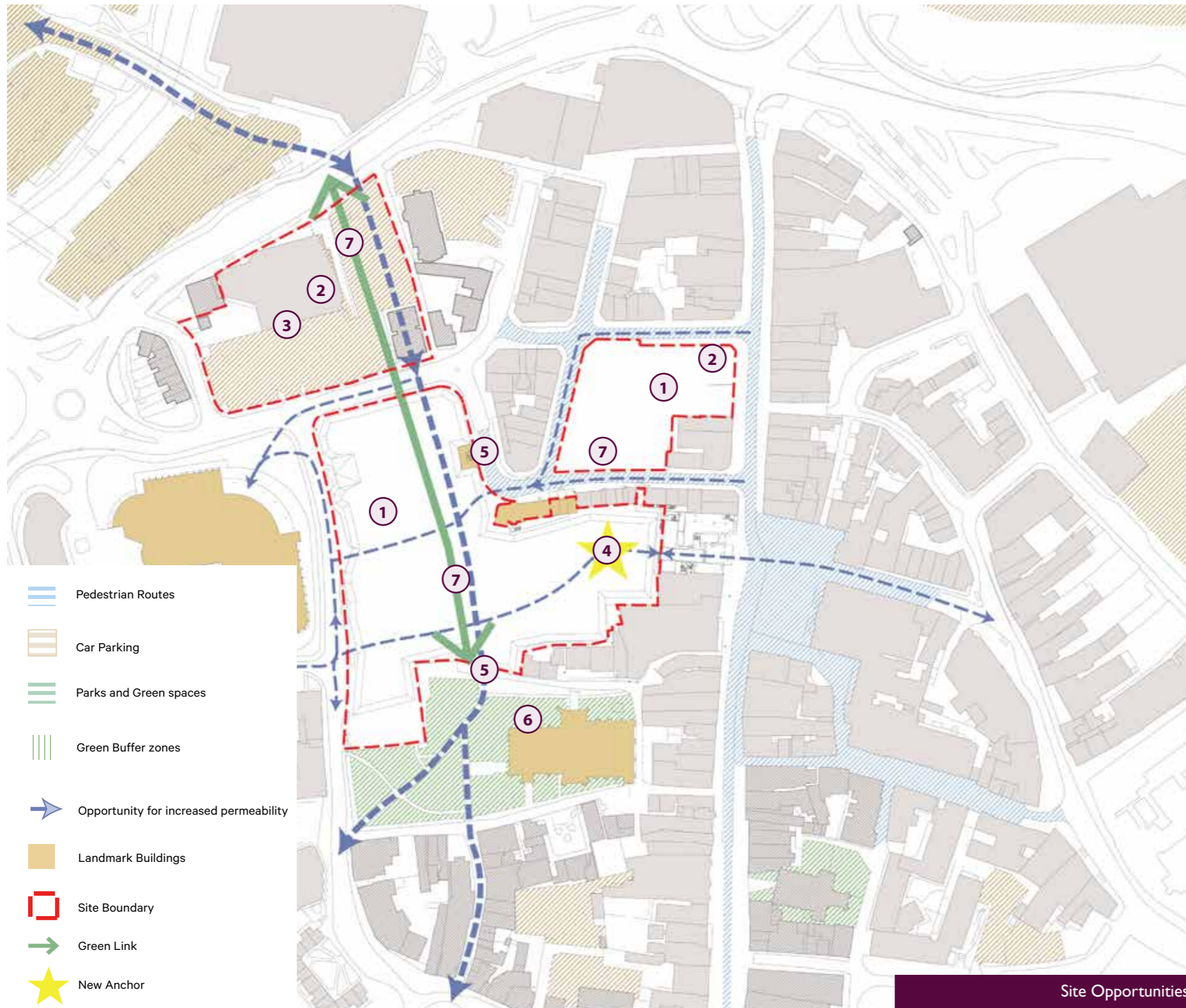
- Staffordshire Local Transport Plan (2026).
- Stafford Economic Growth Strategy (2020-2025).
- Stafford Corporate Plan (2025-2028).
- Stafford Climate Change Strategy.

# 3. Challenges and Opportunities



## The Challenges

- ① There has been a general decline in requirement for large scale retail space within the Town Centre due to online shopping trends and post pandemic behaviours.
- ② There is a lack of suitable residential accommodation within the Regeneration Area across all age groups.
- ③ There is a lack of connectivity between key spaces and landmarks, there is a need to connect areas of the Town Centre back together.
- ④ Inconsistent quality of public realm, paving, seating options and poor signage.
- ⑤ Streets like Chapel Street lack active frontages and feel neglected compared to the primary shopping core.
- ⑥ There is an unmet and growing demand for education, yet limited space to accommodate its exponential growth.
- ⑦ Current built form around St Mary's Church creates a poor setting for the Grade I Listed Building.



## The Opportunities

- ① The former Guildhall Shopping Centre and Co-op Department Store have been acquired and demolished by the Council. This is creating opportunities for the private sector to introduce a range of new uses, including residential, leisure, education and commercial to help diversify the Town Centre.
- ② Further sites have been acquired and are planned to be demolished, further expanding the regeneration footprint.
- ③ By acquiring and demolishing vacant sites, new spaces have been created which could support Newcastle and Stafford Colleges Group's expansion.
- ④ An anchor development, such as a food hall can provide a focus for the centre and extend activity beyond daytime shopping.
- ⑤ Opportunity to increase footfall and improve accessibility between key landmarks, such as Chapel Tower and St Mary's Church, enhancing permeability.
- ⑥ There is an opportunity to enhance the Stafford Conservation Area.
- ⑦ Opportunity to create a sequence of new public realm areas within the town, which link to existing squares and greenspaces.

# 4. The Development Framework

*The Development Framework has been prepared to guide the future regeneration for the north of the Town Centre. It provides design and development principles to guide development on the key regeneration sites outlined opposite.*

The Development Framework provides guidance to promote sustainable growth and revitalisation within the Regeneration Area.

The vision is to create a vibrant, safe, inclusive, and sustainable Town Centre community. The core urban design principles are retained and refined to reflect Stafford's evolving needs.

The document provides both:

- **Strategic design principles** that should guide all development within the Regeneration Area.
- **Site specific parameters** for the individual sites that can help guide massing, heights and quantum.





# Strategic Framework Principles

*In delivering the vision for Stafford it is essential that all development demonstrates that it meets the Strategic Framework Principles to improve the quality of buildings and spaces within the Regeneration Area.*

*The following strategic framework principles have been identified to help shape the type of quality that future schemes should uphold within Stafford, anchoring development in local character, heritage and needs within the Regeneration Area.*

## Strategic Framework Principles include:

- **Creating a thriving Town Centre with a distinct character** - creating a strong sense of place that knits the area back together through permeable, active routes.
- **Creating diversity through a vibrant mix of uses** - by providing a complementary mix of uses to build on the recent successes within Stafford, such as Riverside.
- **Creating a connected and legible public realm** - through the creation of welcoming routes that prioritise people, reinforce identity, and create a resilient Town Centre.
- **Encourage a heritage-led design response** - drawing on Stafford's heritage to create an attractive and visually interesting focal point for residents of the town and the surrounding area.
- **Safeguard natural resources and sustainability** - protecting water, energy, and biodiversity through sustainable drainage, green infrastructure, efficient materials, and climate-resilient design.

## Creating a thriving Town Centre with a distinct character

*It is important that at the heart of all development proposals within the Regeneration Area, a strong sense of place is developed to enhance the existing Town Centre.*

*Proposed interventions will bring forward a range of uses, promote a finer grain of built form and create streets and spaces that are fronted by high quality development.*

**The overarching aim for development within the area is to promote design excellence and develop a sense of place, with a clear character through development that:**

- Reinforces Stafford's identity as a County Town, through new uses, distinctive architecture and civic spaces.
- Enhances a sense of place through the design of buildings and responding to the immediate context, heritage and townscape.
- Creates a robust urban form that encloses and fronts streets and spaces across the area. Development sites should include a clear definition between public and private spaces and demonstrate how parking and servicing can be accommodated where appropriate.
- Expands and diversifies public spaces, with improved pedestrian connectivity through a linked sequence of green and civic spaces, improving the permeability to existing public and green spaces, such as the Market Square and St Mary's Church.
- Ensures a high quality public realm to seamlessly guide people through the area and connect to adjoining locations within the town.



Diversifying the Town Centre with vibrant new uses

## Creating diversity through a vibrant mix of uses

*Attracting and accommodating a viable and robust mix of uses will be important in ensuring the future success of the Regeneration Area.*

*Successful regeneration within the town, such as Riverside, has drawn footfall away from the traditional centre. The acquisition of large sites provides the opportunity to create a complementary mix of uses within the northern Town Centre to ensure it is well-used and help attract people to live, work and play in the same area.*

### **The Development Framework promotes a mix of uses to complement the existing retail function.**

The Framework promotes a flexible range of uses, to diversify the Town Centre, including:

- A new Market Hall, including retail and food and drink.
- New homes, including buy-to-let, affordable, senior living and open market homes for Stafford.
- Space for commercial, retail, business and service uses, for a variety of operators.
- Space for educational uses and expansion of the NSCG College.

A range of unit sizes and uses will be encouraged to strengthen footfall and extend activity beyond daytime shopping, fostering a vibrant town centre environment.

Ground floors of buildings should have active frontages, incorporating uses that animate the street.



Active ground floors and a variety of uses will promote diversity

## A Connected, Legible Public Realm

*The Framework promotes development that enhances existing views and vistas so that the Regeneration Area is legible, permeable and easy to move around. This will contribute to improving the general accessibility of the Town Centre.*

*The ability to see important routes and landmarks is integral to finding your way around and helps contribute to making a place feel safe. Places where the urban form and layout make them easy to understand often function well and makes them pleasant places to work and visit.*

**A connected and legible public realm in Stafford should knit together heritage, civic spaces, and green assets with clear, welcoming routes that prioritise people, reinforce identity, and create a resilient Town Centre.**

The Framework promotes the following:

- Key civic and heritage buildings, such as St Mary's Church and Chapel Tower should be visible along routes, aiding navigation and reinforcing character.
- Create and maintain clear, direct links between the Regeneration Area and existing civic spaces ensuring easy movement across the Town Centre.
- Reinforce Stafford's historic character by using locally appropriate materials, clear signage, public art and lighting that reflect Stafford's identity as a County Town.
- New public realm, greenspaces and streets should be designed to reinforce civic life able to host markets, festivals, and cultural events, reinforcing civic life.
- Use consistent paving, lighting, and street furniture to guide movement and reinforce identity and make spaces welcoming.



