Dear Members

Cabinet

A meeting of the Cabinet will be held in the Craddock Room, Civic Centre, Riverside, Stafford on Thursday 7 March 2019 at 6.30pm 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. R. Will

Head of Law and Administration
CABINET - 7 MARCH 2019

Chairman Councillor P M M Farrington

A G E N D A

1 Minutes of 7 February 2019 as published in Digest No 252 on 8 February 2019

2 Apologies

3 Councillors’ Question Time (if any)

4 Proposals of the Cabinet Members (as follows):-

Page Nos

(a) ECONOMIC DEVELOPMENT AND PLANNING PORTFOLIO

(i) Barlaston Neighbourhood Plan - Referendum 3 - 47

(b) COMMUNITY PORTFOLIO


(c) RESOURCES PORTFOLIO

(i) Council Tax and Business Rates Arrears Submitted for Approval to Write Off 79 - 88
- PART CONFIDENTIAL

This Report is part confidential due to the inclusion of information relating to an action taken or to be taken in connection with the prevention, investigation or prosecution of crime, along with information relating to individuals. No representations have been received in respect of this matter.

Membership

Chairman Councillor P M M Farrington

P M M Farrington - Leader
R M Smith - Deputy Leader and Leisure Portfolio
J M Pert - Community Portfolio
F A Finlay - Environment and Health Portfolio
F Beatty - Economic Development and Planning Portfolio
K S Williamson - Resources Portfolio
1 Purpose of Report

1.1 To seek Cabinet approval to proceed to a referendum for the Barlaston Neighbourhood Plan on Thursday 2 May 2019, following consideration of the Independent Examiner’s Report (set out in APPENDIX 1) and its recommendations.

2 Proposal of Cabinet Member

2.1 That the Barlaston Neighbourhood Plan proceeds to Referendum, incorporating the Examiner’s recommended modifications.

2.2 That the Decision Statement (set out in APPENDIX 2) be approved and published with the Examiner’s Report.

3 Key Issues and Reasons for Recommendation

3.1 The Examiner’s Report confirms that the Barlaston Neighbourhood Plan, subject to modifications, meets the basic conditions shown below in paragraph 5.3, and can therefore proceed to a referendum when Parish residents and businesses can vote on whether the Plan should be approved.

3.2 After considering the Examiner’s Report, the Council are satisfied that the modifications made to the Barlaston Neighbourhood Plan satisfy the basic conditions. The next step is to publish a Decision Statement and proceed to referendum.
3.3 At all stages of preparing the Barlaston Neighbourhood Plan the Council has ensured that the process meets the statutory requirements and follows Regulations, so that the decision making process is clear and transparent.

3.4 Following a successful referendum vote the Neighbourhood Plan must be adopted and form part of the statutory development plan for Stafford Borough. Together with the adopted Plan for Stafford Borough, and the revised National Planning Policy Framework, the Neighbourhood Plan will be used to make decisions on planning applications that are applicable within the Neighbourhood Plan area.

4 Relationship to Corporate Priorities

4.1 From the Corporate Business Plan 2018-2021 the following Corporate Business Objectives are relevant:

Corporate Business Objective 1 ‘To deliver sustainable economic and housing growth to provide income and jobs.’

Corporate Business Objective 2 ‘To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing.’

5 Report Detail

5.1 Neighbourhood planning was introduced in 2011 by the Localism Act to give communities direct power to develop a shared vision for their neighbourhoods and shape development and growth of their area through the production of Neighbourhood Plans.

5.2 Neighbourhood Plans must be prepared in general conformity with local and national planning policy. They cannot reduce the level of growth outlined in the strategic policies of the local development plan. The Barlaston Neighbourhood Plan has been prepared in line with the Plan for Stafford Borough.

5.3 Neighbourhood Plans must satisfy the Basic Conditions set out below:-

(a) The plan must have regard to national policies and advice contained in guidance issued by the Secretary of State;

(b) Contribute to the achievement of sustainable development;

(c) Be in general conformity with strategic policies of the development plan for the area;

(d) Be compatible with European Rights (EU) and European Convention on Human Rights (EUCR) obligations.
Development of Barlaston Neighbourhood Plan

5.4 In November 2012 Barlaston Parish Council applied to designate the Parish as a Neighbourhood Plan Area, which was approved by the Council in July 2013. Subsequently a Neighbourhood Plan Working Group consisting of local volunteers was established to produce the Neighbourhood Plan.

5.5 The Barlaston Neighbourhood Plan has been subject to extensive community consultation, and supported by an evidence base. The Parish Council published a pre-submission version of the Neighbourhood Plan and invited the public to comment between 10 November 2017 and 5 January 2018. Following the consultation, Barlaston Parish Council made subsequent amendments in order to produce the submission version of the plan.

5.6 In June 2018 Barlaston Parish Council submitted their Neighbourhood Plan, with supporting documents (Basic Conditions Statement, Consultation Statement and a Screening Assessment), to the Council for a six week publication period of consultation between 18 July and 7 September 2018. In December 2018 & January 2019 the independent Examination took place when the appointed Examiner considered the representations received and all of the relevant documents.

5.7 On 22 January 2019, the Council received the Examiner’s Report (see APPENDIX 1) on the Barlaston Neighbourhood Plan, which recommended that the Neighbourhood Plan, subject to the Examiner’s recommended modifications, should proceed to Referendum. In summary, the Examiner considers that the Barlaston Neighbourhood Plan brings forward positive and sustainable development in the Parish with a focus on safeguarding the very distinctive character of the area whilst accommodating future change and growth, based on extensive community support and engagement.

5.8 The findings of the Examiner’s Report recommends a number of modifications to help refine policies so that they are more effective and, most importantly, ensure the Barlaston Neighbourhood Plan meets the basic conditions, summarised below:

- Amendments to Policies for housing, site allocations, high-speed connectivity, community services and facilities as well as the natural environment
- Rationalisation on the Neighbourhood Plan consultation and development brief information
- Updated maps relating to community services & facilities as well as sites
- Non-planning matters moved into a separate Appendix
- Further details and web-links on source information and evidence

5.9 Barlaston Parish Council has considered the Examiner’s Report and its recommendations, and is satisfied with the proposed amendments to the Plan. The amended and final version of the Barlaston Neighbourhood Plan is circulated with this agenda as a separate BOOKLET.
Next Steps

5.10 As the Council are satisfied that the Neighbourhood Plan fulfils the basic conditions of the Neighbourhood Planning Regulations and should proceed to a Referendum, the Council must publicise a Decision Statement (see APPENDIX 2) to take forward the Barlaston Neighbourhood Plan.

5.11 Furthermore, the Council will proceed in arranging a Referendum on 2 May 2019 to enable local people within the Parish to vote on adopting the Barlaston Neighbourhood Plan.

6 Implications

<table>
<thead>
<tr>
<th>6.1 Financial</th>
<th>The costs incurred in arranging an independent Examination and Referendum are supported by grant aid from the Ministry of Housing, Communities and Local Government (MHCLG). £20,000 will now be claimed to cover the costs incurred by the Council.</th>
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<tr>
<td>Legal</td>
<td>The Barlaston Neighbourhood Plan meets the legal requirements and Basic Conditions of the Neighbourhood Planning Regulations.</td>
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<tr>
<td>Risk Management</td>
<td>The risk issues contained in this report are not strategic and therefore should not be included in the Strategic Risk Register.</td>
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6.2 **Community Impact Assessment Recommendations**

The Borough Council considers the effect of its actions on all sections of our community and has addressed all of the following Equality Strands in the production of this report, as appropriate:

- Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation

The Barlaston Neighbourhood Plan provides clear guidance to developers and also members of the public through planning policies and proposals in the Parish. This will enable any resident or business to see the requirements related to future development.

Working from a consistent evidence base through the Parish Council and with partners, ensures that Community Impact Assessment recommendations made in relation to the Barlaston Neighbourhood Plan with policy-specific areas are also consistent and complementary to an approach that supports equality in both service provision and health outcomes.

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**Previous Consideration - Nil**

**Background Papers - File available in Forward Planning**
BARLASTON NEIGHBOURHOOD DEVELOPMENT PLAN 2019 - 2031


Andrew Matheson MSc MPA DipTP MRTPI FCIH
Independent Examiner
22nd January 2019
Summary

I was appointed by Stafford Borough Council, in agreement with the Barlaston Parish Council, in November 2018 to undertake the Independent Examination of the Barlaston Neighbourhood Development Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 7th January 2019.

The Neighbourhood Development Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Barlaston Neighbourhood Area. There is an evident focus on safeguarding the very distinctive character of the area whilst accommodating future change and growth.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic aspects of the issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Plan for Stafford Borough 2011 – 2031.

Subject to a series of recommended modifications set out in this Report I have concluded that the Barlaston Neighbourhood Development Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.
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Introduction
This report sets out the findings of the Independent Examination of the Barlaston Neighbourhood Development Plan 2019 - 2031. The Plan was submitted to Stafford Borough Council by Barlaston Parish Council in their capacity as the ‘qualifying body’ responsible for preparing the Neighbourhood Development Plan.

Neighbourhood Development Plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy. A new NPPF was published in July 2018 but the transitional arrangements in para 214 Appendix 1 on Implementation apply and thus this Examination is unaffected by the changed NPPF; accordingly all references to the NPPF in this Report are to the original 2012 NPPF document.

This report assesses whether the Barlaston Neighbourhood Development Plan is legally compliant and meets the ‘basic conditions’ that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Barlaston Neighbourhood Development Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Barlaston Neighbourhood Development Plan would then be used in the process of determining planning applications within the Plan boundary as an integral part of the wider Development Plan.

The Role of the Independent Examiner
The Examiner’s role is to ensure that any submitted Neighbourhood Development Plan meets the legislative and procedural requirements. I was appointed by Stafford Borough Council, in agreement with Barlaston Parish Council, to conduct the examination of the Barlaston Neighbourhood Development Plan and to report my findings. I am independent of both Stafford Borough Council and Barlaston Parish Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years’ experience in various local authorities and third sector bodies as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Development Planning Independent Examiner Referral Service (NPIERS). I am a Member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:
- the Barlaston Neighbourhood Development Plan is submitted to a referendum; or
- the Barlaston Neighbourhood Development Plan should proceed to referendum as modified (based on my recommendations); or
- the Barlaston Neighbourhood Development Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. If recommending that the Neighbourhood Development Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:
• the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
• the Neighbourhood Development Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
• the Neighbourhood Development Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this examination I have considered the following documents:
• Barlaston Neighbourhood Development Plan as submitted
• Barlaston Neighbourhood Development Plan Basic Conditions Statement (May 2018)
• Barlaston Neighbourhood Development Plan Consultation Statement (May 2018)
• Screening Assessment of the Draft Barlaston Neighbourhood Plan - Strategic Environmental Assessment & Habitats Regulation Assessment (July 2018)
• Content at: www.staffordbc.gov.uk/barlaston-neighbourhood-plan1
• Representations made to the Regulation 16 public consultation on the Barlaston Neighbourhood Development Plan
• Plan for Stafford Borough 2011 – 2031 & Plan for Stafford Borough Part 2
• National Planning Policy Framework (NPPF) (March 2012)
• Neighbourhood Development Planning Regulations (2012)
• Planning Practice Guidance (PPG) (March 2014 and subsequent updates)

I carried out an unaccompanied visit to the Neighbourhood Area on 7th January 2019. I looked at Barlaston and its rural hinterland. I also viewed all the various sites and locations identified in the Plan document.

The legislation establishes that, as a general rule, Neighbourhood Development Plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Barlaston Neighbourhood Development Plan could be examined without the need for a public hearing and I advised Stafford Borough Council accordingly. The Qualifying Body has helpfully responded to my enquiries so that I may have a thorough understanding of the thinking behind the Plan, and the correspondence has been shown on the Stafford Borough Council Neighbourhood Development Planning website for the Barlaston Neighbourhood Development Plan.

**Barlaston Neighbourhood Area**

A map showing the boundary of the Barlaston Neighbourhood Area has been provided within the Neighbourhood Development Plan. Further to an application made by Barlaston Parish Council, Stafford Borough Council approved the designation of the Neighbourhood Area on 4th July 2013. This satisfied the requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

**Consultation**

In accordance with the Neighbourhood Development Planning (General) Regulations 2012, the qualifying body has prepared a Consultation Statement to accompany the Plan.
The Planning Practice Guidance says:

“A qualifying body should be inclusive and open in the preparation of its Neighbourhood Development Plan [or Order] and ensure that the wider community:

- is kept fully informed of what is being proposed
- is able to make their views known throughout the process
- has opportunities to be actively involved in shaping the emerging Neighbourhood Development Plan [or Order]
- is made aware of how their views have informed the draft Neighbourhood Development Plan [or Order].” (Reference ID: 41-047-20140306)

As early as 2011 a Village Survey was undertaken to gain an understanding of the main issues for a potential Neighbourhood Plan and 300 responses were received, which is good for a Parish of approximately 1000 households. A Steering Group was established in 2012, followed later by sub-groups, to enable a programme of community engagement and in 2013 the Neighbourhood Area was designated by Stafford Borough Council on application by the Parish Council. In May 2014 a leaflet was produced to provide a background to the Community Questionnaire launched in the same month; this survey attracted 377 responses. This survey was followed up with some more targeted enquiries and stakeholder meetings. The Steering Group then undertook community engagement in partnership with stakeholders and the Local Planning Authority on a proposed revision to the Barlaston Settlement Boundary; this was subsequently adopted within the Plan for Stafford Borough Part 2 in January 2017.

