

**PLAN FOR STAFFORD BOROUGH - PUBLICATION**

**SUMMARY OF REPRESENTATIONS - AUGUST 2013**

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SCHEDULE OF REPRESENTATIONS - SUMMARY

Rep No / Respondent	Section	Mod Ref No.	Legally Compliant?	Sound?	Reason for being unsound	Summary of representation	Changes requested
PS1 S Felstead	Appendix C	M115	No	No	None given	Queries why both Duddas Wood and Derrington Millenium Green have been excluded from Appendix C when the Millenium Green is a nominated SBI - <a href="http://www.derrington.org.uk/page3.html">http://www.derrington.org.uk/page3.html</a>	No
PS2 Mr A Lavelle	Para 2.19	M5 – M7	No	No	Justified	Elsewhere in the report, data for 2012 is being quoted, yet the population information in this section is still referring to 2001.  This should be updated for 2011 Census information, released in December 2012 to provide a more up to date overview of the population and its needs.	Update Census data from 2001 to 2011
PS3 Mr B Hilton	Policy Stone 1		Yes	Yes	None given	Comments relate to the need for improved facilities and accessibility of Stone Rail Station along with suitable taxi ranks within the town.	No
PS4 Mr T Pick	Policy Stone 1 – Stone Town		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Comments relate to retail development at Westbridge Park, the loss of open space, impact on other retail uses within the town and loss of amenity space for events. The representation also raises concern about traffic impacts on Eccleshall Road, west of Stone.	No

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PS5 Mr B Apps	Para 10.6		Yes	No	Justified; Effective	<p>Objects to further development at Raleigh Hall due to rural location, status and level of traffic on the road network.</p> <p>All Business Parks / Industrial Estates must be sited with direct dual carriageway access from the park to the motorway network, not along narrow bendy "A" roads.</p>	Policy wording amended to state that all business parks to be sited with direct access to the motorway network.
PS6 Mr B Apps	Policy T1		Yes	No	Justified; Effective	<p>Questions how walking and cycling can be encouraged in some areas, particularly Raleigh Hall Recognised Industrial Estate where there is no pavement nearby.</p> <p>Consider development at Raleigh Hall would conflict with Policy T1, particularly criteria (g).</p>	Policy wording amended to state that all business parks to be sited with direct access to the motorway network.
PS7 Mr B Apps	Para 9.16		Yes	No	Justified; Effective	Raleigh Hall at Eccleshall does not have good transport links to Stafford, Stoke on Trent or the M6 as it is not on a dual carriageway.	Policy wording amended to state that all business parks to be sited with direct access to the motorway network.
PS8 Mr C Tibbitts	Policy Stone 1		Yes	Yes	None given	Support reference to the development at Westbridge Park as it would contribute to leisure needs of current and future communities, encourage inward investment to the town centre and meet shopping needs.	More specific details on nature of the new leisure centre including the new park.

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PS9 Severn Trent Water	Para 7.22	M38	Yes	Yes	None given		Add a new third sentence to read 'No distribution network reinforcement is required to support the growth in Stafford town, however some areas of the town will need to have the water supply allocated to Peasley Bank service reservoir in the North from Butterhill Service Reservoir in the south west.'
PS10 Severn Trent Water	Policy Stafford 4 – East Of Stafford	M46	Yes	Yes	None given		Text change to read in the infrastructure, bullet xx 'Potable Water - Parts of Stafford town will require reallocation to Peasley bank Service Reservoir from Butterhill Service reservoir'

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PS11 Severn Trent Water	Para 8.20	M56	Yes	Yes	None given		Additional sentence to read 'Off site reinforcement will be required to secure levels of service to Stone. Current proposals are to reinforce the trunk main network in Stone. It is planned that this is constructed by 2016'
PS12 Severn Trent Water	Policy Stone 2 – West And South Of Stone	M58	Yes	Yes	N/A		Infrastructure bullet xiv to read 'Potable water reinforcement required to the trunk main system in Stone'
PS13 Severn Trent Water	Para 9.18	M64	Yes	Yes	N/A		Bullet point 1 to read 'Water Main running through the Ladfordfields site may require diversion to a new route' Remove the reinforcement at Raleigh Hall sentence