## Encouraging a heritage-led design response

*Making beautiful, sustainable places to live and work also means creating places that feel at home with their surroundings, while also pushing the boundaries of design.*

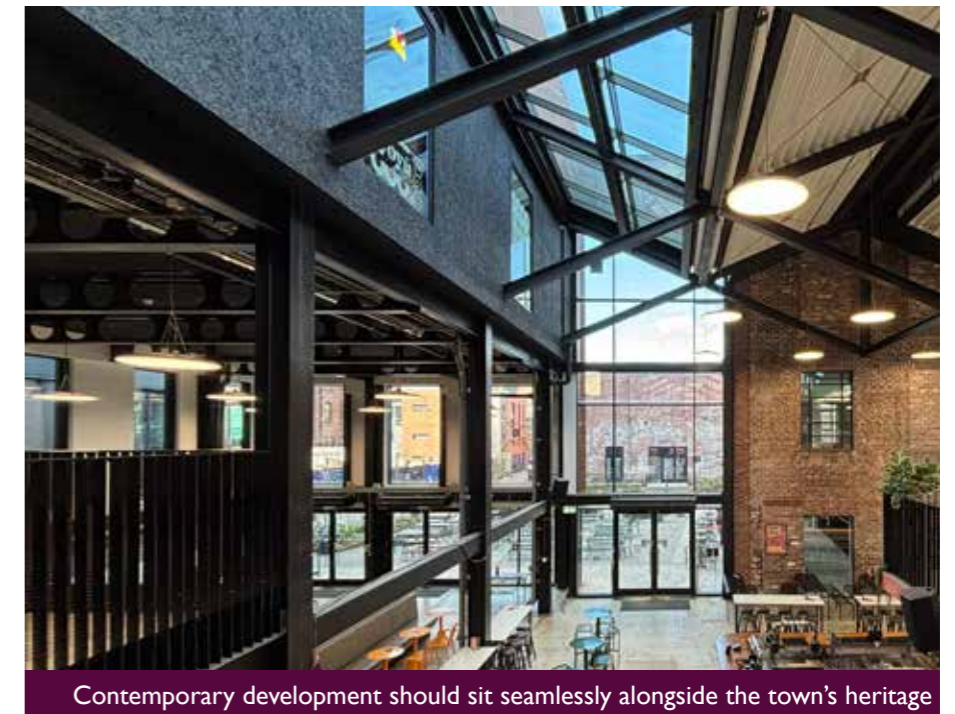
*Stafford Town Centre has a rich history with an abundance of heritage assets demonstrating the town's evolution.*

*One of Stafford's primary strengths is drawing on this heritage to create an attractive and visually interesting focal point for residents of the town and the surrounding area.*

**Buildings and public spaces should be designed to the highest standards, with thoughtful detailing and a clear response to Stafford's historic character.**

Development in Stafford should promote a heritage-led design response and ensure:

- New development should complement the existing townscape, Conservation Area and Listed Buildings. Development should be appropriate to the scale and nature of their immediate surroundings, respecting heritage assets while introducing quality built form.
- Human-scale frontages and avoid overbearing massing that detracts from heritage assets.
- Sightlines to landmarks such as St Mary's Church, Chapel Tower and Market Square are framed appropriately and protected.
- New public realm areas reinforce historic identity and explore the inclusion of heritage trails, plaques, and public art to celebrate Stafford's history and improve legibility.
- Resilient, adaptable design that stands the test of time, supporting Stafford's identity and economic vitality.



Contemporary development should sit seamlessly alongside the town's heritage

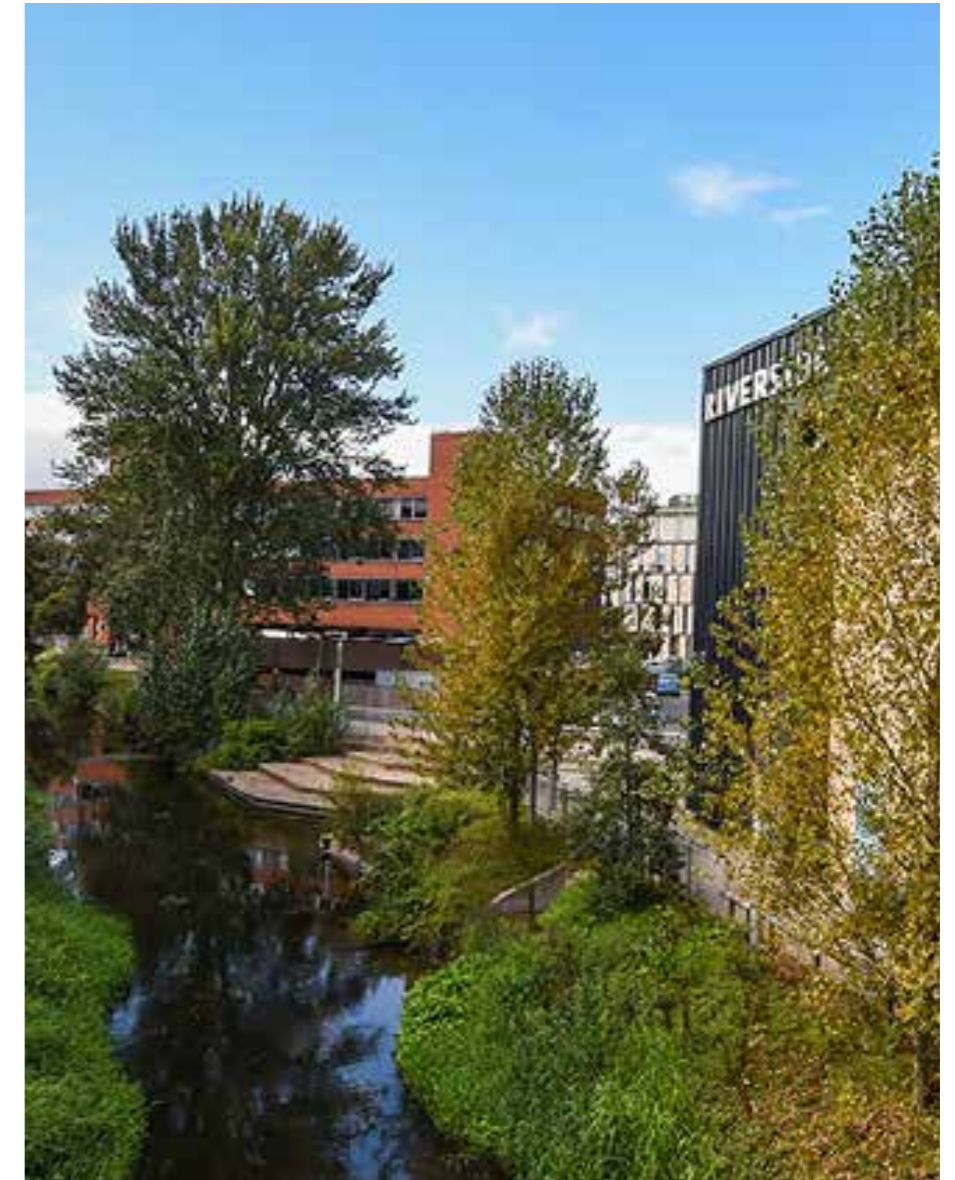
## Natural Resources

*Stafford Borough Council have declared a Climate Emergency and new development on prominent sites has an important role to play in changing attitudes towards how we care for the environment and minimise our footprint on the planet.*

*The Development Framework is fully supportive of the Council's environmental sustainability targets and supports this through its guidance.*

**Development should prevent harm to the environment and mitigate any negative impacts in line with relevant planning policies, including:**

- Design which achieves the highest practicable energy efficiency, uses low-embodied carbon building materials and minimises water demand on any deliverable scheme.
- At least a 10% measurable net gain in biodiversity is required in line with policy.
- Integrating shading, sustainable drainage, and natural features to future-proof spaces.
- Using robust, low-maintenance finishes that age well and reduce long-term costs.



Development should incorporate planting and biodiversity features

# 5. Development Areas

The Development Framework proposals each seek to contribute to the area's overarching vision over coming years in becoming vibrant, resilient and attractive.

The Framework sets out to address the following key issues for the area:

- Establishing a **strong character and identity by creating a robust, legible and flexible built form.**
- Creating an **attractive public realm that encourages people to visit and dwell.**
- Attract and accommodate a **viable mix of uses.**
- Enhance and improve **sustainable movement through the area.**

## Development Matrix

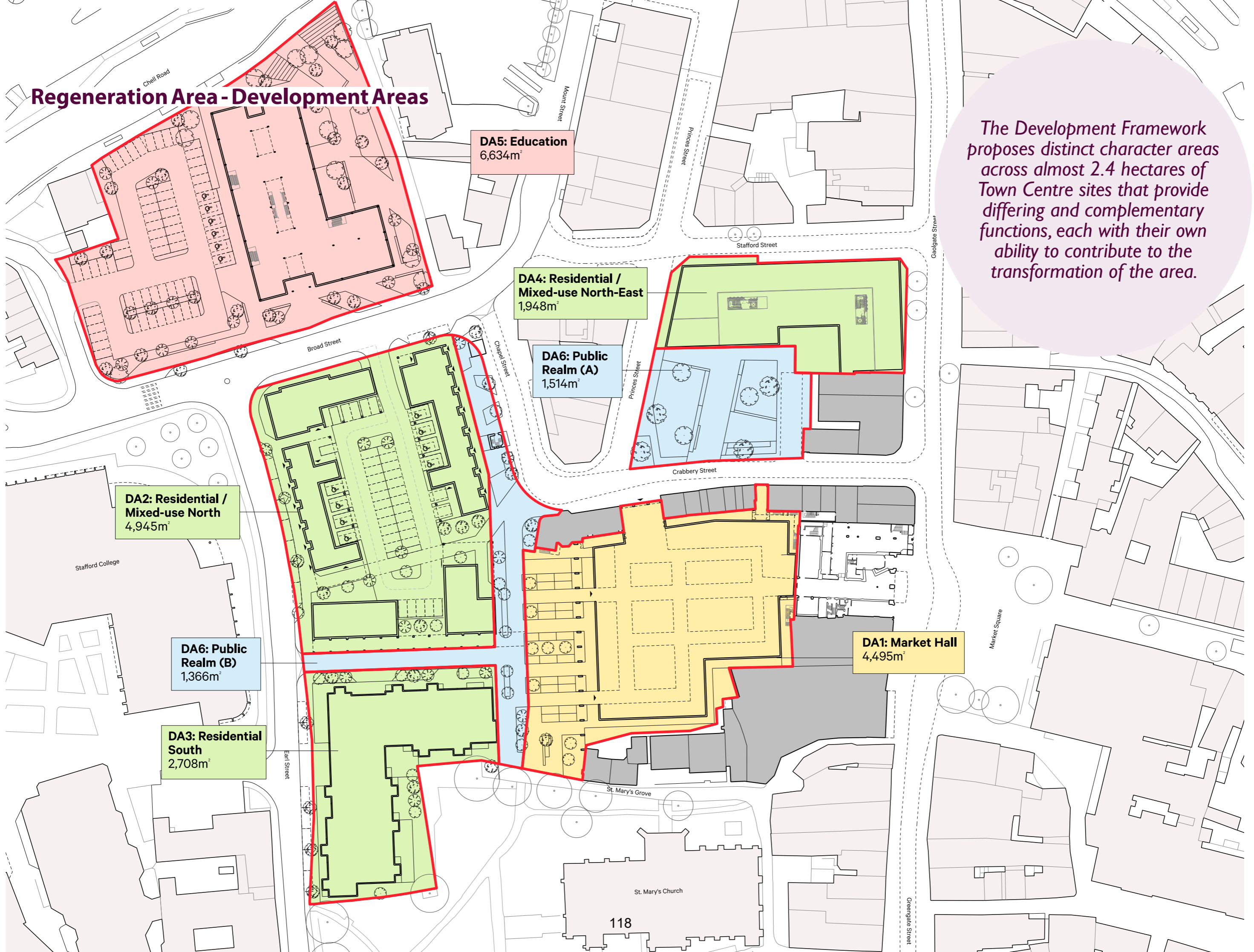
Site name	Site area (m <sup>2</sup> )	Site area (ft <sup>2</sup> )
DA1: Market	4,495	48,384
DA2: Residential / Mixed-Use North	4,945	53,228
DA5: Education	6,634	71,408
DA3: Residential South	2,708	29,149
DA4: Residential/Mixed-Use North-East	1,948	20,968
DA6: Public Realm	2,880	31,000
<b>Totals</b>	<b>23,610</b>	<b>254,136</b>