2015 saw the commencement of specific work on housing and Community Housing Workshops were convened in order to invite and consider suitable sites with potential to meet the identified housing need. Subsequently criteria were established and consulted upon to provide a methodology for selecting the preferred sites for housing allocations. A stand at the Barlaston Village Show in September 2016 and the Annual Parish Council Meeting allowed the Steering Group to check with the community the direction of the draft Plan.

The six week public consultation period on the Pre-Submission Barlaston Neighbourhood Development Plan ran from 30th October 2017 to 5th January 2018. Three 6ft banners at key junctions in the Village were prominent in promoting the consultation, which included two public meetings and a booklet summary of the Plan posted to all households, local land owners and businesses; the full Plan was made available on-line and in hard copy at 6 locations within the Parish as well as at the office of Stafford Borough Council. Additional publicity urging responses included posters, websites and Facebook content; all the statutory consultees and stakeholder contacts were informed direct. A summary report of the analysis of the responses and the recommendations relating to them was prepared and is included within the Consultation Statement.

I am therefore satisfied that the consultation process accords with the requirements of the Regulations and the Practice Guidance and that, in having regard to national policy and guidance, the Basic Conditions have been met. In reaching my own conclusions about the specifics of the content of the Plan I will later note points of agreement or disagreement with Regulation 16 representations, just as the Qualifying Body has already done for earlier consultations. That does not imply or suggest that the consultation has been inadequate, merely that a test against the Basic Conditions is being applied.

**Representations Received**

Consultation on the submitted Plan, in accordance with Neighbourhood Development Planning Regulation 16, was undertaken by Stafford Borough Council from Thursday 19th...
July to Friday 7th September 2018. I have been passed representations – 15 in total - received from the following:

- Peter & Jill Wraight
- Network Rail
- Severn Trent
- Wood plc on behalf of the National Grid
- Jon & Louise Tilstone
- Historic England
- BPA Pipelines
- Laura Eardley
- Stafford BC
- Natural England
- The Coal Authority
- Highways England
- Staffordshire CC
- Environment Agency
- RJ & VE Harden
The Neighbourhood Development Plan

The Barlaston Parish Council is to be congratulated on its extensive efforts to produce a Neighbourhood Development Plan for their area that will guide development activity over the period to 2031. I can see that a sustained effort has been put into developing a Plan with a vision for 2031 of “A Village environment and community that enables sustainable growth and development, preserves and enhances the quality of life for the community, and safeguards and protects environmental quality, including special historical and natural characteristics of the neighbourhood”. The Plan document is simply presented with a distinctive combination of text, illustrations and Policies that are, subject to the specific points that I make below, well laid out and helpful for the reader. The Plan has been kept to a manageable length by not overextending the potential subject matter and the coverage of that.

The wording of some content & Policies is not always as well-expressed as one might wish, but that is not uncommon in a community-prepared planning document and something that can readily be addressed. It is an expectation of Neighbourhood Development Plans that they should address the issues that are identified through community consultation, set within the context of higher level planning policies. There is no prescribed content and no requirement that the robustness of proposals should be tested to the extent prescribed for Local Plans. Where there has been a failure by the Qualifying Body to address an issue in the round, leading to an inadequate statement of policy, it is part of my role wherever possible to see that the community’s intent is sustained in an appropriately modified wording for the policy. It is evident that the community has made positive use of “direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area” (PPG Reference ID: 41-001-20140306). It is evident that the Qualifying Body understands and has addressed the requirement for sustainable development.

Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It works from a positive vision for the future of the Neighbourhood Area and promotes policies that are, subject to some amendment, proportionate and sustainable. The Plan sets out the community needs it will meet whilst identifying and safeguarding Barlaston’s distinctive features and character. The plan-making had to find ways to reconcile the external challenges that are perceived as likely to affect the area with the positive vision agreed with the community. All such difficult tasks were approached with transparency and care, with input as required and support from Stafford Borough Council.

However, in the writing up of the work into the Plan document, it is sometimes the case that the phraseology is imprecise, not helpful, or it falls short in justifying aspects of the selected policy. Accordingly I have been obliged to recommend modifications so as to ensure both clarity and meeting of the ‘Basic Conditions’. In particular, Plan policies as submitted may not meet the obligation to “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet or can meet the ‘Basic Conditions’.

Basic Conditions

The Independent Examiner is required to consider whether a Neighbourhood Development Plan meets the “Basic Conditions”, as set out in law following the Localism Act 2011. In order to meet the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
be in general conformity with the strategic policies of the development plan for the area;
be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

The submitted Basic Conditions Statement has very helpfully set out to address the issues in the same order as above and, where appropriate, has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. I note that the Local Plan is the Plan for Stafford Borough 2011 - 2031 which includes the Plan for Stafford Borough Part 2.

I have examined and will below consider the Neighbourhood Development Plan against all of the Basic Conditions above, utilising the supporting material provided in the Basic Conditions Statement and other available evidence as appropriate.

The Plan in Detail
I will address the aspects of the Neighbourhood Development Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics, and I have brought them together as a list at the end of the Report.

As a general point I should note that there is an erratic use of capital letters within the Plan document (eg “local Plan” instead of Local Plan) and it would be helpful if a single proof-reader re-read the whole document after the recommendations have been addressed and incorporated.

Front cover
A Neighbourhood Development Plan must specify the period during which it is to have effect. I note that there is a reference to the Plan dates prominently on the front cover but as the Plan cannot be applied retrospectively and will not be ‘made’ before 2019 I believe that 2019 would be the appropriate start date.

Recommendation 1:
Show the Plan period on the front cover as 2019 – 2031; delete “Draft”.

List of Contents
The Contents list will need to be reviewed once the text has been amended to accommodate the recommendations from this Report.

Recommendation 2:
Review the “Contents” pages once the text has been amended to accommodate the recommendations from this Report.

Main Contents
It would appear that the opening section (green headings p3 to p19) is a hangover from the Regulation 14 Consultation (although with the ‘timeline’ section finishing at September 2016 it may even pre-date that); some content is repeated on pages 31 & 32. Apart from the section with the map required to define the designated Neighbourhood Area (incorrectly titled as the “Neighbourhood Plan Area”) and the opening paragraphs of the sub-section headed “Community and Stakeholder Engagement”, which can cross-refer to the extensive, accompanying Consultation Statement, the “Main Contents” no longer seem relevant to a document on the verge of becoming part of the Development Plan.

Recommendation 3:
3.1 Delete pages 3 & 4.
3.2 Retitle the map on page 5 as ‘Map 1: The Neighbourhood Area’; if possible remove the boundaries for adjacent Parishes which are not part of the Plan.

3.3 Delete pages 6 to 19 except for the heading “Community and Stakeholder Engagement” and the two paragraphs immediately below.

3.4 Within the first retained paragraph replace “is summarised in the community engagement table, as shown on pages 10-13 of this document” with ‘is detailed within the Consultation Statement that accompanies this Plan’.

About Barlaston
This section largely provides a helpful, factual picture of Barlaston 2018 but with occasional references which are out of place: the “Environment” illustration on page 22, the “fear of development” reference in paragraph 4 on the same page, the “anecdotal” reference in the middle of page 27, and the very detailed referencing of the proposed play area at the foot of page 28 with accompanying Appendix D.

The use of both 2016 and 2018 Ordnance Survey base maps has given rise to an apparent anomaly – raised within the representations – with regard to the line defined for the “Settlement Boundary” as shown on page 25. The Qualifying Body has confirmed that the Neighbourhood Plan accepts and adopts the line of the Settlement Boundary set out in the Plan for Stafford Borough Part 2 2017. Apparently because of the loss of some reference points on the 2018 base map, the Settlement Boundary line appears to have shifted along part of the north-west edge on the map on page 25 (and also on the map on page 36). So as not to give rise to any confusion, all the maps that show the Settlement Boundary need to use the same base map and quote the source.

Recommendation 4:
4.1 On page 22 delete the unreferenced “Environment” illustration and paragraph 4 (which starts with “There is a fear of significant ….”).

4.2 On page 24 remove the “we” references in paragraph 6 since the Plan is on the verge of becoming part of the Development Plan; therefore the amended two sentences will read: ‘As part of the evidence base for the Neighbourhood Plan the core local services within Barlaston have been identified and mapped. In addition there is a mobile library service that visits fortnightly at the Plume of Feathers and the Village Hall.’

4.3 On page 25 remove the Settlement Boundary from the map and the key since it is not any part of the content referenced on page 24; add ‘Map 2’ to the map title and add a source.

4.4 On page 27 correct the reference to “Tittensor Road” in the third line and delete the last two sentences from the sub-section headed “Narrow Pavements and Pedestrian Hazards”.

4.5 On page 28 under the heading “Sport and Recreation” reduce the last three sentences of the second paragraph to: ‘There is a proposal to build a play area on Meadow Road, Barlaston at the site of a former children’s park; delete Appendix D.

4.6 On page 29 under the heading “Surface Water/Flooding” delete the final sentence which references the deleted Appendix E – see later recommendation.
Policy Contents
Vision and Aims of the Neighbourhood Plan
This page helpfully provides the contextual ambition for the more detailed Policies that follow.

Land Use Policies
Whilst it is useful to have the Policy Context described, some of the wording here has been overtaken by events and some of the wording, by summarising, has incorrectly represented national policy.

Recommendation 5:
Under the sub-heading “Policy Context”:
5.1 Under the sub-heading “Context” delete the first paragraph and update the last paragraph to: 'This Plan is accompanied by a Basic Conditions Statement which shows how the Basic Conditions have been addressed'.

5.2 Under the sub-heading “National Policy”:
  5.2.1 In the second sentence replace “to determine decisions on planning applications” with ‘to inform the determination of planning applications’.

  5.2.2 In the second paragraph replace “all kinds of business and enterprise in” with ‘businesses and enterprise appropriate to’.

5.3 Under the sub-heading “Sustainable Development” correct “NPFF” to ‘NPPF’.

Policies for Barlaston
It is noted here that “The evidence underpinning the Neighbourhood Plan is listed in the Schedule of Evidence scheduled within the Appendix to the plan”; however, the Schedule only includes the titles of documents and the specific source of content relied upon within the Plan is not detailed; in particular the surveys and other work undertaken as part of the Plan preparation are not mentioned nor retained on the Parish Council website (although now summarised within the Consultation Statement). I will comment on the evidence issues as I run through each Policy in turn and on the Appendix when I reach that section.

The representation from the local authority has suggested revised wording for the “Developer Contributions” section on this page, to accurately represent the current position.

Recommendation 6:
6.1 Under the heading “Policies for Barlaston”:
  6.1.1 In the second paragraph replace “scheduled within the Appendix of the plan” with ‘included as an Appendix to the Plan’.

  6.1.2 Delete paragraph 3 since it cross-refers to pages now deleted and the opening paragraph provides sufficient detail.

6.2 Under the sub-heading “Developer Contributions” correct the wording as follows: ‘The adopted Plan for Stafford Borough includes Policy I1 which sets out the requirements for infrastructure provision and contributions to that from new development. Parish Councils which have a Neighbourhood Plan in place are entitled to 25% of Community Infrastructure Levy (CIL) contributions when that mechanism is in place; currently the Borough Council is progressing the introduction of CIL. Contributions via planning consents subject to Section 106 planning obligations have to meet the relevant tests defined in national policy.’
Rural Settlement

I am advised by the Qualifying Body that the duplication in content between this section and the later section “Planning for Housing Growth” has arisen because “if someone only read one section as they thought the other was not applicable then the rationale would be lost”. However, this problem would not arise if the two sections that rely on each other were brought together (and in the process simplified with repetition removed); therefore the recommendations that follow seek to effect such a rationalisation to ensure “a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17).

I note from paragraph 4 under the sub-heading “Context and rationale” that the Local Plan housing requirement for “key service villages” (of which Barlaston is one) has already been met and from the Stafford Borough Authority Monitoring Report 2018 that a 5 year housing land supply continues to be maintained. However, Planning Practice Guidance says that “A neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development (as outlined in paragraph 13 of the National Planning Policy Framework)” (Paragraph: 004 Reference ID: 41-004-20170728) and “Neighbourhood plans should consider … allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan” (Paragraph: 009 Reference ID: 41-009-20160211). Further, as noted in the opening paragraph of “Context and rationale”, the Plan for Stafford Borough adopted in 2014 proposed that specific sites for housing should be identified within the defined Settlement Boundary through Neighbourhood Plans. Therefore it is entirely appropriate for the Neighbourhood Plan to be allocating a modest number of sites within the Settlement Boundary to meet emerging housing requirements.

Having said that I note that one of the sites, Land at Rock House Drive, has an existing planning consent and has now commenced construction. Another site, Leese’s Garage, previously had an outline planning consent which, although now expired, will have been counted by the local authority in previous Monitoring Reports as a commitment. Therefore the text must avoid confusion by potentially double-counting the same ‘new’ housing allocations.

In relation to the current Policy H1 the representation from the local authority notes that the Housing Needs Assessment (HNA) 2017 prepared by Stafford & Rural Homes might have been used to define specific needs for Barlaston. The Qualifying Body has responded that reliance on one HNA by a Registered Social Landlord may not reflect the true and current figures and as the Part 2 Local Plan evidence base was current and relevant when the Plan was being prepared it was not considered necessary to embark on a separate HNA for the Neighbourhood Area. Consequently the Policy can only be worded in very general terms and there needs to be a cross-reference to the related Local Plan Policies.