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PS14 Severn Trent Water	Para 13.11	M100	Yes	Yes	N/A		<p>Amend 3<sup>rd</sup> sentence onwards to read 'All three Strategic Development Locations at Stafford Town can be supported with some distribution network rezoning.</p> <p>The strategic location at Stone will require some infrastructure reinforcement to support delivery. It is expected that this reinforcement would be funded by Severn Trent Water and is currently planned for delivery in the period 2014-2015. Network Rezoning is likely to be required in Stafford in the period 2016-2020. A new Water Pumping Station is likely to be required in the eastern rural area</p>

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							(Stowe) in the period 2021-25.'
PS15 Severn Trent Water	Para 13.24	M105	Yes	Yes	N/A		Amend table to read 'Water Supply Total Capital Cost 2011-2031 = £2m Capital Cost 2011- 2016 = £1.7m Committed funding = £1.7m Notes - remove 'costs subject to on- going feasibility work'.
PS16 Severn Trent Water	Appendix D - Infrastructure	M118, M120, M122, M124	Yes	Yes	N/A		<b>Stafford Town West - Potable Water</b> Delete requirements section and replace with 'Reallocation of supply to Peasley Bank Service reservoir, from Butterhill Service reservoir for areas of the town will facilitate the growth within

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							<p>Stafford Town from a water supply perspective. Phasing = 2016-20 Capital Cost = £150k Stafford Town East - potable water.</p> <p><b>Stafford Town East - Potable Water</b> Delete requirements section and replace with 'New Water Pumping Station required in the rural area to the East of Stafford Town at Stowe' Phasing = 2021-25 Capital Cost = £150k</p> <p><b>Stone Town West - potable water</b> Add to text '1.2km of 450mm pipe in A34 Stone required to protect water levels of service in Stone' Phasing = 2013-15</p>

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							Capital Cost = £1.7m  <b>Raleigh Hall and Ladfordfields - potable water</b> Remove reference to reinforcement at Raleigh Hall.
PS17 Mr Alcock	Policy Stone 1 – Stone Town		Yes	Yes	N/A		
PS18 Mr Alcock	Policy Stone 1 – Stone Town		Yes	Yes		Support the mixed-use allocation at Westbridge Park and the Council's reasoning for this allocation.	
PS 19 L Cockburn	Policy Stone 1 – Stone Town		Yes	Yes		Support the mixed use development at Westbridge Park due to increased leisure opportunities, the location, more efficient use of the site and knock on positive effects for the town centre.	
PS20 R Till	Para 8.5		Yes	No		The needs start-up businesses should be considered within the plans for employer accommodation with the aim to achieve something similar to 'Enterprise HQ' and 'Enterprise Hub' in Coalport and Telford, which are ideal spaces both for co-working (rent a desk) or long term office rental.	

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PS21 Mr Lufton	Policy Stafford 2 – North Of Stafford		Yes	No	Justified	<p><b>North of Stafford - Housing Allocation</b> There is a risk to relying on one allocation to the North of Stafford to deliver over two-fifths (43%) of the housing allocation for the whole town until 2031.</p> <p>There is no evidence to show that the northern allocation is viable.</p>	Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.
PS22 Mr Lufton	7.27 Para		Yes	No	Justified	<p><b>North of Stafford - Transport</b> The access and transport strategy relating to the delivery of the major strategic development allocation North of Stafford is very general, vague and ill-defined and does not appear to be supported by any substantive transport assessment or evidence.</p>	Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.
PS23 Mr Lufton	7.25 Para		Yes	No	Justified	<p><b>North of Stafford - Lack of Recognition of Existing Development</b> The north of Stafford allocation does not recognise or co-ordinate with the existing MoD development to the north of Beaconside or indicate how it would relate to the existing facilities that are on the boundary.</p>	Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.
PS24 Mr Lufton	Policy Stafford 2 – North Of		Yes	No	Justified	<p><b>North of Stafford - Historic Landscape Character</b> The north of Stafford is recognised as having a high value in terms of the recognition of historic landscape features and</p>	Delete Policy Stafford 2 North of Stafford and all the supporting text and