Building name	Ground floor GIA (m <sup>2</sup> )	First floor GIA (m <sup>2</sup> )	Second floor GIA (m <sup>2</sup> )	Third floor GIA (m <sup>2</sup> )	Fourth floor GIA (m <sup>2</sup> )	Fifth floor GIA (m <sup>2</sup> )	Building GIA (m <sup>2</sup> )	Building GIA (ft <sup>2</sup> )	No. Dwellings
Market	2,594.00	-	-	-	-	-	2,594.00	27,921.58	-
Resi Block 1 (North)	294.00	389.00	389.00	389.00	270.00	-	1,731.00	18,632.33	25
Resi Block 2 (East)	417.00	626.00	626.00	626.00	-	-	2,295.00		25
Resi Block 3 (South East)	275.00	345.00	345.00	345.00	-	-	1,310.00		13
Resi Block 3 (GF Commercial)	208.00	-	-	-	-	-	208.00		
Resi Block 4 (South West)	222.00	312.00	312.00	312.00	-	-	1,158.00		14
Resi Block 5 (West)	292.00	548.00	548.00	-	-	-	1,388.00		16
College	1,522.00	1,522.00	1,522.00	1,522.00	-	-	6,088.00	65,530.69	-
Residential Building	1,493.00	1,493.00	1,493.00	-	-	-	4,479.00	48,211.55	47
Residential Building	1,075.00	1,520.00	1,520.00	1,520.00	-	-	5,635.00	60,654.64	60
Resi (GF Commercial)	445.00	-	-	-	-	-	445.00	4,789.94	-
	-	-	-	-	-	-	0.00	0.00	-
<b>Totals</b>							<b>27,331.00</b>	<b>225,740.73</b>	<b>200</b>

The schedules above describe the site areas at the current stage of design. The design is subject to Statutory approvals and specialist design input. Any decision to be made on the basis of these numbers, such as project viability, pre-letting, lease agreements or the like, should include due allowance for the changes inherent in the design development and building processes.

# Regeneration Area - Development Areas

The Development Framework proposes distinct character areas across almost 2.4 hectares of Town Centre sites that provide differing and complementary functions, each with their own ability to contribute to the transformation of the area.



**DA2: Residential / Mixed-use North**  
4,945m<sup>2</sup>

**DA6: Public Realm (B)**  
1,366m<sup>2</sup>

**DA3: Residential South**  
2,708m<sup>2</sup>

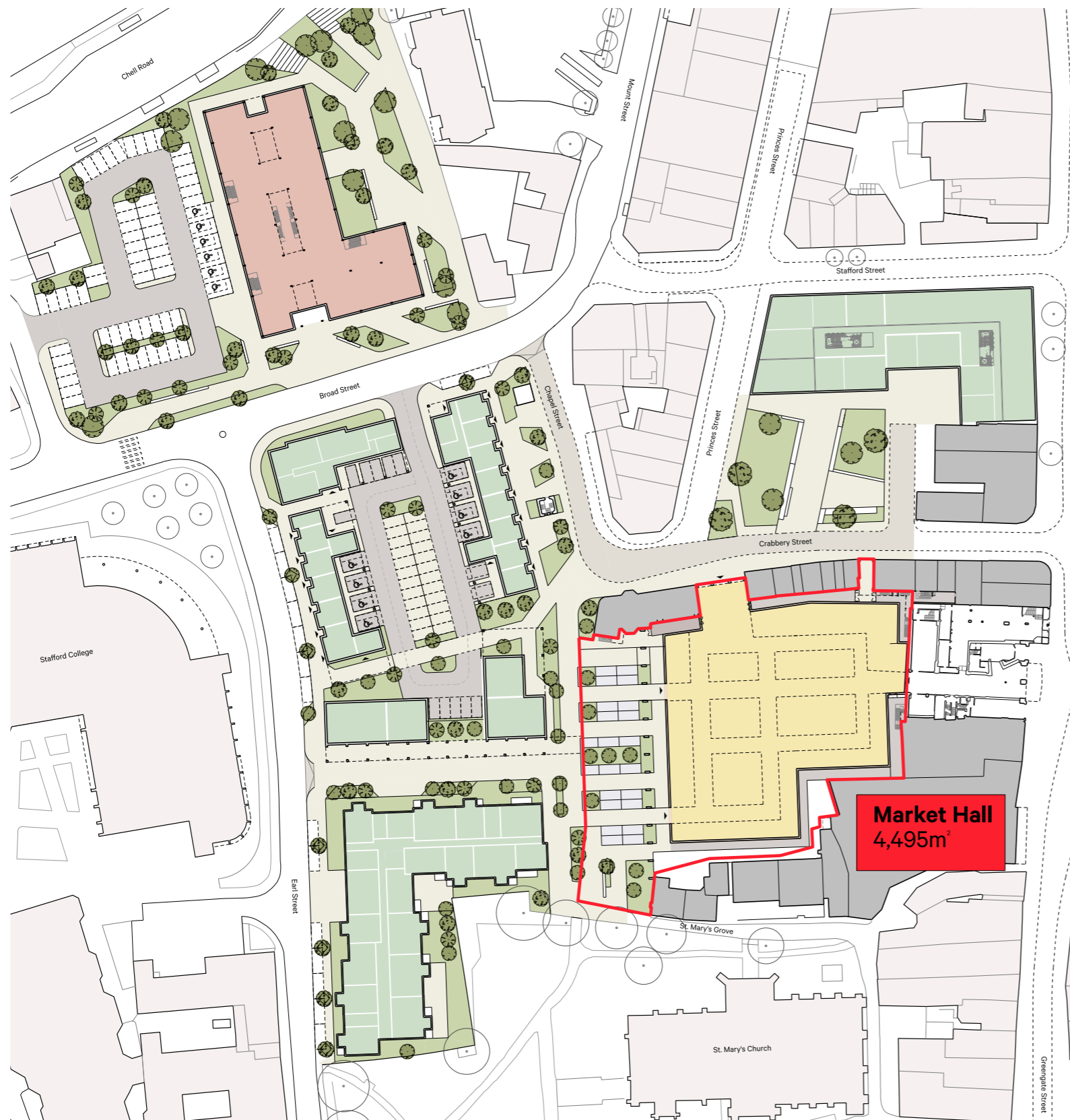
**DA5: Education**  
6,634m<sup>2</sup>

**DA4: Residential / Mixed-use North-East**  
1,948m<sup>2</sup>

**DA6: Public Realm (A)**  
1,514m<sup>2</sup>

**DA1: Market Hall**  
4,495m<sup>2</sup>

# DA I: Market Hall



The former Guildhall Shopping Centre offers a significant redevelopment opportunity within the Town Centre. With its central location and considerable footprint, this site is perfectly positioned for a bold mixed-use scheme.

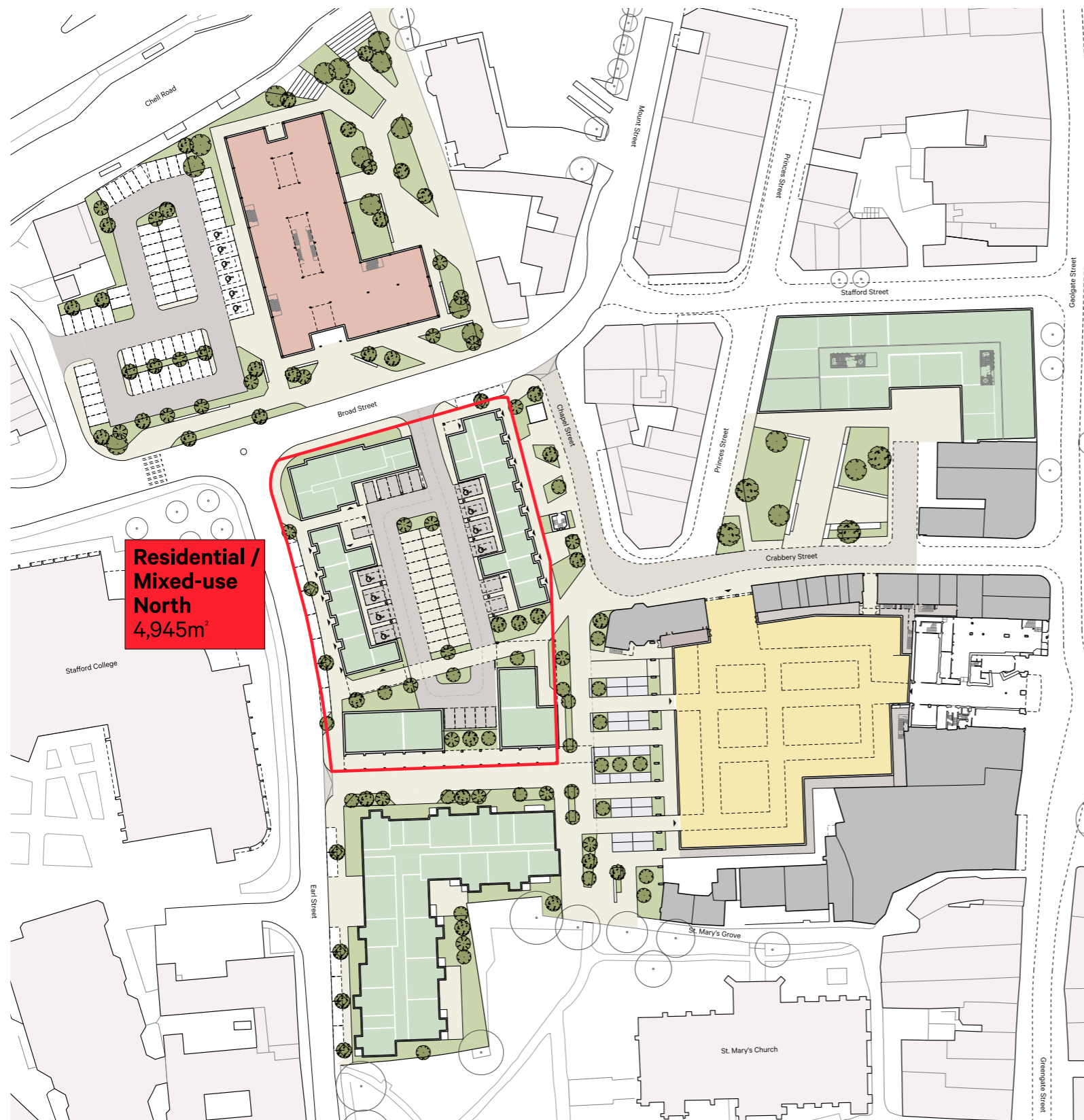
A new market hall will be situated in the heart of the Town Centre, complementing the existing retail offer to attract footfall, support businesses and acting as a focal point in the town centre.