Recommendation 7:
7.1 Under the heading “Rural Settlement” “Context and rationale”:

7.1.1 In the last sentence of paragraph 1 replace “through the Settlement Boundaries” with ‘within the Settlement Boundaries’; throughout the Plan use capital letters for ‘Settlement Boundary’ where the Local Plan defined Boundary is being referenced.

7.1.2 Move paragraph 2 (beginning “Within..” and ending “…page 51”) to after paragraph 4.

7.1.3 Correct paragraph 3 to show capital letters for ‘Local Plan’ and ‘Borough’ and to replace “has” with ‘had’ in the second sentence; replace “Borough Council’s Housing
7.1.4 Correct paragraph 4 to replace “has a set settlement boundary” with ‘defined a Settlement Boundary’ and to remove the stray comma after “which” in the final sentence.

7.1.5 Amend the paragraph which was previously paragraph 2 but now relocated to after paragraph 4 to:

7.1.5.1 Replace “four” with ‘three’ and replace “shown on the attached plans on pages 52 and 59” with ‘shown on the adjacent Map 3.’

7.1.5.2 Delete “Land at Rock House Drive” from the list of sites.

7.1.5.3 Delete the stray “the” before “housing” in the last-but-one sentence.

7.1.5.4 Replace the last sentence with ‘The robust site selection process and the criteria used for selection are set out in Appendix C to this Plan’ – see also the later recommendation re this Appendix.

7.1.6 Add a new map titled: ‘Map 3: Housing Land Allocations’ solely defining the three housing sites at a scale that ensures site boundaries are unambiguous (Land at Rock House Drive being excluded as construction has already commenced); include the accurate Settlement Boundary and Green Belt (with Local Plan source acknowledged).

7.1.7 Amend paragraph 5 as: ‘In identifying three priority sites for new housing and recognising that Barlaston may also have some infill development, it is anticipated that the Settlement Boundary may accommodate some 70 new dwellings over the Plan period.’

7.1.8 Replace paragraph 6 (top of page 35) with the content of pages 53 & 54 amended as follows:

7.1.8.1 Replace references to Policy “SA1” with ‘H1’ renumbering subsequent Housing policies accordingly.

7.1.8.2 In the second paragraph on page 53 delete “of the four” from the first sentence.

7.1.8.3 Delete paragraphs 3, 4 & 5 on page 53.

7.1.8.4 Reword Policy SA1, renumbered as Policy H1, as follows:

‘The following sites as identified on the adjacent Map 3 are allocated for housing:

1. The site of The Limes, part of the former Wedgwood Memorial College, 2.47ha with an approximate Developable Area of 1ha;
2. The site of Estoril House, part of the former Wedgwood Memorial College, 1.49ha with an approximate Developable Area of 0.9ha;
3. The site of Leese’s Garage, Station Road, 0.28ha.

Development proposals must address the following:
(i) All applicable Policies in this Neighbourhood Plan;
(ii) For the The Limes and Estoril House, the ‘Development and Design Guide for the Former Wedgwood Memorial College’ published by Stafford Borough

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Council in August 2013 (revised July 2014) (see here: www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Regeneration/Former-Wedgwood-Memorial-College,-Barlaston.pdf);
(iii) For the site of Leese’s Garage the following Key Development Principles: [here take in the Key Development Principles as set out on page 57 but excluding item 1 and delete page 59 including individual site maps].

Other infill development may be supported subject to compliance with Policy SP7 of the Plan for Stafford Borough 2011 – 2031.’

7.1.8.5 Under the sub-heading “Application of Policy” delete the second and third paragraphs.

7.1.9 Retain the first sentence of paragraph 7 (on page 35, commencing “Barlaston Neighbourhood Plan…”) but delete the second sentence as well as paragraph 8.

7.2 Renumber Policy H1 as ‘H2’ and reword the Policy as follows: ‘Development proposals within the Settlement Boundary should demonstrate regard for current evidence on local housing needs, including the needs of an ageing population, with an appropriate mix of housing types, sizes and tenures.’

7.3 Under the sub-heading “Application of Policy” after the renumbered Policy H2, replace the present wording with: ‘Policy H2 will operate in conjunction with Plan for Stafford Borough Policies C1, C2 & C3.’

7.4 Delete the map on page 36 (its purpose having been replaced by the new Map 3 recommended above).

7.5 Delete pages 49, 50, 55 & 56 content on ‘Planning for Growth in Barlaston’ and ‘Development Briefs’.

As amended and renumbered Policies H1 and H2 meet the Basic Conditions.

Design
At the bottom of page 37 there is indicated a footnote reference for the “Building for Life” document but the footnote itself is absent. The representation from the local authority questions whether the use of “including degree of set-back” is over-prescriptive within a set of design principles; however, I note that the factor is but one of those used to illustrate in what ways a chosen design might “respond to the existing built form”. Although I don’t believe that Policy D1 derives as far as it might from “an understanding and evaluation of [Barlaston’s] defining characteristics” (as suggested in “Strategic basis” para 1) and there is some evident overlap with the Local Plan Policy N1, these shortcomings are not so great as to offend against the Basic Conditions; accordingly my comments are limited to corrections.

Recommendation 8:
8.1 Under the heading “Design”, at the foot of page 37, add the omitted source reference for the “Building for Life” document and remove the reference to the Design Council (since this is not solely a Design Council document).

8.2 Within Policy D1:
   8.2.1 In element 5 replace “or” with ‘and’.

   8.2.2 For consistency, use semi-colons rather than full stops at the end of elements 7 & 8.
8.2.3 In element 9 replace “frontage” with ‘frontages’.

As amended Policy D1 meets the Basic Conditions.

Business and Employment Policies
The use of a Purpose “To provide…” is beyond the capability of a land use Plan and so a rewording here is required. Similarly it is important that the Policy wording reflects the fact that it is necessarily a land use Policy. It would seem that some unfinished editing has taken place to this section; for example there is a stray “Application of Policy” paragraph immediately above Policy BE1.

Recommendation 9:
9.1 Under the “Business and Employment Policies” “Purpose” sub-heading, in the third bullet point replace “To provide” with “To enable”.

9.2 On page 41 delete paragraph 3 along with the sub-heading “Application of Policy” that follows and the sentence that is immediately below this beginning “Where business use…..”.

9.3 Amend Policy BE1 to read:
‘New residential and commercial development should incorporate open access ducting to industry standards to enable all homes and premises to be served directly by fibre optic broadband technology.’

9.4 Immediately after the Policy, under the sub-heading “Application of Policy” delete the first two sentences and add to the third ‘and to ensure that these do not impact negatively on the existing network’.

As amended Policy BE1 meets the Basic Conditions.

Community Facilities and Assets Policies
There is potential for confusion here between the legally defined “Assets of Community Value” and the title chosen here: Community-Valued (or sometimes Community Valued) Assets; this is compounded within the Policy wording. Further potential confusion arises from the reference to the page 25 illustration which is headed “Community Services and Facilities” and the title for Appendix B which lists facilities as “Sport and Recreation”. Since it would appear that there are no local facilities and assets that are not valued, the Community-Valued descriptor could helpfully be dropped without loss. However, the ‘facilities and assets’ that are to be under the aegis of this Policy do require more clarity; the map has no key which would allow the specifics of colour spots and defined boundaries to be understood and the purpose of including bus and mobile library stops is unstated.

Given the Local Plan policy context and since the “Context and rationale” wording seems to serve them both, there would seem to be value in merging Policies CAF1 & CAF2 so that it can commence with a positively worded encouragement for new or improved facilities. The second part of Policy CAF2 is not a land use policy but about financial mechanisms that the Parish Council may employ; restricting that to the mention within the text is therefore more appropriate.

Recommendation 10:
10.1 Under the heading “Community Facilities and Assets Policies” replace all references to “Community Valued Assets” with ‘community facilities and assets’ and “CAF1” with ‘CFA1’.

10.2 Under the sub-heading “Context and rationale”: 
10.2.1 In the second paragraph replace the first sentence with: ‘Barlaston has a range of vital community facilities and assets that are listed within Policy CFA1 and their locations are indicated on Map 2 within the “About Barlaston” section.’

10.2.2 In the fifth paragraph replace “in the map on page 25” with ‘on Map 2’.

10.2.3 Delete the last sentence of the fifth paragraph and the whole of the sixth paragraph.

10.2.4 In the ninth paragraph add the references for the NPPF quotations: paras 28 and 70 respectively.

10.3 Merge Policies CAF1 and CAF2 as a single Policy as follows:

‘Policy CFA1: Community Facilities and Assets
Development proposals for new or improved community facilities of value to the community will be supported; in particular the community has identified the need for:
- an improved Scout Hut;
- an improved Village Hall;
- new medical facilities;
- children’s play facilities.

Development proposals that will affect the community facilities and assets identified below must not result in their loss or reduce their community value unless an equivalent replacement is provided or it has been adequately demonstrated that the facility or asset is no longer required or viable; the relevant facilities and assets are:
[provide here a list of the site-based community facilities and assets ie exclude mobile services]

10.4 Retain a single sub-section headed “Application of Policy” which should comprise the two paragraphs presently under Policy CAF2 and the first paragraph presently under Policy CAF1; amend the second paragraph to replace “including” with ‘which may arise from’.

As amended and renamed Policy CFA1 meets the Basic Conditions.

Landscape and Natural Environment
The quotation from the Plan for Stafford Borough used as part of the “Context and rationale” section is unreferenced – I believe the relevant reference is ‘Key Issues and Challenges p4’.

The representation from the local authority suggests that Policy LNE1 is inappropriate in a Neighbourhood Plan because national and local planning policies already require that the issue is appropriately addressed. Further the National Rail representation rather illustrates the dangers of generalised policies which might be seen to override site-specific detail (railway embankments and cuttings). It is not reasonable to require that individual developments address the flood issues of the whole Parish but if there are site-specific issues then these can and should be addressed through the Policy allocating a site for a specific use; I note that the Development and Design Guide for the former Wedgwood Memorial College includes a relevant section ‘2.5 Climate Change’. Accordingly I conclude that Policy LNE1 should be deleted as it does not provide the required “practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17).

The same might be said for Policy LNE2 but I appreciate that this is a more widespread concern. Care is needed in Policy wording so that the intent and how it will be satisfied are clear. I question whether the natural environment can be “enhanced” by the “retention” of
existing features. Furthermore, although the “Application of Policy” text says that “Where possible, new developments should incorporate new hedgerows as part of their landscaping” the Policy itself only addresses “replacement” hedgerows, twice.

**Recommendation 11:**
11.1 Delete Policy LNE1 and renumber the subsequent LNE Policy accordingly; delete the related “Application of Policy”.

11.2 Reword Policy LNE2 as follows:
‘Policy LNE1: Natural Environment
Development will be supported, subject to other planning policies and material considerations, where its impact on the natural environment is assessed and addressed; particular attention should be afforded to providing additional hedgerows and trees wherever possible and those already established should be retained but where necessarily removed they must be replaced within the site; all new planting should be of an equivalent to the species and type in the locality unless otherwise agreed.’

As amended and renumbered Policy LNE1 meets the Basic Conditions.

**Transport and Movement**
As written, Policy TM1 is effectively an aide memoir to the Parish Council as to how any financial contributions passed to the Parish Council might best be used (with the actual locations only vaguely specified as noted within one representation); it is not a land use Policy. It is also unclear how the related “Application of Policy” content relates to the Policy. The “Context and rationale” and “Policy” text should be relocated to the Appendix on Non-planning Issues – see later recommendation – with the reference to Policy TM1, the Policy text box and the “Application of Policy” content deleted.

**Recommendation 12:**
Under the heading “Transport and Movement” delete the reference to Policy TM1, the Policy text box and the content of “Application of Policy” and relocate the remaining text to the new Appendix F – see recommendations below.

**Planning for Housing Growth in Barlaston**
This section has been incorporated within the “Rural Settlement” section above to the extent necessary whilst removing duplication.

**Non-Planning Issues**
As the local authority representation notes, the content here seems rather unexplained. It appears to be part of the Development Briefs section but the wording does not fit with that. None of the listed issues is developed beyond a heading. The Qualifying Body has advised that this is a to-do list for the Parish Council and, as such, it would be more appropriate as an Appendix or Annex to the document. Planning Practice Guidance says: “Wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non land use matters should be clearly identifiable. For example, set out in a companion document or annex.” Paragraph: 004 Reference ID: 41-004-20170728

The map on page 58, whilst helpful in the identification of the confusion arising from different base maps, seems to have become stranded and is not referenced within the text. I am advised that the map is probably related to a previous version of the Plan.

**Recommendation 13:**
13.1 Move the section headed “Non-planning Issues” to be a new Appendix (see the recommendations for the Appendices for final numbering).
13.2 Delete the map on page 58.

Appendices
I can see that Appendices A & B provide useful supplementary detail to the Barlaston context. Appendix C seems only to provide an illustration of the front cover of a Stafford Borough document; I believe it is sufficient for the related Policy to provide the web-address for the document. Appendix D provides more detail than the related reference requires and could be omitted. Appendix E is a copy of an on-line map the content of which may well change over time; as it is unreferenced in the text references it is best omitted. Appendix F provides some detail on the Site Selection process which, in principle, is appropriate, but I suggested earlier that some of the content presently within the Plan would be better located within the Appendix. For ease of referencing I suggest that the Glossary and List of Evidence and Sources (subject to earlier comments) should also become Appendices. To distinguish it from the Neighbourhood Plan content the non-planning content could be included as an Appendix.