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	Stafford					in particular evidence of mediaeval ridge and furrow. This is a feature of all the land to the south-west of Marstongate Farm.	justification.
PS25 Mr Lufton	7.28 Para		Yes	No	Justified	<b>North of Stafford - Incursion into Open Countryside</b> The north of Stafford allocation represents a huge incursion into open countryside and lacks defensible boundaries to the north and east.	Delete Policy Stafford 2 North of Stafford and all the supporting text and justification.
PS26 Mr Lufton	Policy Stafford 1 – Stafford Town		Yes	No	Justified	<b>North of Stafford - Housing Allocation</b> The Plan does not provide information in viability, transport or how the development would be relating to existing boundaries and development.  Concern over the impact on the historic environment landscape, and incursion on the open countryside.	Delete references to an allocation North of Stafford and all the supporting text and justification.
PS27 Lufton & Associates for Clarkes Farm, Weston Road	Para 2.8		Yes	Yes		The recognition of the needs for housing for military personnel in the town is supported. The Ministry of Defence (MOD) make an important contribution to the local economy, providing and supporting employment in the town and providing opportunities for local businesses.	

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PS28 Lufton & Associates for Clarkes Farm, Weston Road	Para 2.15		Yes	No	Justified	<p>Recognition of historic environment and its importance not reflected in the development and allocation strategy. Land north of Stafford is recognised as having a high historic landscape value in the evidence of medieval ridge and furrow.</p> <p>Other potential directions for development around the town would have less impact on the historic landscape features. Land to the north-east of Beaconside is not of high historic landscape value and provides a good opportunity to develop an extension to the town in a naturally enclosed landscape setting.</p>	
PS29 Lufton & Associates for Clarkes Farm, Weston Road	Para 4.1		Yes	Yes		<p>Maximising access to services and reducing the need to travel. This objective is supported as a central tenet of creating sustainable development.</p> <p>Development of land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity.</p>	

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PS30 UK Independence Party	Policy Stafford 1 – Stafford Town	M29	Yes	No	Effective	<p>Criteria ii Deliver.... Phase 1 of the Eastern Distributor Road from Weston Road / Beaconside to Baswich Lane road Bridge at St Thomas</p> <p>Criteria vi. Ensure that new developments are capable of providing safe and convenient access by ... private transport that addresses the needs of all</p>	Plan to state the timescale for new road and the proposed extension to Lichfield Road A513 and Cannock Road A34 as shown on the Policies Map – Stafford.
PS31 UK Independence Party	Policy T1		Yes	No	Effective	<p>Criteria g.... ensuring that all developments that generate significant traffic flows... must be located in close proximity to the primary road network... and should have adequate capacity to accommodate the development or can be improved or mitigated as part of the development.</p>	<p>Replace the word 'and' to read 'which'.</p> <p>Further details to specify delivery and improvements to the Eastern Distributor Road.</p>
PS 32 Mr J Johnson	Policy Stafford 1 – Stafford Town		Yes	No	Effective	<p>Concern about the deliverability of the strategy, particularly the timeframe, infrastructure and funding from utilities.</p> <p>Reference made to the EDR being a suggested route 40 years ago.</p> <p>Greater consideration required for attracting developers and funding to Stafford, especially due to recent news events of town stores</p>	

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						closing, the potential for Staffordshire University to relocate the campus to Stoke and HS2 route, and the adequate protection of existing settlements and environment	
PS33 Lufton & Associates for Clarkes Farm	Spatial Principle 1 SP1)		Yes	Yes		This principle is supported.	
PS34 Lufton & Associates for Clarkes Farm	Spatial Principle 2 SP2)		Yes	Yes		This principle of providing 500 dwellings per year across the Borough is supported. Based on housing need, affordable housing requirements and market house prices this should be a minimum requirement.	
PS35 Lufton & Associates for Clarkes Farm	Spatial Principle 3 SP3)		Yes	Yes		<p>This principle is generally supported, balancing housing and employment growth with the strategy to develop a town with a high degree of self-containment in terms of housing, employment, schools and other education facilities and recreational and leisure facilities.</p> <p>New housing development on land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity.</p>	