<b>Site Name</b>	<b>Market Hall</b>
<b>Site Area</b>	0.45ha
<b>Uses</b>	Market Hall, Food, Retail.
<b>Indicative Quantum</b>	2,595sqm GIA.
<b>Massing and Height</b>	Up to two / three storeys - respect the three-storey building line typical of Stafford's Town Centre. Site appropriate for large footprint building, sensitively located behind existing built form.
<b>Site Principles</b>	<ul style="list-style-type: none"> <li>• Integrate Stafford's heritage assets, Listed Buildings and Conservation Area setting into design, creating a new setting to St Mary's Church.</li> <li>• Ensure clear sight lines and multiple entrances to allow strong pedestrian connections to surrounding streets, including Crabbery Street and Market Square.</li> <li>• Create a new green connection between St Mary's Grove and Chapel Street and the landmarks of St Mary's Church and the Chapel Tower to connect previously severed links and contribute to the wider sequence of green spaces within the Town Centre.</li> <li>• Include shared seating, cultural programming, and event space to foster social interaction.</li> <li>• Design with flexibility to adapt to changing retail and leisure trends over time.</li> </ul>



New market hall destination, with places to eat and public realm

# DA2: Residential / Mixed-Use North



<b>Site Name</b>	<b>Residential / Mixed-Use North</b>
<b>Site Area</b>	0.49ha
<b>Uses</b>	Residential - mix of dwelling types. Active ground floor. uses.
<b>Indicative Quantum</b>	8,090 sqm GIA residential development. 93 Units. 208 sqm GIA commercial, business, service use.
<b>Massing and Height</b>	Up to four storeys, Potential opportunity up to five storeys in appropriate locations.
<b>Site Principles</b>	<ul style="list-style-type: none"> <li>• Development should provide a balanced mix of apartments and townhouses, catering to diverse households and age groups, including senior living and affordable homes.</li> <li>• The layout of any residential development should incorporate framed views and sight lines to celebrate existing high quality architecture and heritage assets, rather than obscure it.</li> <li>• Buildings should be set back to reduce impact along Earl Street to avoid a tunnelling effect to the street. The design should incorporate human-scale detailing and facades should be articulated to provide interest in the street scene.</li> <li>• Buildings should be set back on Chapel Street to celebrate landmarks, such as Chapel Tower and create space for public realm, planting and green space incorporated into the design to enhance its setting.</li> <li>• Homes should front onto the street, with active ground floors with a mix of uses, reinforcing the Town Centre's function and urban grain.</li> <li>• The design should encourage permeability and legibility, with clear pedestrian routes and courtyards that connect to the wider Town Centre and landmark's such as St Mary's Church.</li> <li>• Homes should have access to amenity space and communal gardens or shared courtyards should be provided within apartments to encourage social interaction and soften the built form.</li> <li>• Rooflines and heights must be carefully considered and designed, with step-backs or varied profiles to reduce visual impact.</li> </ul>

*The northern residential / mixed-use area is proposed on Chapel Street, south of Broad Street, on the former market site. Designed with a fine-grain layout, it will enhance the setting of nearby heritage assets and provide a mix of townhouses and apartments, with potential for other uses to create activity at ground floor.*

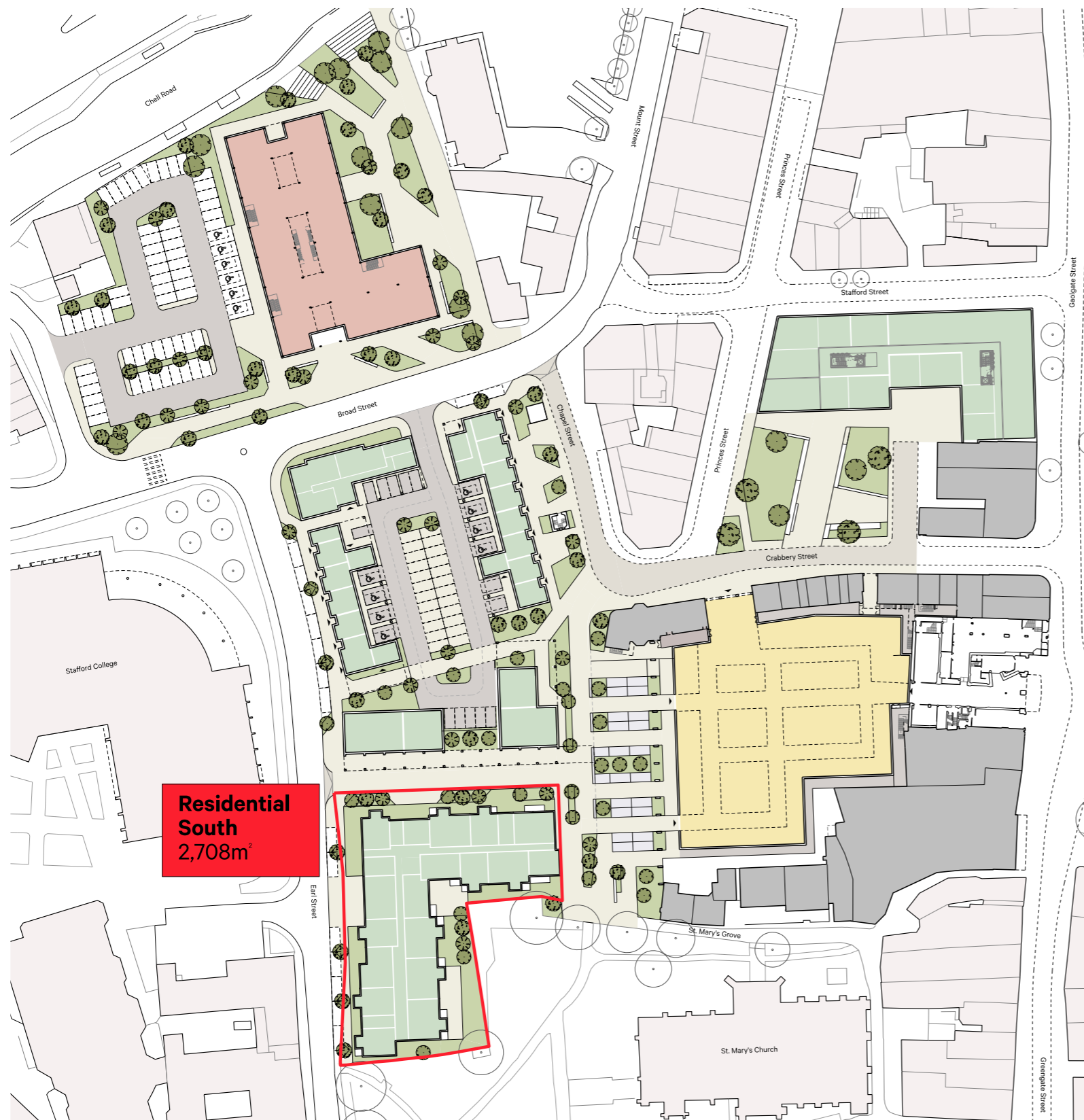
*Introducing homes into Stafford Town Centre will re-energise the area, diversify its offer, and support long-term resilience.*

*Town Centre living sustains local shops, cafés, and leisure venues beyond retail hours, fostering a vibrant evening economy.*



A finer grain of development helps better reveal existing heritage assets

# DA3: Residential South



<b>Site Name</b>	<b>Residential South</b>
<b>Site Area</b>	0.27ha
<b>Uses</b>	Residential - mix of sizes. Terraced housing and apartments.
<b>Indicative Quantum</b>	4479 sqm GIA. 47 Units.
<b>Massing and Height</b>	Up to three storey development, arranged to be set back from St Mary's Church.
<b>Site Principles</b>	<ul style="list-style-type: none"> <li>• Development should provide a balanced mix of units, catering to diverse households and age groups, including senior living and affordable homes.</li> <li>• Landscape and building design should enhance the church's setting, with buildings set back to reduce impact and planting and green space incorporated into the design to enhance its setting.</li> <li>• Homes must front onto the street, and civic square, creating active façades and reinforcing the Town Centre's urban grain.</li> <li>• Designs should encourage permeability and legibility, with clear pedestrian routes and courtyards that connect to the wider Town Centre and new public realm spaces created.</li> <li>• Homes should have access to amenity space and communal gardens or shared courtyards should be provided within apartments to encourage social interaction and soften the built form.</li> <li>• Design should incorporate human scale detailing to enrich the streetscape and facades should be articulated to provide interest in the street scene.</li> <li>• Rooflines and heights must be carefully considered and designed, with step-backs or varied profiles to reduce visual impact.</li> </ul>