Recommendation 14:
Revise the Appendices as follows, renumbering as required; recheck the Plan text for correct references:
Appendix A: Business and Employment within Barlaston – unaltered
Appendix B: Sport and Recreation – unaltered
Appendix C: delete the existing content since it has been directly referenced within the Policy; replace this with content headed ‘Housing Site Selection’ as follows:
- content from page 51
- content from page 52
- content from page 68 (as an example of the application of the criteria)
Appendix D: delete the content and replace with “Glossary of Terms”
Appendix E: delete the content and replace with “List of Evidence and Sources” with the sources (preferably with a hyperlink) included; ensure that the List includes all the references used within the Plan document and the Parish Council webpages with the original source material from which the Statement of Community Consultation has been compiled
Appendix F: replace the content moved to Appendix C with the content headed “Non-planning Issues” taken from the bottom of page 57.

Other matters raised in representations
Some representations have suggested additional or expanded content that the Plan might include. However, given that the Neighbourhood Development Plan sits within the development plan documents as a whole, keeping content pertinent to Barlaston identified priorities is entirely appropriate. As noted within the body of this Report it is a requirement that a Neighbourhood Development Plan addresses only the “development and use of land”. Even within this restriction there is no obligation on Neighbourhood Development Plans to be comprehensive in their coverage – unlike Local Plans - not least because proportionate supporting evidence is required.

Some representations indicate support for all or parts of the draft Plan and this helps in a small way to reassure that the extensive public consultation has been productive.

I have not mentioned every representation individually but this is not because they have not been thoroughly read and considered in relation to my Examiner role, rather their detail may not add to the pressing of my related recommendations which must ensure that the Basic Conditions are met.
European Union (EU) and European Convention on Human Rights (ECHR) Obligations

A further Basic Condition, which the Barlaston Neighbourhood Development Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

There is no legal requirement for a Neighbourhood Development Plan to have a sustainability appraisal. A Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion for the Barlaston Neighbourhood Development Plan has been used to determine whether or not the content of the Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plan and Programmes Regulations 2004. In accordance with Regulation 9 of the SEA Regulations 2004, Stafford Borough Council determined in July 2018 that an environmental assessment of the emerging Barlaston Neighbourhood Development Plan was not required as it is unlikely to have significant environmental effects. The report concluded: “it is considered unlikely that any significant environmental effects will occur from the implementation of the Barlaston NP that were not considered and dealt with by the Sustainability Appraisal of the Plan for Stafford Borough (PFSB). As such the Barlaston NP does not require a full SEA to be undertaken” and “it is considered unlikely that any significant environmental effects will occur from the implementation of the draft Barlaston NP that were not considered and dealt with by the Habitats Regulation Assessment carried out on the PFSB. As such the draft Barlaston NP does not require a further HRA work to be undertaken”. In making this determination, the Borough Council had regard to Schedule 1 of the Regulations and carried out consultation with the relevant public bodies who concurred with the screening opinion. Particularly in the absence of any adverse comments from the statutory bodies or the Local Planning Authority, I can confirm that the Screening undertaken was appropriate and proportionate and confirm that the Plan has sustainability at its heart.

The Barlaston Neighbourhood Development Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998. No evidence has been put forward to demonstrate that this is not the case.

Taking all of the above into account, I am satisfied that the Barlaston Neighbourhood Development Plan is compatible with EU obligations and that it does not breach, nor is in any way incompatible with, the ECHR.
Conclusions
This Independent Examiner’s Report recommends a range of modifications to the Policies, as well as some of the supporting content, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the Basic Conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Body.

I therefore conclude that, subject to the modifications recommended, the Barlaston Neighbourhood Development Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

On that basis I recommend to the Stafford Borough Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Barlaston Neighbourhood Development Plan to proceed to referendum.

Referendum Area
As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the Neighbourhood Area as approved by the Stafford Borough Council on 4th July 2013.
## Recommendations:

**(this is a listing of the recommendations exactly as they are included in the Report)**

<table>
<thead>
<tr>
<th>Rec.</th>
<th>Text</th>
<th>Reason</th>
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<tbody>
<tr>
<td>1</td>
<td>On the front cover show the Plan period as 2019 – 2031; delete “Draft”.</td>
<td>For clarity</td>
</tr>
<tr>
<td>2</td>
<td>Review the “Contents” pages once the text has been amended to accommodate the recommendations from this Report.</td>
<td>For clarity and correction</td>
</tr>
<tr>
<td>3</td>
<td>3.1 Delete pages 3 &amp; 4 including the heading “Main Contents”. 3.2 Retitle the map on page 5 as ‘Map 1: The Neighbourhood Area’; if possible remove the boundaries for adjacent Parishes which are not part of the Plan. 3.3 Delete pages 6 to 19 except for the heading “Community and Stakeholder Engagement” and the two paragraphs immediately below. 3.4 Within the first retained paragraph replace “is summarised in the community engagement table, as shown on pages 10-13 of this document” with ‘is detailed within the Consultation Statement that accompanies this Plan’.</td>
<td>For clarity and correction</td>
</tr>
<tr>
<td>4</td>
<td>4.1 On page 22 delete the unreferenced “Environment” illustration and paragraph 4 (which starts with “There is a fear of significant ....”). 4.2 On page 24 remove the “we” references in paragraph 6 since the Plan is on the verge of becoming part of the Development Plan; therefore the amended two sentences will read: ‘As part of the evidence base for the Neighbourhood Plan the core local services within Barlaston have been identified and mapped. In addition there is a mobile library service that visits fortnightly at the Plume of Feathers and the Village Hall.’ 4.3 On page 25 remove the Settlement Boundary from the map and the key since it is not any part of the content referenced on page 24; add ‘Map 3’ to the map title and add a source. 4.4 On page 27 correct the reference to “Tittensor Road” in the third line and delete the last two sentences from the sub-section headed “Narrow Pavements and Pedestrian Hazards”. 4.5 On page 28 under the heading “Sport and Recreation” reduce the last three sentences of the second paragraph to: ‘There is a proposal to build a play area on Meadow Road, Barlaston at the site of a former children’s park’; delete Appendix D. 4.6 On page 29 under the heading “Surface Water/Flooding” delete the final sentence which references the deleted Appendix E – see later recommendation.</td>
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<tr>
<td>5</td>
<td>Under the sub-heading “Policy Context”:</td>
<td>For clarity</td>
</tr>
</tbody>
</table>
5.1 Under the sub-heading “Context” delete the first paragraph and update the last paragraph to: ‘This Plan is accompanied by a Basic Conditions Statement which shows how the Basic Conditions have been addressed’.

5.2 Under the sub-heading “National Policy”:
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7.1.3 Correct paragraph 3 to show capital letters for ‘Local Plan’ and ‘Borough’ and to replace ‘has’ with ‘had’ in the second sentence; replace “Borough Council’s Housing Monitoring and 5 year Housing Land Supply Statement” with ‘Stafford Borough Authority Monitoring Report’ and provide a source reference for this both here and in the “Evidence” Appendix.

7.1.4 Correct paragraph 4 to replace “has a set settlement boundary” with ‘defined a Settlement Boundary’ and to remove the stray comma after “which” in the final sentence.
7.1.5 Amend the paragraph which was previously paragraph 2 but now relocated to after paragraph 4 to:
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(iii) For the site of Leese’s Garage the following Key Development Principles:
[here take in the Key Development Principles as set out on page 57 but excluding item 1 and delete page 59 with individual site maps].

Other infill development may be supported subject to compliance with Policy SP7 of the Plan for Stafford Borough 2011 – 2031.'

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7.2 Renumber Policy H1 as ‘H2’ and reword the Policy as follows: ‘Development proposals within the Settlement Boundary should demonstrate regard for current evidence on local housing needs, including the needs of an ageing population, with an appropriate mix of housing types, sizes and tenures.’

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7.4 Delete the map on page 36 (its purpose having been replaced by the new Map 3 recommended above).

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| 8   | 8.1 Under the heading “Design”, at the foot of page 37, add the omitted source reference for the “Building for Life” document and remove the reference to the Design Council (since this is not solely a Design Council document). | For clarity and correction |
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| 12 | Under the heading “Transport and Movement” delete the reference to Policy TM1, the Policy text box and the content of “Application of Policy” and relocate the remaining text to the new Appendix F – see recommendations below. | For clarity and correction and to meet Basic Condition 1 |
| 13 | 13.1 Move the section headed “Non-planning Issues” to be a new Appendix (see the recommendations for the Appendices for final numbering).  
13.2 Delete the map on page 58. | For clarity and correction and to meet Basic Condition 1 |
| 14 | Revise the Appendices as follows, renumbering as required; recheck the Plan text for correct references:  
Appendix A: Business and Employment within Barlaston – unaltered  
Appendix B: Sport and Recreation – unaltered  
Appendix C: delete the existing content since it has been directly referenced within the Policy; replace this with content headed ‘Housing Site Selection’ as follows:  
• content from page 51  
• content from page 52  
• content from page 68 (as an example of the application of the criteria)  
Appendix D: delete the content and replace with “Glossary of Terms”  
Appendix E: delete the content and replace with “List of Evidence and Sources” with the sources (preferably with a hyperlink) included; ensure that the List includes all the references used within the Plan document and the Parish Council webpages with the original source material from which the Statement of Community Consultation has been compiled  
Appendix F: replace the content moved to Appendix C with the content headed “Non-planning Issues” taken from the bottom of page 57. | For clarity and correction and to meet Basic Condition 1 |
Stafford Borough Council

Barlaston Neighbourhood Plan – Referendum Decision Statement

1. Summary

1.1 Following an Independent Examination of written representations, Stafford Borough Council now confirms the Barlaston Neighbourhood Plan will proceed to a Neighbourhood Planning Referendum.

1.2 The Decision Statement and the Examiner’s Report are available for inspection on the Council’s website and also Barlaston Parish Council’s website.

A hard copy is available for viewing at the Council Office Reception Desk during opening hours. The Council’s address is:

Stafford Borough Council,  
Civic Centre,  
Riverside,  
Stafford  
ST16 3AQ

2. Background

2.1 In November 2012 Barlaston Parish Council applied to designate the Parish a Neighbourhood Area. This was approved by Stafford Borough Council in July 2013. Following approval a Neighbourhood Plan Working Group consisting of local volunteers was established to prepare the Neighbourhood Plan.

2.2 Barlaston Neighbourhood Plan has been subject to extensive community consultation and supported by an evidence base. In accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, the Parish Council published a pre-submission version (draft) of the Neighbourhood Plan and invited comments on the draft between 10 November 2017 and 5 January 2018. Following the consultation, Barlaston Parish Council made subsequent amendments to the final plan.

2.3 In June 2018, and in accordance with Regulation 15 of the Neighbourhood Planning Regulations, Barlaston Parish Council submitted their Neighbourhood Plan with supporting documents (Basic Conditions Statement, Consultation Statement and a Screening Assessment) to the Council for publication and Independent Examination.
2.4 In accordance with Regulation 16 of the Neighbourhood Planning Regulations the Council publicised the Neighbourhood Plan inviting representations between 18 July and 7 September 2018. The representations received were subsequently forwarded to the appointed Examiner.

2.5 Following the consultation, the Council appointed Andrew Matheson, as Independent Examiner to undertake the independent Examination in November 2018 to examine if the Neighbourhood Plan meets the basic conditions set out in paragraph 8(2) Schedule 4B of the Town and Country Planning Act 1990.

2.6 On the 22 January 2019, the Council received the Examiner’s Report on the Barlaston Neighbourhood Plan. The Examiner’s Report recommends that the Neighbourhood Plan, subject to modifications, should proceed to Referendum.

3. Decisions and Reasons

3.1 The Examiner has concluded that, subject to modifications, the Barlaston Neighbourhood Plan meets the legal requirements of the Neighbourhood Planning (General) Regulations 2012 and meets the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The Basic Conditions are:

- Have regard to national policy and guidance from the Secretary of State
- Contribute to sustainable development
- Have general conformity with the strategic policies of the development plan for the area or any part of that area
- Doesn’t breach or is otherwise compatible with EU obligations – this includes the SEA Directive of 2001/42/EC.

3.2 Borough Council Officers and Barlaston Parish Council have considered the Examiners’ Report and recommendations, and are satisfied in making the proposed modifications as suggested. The modifications made and the reasons behind the changes are shown in Table 1 below.

3.3 The Council consider the impacts from the Neighbourhood Plan are contained within the Barlaston Neighbourhood Area and therefore agree with the Examiner, that there is no reason to extend the Neighbourhood Plan Area for the purpose of holding a referendum.