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PS36 Lufton & Associates for Clarkes Farm	Spatial Principle 4 SP4)		Yes	Yes		This principle is generally supported with the focus of housing growth at Stafford town.	
PS37 Lufton & Associates for Clarkes Farm	Para 6.52		Yes	No	Justified	The Strategic Housing Land Availability Assessment is a key evidence base to the strategy required by national policy. Concern that the information is out of date.	
PS38 Lufton & Associates for Clarkes Farm	Policy Stafford 1 – Stafford Town		Yes	No	Justified	The policy of providing development land to provide for 5,500 dwellings in the town up to 2031 is supported.  Focussing the substantial majority of housing development in three strategic locations is not supported due to risk of non-delivery in terms impact on highway network and funding provision for education facilities.	
PS39 Lufton & Associates for Clarkes Farm	Policy Stafford 2 – North Of Stafford		Yes	No	Justified	POLICY STAFFORD 2 - NORTH OF STAFFORD (Housing) - Concern that the allocation is not demonstrated as being viable in the plan.  POLICY STAFFORD 2 - NORTH OF STAFFORD (Transport) - The access and transport strategy is not clearly defined or consistent with a robust delivery mechanism.	Amend the policy and supporting text in order to reduce the scale the development North of Stafford to 1,500 to 2,000 dwellings, provide a framework for future

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						<p>Little evidence that adequate transport modelling completed to assess development impact on the network. The Infrastructure Delivery Plan report, July 2012, has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings as proposed.</p> <p>Concerns raised in terms of historic environment landscape, incursion onto the open countryside, lack of defensible boundary, no recognition of existing development and relationship to it. There are also concerns that the Initial Preferred Route for HS2 Phase 2 to Manchester is shown to pass within less than 200 metres of the northern boundary of the strategic allocation.</p> <p>POLICY STAFFORD 2 - NORTH OF STAFFORD (Environment and Biological Importance) - Land to the south of Marstongate Farm is an area of significant biological importance, to be considered as a critical element of green infrastructure linking with Stafford Common and open land to the south of Beaconside. These areas to be protected and enhanced with ecological and biological linkages across the ring road. It is also important to have regard to Marston Brook as a natural water corridor to the east</p>	<p>development to integrate with existing employment and communities, enhancement and mitigation measures for biological importance and wider linkages.</p>

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						of Marston Lane.	
PS40 Lufton & Associates for Clarkes Farm	Policy Stafford 3 – West Of Stafford		Yes	No	Justified	<p>POLICY STAFFORD 3 - WEST OF STAFFORD (Transport) - Limited information and supporting evidence for funding and delivery of the Western Access Improvement Scheme over the time period. The allocation should only be considered viable later in the plan period beyond 2021.</p> <p>POLICY STAFFORD 3 - WEST OF STAFFORD (Infrastructure) - The policy under point xiii only refers to the delivery of phase 1 of Western Access Improvement Scheme whereas in other documents and in policy 1 Stafford Town it is clear the Borough Council is committed to a wider highway improvement scheme. Apart from allowing immediate access to the major site it is difficult to assess what phase 1 of the Western Access Improvement Scheme could achieve in isolation.</p>	
PS41 Lufton & Associates for Clarkes Farm	Para 7.28		Yes	No	Justified	The OS Plan and Concept Plan for North of Stafford are not consistent.	Amend policy and supporting text to reduce the scale of development to 1,500 to 2,000 dwellings and include enhancement and

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							mitigation measures for biological importance and its wider linkages to be 300 metres either side of Marston Brook.
PS42 Lufton & Associates for Clarkes Farm	Policy Stafford 1 – Stafford Town		Yes	No	Justified	<p>POLICY STAFFORD 1 - STAFFORD TOWN (Housing) - The policy of providing development land to provide for 5,500 dwellings in the town up to 2031 is supported. Consideration of land to the north-east of Beaconside for up to 1,000 new dwellings, integrated with development on adjoining land under the control of the Ministry of Defence (MOD).</p> <p>POLICY STAFFORD 1 - STAFFORD TOWN (Employment) The support for the Science and Technology Park at Beaconside and development for the MOD to retain their military base in Stafford. Development to the north-east of Beaconside would support the Core Strategy by providing mixed use development and local services in close proximity to the Science and Technology Park and the MOD.</p>	<p>New housing development on land to the north-east of Beaconside provides an excellent opportunity to provide housing, education, local services and employment in close proximity.</p> <p>North-east of Stafford should be identified as a strategic development location for housing.</p>