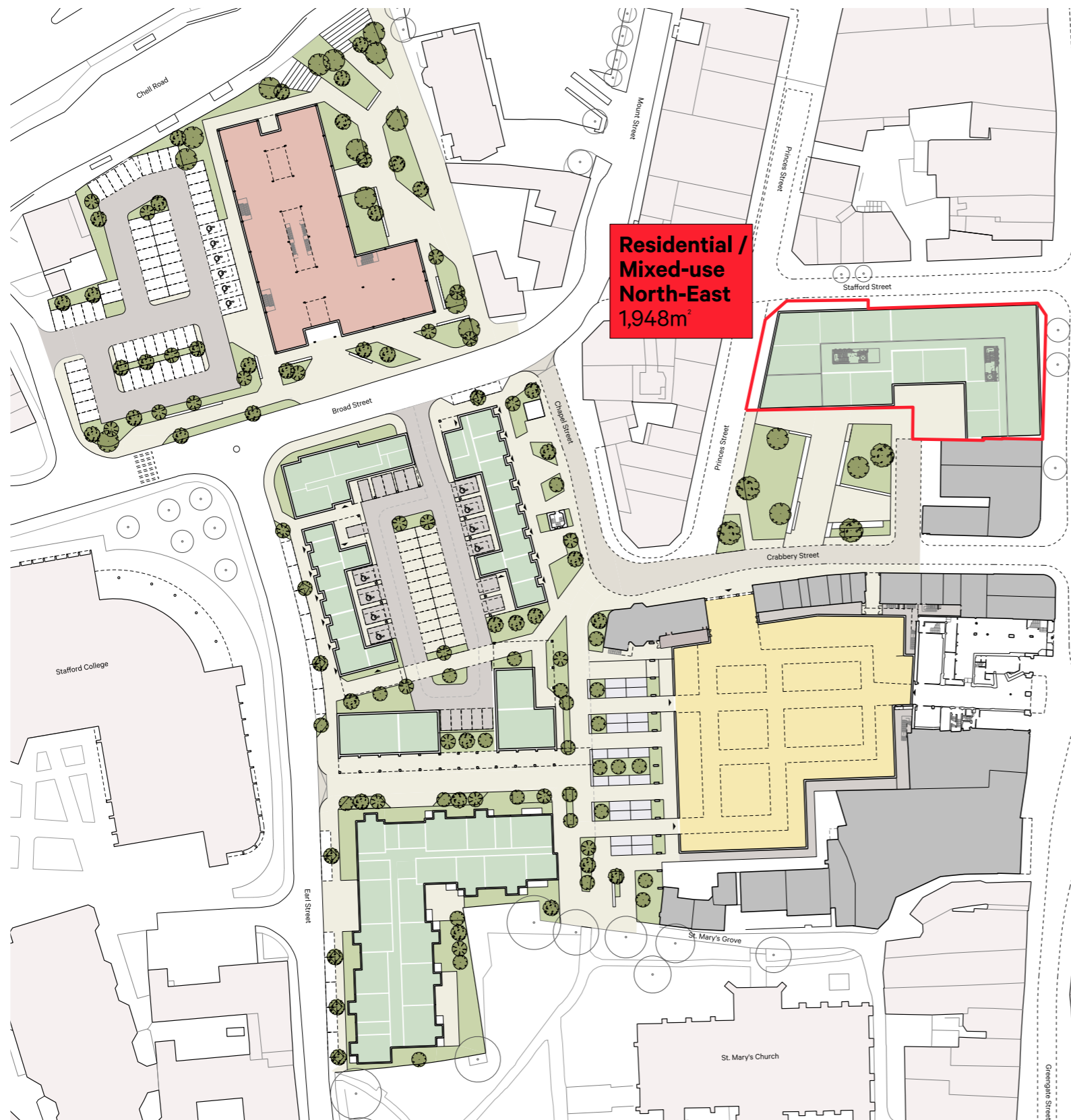
*The southern residential area is located to the west of St. Mary's Church on the southern area of the former Guildhall Shopping Centre and car park. The new homes will provide an improved setting to the church and create front doors along Earl Street enlivening facades on a key town centre street.*

*This site also promotes Town Centre living by placing residents close to transport and services, the scheme reduces car dependency, strengthens sustainability, and promotes wellbeing.*



Homes and uses should create active frontages

# DA4: Residential / Mixed-Use North-East

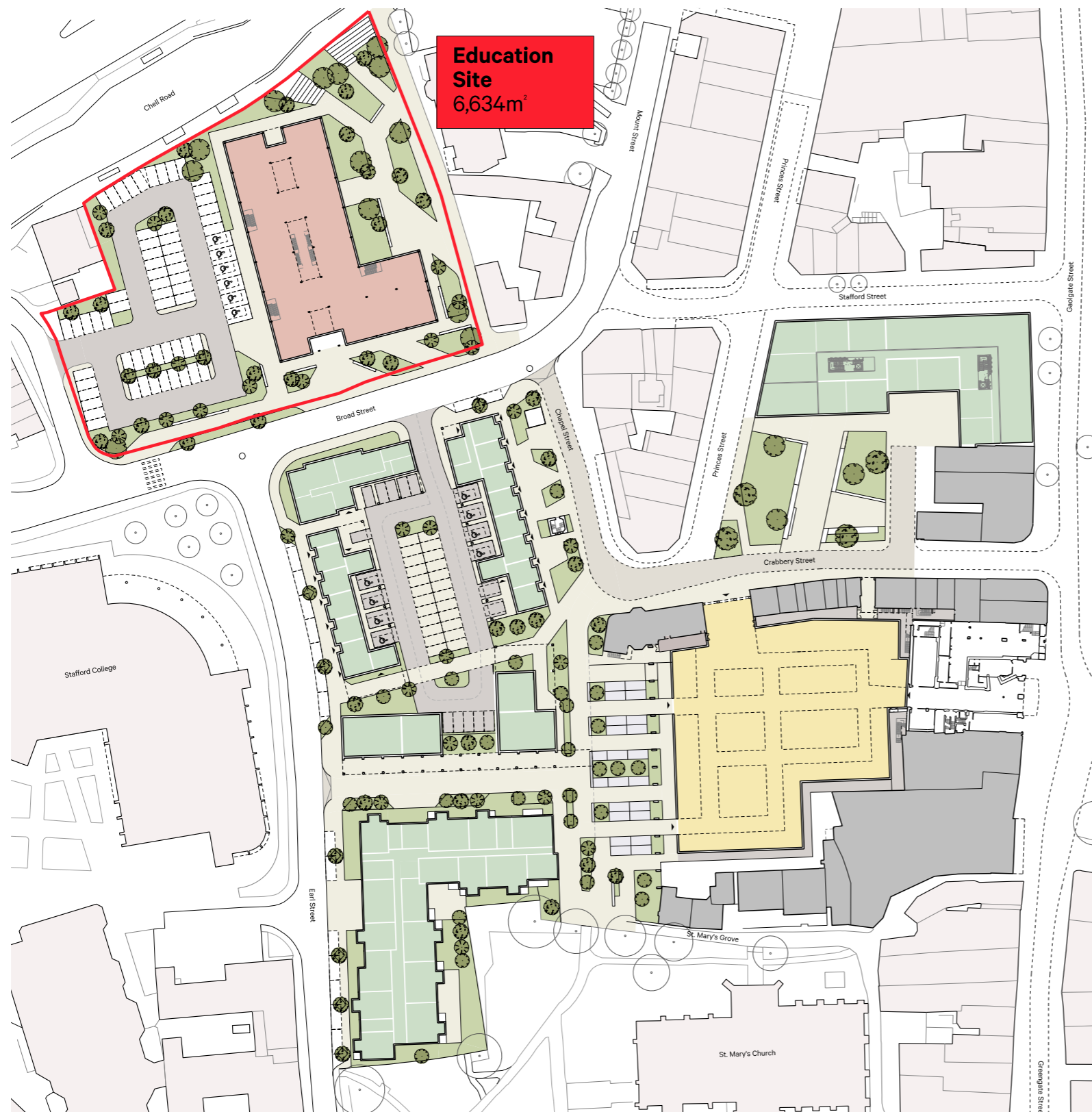


The former Co-op building on Gaolgate Street has been vacant for over ten years and offers a high-profile development opportunity at a key gateway into Stafford's northern Town Centre.

The Development Framework proposes the site is redeveloped as a mixed-use within a new public realm to help reinforce Stafford's heritage assets, animate civic spaces, prioritise sustainable movement, and create a lively, resilient Town Centre.

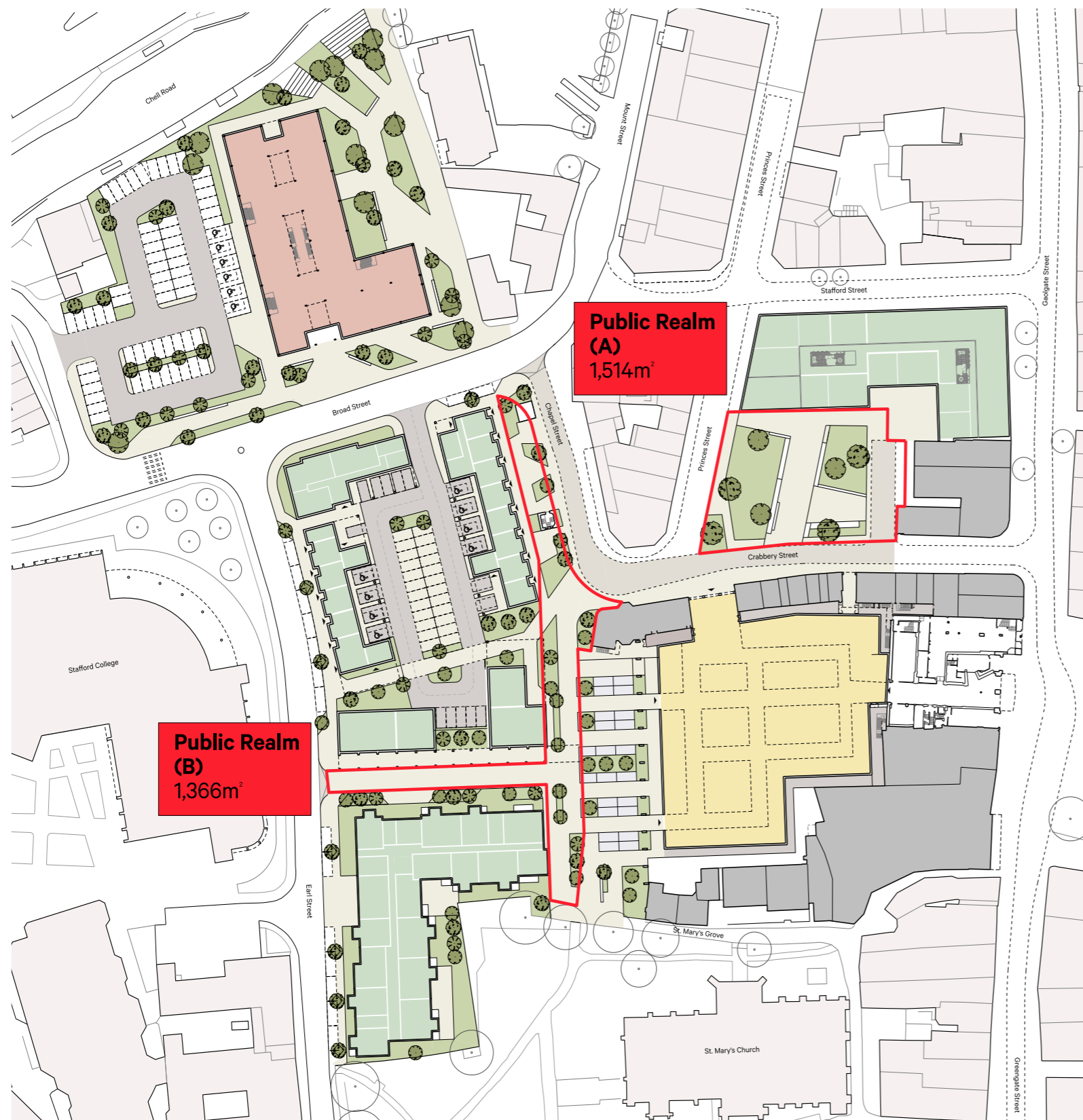
<b>Site Name</b>	<b>Residential / Mixed-Use North-East</b>
<b>Site Area</b>	0.19ha
<b>Uses</b>	Mixed-use - Residential, Commercial, Business and Service.
<b>Indicative Quantum</b>	5635 sqm GIA Residential. 60 units. 445 sqm GIA Business, Commercial, Service Use.
<b>Massing and Height</b>	<ul style="list-style-type: none"> <li>Up to four storeys.</li> <li>Residential uses above, with active ground floor uses fronting public space.</li> </ul>
<b>Site Principles</b>	<ul style="list-style-type: none"> <li>Development should provide a balanced mix of units, catering to diverse households and age groups, including senior living and affordable homes. New buildings should complement Stafford's historic fabric, with new open space allowing an improved setting to buildings on Crabbery Street.</li> <li>Maintain the rhythm of three-storey frontages typical of Stafford, with taller elements used sparingly as landmarks. Development of up to four storeys may be appropriate, particularly fronting Stafford Street.</li> <li>Buildings should frame streets and new public space.</li> <li>Ground floors should be animated with retail, cafés, and business uses that spill into the public realm and create activity.</li> <li>Development should encourage smaller unit sizes to support independent businesses and variety.</li> </ul>