3.4 The amended and final version of the Barlaston Neighbourhood Plan is available by visiting http://www.staffordbc.gov.uk/barlaston-neighbourhood-plan-referendum
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<td>2. Review the “Contents” pages once the text has been amended to accommodate the recommendations from this Report.</td>
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<td>3. 3.1 Delete pages 3 &amp; 4 including the heading “Main Contents”.</td>
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<td>3.2 Retitle the map on page 5 as ‘Map 1: The Neighbourhood Area’; if possible remove the boundaries for adjacent Parishes which are not part of the Plan.</td>
<td>For clarity and correction.</td>
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<td>3.3 Delete pages 6 to 19 except for the heading “Community and Stakeholder Engagement” and the two paragraphs immediately below.</td>
<td>For clarity and correction.</td>
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<td>3.4 Within the first retained paragraph replace “is summarised in the community engagement table, as shown on pages 10-13 of this document” with ‘is detailed within the Consultation Statement that accompanies this Plan’.</td>
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<td>4. 4.1 On page 22 delete the unreferenced “Environment” illustration and paragraph 4 (which starts with “There is a fear of significant ....”).</td>
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<td>4.2 On page 24 remove the “we” references in paragraph 6 since the Plan is on the verge of becoming part of the Development Plan; therefore the amended two sentences will read: ‘As part of the evidence base for the Neighbourhood Plan the core local services within Barlaston have been identified and mapped. In addition there is a mobile library service that visits fortnightly at the Plume of Feathers and the Village Hall.’</td>
<td>For clarity and correction.</td>
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<td>4.3 On page 25 remove the Settlement Boundary from the map and the key since it is not any part of the content referenced on page 24; add ‘Map 3’ to the map title and add a source.</td>
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<td>4.4 On page 27 correct the reference to “Tittensor Road” in the third line and delete the last two sentences from the sub-section headed “Narrow Pavements and Pedestrian Hazards”.</td>
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<td>4.5 On page 28 under the heading “Sport and Recreation” reduce the last three sentences of the second paragraph to: ‘There is a proposal to build a play area on Meadow Road, Barlaston at the site of a former children’s park’; delete Appendix D.</td>
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<td>4.6 On page 29 under the heading “Surface Water/Flooding” delete the final sentence which references the deleted Appendix E – see later recommendation.</td>
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<td>Under the sub-heading “Policy Context”: 5.1 Under the sub-heading “Context” delete the first paragraph and update the last paragraph to: ‘This Plan is accompanied by a Basic Conditions Statement which shows how the Basic Conditions have been addressed’.</td>
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<td><strong>5.2 Under the sub-heading “National Policy”:</strong>&lt;br&gt; 5.2.1 In the second sentence replace “to determine decisions on planning applications” with ‘to inform the determination of planning applications’.&lt;br&gt; 5.2.2 In the second paragraph replace “all kinds of business and enterprise in” with ‘businesses and enterprise appropriate to’.&lt;br&gt; 5.3 Under the sub-heading “Sustainable Development” correct “NPFF” to ‘NPPF’.</td>
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<td><strong>6 6.1 Under the heading “Policies for Barlaston”:</strong>&lt;br&gt; 6.1.1 In the second paragraph replace “scheduled within the Appendix of the plan” with ‘included as an Appendix to the Plan”.&lt;br&gt; 6.1.2 Delete paragraph 3 since it cross-refers to pages now deleted and the opening paragraph provides sufficient detail.&lt;br&gt; 6.2 Under the sub-heading “Developer Contributions” correct the wording as follows:&lt;br&gt; ‘The adopted Plan for Stafford Borough includes Policy I1 which sets out the requirements for infrastructure provision and contributions to that from new development. Parish Councils which have a Neighbourhood Plan in place are entitled to 25% of Community Infrastructure Levy (CIL) contributions when that mechanism is in place; currently the Borough Council is progressing the introduction of CIL. Contributions via planning consents subject to Section 106 planning obligations have to meet the relevant tests defined in national policy.’</td>
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<td>7.1.1 In the last sentence of paragraph 1 replace “through the Settlement Boundaries” with ‘within the Settlement Boundaries’; throughout the Plan use capital letters for ‘Settlement Boundary’ where the Local Plan defined Boundary is being referenced.</td>
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<td>7.1.2 Move paragraph 2 (beginning “Within...” and ending “...page 51”) to after paragraph 4.</td>
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<td>7.1.3 Correct paragraph 3 to show capital letters for ‘Local Plan’ and ‘Borough’ and to replace “has” with ‘had’ in the second sentence; replace “Borough Council’s Housing Monitoring and 5 year Housing Land Supply Statement” with ‘Stafford Borough Authority Monitoring Report’ and provide a source reference for this both here and in the “Evidence” Appendix.</td>
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<td>7.1.4 Correct paragraph 4 to replace “has a set settlement boundary” with ‘defined a Settlement Boundary’ and to remove the stray comma after “which” in the final sentence.</td>
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<td>7.1.5 Amend the paragraph which was previously paragraph 2 but now relocated to after paragraph 4 to:</td>
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<td>7.1.5.1 Replace “four” with ‘three’ and replace “shown on the attached plans on pages 52 and 59” with ‘shown on the adjacent Map 3’.</td>
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<td>7.1.5.2 Delete “Land at Rock House Drive” from the list of sites.</td>
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<td>7.1.5.3 Delete the stray “the” before “housing” in the last-but-one sentence.</td>
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<td>7.1.5.4 Replace the last sentence with ‘The robust site selection process and the criteria used for selection are set out in Appendix C to this Plan’ – see also the later recommendation re this Appendix.</td>
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<td>7.1.6 Add a new map titled: ‘Map 3: Housing Land Allocations’ solely defining the three housing sites at a scale that ensures site boundaries are unambiguous (Land at Rock House Drive being excluded as construction has already commenced); include the accurate Settlement Boundary and Green Belt (with Local Plan source acknowledged).</td>
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<td>7.1.7 Amend paragraph 5 as: ‘In identifying three priority sites for new housing and recognising that Barlaston may also have some infill development, it is anticipated that the Settlement Boundary may accommodate some 70 new dwellings over the Plan period.’</td>
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<td>7.1.8.4 Reword Policy SA1, renumbered as Policy H1, as follows: ‘The following sites as identified on the adjacent Map 3 are allocated for housing: 1. The site of The Limes, part of the former Wedgwood Memorial College, 2.47ha with an approximate Developable Area of 1ha; 2. The site of Estoril House, part of the former Wedgwood Memorial College, 1.49ha with an approximate Developable Area of 0.9ha; 3. The site of Leese’s Garage, Station Road, 0.28ha. Development proposals must address the following: (i) All applicable Policies in this Neighbourhood Plan; (ii) For the The Limes and Estoril House, the ‘Development and Design Guide for the Former Wedgwood Memorial College’ published by Stafford Borough Council in August 2013 (revised July 2014) (see here: <a href="http://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Regeneration/Former-Wedgwood-Memorial-College,-Barlaston.pdf">www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Regeneration/Former-Wedgwood-Memorial-College,-Barlaston.pdf</a>); (iii) For the site of Leese’s Garage the following Key Development Principles: [here take in the Key Development Principles as set out on page 57 but excluding item 1 and delete page 59 with individual site maps]. Other infill development may be supported subject to compliance with Policy SP7 of the Plan for Stafford Borough 2011 – 2031.’</td>
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</tr>
<tr>
<td>Examiners Recommendation</td>
<td>Reason for change</td>
<td>Action taken</td>
</tr>
<tr>
<td>---------------------------</td>
<td>-------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>13.1 Move the section headed “Non-planning Issues” to be a new Appendix (see the recommendations for the Appendices for final numbering).</td>
<td>For clarity and correction and to meet Basic Conditions 1.</td>
<td>Agreed and modified.</td>
</tr>
<tr>
<td>13.2 Delete the map on page 58.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Revise the Appendices as follows, renumbering as required; recheck the Plan text for correct references:</td>
<td>For clarity and correction and to meet Basic Condition 1.</td>
</tr>
<tr>
<td>Appendix A: Business and Employment within Barlaston – unaltered</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Appendix B: Sport and Recreation – unaltered</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Appendix C: delete the existing content since it has been directly referenced within the Policy; replace this with content headed ‘Housing Site Selection’ as follows:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• content from page 51</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• content from page 52</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• content from page 68 (as an example of the application of the criteria)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Appendix D: delete the content and replace with “Glossary of Terms”</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Examiners Recommendation</td>
<td>Reason for change</td>
<td>Action taken</td>
</tr>
<tr>
<td>--------------------------</td>
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<td>--------------</td>
</tr>
<tr>
<td>Appendix E: delete the content and replace with “List of Evidence and Sources” with the sources (preferably with a hyperlink) included; ensure that the List includes all the references used within the Plan document and the Parish Council webpages with the original source material from which the Statement of Community Consultation has been compiled</td>
<td>Appendix F: replace the content moved to Appendix C with the content headed “Non-planning Issues” taken from the bottom of page 57.</td>
<td></td>
</tr>
</tbody>
</table>
1 Purpose of Report


2 Proposal of Cabinet Member

2.1 That the report as set out in the APPENDIX be noted and approval given for its publication and submission to Government.

3 Key Issues and Reasons for Recommendation

3.1 The Home Energy Conservation Act 1995 requires all local authorities to report on what is being done to improve energy efficiency in all residential accommodation in their area. The reports are prepared and published every two years with the next one due by 31 March 2019.

3.2 This 2019 update sets out the Borough’s ambitions and priorities; current performance; data on the Borough relating to energy efficiency and planned interventions going forward, this is in line with Government guidance.

4 Relationship to Corporate Priorities

4.1 Production of the HECA Report 2019 and the commitments within the document support Corporate Business Objectives One and Two, “To deliver sustainable economic and housing growth to provide income and jobs” and “To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing”.

SUBMISSION BY COUNCILLOR J M PERT
COMMUNITY PORTFOLIO
4.2 The commitments that are most closely aligned to energy efficiency are:-

- Develop a Health in All approach with our partners, ensuring that the health of local people is paramount in everything we do;
- Encourage and support our residents to take responsibility for their own wellbeing and lifestyle; and
- Work towards everyone having access to safe and suitable accommodation.

5 Report Detail

5.1 The Home Energy Conservation Act 1995 requires local authorities to report on what is being done to improve energy efficiency in all residential accommodation in their area. The reports are prepared and published every two years with the next one due by 31 March 2019. The Act recognises that local authorities are uniquely placed to assess the needs of their areas and local residents and to act as catalysts for change.

5.2 The HECA report sets out the Council’s current situation in relation to population and household demographics, data on energy efficiency and thermal quality, the relationship between these and fuel poverty, and proposals to improve health, housing standards and energy efficiency in the Borough. The report sets out the actions the Council intends to take to continue improving the energy efficiency of residential accommodation in the area in line with Government guidance.

5.3 One of the principal actions in the HECA report is the commitment to produce an Affordable Warmth Strategy during 2019. This strategy will guide future activity in this area. If significant changes are proposed in our approach to affordable warmth, updates to this HECA report can be published within the two year reporting cycle.

5.4 Much of the current activity on energy efficiency improvements is delivered through the Warmer Homes Stafford advice service, which runs to March 2020 at a cost of £10,000 per annum. In developing the Affordable Warmth Strategy, consideration will be given to the performance of this contract and whether such a service should be recommissioned. Depending on the outcome of this, a budget bid may be produced during 2019 for this activity from 2020 onwards.

5.5 There is a current Staffordshire wide Warm Homes Funding Bid of which Stafford Borough Council is a partner. This bid is for the installation of first time central heating systems in households which have been identified by health condition (in partnership with the CCG). The Council are still awaiting the outcome of this bid, which is why it hasn’t been reflected in the HECA report.

5.6 The 2019 HECA update has seen a shift in focus as a result of the Health in all Policies approach. It has an enhanced focus on health and wellbeing and fuel poverty as opposed to the carbon emissions reduction slant of previous iterations. This is still in line with Government guidance, but reflects more strongly the ambitions and priorities of Stafford Borough.
6 Implications

6.1 Financial

Legal

Human Resources

Human Rights Act

Data Protection

Risk Management

6.2 Community Impact Assessment Recommendations

The Borough Council considers the effect of its actions on all sections of our community and has addressed all of the following Equality Strands in the production of this report, as appropriate:-

Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

The HECA report and actions flowing from it recognise that fuel poverty and cold homes can have significant physical and mental health impacts on both the old and the young, people with disabilities and potentially pregnant women.

An element of the Warmer Homes Stafford contract is to provide advice and guidance on energy efficiency and warm homes which is available to all residents. Community groups are made aware of this service and can support in the promotion and awareness raising as well as identifying vulnerable households who may be able to benefit from the interventions that are available. Interventions are targeted at those vulnerable groups on low incomes.

Improving energy efficiency in residential accommodation is a key factor in improving health outcomes and preventing health conditions related to the cold. This HECA report has seen an enhanced focus on health and wellbeing to adequately reflect this.

Previous Consideration - Nil

Background Papers - File available in Health and Housing
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<td>Our Ambitions and Priorities</td>
<td>4</td>
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1. Introduction

1.1. This report is prepared in accordance with guidance issued to local authorities under the Home Energy Conservation Act 1995. The ‘Act’ recognises local authorities’ ability to use their position to improve the energy efficiency of all residential accommodation in their areas and requires authorities to provide reports on what is being done and to report to the Secretary of State on progress in implementing related measures.

1.2. The report sets out the Council’s current performance in terms of our population and household demographics; data concerning the energy efficiency and thermal quality of our residents’ homes; the relationship between these and resulting levels of fuel poverty; and our proposals to improve health, housing standards and energy efficiency in the Borough.