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						<p>POLICY STAFFORD 1 - STAFFORD TOWN (Infrastructure) There is insufficient information and evidence to demonstrate the delivery mechanisms for the Western Access Improvement Scheme or the Eastern Access Improvement Scheme. Traffic modelling for the North of Stafford has been predicated on an allocation of 2,000 dwellings and not 3,100 dwellings proposed.</p>	

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PS43 Lufton & Associates for Clarkes Farm	Policy Stafford 1 – Stafford Town		Yes	No	Justified	POLICY STAFFORD 1 - STAFFORD TOWN (Housing) - Focussing the substantial majority of housing development in three strategic locations is not supported.	The Plan should include a strategic allocation North East of Beaconside providing an excellent opportunity for 1,000 houses, education, local services and employment, on land south and west of Beacon Farm, being integrated with adjoining land under the control of the MOD.
PS44 Lufton & Associates for Clarkes Farm	Para 7.4		Yes	No	Justified	POLICY STAFFORD 1 - STAFFORD TOWN (Housing)  Focussing the substantial majority of housing development in three strategic locations is not supported.	The Plan should include a strategic allocation North East of Beaconside providing an excellent opportunity for 1,000 houses, education, local services and employment, on land south and west of Beacon Farm, being

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							integrated with adjoining land under the control of the MOD.
PS45 Lufton & Associates for Clarkes Farm	Para 7.8		Yes	No	Justified	Focussing the substantial majority of housing development in three strategic locations is not supported.	The Plan should include a strategic allocation North East of Beaconside providing an excellent opportunity for 1,000 houses, education, local services and employment, on land south and west of Beacon Farm, being integrated with adjoining land under the control of the MOD.
PS46 Mr J Leather	Para 2.26		Yes	No	Effective	Working on a population of 2,541 in Eccleshall this represents 2.1% of the whole Borough any employment allocation should take into account the distribution of the workforce and should not be disproportionate such as at Raleigh Hall being 12.5%.	

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PS47 Mr J Leather	Para 2.17		Yes	Yes	Effective	Although the transport and accessibility in parts of the Borough are good, many of the rural areas are badly serviced and heavy vehicles are using appropriate roads so further development should be avoided.	Locate industry to areas where there is satisfactory road access.
PS48 Mr J Leather	Para 2.13		Yes	No	Effective	Why bother to build more when nearly one in eight employment buildings are empty?	
PS49 Mr J Leather	The Plan For Stafford Borough - Publication		Yes	No	Effective	Object to employment allocation at Raleigh Hall with the area previously used for residential.  Access to Raleigh Hall is completely unsatisfactory for the use by large lorries due to the restricted width of the Stafford to Eccleshall Road, Stafford Street and Castle Street through Eccleshall and the narrow 'C' class road from the A519 to Raleigh Hall site.	Re-consider the allocation as it will not contribute to the area and the site is only 4 hectares not 6 hectares, part of the area is developed for the Biomass plant.
PS50 Mr J Leather	Para 5.2		Yes	No	Effective	Reference to point 5 - the allocation at Raleigh Hall does not mitigate adverse effects. It creates adverse effects in relation to encroachment into good agricultural land and effects of heavy traffic on country roads.	
PS51 Mr J Leather	Para 6.28		Yes	No	Effective	Eccleshall is a historic area and should not have additional unacceptable heavy goods vehicles passing through due to the proposed	Amend allocations to link with the workforce.