# DA5: Educational Site



<b>Site Name</b>	<b>Educational Site</b>
<b>Site Area</b>	0.66 ha
<b>Suitable Uses</b>	Education.
<b>Indicative Quantum</b>	6088 sqm.
<b>Massing and Height</b>	Site suitable for a larger footprint / landmark building of up to four storeys.
<b>Site Principles</b>	<ul style="list-style-type: none"> <li>• Reinforce the college as a landmark within the Town Centre, strengthening Stafford's role as a county town and hub for learning.</li> <li>• Integrate public realm and green spaces into wider sequence of green space within the Town Centre from the site, leading to St Mary's Church.</li> <li>• Ensure new buildings complement the setting of the Conservation Area and historic fabric, using sympathetic materials and scale.</li> <li>• Create flexible spaces that can evolve with changing needs and where feasible, incorporate shared facilities that benefit both students and residents.</li> <li>• Explore the opportunity to animate ground floors with cafés, exhibition spaces, and public-facing facilities to engage the wider community and create courtyards, squares and green areas that invite public use and foster interaction.</li> <li>• Maintain building heights and proportions that respect the Town Centre's character, with focal elements used sparingly.</li> </ul>

# DA6: Public Realm Enhancements



Public realm enhancements and new open spaces are proposed throughout the Development Framework Area to provide an improved setting for heritage assets and to create attractive and successful outdoor areas, providing a variety of spaces that both respond to the immediate context and encourage social interaction.

<b>Site Name</b>	<b>Public Realm Enhancements</b>
<b>Site Area</b>	0.3ha
<b>Uses</b>	Public Realm - variety of spaces.
<b>Site Principles</b>	<ul style="list-style-type: none"> <li>• Promote a north-south green link between the education site to St Mary's Church, as part of a wider sequence of public realm areas that improve permeability between key buildings, streets and squares.</li> <li>• Ensure enhancements complement the Conservation Area, Listed Buildings, and historic street patterns.</li> <li>• Use high-quality, locally appropriate materials (stone, brick, timber) to reinforce the county town's identity.</li> <li>• Improve connections to civic areas such as Market Square as focal points for community life.</li> <li>• Introduce trees, planting and pocket parks to soften hard landscapes and improve biodiversity.</li> <li>• Design spaces that can evolve with changing community needs and retail trends and adaptable areas for markets, festivals, and civic events.</li> <li>• Use robust, low-maintenance finishes that age well and reduce long-term costs.</li> <li>• Incorporate lighting, seating, and safe routes to support activity beyond retail hours.</li> </ul>



Streets and spaces will be improved throughout the area



St Mary's Church

Market Square

Chapel Tower

Trinity Church



# 6. Next Steps

*This Development Strategy identifies a flexible solution for the Regeneration Area to foster transformational change and revitalised growth within the northern Town Centre.*

*It is recognised that implementing the development proposed will be challenging but the Development Framework and this design strategy identify that it can be delivered.*

The Council have committed funds to deliver and unlock this change. The investment strategy for the next three years will focus on:

- De-risking sites;
- Improving the infrastructure and environment of the area;
- Site acquisition; and
- Procurement of private sector developers.

Private sector investment is vital to the success of the Town Centre. The procurement of private sector developer/s will be a major milestone in realising the vision for the area.

The Council will work with architects and developers to develop detailed design and market solutions guided by the design principles within this Framework.



For further information, please contact:

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## STAFFORD TOWN CENTRE REGENERATION: DEVELOPMENT FRAMEWORK: NEXT STEPS

## **Contents**

1. Introduction and Background
2. Progress to Date
3. The Council's Role
4. Development Framework
5. Developer and Operator Selection
6. Governance
7. Next Steps

### 1. Introduction and Background

The regeneration of the north of Stafford Town Centre responds to a clear set of challenges and opportunities. Like many towns across the UK, Stafford has faced structural changes in retail, high vacancy rates, and underutilised buildings. These trends have reduced vitality and limited the town's ability to attract and retain investment.

In 2020, Stafford Borough Council successfully secured £14.37 million through the Future High Streets Fund (FHSF). This programme, led by the Ministry for Housing, Communities and Local Government, provided investment to reimagine high streets and town centres across the country. The funding has enabled Stafford to embark on an ambitious strategy, underpinned by additional match funding and private investment.

The Council's vision is clear:

- To re-establish the northern town centre as a dynamic mixed-use environment.
- To create new housing, retail, education, leisure, and commercial spaces.
- To deliver public realm improvements that make Stafford attractive and accessible.
- To act proactively as Master Developer, driving delivery and reducing risk.

This report sets out progress to date, the Council's approach, the emerging Development Framework, and the next steps required to ensure successful delivery in 2026.

### 2. Progress to Date

Since securing FHSF funding, Stafford Borough Council has made significant headway in preparing the town centre for redevelopment.

- **Acquisitions:** The Council has acquired a large proportion of the regeneration footprint, including the former Guildhall, Co-op, Wilko, and 10–12 Gaolgate Street. These acquisitions consolidate control and create the conditions for coordinated development.
- **Demolition:** Planning approvals for the demolition of the Guildhall and Co-op were granted in August and October 2024, with demolition commencing in March 2025, which is now substantially completed. Demolition planning applications are also underway for the Wilko site and 10-12 Gaolgate Street, with preparatory soft-strip works under consideration.
- **Public Realm:** Investments in Market Square and Station Approach have delivered visible improvements to the urban environment, enhancing confidence among residents and stakeholders.
- **Market Testing:** Engagement at UKREiiF (2025) has generated strong interest from potential operators across multiple sectors, with discussions progressing toward specific commitments for the cleared sites.

## **Stafford Borough Council Development Framework Report**

This progress demonstrates that the Council's strategy is working: by acquiring land, securing demolition permissions, and de-risking the process, Stafford is creating the conditions necessary to attract high-quality investment.

### **3. The Council's Role**

Traditionally, local authorities have taken a limited role in regeneration, setting Development Masterplans and granting permissions while leaving delivery to the private sector. Stafford Borough Council has instead adopted a more interventionist approach, positioning itself as Master Developer.

This strategy involves direct acquisition, planning, and demolition, with the Council preparing sites for future investment. By doing so, Stafford reduces risks for private operators, accelerates timelines, and ensures that delivery aligns with the town's strategic priorities.

The benefits of this approach are clear:

- Greater control over land use and design quality.
- The ability to sequence projects coherently.
- Increased attractiveness to private investors, who are reassured by reduced development risk.
- Enhanced viability of future schemes

This proactive stance positions Stafford as a leader in local authority-led regeneration, showing a clear willingness to invest in its own future.

### **4. Development Framework**

The Stafford Development Framework will provide the overarching structure for the town centre's regeneration. Building on concepts presented at UKREiiF (2025), the framework will establish principles for building heights, massing, and key spatial arrangements.

Distinct development parcels will be identified, each suitable for different operators and uses. By coordinating design principles across these parcels, the framework ensures consistency while allowing operators the flexibility to tailor their proposals. Early engagement with stakeholders and the local planning authority has shaped the Framework, which will be presented to Cabinet for approval in April 2026.

Key elements of the Framework include:

- A mix of housing types being introduced into the town centre
- A reimagined market hall to replace the Guildhall shopping centre
- A dedicated space for education
- New mixed-use space which could accommodate a combination of residential, commercial, retail and office space
- New public realm and improved vistas and sight lines around the town centre

This Framework is critical to providing clarity for investors and residents alike. It demonstrates a coordinated vision, ensuring that regeneration delivers a cohesive town centre environment.

## **5. Developer and Operator Selection**

The Council intends to use a combination of proven procurement and delivery mechanisms to secure development partners for the regeneration programme. These routes provide the flexibility, compliance, and speed required for a programme of this scale, while ensuring the Council maintains oversight of quality, value for money, and long-term outcomes.

### **Preferred procurement and delivery routes include:**

- **Framework Procurement:** Using established and legally compliant public sector frameworks such as Pagabo, allowing the Council to access experienced and pre-vetted development partners while streamlining the procurement process.
  - **Mini Competition or Direct Award:** For a Mini Competition, a focused tender exercise between a shortlisted group of suitably qualified parties will be undertaken to test the market while maintaining pace. This approach promotes competitive tension, demonstrates value for money, and supports transparent decision-making, while enabling the Council to refine proposals and secure terms that appropriately balance risk and deliverability.
- **Direct Land Transactions:** Supported by independent Red Book valuations, this will ensure transparency, value for money, and appropriate risk transfer, while allowing the Council to negotiate directly with prospective partners.

### **Routes Not Being Used**

Several alternative procurement routes have been considered but are not proposed due to the risks and delays they would introduce:

- **Open, Restricted or Competitive Flexible Procedures:** While compliant, these traditional procurement routes are often lengthy, resource-intensive, and risk attracting unsuitable or speculative bidders. Given that the Council has already de-risked the majority of sites, such methods could significantly delay programme delivery without offering meaningful additional benefit.
- **Complex Joint Venture Structures:** Formal JV arrangements require extensive negotiation, long lead-in periods, and substantial legal input. They also introduce governance complexities and can dilute the Council's strategic control. For this programme, where the Council already has a strong land position and clear development vision, a JV model is not considered appropriate.
- **Informal Market-Led Approaches:** Approaches based purely on unsolicited bids or informal negotiations are not considered sufficiently robust or transparent. They would not provide a fair comparison of proposals and would limit the Council's ability to demonstrate best value.

By discounting these routes, the Council is prioritising procurement pathways that deliver certainty, reduce delay, and ensure that partners are selected through a transparent and well-structured process aligned with both public sector requirements and the ambitions of Stafford's regeneration programme.