1.3. The Council and its partners have been proactive in tackling the issues of cold homes and the impact they have on fuel poverty, health (including excess winter deaths) and carbon emissions through a variety of mechanisms, including:

- Promotion of low cost and free energy efficiency measures under the Energy Company Obligation;

- Delivery of advice, assistance and measures through Warmer Homes Stafford - a partnership between the local authority and a specialist energy agent;

- Enforcement of the Housing Health and Safety Rating System in relation to cold homes

1.4. The report sets out the actions the Council intends to take to continue improving the energy efficiency of residential accommodation in the area.
2. Our Ambitions and Priorities

2.1. The Council’s Corporate Business Plan 2018-2021 sets out our vision for “A prosperous and attractive Borough with strong communities” and has a key business objective “To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing.”

2.2. The actions set out in section 5 have strong links to key pieces of work that have been identified in delivery plans, to ensure the Council achieves its strategic objectives. Such work includes our commitment to:

2.2.1. **Develop a ‘Health in All’ approach with our partners, ensuring that the health of local people is paramount in everything we do** – this is a firm part of our agenda when considering the negative health impacts of cold homes and in preparing our localised schemes for tackling fuel poverty and improving housing standards.

2.2.2. **Encourage and support our residents to take responsibility for their own wellbeing and lifestyle** – equipping people with the right information advice and guidance to manage their energy costs and consumption and to plan for the future maintenance of their homes is an important part of building resilience and sustainability into our communities.

2.2.3. **Work towards everyone having access to safe and suitable accommodation** – providing support to enable residents to choose a good quality home, where we encourage and promote high standards, in particular in the private rented sector and use our enforcement powers to remedy poor conditions.

2.3. As part of the wider Local Enterprise Partnership for Stoke & Staffordshire, energy is an integral element and the LEP is developing its strategy with support from the Department for Business, Energy & Industrial Strategy (BEIS). The strategy includes domestic-focussed pledges to:

2.3.1. Ensure security of energy supply for residents.

2.3.2. Minimise the cost of energy for domestic consumers.

2.3.3. Improve the energy efficiency of homes.

2.3.4. Promote decarbonisation of energy supply.

2.3.5. Address fuel poverty across the region.
3. Current Performance

3.1. ECO measures by ECO obligation by administrative area (from May 2015 up to end June 2018)

ECO (the Energy Company Obligation) provides funding to replace inefficient boilers and to install free loft insulation and free cavity wall insulation for householders who receive means-tested benefits. The ECO Affordable Warmth Scheme was introduced to help the poorest of householders to reduce their heating bills and also to cut carbon emissions (GOV UK, 2018).

Figure 1 shows the number of ECO measures installed under Affordable Warmth until end of March 2017 (873 measures across Stafford) and the number of ECO measures installed overall up until end of June 2018 (3,019 measures across Stafford).

The Affordable Warmth part of ECO2 ended on 31st March 2017 but a new ECO2 scheme started on 1st April 2017 for a transitional period of 18 months, during which time, consultation and discussions took place in order to shape a future ECO scheme. The scheme became more simplified and targeted, to include more households who are in fuel poverty, on lower incomes, and an extension to include social housing in EPC bands E, F and G. (BEIS, 2018). This could explain the sudden spike in the number of ECO measures installed since April 2017 until the end of June 2018.

Figure 1: ECO measures installed in households

<table>
<thead>
<tr>
<th></th>
<th>Carbon Saving Target (CERO)</th>
<th>Carbon Savings Community (CSCO)</th>
<th>Affordable Warmth measures installed (May 2015 to March 2017)</th>
<th>ECO measures installed overall (May 2015 to June 2018)</th>
<th>Households with at least one usual resident</th>
<th>ECO measures per 1,000 households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stafford</td>
<td>1,896</td>
<td>250</td>
<td>873</td>
<td>3,019</td>
<td>57,228</td>
<td>52.8</td>
</tr>
<tr>
<td>West Midlands</td>
<td>92,182</td>
<td>68,701</td>
<td>111,557</td>
<td>272,440</td>
<td>2,369,400</td>
<td>115</td>
</tr>
<tr>
<td>England</td>
<td>808,237</td>
<td>431,039</td>
<td>704,906</td>
<td>1,944,182</td>
<td>22,984,491</td>
<td>84.6</td>
</tr>
</tbody>
</table>

Data Source: (BEIS, 2018)

3.2 Households in receipt of ECO measures by administrative area

As Figure 2 shows, the number of households in receipt of ECO measures by administrative area is significantly less in Stafford than the West Midlands and across England. The number of households in receipt of ECO measures by administrative area is less than half the number of measures across the West Midlands as an average.

Figure 2: Households in receipt of ECO measures

<table>
<thead>
<tr>
<th></th>
<th>Households in receipt of ECO measures</th>
<th>Households with at least one usual resident</th>
<th>Households in receipt of ECO measures per 1,000 households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stafford</td>
<td>2,458</td>
<td>57,228</td>
<td>43</td>
</tr>
<tr>
<td>West Midlands</td>
<td>212,235</td>
<td>2,369,400</td>
<td>89.6</td>
</tr>
<tr>
<td>England</td>
<td>1,533,246</td>
<td>22,984,491</td>
<td>66.7</td>
</tr>
</tbody>
</table>

Data Source: (BEIS, 2018)
3.3 Sub-National Gas Consumption

In 2016, total domestic gas consumption in England increased very slightly, by 0.3% from 2015, to 309,628 GWh. The rise in domestic consumption was driven by an increase in meters (1.4%) (BEIS, 2018).

The rise in domestic gas consumption may be consistent with a general fall in domestic energy consumption, as households switch to gas from other less efficient heating fuels.

Research conducted by The Green Age has found that one unit of mains gas is approximately 4p/kWh. One unit of electricity from mains is approximately 15p/kWh. Therefore, gas is approximately 3-4 times cheaper than electricity per kWh (The Green Age, 2018).

However, homes that don’t have access to grid gas can run their homes on gas, but this is in the form of LPG which is more expensive than mains electricity (The Green Age, 2018).

The table below shows that mean consumption of gas for domestic use is higher in Stafford than the West Midlands and England.

<table>
<thead>
<tr>
<th>Location</th>
<th>Mean domestic gas consumption, 2016 (kWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stafford</td>
<td>13,822</td>
</tr>
<tr>
<td>West Midlands</td>
<td>13,190</td>
</tr>
<tr>
<td>England</td>
<td>13,077</td>
</tr>
</tbody>
</table>

Data Source: (BEIS, 2018)

3.4 Sub-National Electricity Consumption

Total electricity consumption across England decreased by 3.6% in 2016, to 277,020 GWh and the total number of meters increased by 0.7%. Indeed, mean domestic electricity consumption in 2016 was down 2.8% compared to the previous year (BEIS, 2018).

The West Midlands has seen the largest decrease in average domestic consumption between 2005 and 2015 (BEIS, 2018).

Yet, as the table below shows, both Stafford and the West Midlands as a whole still have higher average electricity consumption than the average for England.

<table>
<thead>
<tr>
<th>Location</th>
<th>Average domestic electricity consumption per household, 2016 (kWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stafford</td>
<td>3,951</td>
</tr>
<tr>
<td>West Midlands</td>
<td>3,926</td>
</tr>
<tr>
<td>England</td>
<td>3,911</td>
</tr>
</tbody>
</table>

Data Source: (BEIS, 2018)
3.5 Fuel Poverty

Formerly, a household was identified as being fuel poor if more than 10% of the household income was spent on fuel. However, this did not take into consideration low income households who chose not to use fuel as a way of avoiding expenditure on fuel bills. There is a social gradient in fuel poverty with lower income households more likely to be at risk of fuel poverty than high income households, which is likely to contribute to social and health inequalities.

As of 2015, under the new Low Income High Costs (LIHC) indicator, a household is considered to be fuel poor if they have required fuel costs that are above average and, were they to spend that amount, they would be left with a residual income below the official poverty line (GOV UK, 2018).

Figure 5 identifies that Stafford has a lower percentage of households in fuel poverty than Staffordshire and the West Midlands. Stafford has a similar percentage of households in fuel poverty to the whole of England.

Figure 6 compares results for Stafford using both methods. It shows that the number of owner-occupied and social rented (Registered Provider) homes identified as fuel poor is lower under the LIHC method. However, the number of private rented homes in fuel poverty increases under LIHC.

The LIHC method has now entirely replaced the 10% income method. Despite the new method identifying fewer households as fuel poor (as identified in Figure 6), more than 1 in 10 households in Stafford are living in fuel poverty. This is slightly higher than the national average, but significantly better than the average for Staffordshire County (11.5% of the households for Stafford; 11.1% of households for England; 12.2% of households for Staffordshire) (Staffordshire County Council, 2018).

Figure 7 shows the distribution of fuel poverty across Stafford by LSOA. The prevalence of fuel poverty in Stafford is generally higher in rural areas, with west Eccleshall having the worst rate of fuel poverty.

Figure 8 focuses on Stafford Town and shows that the inner town centre has the highest percentage of fuel poverty households than the rest of the Town.

Although the percentage of fuel poor households in Stafford is below that of the West Midlands and Staffordshire, figures 7 and 8 display the significant disparity between areas within Stafford.

People over 60 are the most likely age group to be affected by fuel poverty, with at least one person over the age of 60 living in 23% of all fuel poor households (Department of Energy and Climate Change, 2015). As identified in section 4.1, the number of people in Stafford aged 65 and over is projected to significantly increase in the next 10 years (Staffordshire County Council, 2018).

Cold homes and poor housing conditions have been linked with a range of health problems in children. Children growing up in poor housing conditions (including cold living conditions) are more likely than others to experience mental health problems, such as depression and anxiety; more likely to experience slower physical growth and cognitive development; and had higher risks of respiratory problems, long term ill-health and disability. Similarly, children living in cold, damp and mouldy homes have been found to be between 1.5 and 3 times more likely to develop symptoms of asthma than children living in warm and dry homes (Public Health England, 2014).
Figure 5: Households in Fuel Poverty

<table>
<thead>
<tr>
<th></th>
<th>All Households</th>
<th>Number of Fuel Poverty Households LIHC</th>
<th>% of Fuel Poverty Households LIHC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stafford</td>
<td>60,580</td>
<td>6,695</td>
<td>11.5</td>
</tr>
<tr>
<td>Staffordshire</td>
<td>363,600</td>
<td>44,452</td>
<td>12.2</td>
</tr>
<tr>
<td>West Midlands</td>
<td>2,317,800</td>
<td>327,235</td>
<td>13.7</td>
</tr>
<tr>
<td>England</td>
<td>22,695,000</td>
<td>2,550,565</td>
<td>11.1</td>
</tr>
</tbody>
</table>

Data Sources: (Labour Force Survey, 2018) (Staffordshire County Council, 2018) (BEIS, 2018)

Figure 6: Fuel poverty in Stafford 10% income vs. LIHC

Data Source: (BRE, 2016)
Graph Source: (Stafford Borough Council, 2018)

Figure 7: Percentage of households in fuel poverty per LSOA - Stafford

Data Source: (BRE, 2016)
Maps Source: (Stafford Borough Council, 2018)
Figure 8: Percentage of Households in Fuel Poverty per LSOA – Stafford Town

Data Source: (BRE, 2016)
Maps Source: (Stafford Borough Council, 2018)
4. Borough Profile
Stafford is resident to 134,800 people, with the population expected to grow by 3% between 2017 and 2027. 5% of residents (7,100 people) live within the most deprived national quintile. Data from ‘Feeling the Difference’ in the Stafford District Data Pack identifies that 95% of respondents from Stafford were satisfied with the area as a place to live (Staffordshire County Council, September 2018).

4.1 Population Demographic
Stafford has an increasingly ageing population. There are more people aged 60 and over in Stafford compared to the national average and the rate of increase in the number of older people in Stafford is faster than the England average. The population of people in Stafford aged 65 and over is projected to increase by 17% between 2017 and 2027, and by 37% for 85 and over, which will result in an additional 1,300 residents aged 85 and over by 2027. The rate of increase in the number of older people in Stafford is faster than the England average (Staffordshire County Council, September 2018).

4.2 Household Profile
The percentage of households in Stafford deemed vulnerable is lower than England and the West Midlands across a number of indicators, as illustrated in Figure 9. Stafford does, however, have a higher percentage of older people, as identified above in section 4.1.

Research from UK Energy Research, University of York and ACE Research found that low-income families with children often had higher energy demands within the home compared to other households (UK Energy Research, University of York, ACE Research, 2018).

Figure 9: Vulnerable household data

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Period</th>
<th>England</th>
<th>West Midlands</th>
<th>Stafford</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lone parent households. % of households</td>
<td>2011</td>
<td>7.1</td>
<td>7.5</td>
<td>5.4</td>
</tr>
<tr>
<td>Household overcrowding. % of households</td>
<td>2011</td>
<td>4.8</td>
<td>4.6</td>
<td>2.0</td>
</tr>
<tr>
<td>% of children in low income families (all dependent children under 20)</td>
<td>2015</td>
<td>16.6</td>
<td>19.5</td>
<td>10.3</td>
</tr>
<tr>
<td>Child poverty: % of children living in income deprived families, 0-15</td>
<td>2015</td>
<td>16.8</td>
<td>19.8</td>
<td>10.6</td>
</tr>
<tr>
<td>% of older people aged 60 and over living in income-deprived households (IMD 2015)</td>
<td>2016</td>
<td>16.2</td>
<td>10</td>
<td>18.2</td>
</tr>
</tbody>
</table>

Data Source: (Public Health England)
4.3 Employment and Income

Generally, employment rates in Stafford are high, with around 82% of the adult population in employment, compared to 75% nationally and 79.3% of Staffordshire (Public Health England). However, it is recorded that around 24% (31,900) of the population of Stafford are estimated to be financially stressed, i.e. find it difficult or very difficult to cope on their current income (Staffordshire County Council, 2018).