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						additional industrial development at Raleigh Hall.	
PS52 Mr J Leather	Spatial Principle 5 (SP5)		Yes	No	Justified	Concern about the proportion of employment development to the rural areas when compared to the housing strategy. 32% of employment allocations in the rural areas compared to 20% for housing.	Amend allocations to link with the workforce.
PS53 Mr J Leather	Policy E1		Yes	No	Justified	Bullet point 'e' - Agree development should be within the RIE, not outside as major expansions, such as at Raleigh Hall and Ladfordfields	
PS54 Mr J Leather	Policy E2		Yes	No	Justified	<p>Agree with bullet point (i) - adjoining land should not be used.</p> <p>Bullet point (c) - development should complement and not prejudice agricultural operations</p> <p>Bullet point (g) – development should not be detrimental to area</p> <p>Bullet point (e) rural areas - should be designed to be in keeping with its surroundings</p> <p>Object to new employment allocation at</p>	Reconsider the proposed allocation

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						Raleigh Hall as it does not compliment agriculture, any development will be detrimental to the area and cannot be satisfactorily landscaped and would be out of keeping with the surrounding area.	
PS55 Mr J Leather	Para 9.12		Yes	No	Effective	There are existing issues with development at Raleigh Hall and this should be addressed before any future development such as landscaping, traffic impact and pollution.	No further development until existing site meets regulations.
PS56 Mr J Leather	Para 9.13		Yes	No	Effective	There are existing issues with development at Raleigh Hall and this should be addressed before any future development such as landscaping, traffic impact and pollution.	No further development until existing site meets regulations.
PS57 Mr J Leather	Policy E3	M60	Yes	No	Justified	Proposed industrial uses are not suitable for rural locations where the transport problems would be made worse by additional HGV's	
PS58 Mr J Leather	Para 9.15		Yes	No	Justified	There are existing issues with development at Raleigh Hall and this should be addressed before any future development such as landscaping, traffic impact and pollution.	No further development until existing site meets regulations.

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PS59 Mr J Leather	Policy E4		Yes	No	Justified; Effective	The plan states that the area available is 6 hectares but the biomass plant and Underwoods Farm takes a large area of the field as shown on the Plan, measuring 4 hectares. Development should be delayed until existing road network issues are addressed through Eccleshall.	
PS60 Mr J Leather	Para 9.16		Yes	No	Justified, effective	Neither Raleigh Hall nor Ladfordfields have good access due to the rural road network.	
PS61 Mr J Leather	Para 9.17		Yes	No	Justified, effective	The employment area of the field is about 4 hectares not 6 hectares.	
PS62 Mr Lufton	Para 6.28		Yes	Yes		Support the recognition of Eccleshall as a Key Service Village but should be considered the most important with an associated level of residential development.	
PS63 Mr Lufton	Para 6.29		Yes	Yes		Support the recognition of Gnosall as a Key Service Village and it should be regarded as being suitable for new residential development.	
PS64 Mr Lufton	Para 6.32					Support the recognition of Great Haywood as a Key Service Village and it should be regarded as being suitable for new residential development, with the proposed Phase 2 HS2 line forming a boundary to the north.	

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PS 65 Severn Trent Water – waste water	The Plan For Stafford Borough - Publication		Yes	Yes		<p>Severn Trent Water has a duty to provide additional sewerage and sewage treatment capacity to accommodate new development. As part of the regulatory framework with Ofwat, investment required to provide additional capacity on the existing sewerage system and at sewage treatment works is funded through customers' bills across the entire Severn Trent customer base. Consequently there is a requirement to manage existing capacity and provide future capacity as required to minimise impact on customers' bills. In light of this, we are aware that the new Plan covers the period 2011 to 2031 and so capacity improvements will need to be phased to coincide with timing and construction of development. Initial assessments indicates that £5.2m will need to be spent across Stafford by 2031 to accommodate proposed development, however the timing of the capacity improvements will depend on the location, timing and construction programme for each site. The Plan provides detailed information on infrastructure provision but there is still uncertainty over actual expenditure per development area. To ensure sewerage capacity is available Severn Trent have promoted an investment project and allocated</p>	

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						£5.2m of funding to provide additional capacity but no 'showstoppers' are envisaged based on the development.	
PS 66 Severn Trent Water – waste water	Para 7.21	M37	Yes	Yes			Amend text to read as follows: 'A key consideration in terms of new housing development in Stafford is the provision of additional foul sewerage capacity to accommodate new development flows. Large parts of the Stafford sewerage system were originally designed to accept both foul and storm water in the same pipe, and during heavy rainfall the capacity in parts of the sewerage system can be exceeded resulting in localised sewer flooding. To ensure