## **Stafford Borough Council Development Framework Report**

### **Procurement Structure, Scoring and Evaluation Approach**

To ensure transparency, consistency, and value for money, the Council will apply a clearly defined procurement structure and evaluation methodology across each of the preferred delivery routes. While the structure of each route differs, a common set of principles will apply to ensure proposals can be assessed on a comparable basis and that recommendations to Cabinet are supported by robust evidence.

#### **1. Framework Procurement**

##### **Procurement Structure**

Where framework procurement is used, the Council will utilise an established and legally compliant public sector framework, such as Pagabo. This approach enables the Council to draw from a pool of pre-qualified development partners who have already been assessed against core financial, technical, and governance standards.

The Council will issue a project-specific brief to framework members, setting out the scope, objectives, site context, and expectations for delivery. Interested Framework partners will be invited to submit proposals responding directly to this brief. Clarification stages and bidder engagement sessions may be undertaken to refine proposals prior to final submission.

The approach will follow a structured and transparent process, comprising the following key stages:

- Formal launch through the Development Framework, setting out the Council's vision, key heights and massing principles, as well as opportunity sites broken out with preferred use cases.
- An initial Expression of Interest (EOI) stage, enabling interested parties to confirm capability and alignment with the Council's objectives.
- Shortlisting and structured bidder engagement, including clarification meetings and dialogue to refine proposals and delivery expectations
- Submission of detailed proposals for evaluation, assessed against the agreed qualitative, financial, and value-for-money criteria.

##### **Scoring and Evaluation**

Evaluation will follow a structured scoring matrix, combining qualitative and financial assessment as well as other factors such as environmental, health and well-being, jobs created and overall creation of place. The assessment will ensure that bids are evaluated holistically, reflecting the Council's wider economic, social, and placemaking objectives rather than purely financial considerations. Proposals will be assessed against a defined set of criteria, typically including:

- Alignment with the Development Framework and placemaking vision
- Deliverability and programme
- Relevant experience and track record
- Commercial structure and financial offer
- Value for money and risk allocation
- Social value, climate change and wider public benefit

## **Stafford Borough Council Development Framework Report**

Each criteria will be weighted in advance and applied consistently across all bids where a mini-competition is selected.

### **2. Direct Land Transactions**

#### **Process**

For direct land transactions, the Council will market specific sites or development parcels to the market, either on a freehold or long-leasehold basis. This process may include targeted marketing, an invitation to submit bids, and structured negotiation with interested parties.

All land transactions will be supported by independent Red Book valuations, providing a transparent benchmark against which offers can be assessed. The Council will also request outline development proposals alongside financial offers to ensure that bids align with the Development Framework and wider regeneration objectives.

#### **Scoring and Evaluation**

Evaluation will consider both the financial offer and the quality of the proposed development. Assessment criteria are expected to include:

- Alignment with the Development Framework and placemaking vision
- Deliverability and programme
- Relevant experience and track record
- Commercial structure and financial offer
- Value for money and risk allocation
- Social value and wider public benefit

Proposals will be scored using a weighted matrix, allowing direct comparison between bids. Financial offers will not be considered in isolation but assessed alongside deliverability and long-term outcomes.

#### **Value for Money Assessment**

Value for money will be demonstrated through comparison of bids against Red Book valuations, assessment of abnormal costs, and consideration of wider economic and social benefits. The Council will also assess long-term impacts, including council tax, business rates, and regeneration uplift.

## **6. Governance**

Through the next stages of the regeneration programme, it is essential that there is complete transparency, balance and accountability in shaping what is developed on the regeneration sites in Stafford Town Centre, ensuring that future development aligns with the long-term vision for the town.

It is therefore essential that a structured governance process is implemented and applied proportionately at each stage of delivery, ensuring that the Council's interests and those of its constituents are consistently protected and maintained as well as providing direction and clarity to Development partners.

### Delivery of Development

Following the selection of developer and operator partners, it is essential to recognise that the Council's role does not end at appointment. The Council has an ongoing responsibility, on behalf of its residents and Members, to ensure that development is brought forward promptly, delivered to the agreed quality and design standards, and implemented in accordance with the Development Framework, contractual obligations, and planning approvals.

As such, ensuring that there are rigorous governance processes in place is essential. This will include:

- **Regular Project Management Meetings**

The Council will establish regular project management meetings with appointed developers and operators to oversee progress, monitor programme milestones, and address risks or issues at an early stage. These meetings will provide a formal forum for performance review, coordination across workstreams, and confirmation that delivery remains aligned with agreed timescales, quality standards, and the wider regeneration objectives for the regeneration area.

- **Escalation and Remedial Action Processes**

It is essential that the Council has the ability to escalate matters and, where appropriate, exercise contractual remedies should a development fail to progress in accordance with agreed timescales, quality standards, or contractual obligations. Any agreement entered into with a developer or operator will therefore seek to include appropriate provisions that enable the Council to protect its interests and intervene where delivery does not meet agreed requirements.

- **Third-Party Support**

The Council will seek appropriate support from experienced third-party advisors with a proven track record in delivering regeneration projects of this scale and complexity. This support will help to strengthen commercial, technical, and financial decision-making, provide independent assurance, and ensure that the Council's interests are protected throughout procurement, delivery, and post-completion stages. This could cover a range of specialities, including legal, development management, valuation and planning as required at different times in the programme.

## 7. Next Steps

For Stafford, there are a number of key objectives which the Regeneration team need to prioritise in 2026.

- 1) Progress planning applications and commence demolition of the remaining sites in Stafford
- 2) Progress meetings with Operators and Developers to secure a number of delivery agreements and commercial deals by the end of 2026, thereby maintaining momentum and ensuring the timely progression of the regeneration programme
- 3) Launch Development Framework at UKREiiF 2026

## **Stafford Borough Council Development Framework Report**

Collectively, these actions will ensure that the town centre regeneration programme continues as planned and that the Council can deliver meaningful, high-quality development outcomes that support long-term economic growth, housing delivery, and the creation of a more vibrant and sustainable town centre.

## Community Impact Assessment

<b>Title of proposal/policy/strategy</b>	Stafford Town Centre Development Framework
<b>Date Conducted</b>	March 2026 *DRAFT*
<b>Lead Officer and Service Area</b>	Michelle Smith, Economic Development and Planning
<b>CIA Team</b> (Must include a range of people with the appropriate knowledge and expertise in the subject area)	Michelle Smith, Samantha Taylor, Raeven Turnock
<b>Head of Service Sign off and Date</b>	
<p><b>Summary of recommendations and mitigations</b> (Please include in section 6 of cabinet report)</p> <p>The Development Framework sets out the Council's expectations for the types of development that can come forward for Council owned sites within Stafford town centre. At this stage the plans are at concept stage meaning that the detail and specifics of how things will look, feel and function is still to come.</p> <p>When schemes come forward accommodation provision should consider population projections for Stafford. Key considerations include safety and inclusivity in public spaces and social amenities, accessible toilet provision. Access to public toilets is to be retained for as long as possible and future provision to be considered as detailed development schemes are proposed. The quality and usability of public open space within the regeneration area is key to creating positive impacts in terms of safety, rest spaces and building a community.</p> <p>This assessment is based on evidence currently available but will be refreshed following the public engagement exercise due to begin in respect of the Framework itself.</p> <p>Communication of impacts and mitigations to be shared in advance and during works whilst recognising that most mitigations cannot be progressed until the details of the redevelopments are known.</p>	

**Impact on Public Sector Equality Duty (taken from section 1 – p.3):**

Impacts identified across a number of protected characteristics. Proposed mitigations acknowledge that further consideration will form part of the developer and development selection process. Immediate mitigation deliverable in respect of the retention of the public toilets for the short/medium term.

**Wider community Impact (taken from section 2 – p.4-8):**

Generally positive impacts but communication and engagement is key.

**Leadership Team Sign off and Date**

Section 1: Public Sector Equality Duty (PSED)

Protected Characteristics	Does the proposal impact on, or cause any issues for these groups?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No	Please indicate how you intend to address the impacts/issues
	Yes	No		
<b>Race</b>	✓		Cultural norms within some ethnic or racial groups can influence household size, intergenerational living patterns, tenure preferences and therefore housing requirements.	The successful contractor(s) for accommodation provision will be required to consider the forecasted profile of Stafford's urban populations for BAME communities to ensure it is inclusive and responsive to varying cultural needs.
<b>Disability</b>	✓		<p>Removal of public toilets at Earl Street will have a potential negative impact and wider provision of toilet facilities within the town centre should be assessed in terms of volume and distribution.</p> <p>22% of residents in Stafford Borough have day-to-day activity limited by their mobility. The design of the schemes will be required to support accessibility by providing attractive spaces for rest to support people with physical disabilities to utilise this space.</p> <p>Increased access and seating will also be required to encourage social interaction and connectivity, supporting mental wellness and reducing isolation for people with learning disabilities.</p>	<p>The removal of public toilets is to be addressed within the criteria for developer selection; information to be provided on alternative facilities in the meantime.</p> <p>Technical feasibility of demolishing the former Shopmobility unit now confirms the toilet block structure can remain in place in isolation. The facility will therefore be kept for as long as is practicable prior to redevelopment</p>

Protected Characteristics	Does the proposal impact on, or cause any issues for these groups?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No	Please indicate how you intend to address the impacts/issues
	Yes	No		
<b>Sex</b>	✓		The proposed project identifies clear sight lines, multiple entrances to the Market Hall, strong and legible pedestrian connections throughout courtyards in the mixed-use residential north of the town. This is likely to have a positive impact on preventing Violence Against Women and Girls, including improving safety within the night time economy and as such, lighting and safe transport links should be considered.	
<b>Age</b>	✓		Removal of public toilets at Earl Street will have a potential negative impact on both families with young children requiring changing facilities and older adults. Wider provision of toilet facilities within the town centre should be assessed in terms of volume, location and distribution.	To be addressed within the criteria for developer selection; information to be provided on alternative facilities in the meantime
<b>Religion or Belief</b>	✓		<p>Redevelopment is proposed opposite to the Trinity Church allowing for this to potentially become a focal point for the development when designed appropriately and potentially improving access to a physical asset which supports religion or belief.</p> <p>The suggested works in the Market Hall area allows for the development of an event space which can be used for social and cultural events,</p>	The scale, massing, design and usage will be required to be sympathetic to the church within the criteria for developer selection