The gap in the employment rate between those with a long term health condition and the general population is 37%, which is higher than the national average (29%) (Public Health England). Other vulnerable groups (for example those with mental health conditions or a learning disability) also have relatively low employment rates and therefore these groups and those with a long term health condition may be in receipt of limited incomes.

**Figure 10: Employment rates**

<table>
<thead>
<tr>
<th></th>
<th>Stafford (Numbers)</th>
<th>Stafford (%)</th>
<th>West Midlands (%)</th>
<th>England (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>In Employment</td>
<td>68,300</td>
<td>82.1</td>
<td>72.8</td>
<td>75.2</td>
</tr>
<tr>
<td>Employees</td>
<td>55,100</td>
<td>69.2</td>
<td>63.0</td>
<td>64.1</td>
</tr>
<tr>
<td>Self Employed</td>
<td>13,300</td>
<td>12.8</td>
<td>9.6</td>
<td>10.9</td>
</tr>
<tr>
<td>Unemployed</td>
<td>2,000</td>
<td>2.9</td>
<td>4.8</td>
<td>4.2</td>
</tr>
</tbody>
</table>

Data Source: (Public Health England)
4.4 Health and Wellbeing

4.4.1 Life Expectancy and Health
Life expectancy at birth in Stafford for males is higher than the national average, at 81 years, and similar for females to the national average, at 83 years. Both men and women living in the most deprived areas of Stafford live six years less than those living in less deprived areas respectively (Public Health England).

Figure 11 demonstrates that the majority of the population in Stafford have very good / good health and day-to-day activities are not limited.

**Figure 11: Health of residents**

<table>
<thead>
<tr>
<th>All usual residents</th>
<th>Stafford</th>
<th>West Midlands</th>
<th>England</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
<td>Number</td>
</tr>
<tr>
<td>Number</td>
<td>130,869</td>
<td>100%</td>
<td>5,601,847</td>
</tr>
<tr>
<td><strong>General Health</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very Good Health</td>
<td>60,366</td>
<td>46.13%</td>
<td>2,525,862</td>
</tr>
<tr>
<td>Good Health</td>
<td>46,574</td>
<td>35.59%</td>
<td>1,946,936</td>
</tr>
<tr>
<td>Fair Health</td>
<td>17,316</td>
<td>13.23%</td>
<td>786,583</td>
</tr>
<tr>
<td>Bad Health</td>
<td>5,118</td>
<td>3.91%</td>
<td>263,217</td>
</tr>
<tr>
<td>Very Bad Health</td>
<td>1,495</td>
<td>1.14%</td>
<td>79,249</td>
</tr>
<tr>
<td><strong>Long-Term Health Problem or Disability</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Day-to-day activities limited a lot</td>
<td>10,481</td>
<td>8.01%</td>
<td>508,454</td>
</tr>
<tr>
<td>Day-to-day activities limited a little</td>
<td>13,353</td>
<td>10.20%</td>
<td>553,610</td>
</tr>
<tr>
<td>Day-to-day activities not limited</td>
<td>107,035</td>
<td>81.79%</td>
<td>4,539,783</td>
</tr>
</tbody>
</table>

Data Source: (Office for National Statistics, 2011)
4.4.2 Excess Winter Deaths (EWD)
In the winter from 2017 to 2018, there were an estimated 50,100 excess winter deaths (EWD) in England and Wales – the highest for 42 years and more than double the number of deaths for 2016-17 (24,300 EWD). Women and the elderly have been identified as being most at risk of EWD, with most EWD occurring in women and the over-85s (Office for National Statistics, 2018).

Figure 12 shows the EWD Index and is calculated as excess winter deaths divided by the average non-winter deaths, expressed as a percentage. The percentage of EWD in Stafford was higher in the winter between August 2016 to July 2017 than both the West Midlands and England.

<table>
<thead>
<tr>
<th>Excess Winter Deaths Index (August 2016 to July 2017, all ages, all persons)</th>
<th>Stafford</th>
<th>West Midlands</th>
<th>England</th>
</tr>
</thead>
<tbody>
<tr>
<td>24.6%</td>
<td>21.4%</td>
<td>21.6%</td>
<td></td>
</tr>
</tbody>
</table>

Data Source: (Public Health England, 2018)

4.4.3 Mental Health
It has been reported that fuel poverty is detrimental to health, especially mental health, through the financial stress that it causes to households. Mental health is negatively affected by fuel poverty and cold housing for any age group. More than 1 in 4 adolescents living in cold housing are at risk of multiple mental health problems (Marmot Review Team, 2011).

Figure 13 shows that the rate of people in Stafford reporting as having depression or anxiety is lower than rates for both England and the West Midlands. When compared to the rate of suicide (which is significantly higher than the England and West Midlands rates), it suggests that poor mental health is not always recognised or addressed before it is too late.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Period</th>
<th>Stafford</th>
<th>England</th>
<th>West Midlands</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Hospital Admissions for Intentional Self-Harm</td>
<td>2016 - 17</td>
<td>182.7</td>
<td>189</td>
<td>185.3</td>
</tr>
<tr>
<td>Suicide rate (persons)</td>
<td>2015 - 17</td>
<td>15.7</td>
<td>9.5</td>
<td>9.6</td>
</tr>
<tr>
<td>Estimated prevalence of mental health disorders in children and young people. % population aged 5-16</td>
<td>2015</td>
<td>8.6</td>
<td>9.7</td>
<td>9.2</td>
</tr>
<tr>
<td>Estimated prevalence of depression (all ages)</td>
<td>2015</td>
<td>14.7</td>
<td>-</td>
<td>15</td>
</tr>
<tr>
<td>% reporting depression or anxiety</td>
<td>2016/17</td>
<td>12.9</td>
<td>14.1</td>
<td>13.7</td>
</tr>
</tbody>
</table>

Data Source: (Public Health England)
4.5 Housing stock

4.5.1 Age of Housing Stock

Data collected by the VOA and illustrated in Figure 14 shows the age of housing stock in Stafford built up to 2012. Using this data, over 18% of dwellings were constructed prior to 1930, a time period where the dwellings are likely to have solid walls or hard to heat cavities. Most of these solid wall properties will not have benefitted from any form of internal or external wall cladding to date.

**Figure 14: Age of housing stock**

<table>
<thead>
<tr>
<th>Property Build Periods</th>
<th>Stafford</th>
<th>Staffordshire</th>
<th>West Midlands</th>
<th>England</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre 1900</td>
<td>6,320</td>
<td>41,540</td>
<td>284,510</td>
<td>3,762,900</td>
</tr>
<tr>
<td>1900 – 1918</td>
<td>1,820</td>
<td>14,540</td>
<td>112,300</td>
<td>1,291,070</td>
</tr>
<tr>
<td>1919 – 1929</td>
<td>2,130</td>
<td>12,410</td>
<td>139,020</td>
<td>1,231,520</td>
</tr>
<tr>
<td>1930 – 1939</td>
<td>4,320</td>
<td>29,980</td>
<td>298,760</td>
<td>2,591,850</td>
</tr>
<tr>
<td>1945 – 1954</td>
<td>5,090</td>
<td>28,980</td>
<td>195,720</td>
<td>1,648,150</td>
</tr>
<tr>
<td>1955 – 1964</td>
<td>8,130</td>
<td>49,730</td>
<td>304,310</td>
<td>2,535,100</td>
</tr>
<tr>
<td>1965 – 1972</td>
<td>7,220</td>
<td>52,710</td>
<td>292,610</td>
<td>2,435,390</td>
</tr>
<tr>
<td>1973 – 1982</td>
<td>6,590</td>
<td>46,540</td>
<td>239,150</td>
<td>2,279,750</td>
</tr>
<tr>
<td>1983 – 1992</td>
<td>4,150</td>
<td>28,720</td>
<td>165,880</td>
<td>1,763,480</td>
</tr>
<tr>
<td>1993 – 1999</td>
<td>3,360</td>
<td>22,610</td>
<td>128,050</td>
<td>1,281,690</td>
</tr>
<tr>
<td>2010 – 2012</td>
<td>500</td>
<td>3,590</td>
<td>25,350</td>
<td>302,030</td>
</tr>
<tr>
<td>Unknown</td>
<td>1,610</td>
<td>5,430</td>
<td>30,440</td>
<td>234,020</td>
</tr>
<tr>
<td>Total</td>
<td>56,460</td>
<td>365,260</td>
<td>2,384,990</td>
<td>23,152,110</td>
</tr>
</tbody>
</table>

Data Source: (Valuation Office Agency, 2012)

Stafford Borough Council adopted a new Local Plan in 2014, committing to deliver 500 new homes annually to 2031 (Stafford Borough Council, 2014). Since 2014, an additional 2,989 new homes have been delivered in the Borough, as displayed in Figure 15 (Stafford Borough Council, 2018). These homes will be better insulated and have better thermal efficiency than older properties (Laxton & Parckar, 2009).

**Figure 15: Housing Delivery 2011-2018**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>425</td>
<td>306</td>
<td>411</td>
<td>428</td>
<td>688</td>
<td>1,010</td>
<td>863</td>
<td>590</td>
</tr>
</tbody>
</table>

Data Source: (Stafford Borough Council, 2018)
4.5.2 Distribution
There are 43,300 people in Stafford living in rural areas, which equates to 32.2% of the population (Staffordshire County Council, 2018). This is significantly higher than the proportion of people living in rural areas across the West Midlands and England, as illustrated in Figure 16.

Research conducted by the National Housing Federation shows that rural areas have suffered from a lack of investment in new homes and the improvement of existing homes. Rural areas typically have older housing that use traditional, often more expensive, methods to heat homes than urban homes (National Housing Federation, 2018) (Laxton & Parckar, 2009). This reflects the distribution of fuel poor households in Stafford in Figures 7 and 8.

Figure 16: Pie charts showing urban-rural distribution

- **Stafford**: 68% Urban, 32% Rural
- **West Midlands**: 85% Urban, 15% Rural
- **England**: 83% Urban, 17% Rural

Data Source: (Staffordshire County Council, 2018)
Charts Source: (Stafford Borough Council, 2018)
4.5.3 Tenure
Figures 17 and 18 compare the breakdown of housing tenure in Stafford and England. As the charts show, Stafford has a significantly higher percentage of owner-occupied homes than across England. Levels of social and private rented properties are subsequently lower in Stafford than England.

Evidence shows that properties in the private rented sector have a greater proportion of energy inefficient homes than other housing tenure. Private rented properties are more likely to be older and therefore more expensive to insulate than social rented and there is little incentive for private landlords to pay for improvements (DCLG, 2015).

Figure 17: Pie charts showing housing tenure

<table>
<thead>
<tr>
<th>Tenure</th>
<th>Stafford</th>
<th>England</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Households, all tenures</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>Owner-Occupier</td>
<td>73.3%</td>
<td>62.6%</td>
</tr>
<tr>
<td>Social Rented</td>
<td>13.8%</td>
<td>17%</td>
</tr>
<tr>
<td>Private Rented</td>
<td>12.9%</td>
<td>20.3%</td>
</tr>
</tbody>
</table>

Data Source: (Ministry of Housing, Communities & Local Government, 2018)
Chart Source: (Stafford Borough Council, 2018)
4.5.4 Stock Condition

4.5.4.1 Cavity Wall Insulation, Domestic Solar Photovoltaic (PV) Installations and Loft Insulation

Stafford’s rate of cavity wall insulation and Domestic PV installations remains higher than the national average, as identified in Figures 19 and 20, partly reflecting recent programmes by the Council and its partners to improve the energy efficiency of homes in the Borough (BRE, 2016).

Figure 19: Households with cavity and solid walls

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>Insulated Cavity Walls</td>
<td>26,644</td>
<td>48%</td>
<td>22,376</td>
<td>46%</td>
</tr>
<tr>
<td>Uninsulated Cavity Walls</td>
<td>14,231</td>
<td>25%</td>
<td>12,719</td>
<td>26%</td>
</tr>
<tr>
<td>Solid Walls</td>
<td>15,023</td>
<td>27%</td>
<td>13,089</td>
<td>27%</td>
</tr>
<tr>
<td>Total</td>
<td>55,898</td>
<td>100%</td>
<td>48,184</td>
<td>100%</td>
</tr>
</tbody>
</table>

Data Source: (BRE, 2016)

Figure 20: Households with Domestic PV

<table>
<thead>
<tr>
<th>Energy Efficiency Installations</th>
<th>Domestic PV at end of September 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cumulative count</td>
</tr>
<tr>
<td>Stafford</td>
<td>2,208</td>
</tr>
<tr>
<td>National</td>
<td>745,574</td>
</tr>
</tbody>
</table>

Data Source: (Department of Energy and Climate Change, 2015)

As displayed in Figure 21, Stafford has a higher percentage of private stock with 150mm+* loft insulation than across England (54% in Stafford vs. 41% across England). The recommended level of loft insulation is 125mm and in Stafford, approximately 75% of properties with a loft have insulation at this level (BRE, 2016). Figure 22 shows that there are more homes with less than 100mm or no insulation in the rural areas of Stafford.