Protected Characteristics	Does the proposal impact on, or cause any issues for these groups?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No	Please indicate how you intend to address the impacts/issues
	Yes	No		
			potentially having a positive impact on integration and social cohesion relating to religion and cultural belief in the area.	
<b>Gender Reassignment</b>	✓		Town centre redevelopment has the potential to disproportionately impact people with the protected characteristic of gender reassignment. Safety and fear of harassment in public spaces has been identified as a potential issue and this will be included in the specification and design considerations. The proposed project identifies clear sight lines, multiple entrances to the Market Hall, strong and legible pedestrian connections throughout courtyards in the mixed-use residential north of the town, potentially improving natural surveillance and perceptions of safety. Improving safety within the nighttime economy through lighting and safe transport links will be considered to create a positive impact.	Key considerations include safety and inclusivity in public spaces and social amenities, accessible toilet provision. Toilet provision to be addressed within the criteria for developer section should reflect the UK Government's Equality Impact Assessment for the Provision of Toilets (2024)
<b>Sexual Orientation</b>	✓		Town centre redevelopment has the potential to disproportionately impact the LGBTQ+ community and people with the protected characteristic gender reassignment. Safety and fear of harassment in public spaces will be identified in the design considerations. The proposed project identifies	

Protected Characteristics	Does the proposal impact on, or cause any issues for these groups?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No	Please indicate how you intend to address the impacts/issues
	Yes	No		
			clear sight lines, multiple entrances to the Market Hall, strong and legible pedestrian connections throughout courtyards in the mixed-use residential north of the town, potentially improving natural surveillance and perceptions of safety. Improving safety within the nighttime economy through lighting and safe transport links will be considered to create a positive impact.	
<b>Pregnancy and Maternity</b>	✓		The removal of public toilets at Earl Street which include baby changing facilities will have a negative impact. Increased access and seating in socially connected spaces can encourage social interaction and connectivity among new parents at risk of isolation. Opportunities to connect in welcoming public spaces such as the public realm areas and Market Hall can support mental wellness in parents and should allow breast feeding to support infant health. Physical accessibility should be considered for those using prams and pushchairs.	To minimise the impact, the toilet block structure will remain in place for as long as is practicable prior to redevelopment. New provision is to be addressed within the criteria for developer selection. In the interim period, information will be made publicly available on alternative facilities.
<b>Marriage and Civil Partnership</b>		X		

Section 2: Wider Community Impact

Community Impact: Economic Growth

Category Area	Does the proposal impact on, or cause any issues in these areas?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No.	Please indicate how you intend to address the impacts/issues.
	Yes	No		
Business Start Ups	✓		This is a positive impact with the Framework proposing space for startup businesses and supporting independent businesses. By supporting new businesses, the development can encourage a fostered sense of community, encourage footfall and making the Town Centre a place to visit.	The opportunity will be promoted locally via the Chamber of Commerce
The built environment and land use	✓		<p>This is a positive impact as a number of vacant and derelict premises have already been demolished and the Framework promotes high quality, sustainable and accessible placemaking</p> <p>This in turn will have a positive impact on community safety as derelict premises can attract anti-social behaviour.</p>	The Development Framework is being shared with colleagues in Planning, Conservation and Design to ensure that the proposed uses are not detrimental to the existing environment and heritage

## Community Impact Assessment

Category Area	Does the proposal impact on, or cause any issues in these areas?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No.	Please indicate how you intend to address the impacts/issues.
	Yes	No		
Economic and sustainable growth	✓		This is a positive impact with a number of business use sites identified. The Public Realm enhancements are proposed to ensure that the regeneration area and Town Centre are pleasant places to work and visit.	
Rural communities		X	The proposal relates to Stafford Town Centre therefore will not have a proposed direct impact on rural communities	
Gaining employment and access to better jobs?	✓		This is a positive impact with the proposal identifying areas of commercial use which will attract businesses, giving local access to new job opportunities	

**Community Impact: Improving quality of Life, providing a safe, clean, attractive place to live and work, promoting wellbeing and stronger communities**

Category Area	Does the proposal impact on, or cause any issues in these areas?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No.	Please indicate how you intend to address the impacts/issues.
	Yes	No		
Does the proposal promote clean and attractive environments	✓		This is a positive impact. The fundamental principals of the Development Framework are to improve the town centre environment in a way that reinforces the local identity, ensuring the Town Centre is attractive whilst maintaining its history by complimenting nearby Listed Buildings and other surrounding heritage assets.	This will be captured within planning application submissions
Recycling and minimising residual waste		X	Not applicable	
Health and wellbeing of our residents	✓	X	In the initial implementation phase of redevelopment there will be impacts on existing town centre residents however the end result should deliver a longer term positive impact  We know that Stafford has an ageing population, with higher numbers than UK	Mitigation for existing residents to be considered as part of the final delivery plan. High quality development and public realm to be captured within developer selection

			<p>average of adults over 60. This ageing population is expected to increase during the next 5 years. It is important therefore that homes are designed with adaptability in mind to ensure our ageing population can remain at home for as long as possible whilst remaining safe within their homes. According to the Population Demographics and Adult Social Care Needs Report (2019), in 2017, 21% of Staffordshire population were aged 65 or above and that 9% were aged 75 and over, both of which are above average. It estimates that by 2039, Staffordshire's population aged 75 and over will have grown by 51,300 (58%).</p> <p>It is also important that the public realm is designed with the ageing population in mind, ensuring accessibility and fostering a sense of community through areas that can be used and enjoyed by all.</p>	
Opportunities for volunteering		X	<p>The Framework itself won't create opportunities but this can be revisited as the development proposals progress</p> <p>Stafford Town has pockets of deprivation which exacerbates health inequalities. Providing opportunities for volunteering and supporting residents into work though</p>	

## Community Impact Assessment

			volunteering pathways is a positive opportunity this development can provide	
Participation in social and leisure activities	✓		<p>This is a positive impact once the redevelopment is complete</p> <p>The Proposed Principles for the Market contain adaptable space which can be used for leisure and events which can provide a sense of community though the delivery of leisure and social events.</p>	
Community safety	✓		<p>This is a positive impact once the redevelopment is complete, however the redevelopment phase needs to be considered in terms of the impacts on existing residents, businesses and visitors and respond to any issues relating to anti-social behaviour.</p> <p>The design of any new proposal should ensure that it is well designed to ensure safety to residents and visitors to the area. That it is safe from vulnerability to crime and create safe spaces for young people to enjoy</p> <p>Shared spaces can provide enjoyment for all members of the community, however in some circumstances they may be an area that will encourage anti-social behaviour and criminal activity. Therefore, this needs to be considered as the project progresses.</p>	<p>Impacts during the redevelopment phase to be considered as part of the planning application process</p> <p>The layout of homes and facilities should be designed with crime prevention in mind and technical experts from statutory organisations consulted as part of the detailed planning stage.</p> <p>Ensure maximum use of natural surveillance as way of discouraging intrusion. Homes could point towards access points and routes can be observed by residents.</p>

			<p>The fear of crime has a negative psychological impact on members of the community and reduces visitor numbers to facilities and businesses</p>	<p>Consideration to planting designs which can assist in reduction of vandalism. Heights of shrubs and greenery should be considered to allow natural surveillance. Awareness of planting trees to avoid them becoming aids in climbing over boundaries or onto buildings.</p> <p>Layout should provide a clear distinction between private and semi-private public spaces</p> <p>Public Open Spaces should welcome users of all ages throughout the day, with paths lit, which enables users to clearly see the face of the individual approaching them</p> <p>The development should align with the government initiative to provide a safe environment and protect against Violence Against Women and Girls</p>
Areas of deprivation and vulnerable communities		X	<p>Stafford Town has pockets of deprivation and health inequality. Health inequality is apparent with a reduction in life expectancy of over 6 years for those living in the most deprived</p>	<p>It is important that the public realm works are designed with vulnerable populations in mind, providing good levels of accessibility for all supporting the</p>

			<p>areas. We know from the latest Census data that the most deprived areas in Stafford Borough are Common, Highfields and Weston Downs, Forebridge and Penkside and therefore it is in these areas we see lower life expectancies.</p> <p>This development provides a good opportunity to provide good quality housing which benefits the whole population including social housing and senior living facilities which can support the reduction of health inequalities.</p>	<p>enhancement of a sense of community with areas that can be enjoyed and visited by all.</p>
<p>Access to safe and suitable accommodation</p>	<p>✓</p>		<p>This is a positive impact The Development proposes areas for residential which will cater to a diverse range of households including affordable and senior living accommodations. As further development progresses it is important to ensure that any residential built is fit for purpose. A home that is not fit for purpose of the household can cause poor wellbeing for its residents.</p> <p>Overcrowding can have a negative impact on residents, increasing chances of infection, illness and poor mental health; this is more</p>	<p>The central location of the site is ideal for starter homes and downsizing opportunities.</p> <p>Property that is tenure blind is key for the development, reducing segregation of different tenures, contributing to positive outcomes.</p> <p>Adopt a homes for life approach-requiring a minimum standard of accessibility and adaptability within the homes within the Development areas.</p>

			<p>likely in certain ethnic groups and communities.</p> <p>It is important that developers recognise that different residents will require homes of different sizes and tenure to meet their needs.</p> <p>It is important to provide a range of housing tenures with good basic services and links to local amenities. The central location of this development provides the perfect opportunity to ensure this.</p>	
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Community Impact: Climate Change and Green Recovery

Category Area	Does the proposal impact on, or cause any issues in these areas?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No.	Please indicate how you intend to address the impacts/issues.
	Yes	No		
Reducing emissions from our own activities		X	<p>Whilst currently identified as a 'no' this may require review should the Council take on an operational role within any of the final development proposals</p> <p>Construction activities can generate dust, increase congestion, and produce noise, which can negatively affect the health and well-being of nearby residents, visitors and workers.</p>	
Encouraging others to take action that contributes to carbon neutrality/sustainable development within communities	✓		<p>This is a positive impact</p> <p>There is a direct correlation between fuel poverty and shorter life expectancy. Throughout the Borough, particularly within the pockets of deprivation, there are higher levels of fuel poverty (16.3%) compared to the UK average of 13.1%. Therefore by reducing fuel poverty through the construction of homes that</p>	<p>To be captured within the criteria for developer selection</p> <p>better insulation and sustainable construction methods will lead to lower energy consumption, reduced greenhouse gas emissions, and improved public health through better air quality.</p>

			are cheaper to heat, can lead to a reduction of health inequalities and lead to a positive impact.	
Mitigating and adapting to climate change	✓		This is a positive impact	To be captured within the criteria for developer selection
Supporting green recovery objectives	✓		This is a positive impact	To be captured within the criteria for developer selection

**Community Impact: Financially sustainable and responsive to customer need**

Category Area	Does the proposal impact on, or cause any issues in these areas?		Use this section to identify the impacts/issues and to explain why there are no issues if you indicated No.	Please indicate how you intend to address the impacts/issues.
	Yes	No		
Financial Recovery		X		
Customer contact and interaction with our services		X		
Does the proposal have any additional risks and impacts not yet identified?		X	As the plans are not prescriptive at this stage this doesn't really apply yet	To be revisited once specific development proposals are being considered
<b>Financial/Resource Implications</b>				
Are there any financial/resource implications associated with the proposal?	✓		If Yes, please state them here: Resource impacts across Economic Development and Planning, and support services	Please state how your proposals for addressing the implications here: Revenue costs captured within the associated Cabinet report to mitigate the impact on internal services