Figure 21: Rates of loft insulation

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>%</td>
<td>Number</td>
<td>%</td>
</tr>
<tr>
<td>No Loft</td>
<td>3,458</td>
<td>6%</td>
<td>2,019</td>
<td>4%</td>
</tr>
<tr>
<td>No Loft Insulation</td>
<td>2,745</td>
<td>5%</td>
<td>2,465</td>
<td>5%</td>
</tr>
<tr>
<td>50mm Loft Insulation</td>
<td>6,623</td>
<td>12%</td>
<td>6,047</td>
<td>13%</td>
</tr>
<tr>
<td>100mm Loft Insulation</td>
<td>12,935</td>
<td>23%</td>
<td>11,621</td>
<td>24%</td>
</tr>
<tr>
<td>150mm Loft Insulation</td>
<td>9,051</td>
<td>16%</td>
<td>7,815</td>
<td>16%</td>
</tr>
<tr>
<td>200mm Loft Insulation</td>
<td>8,575</td>
<td>15%</td>
<td>7,362</td>
<td>15%</td>
</tr>
<tr>
<td>250mm+ Loft Insulation</td>
<td>12,511</td>
<td>22%</td>
<td>10,855</td>
<td>23%</td>
</tr>
<tr>
<td>Total</td>
<td>55,898</td>
<td>100%</td>
<td>48,184</td>
<td>100%</td>
</tr>
</tbody>
</table>

Source: (BRE, 2016)
Figure 22: Percentage of private sector dwellings in Stafford with less than 100mm or no loft insulation

Source: (BRE, 2016)
4.5.4.2 Central Heating

Today, Stafford has more households with central heating than the England average (Staffordshire County Council, 2018).

When we revisit data from the 2011 Census in Figure 23, we can see that Stafford has continued to retain a significantly lower proportion of households with no central heating than averages for both the West Midlands and England (1.89% Stafford vs. 2.93% and 2.69% for West Midlands and England) (Office for National Statistics, 2011).

The number of homes using oil and solid fuel is double the rate of both the West Midlands and England averages. Stafford has a large number of homes in rural areas and as stated in section 4.5.2, research from the National Housing Federation identifies that rural areas typically have older housing that use traditional methods to heat homes (National Housing Federation, 2018).

Figure 23: Proportion of households with central heating types

<table>
<thead>
<tr>
<th>Central Heating</th>
<th>Stafford</th>
<th>West Midlands</th>
<th>England</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Central Heating (households)</td>
<td>1,055</td>
<td>67,167</td>
<td>594,561</td>
</tr>
<tr>
<td>Gas Central Heating (households)</td>
<td>43,369</td>
<td>1,812,94</td>
<td>17,386,813</td>
</tr>
<tr>
<td>Electric (including storage heaters)</td>
<td>3,816</td>
<td>181,764</td>
<td>1,828,589</td>
</tr>
<tr>
<td>Central Heating (households)</td>
<td></td>
<td>79%</td>
<td>8.29%</td>
</tr>
<tr>
<td>Oil Central Heating (households)</td>
<td>3,963</td>
<td>81,243</td>
<td>848,145</td>
</tr>
<tr>
<td>Solid Fuel (for example wood, coal)</td>
<td>679</td>
<td>15,520</td>
<td>149,694</td>
</tr>
<tr>
<td>Central Heating (households)</td>
<td></td>
<td>0.68%</td>
<td>0.68%</td>
</tr>
<tr>
<td>Other Central Heating (households)</td>
<td>502</td>
<td>38,062</td>
<td>357,916</td>
</tr>
<tr>
<td>Two or more types of Central Heating</td>
<td>2,319</td>
<td>98,159</td>
<td>897,650</td>
</tr>
<tr>
<td>(households)</td>
<td></td>
<td>4.28%</td>
<td>4.07%</td>
</tr>
</tbody>
</table>

Data Source: (Office for National Statistics, 2011)
4.5.4.3 Connections to Gas Mains

Data from the Department for Business, Energy and Industrial Strategy (BEIS) has found that 27.3% (16,534) of properties in Stafford have no access to gas. Just over a third (33.5%) of these properties are located less than 23m away from their nearest gas grid. 14.4% of properties (2,381) are more than 2km away from a gas grid (Kiln for Affordable Warmth Solutions, 2018).

As Figure 24 shows, the majority of areas with a higher percentage of homes off the gas grid are located in the rural areas of the Borough.

A national study supports this, having also found that households not connected to mains gas are more commonly found in rural areas (Laxton & Parckar, 2009).

Figure 24: Percentage of households off the gas grid in Stafford

Map Source: (Kiln for Affordable Warmth Solutions, 2018)
4.5.4.4 Solid Wall Insulation

Figure 25 shows that the areas close to the centre of Stafford Town have more solid walls in their homes than the more rural areas located on the outskirts of Stafford.

Figure 25: Solid Wall Properties - % of Private Sector Dwellings in Stafford with Solid Walls

Map Source: (BRE, 2016)
### 4.5.4.5 Energy Rating

An Energy Performance Certificate (EPC) shows the current energy and potential energy rating of a property. This is measured using the Standard Assessment Procedure (SAP) on a scale of 1 to 120, with the higher the rating, the greater the energy efficiency of the property.

‘Excess cold’ is classified as a Category 1 hazard under HHSRS and is the most common type of Category 1 hazard. Guidance on HHSRS states that homes with a SAP of less than 35 should be classed as ‘excessively cold’ and therefore a Category 1 hazard.

The map (below) shows that properties with low energy efficiency are distributed across Stafford, but tend to be worse in the more rural areas.

Whilst no particular ward obviously dominates, the data behind the map shows that the wards with the lowest average SAP ratings are Milwich, Eccleshall and Seighford & Church Eaton. Lower SAP ratings can occur in areas with larger, older homes where little work has been done by the occupiers to improve energy performance.

**Average SimpleSAP ratings per dwelling in Stafford private sector stock**

![Map Source: (BRE, 2016)](image-url)
4.5.4.8 Cost of Household Energy

As the map below displays, the majority of households pay between £1,152 and £1,476 per year on energy. Yet, there are 7.75% of households in Stafford paying the highest bracket of energy cost - an average total energy cost of between £2,830 and £4,300. The areas with high energy costs are largely located in the rural parts of Stafford.

**Average Total Energy Cost (£/year) – Private Sector Stock**

![Map Source: (BRE, 2016)](image-url)
### 5. Planned Interventions

<table>
<thead>
<tr>
<th>Action</th>
<th>Details</th>
<th>Timing</th>
</tr>
</thead>
</table>
| **Local energy efficiency ambitions and priorities** | **Develop a refreshed Affordable Warmth Strategy for Stafford Borough.**  
*Maintain our Warmer Homes Stafford advice service to:*  
- Increase the number of residents benefitting from energy efficiency measures through increased awareness  
- Improve the energy efficiency of homes in Stafford Borough through increased take-up of advice and financial assistance offered from central Government schemes  
- Tackle fuel poverty  
- Improve the health, wellbeing and resilience of our residents | **March 2020** |
| **Measures that take advantage of financial assistance and other benefits offered from central Government initiatives, to help result in significant energy efficiency improvements of residential accommodation** | **Energy Company Obligation** | **In line with publication of guidance** |
| **Feed in Tariff** | **Feed in Tariff offers are expected to end in April 2019. We will look for opportunities to support housing developers at a master planning stage and our Registered Provider (social housing) partners to explore the potential to achieve photovoltaic system installations (solar panel electricity systems) at a large scale.** | **Ends April 2019** |
| **Renewable Heat Incentives** | **Renewable Heat Incentives are confirmed until March 2021. We will consider ways to promote the installation of better technology, particularly in our rural, off-gas areas.** | **Ongoing** |
| Fuel Poverty | We will continue to offer, subject to budget availability, our Fuel Poverty Top-Up grants, from the Council’s Private Sector Housing Assistance fund. The grants enable us to contribute towards the cost of measures which are otherwise funded by ECO, but where there is a shortfall in meeting the full cost of the improvement. | Annual budget |
| Minimum Energy Efficiency Standards (MEES) | From 1 April 2018 all privately rented dwellings should be brought up to a minimum energy efficiency standard rating of E or above. Stafford Borough Council already works with landlords and tenants to:  
- Highlight the benefits of energy efficiency works  
- Promote awareness of grants, loans and other available offers to improve properties wherever practical  
- Ensure all new tenants are provided with an EPC by their landlord so that they can consider potential energy costs  
- Enforce against landlords to improve energy efficiency in properties under the Housing Health and Safety Rating System (HHSRS) to remove any category 1 hazard of excess cold.  
The enforcement will be undertaken by the Housing Standards team, who are best placed to highlight breaches and to resolve issues using the best course of action.  
Additionally, Stafford is looking to develop a standalone scheme to raise standards across the private rental market; MEES will form a part of that project work and will be integrated in the wider enforcement activity plans. | Ongoing |

| Measures which the authority has developed to implement energy efficiency improvements cost-effectively in residential accommodation by using area based / street by street roll out involving local communities and partnerships (e.g. social housing partners, voluntary organisations and town/parish councils). |
| Collective gas and electricity tariff switching | We will support collective switching campaigns such as the People’s Power Cheaper Energy Together scheme. | As required |
| Home Energy Advice referrals and visits | We will work with our partners (including specialised energy agents, registered providers, the Stafford and Surrounds Clinical Commissioning Group, community groups and charities) to target promotion of all home energy advice, fuel poverty and cold weather health initiatives to vulnerable and deprived groups or households in key localities.  
We are currently delivering a project called ‘Community | Ongoing, annual service delivery included in Warmer Homes Stafford |
Connectors;’ a volunteer led service that works to engage with older, more isolated people within Stafford Borough and helps to connect them with services and support which can help improve their health and wellbeing. The volunteers are from local communities, they offer information about local activities and help residents to gain access to local services that are available within a limited, geographical area. Volunteers have all been trained in awareness of our Warmer Homes Stafford initiative and are able to make referrals for Home Energy Advice visits.

<table>
<thead>
<tr>
<th>Timeframe for delivery and local and national partners</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Partners</strong></td>
</tr>
<tr>
<td>Stafford Borough Council currently works with a specialist energy agent, Marches Energy Agency, to deliver energy efficiency improvements through its Warmer Homes Stafford initiative. We will work in partnership with a range of local and national partners as opportunities arise, to bring the best possible offers and opportunities to deliver energy efficiency improvements, to residents of Stafford Borough. This includes, but is not limited to Staffordshire County Council, Stafford and Rural Homes, Beat the Cold Charity, Affordable Warmth Solutions, Staffordshire Fire and Rescue Service, Stafford and Surrounds Clinical Commissioning Group, the Ministry of Wellbeing, Stafford Community Wellbeing Partnership, Millbrook Healthcare.</td>
</tr>
</tbody>
</table>
6. Bibliography of Sources


March 2019 Update


1 Purpose of Report

1.1 To approve the write-off of arrears listed in the CONFIDENTIAL APPENDIX.

2 Proposal of Cabinet Member

2.1 That the arrears listed in the CONFIDENTIAL APPENDIX be written off.

3 Key Issues and Reasons for Recommendation

3.1 In accordance with the Scheme of Delegation, this report relates only to the writing off of debts in excess of £2,500 that cannot be legally recovered.

4 Relationship to Corporate Priorities

4.1 Not Applicable

5 Report Detail

5.1 The normal course of action has been pursued, namely, bills, reminders and final notices issued and, where appropriate, summonses issued, liability orders obtained and passed to Bailiffs for collection and trace. Trace procedures have been followed, which include checking with our internal Council systems, using the Locating Council Tax Absconders (LOCTA), a Local Authority data sharing system, to check for forwarding addresses at other Local Authorities, visits to the last known address by the Council’s Property Inspector and use of external tracing agents. Despite these best efforts of Council Tax and Business Rates staff, and/or bailiffs, the debtors cannot be traced and no further action can be taken.
### 6 Implications

#### 6.1 Financial

Under the Business Rates Retention Scheme, business rates write offs will no longer be offset against the National Non-Domestic Rating Pool. Write offs will now form part of the costs of collection of business rates. The Business Rates write offs in this report are 18 cases totalling £130,444.24. This represents 0.24% of the outstanding collectable debit as at 1 April 2018.

Council Tax write offs are losses to the Collection Fund and, as such, form part of the cost of collection incurred by this Council. The Council Tax write-offs on this report are 1 case totalling £3,205.56. This represents 0.003% of the outstanding collectable debit as at the 1 April 2018.

The cost of collecting the debts has been considered as part of the decision to put them forward for write off. If further information does come forward about the whereabouts of any of the individual debtors the Council will pursue recovery action.

#### Legal

Cabinet are asked to write off the debts as they are considered to be irrecoverable for the reasons given in the appendices. The debts remain legally due to the Council and should the circumstances causing the write off in any particular case, subsequently change, recovery action may be recommenced.

#### Human Resources

There are no Human Resources implications relating to this report.

#### Human Rights Act

There are no Human Rights implications relating to this report.

#### Data Protection

The appendices to this report contain personal information and are therefore not published.

#### Risk Management

The risk issues contained in this report are not strategic and therefore should not be included in the Strategic Risk Register.
### 6.2 Community Impact Assessment Recommendations

The Borough Council considers the effect of its actions on all sections of our community and has addressed all of the following Equality Strands in the production of this report, as appropriate:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

<table>
<thead>
<tr>
<th>Previous Consideration</th>
<th>Nil</th>
</tr>
</thead>
<tbody>
<tr>
<td>Background Papers</td>
<td>Nil</td>
</tr>
</tbody>
</table>