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							<p>the additional development flows do not increase flood risk, it is envisaged that some localised sewer capacity improvements will be required to provide additional capacity to coincide with development construction. In addition to localised capacity improvements, further strategic capacity improvements will be required at Lammascote sewage pumping station, which pumps the majority of sewage flows from the north, west and city centre direct to Brancote sewage treatment works. Severn Trent have advised that</p>

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							whilst there is some limited capacity at Lammascote there will need to be more extensive sewerage capacity improvements to accommodate medium to long term development. More detailed hydraulic sewer modelling is currently on going to identify the scope of sewerage improvement work to meet the new housing development being allocated across Stafford.'
PS 67 Severn Trent Water – waste water	Para 8.19	M55	Yes	Yes			Amend text to read as follows: 'An important consideration in terms of new residential development at Stone will be the

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							<p>potential impact of additional foul water flows on the current sewerage system. During times of heavy rainfall the capacity in parts of the sewerage system can be exceeded resulting in localised sewer flooding. Depending on the location of development addition sewerage capacity may be required to reduce flood risk. New development to the west of Stone will drain via an existing sewage pumping station at Westbridge Park where capacity assessments will be required to determine whether capacity are required. Any capacity improvements will</p>

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							need to coincide with development construction.'
PS 68 Severn Trent Water – waste water	Para 8.25		Yes	Yes		No change	
PS 69 Severn Trent Water – waste water	Para 13.12	M101	Yes	Yes			Amend text to read as follows: 'Waste Water - Sewerage capacity improvements will be required to accommodate development in all three SDLs in Stafford. Severn Trent has already allocated funding to pay for these capacity improvements with timing of improvement work to be phased to coincide with development phasing. Investment

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							<p>is already underway at Brancote sewerage treatment works to accommodate development in Stafford. Subject to more detailed hydraulic modelling waste water capacity improvements are not envisaged to accommodate the proposed level of development in Stone, however should this be required a lead in time of 2-3 years may be required depending on the extend of the required improvements. All capacity improvements will be funded by Severn Trent Water.'</p>

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PS 70 Severn Trent Water – waste water	Para 13.24	M106	Yes	Yes		<p>The table indicates that £0.9m will need to be spent across Stafford. Initial estimates indicate that in total £5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependent on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lammascote sewage pumping station.</p> <p>More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.</p>	Amend table to read '£5.2m' and delete '£0.9m'

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PS 71 Severn Trent Water – waste water	Appendix D	M116	Yes	Yes		<p><b>Stafford Town North Infrastructure Requirements</b></p> <p>Notional modelling indicates that sewerage capacity improvements will be required to accommodate the additional foul flows from sites to the north of Stafford. Initial estimates indicate that in total £5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependent on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lamascote sewage pumping station.</p> <p>More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.</p>	Amend table to read 'Notional modelling indicate sewerage ...' and '£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.' Delete '£300,000 (tbc)'.

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PS 72 Severn Trent Water – waste water	Appendix D	M119	Yes	Yes		<p><b>Stafford Town West Infrastructure Requirements</b></p> <p>Notional modelling indicates that sewerage capacity improvements will be required to accommodate the additional foul flows from sites to the north of Stafford. Initial estimates indicate that in total £5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependent on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lamascote sewage pumping station.</p> <p>More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.</p>	Amend table to read 'Notional modelling indicate sewerage capacity improvements will be required to accommodate additional foul flows from sites at West Stafford.' and '£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.' Delete 'TBC'.

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PS 73 Severn Trent Water – waste water	Appendix D	M121	Yes	Yes		<p><b>Stafford Town East Infrastructure Requirements</b></p> <p>Notional modelling indicates that sewerage capacity improvements will be required to accommodate the additional foul flows from sites to the north of Stafford. Initial estimates indicate that in total £5.2m of sewerage capacity improvements will be required across to accommodate the SDLs in Stafford. This funding has been allocated within the investment programme to timing of this expenditure will be dependent on when, where and at the rate of development in each of the three SDLs. Work is also planned to provide strategic capacity for the north and west SDLs by undertaking capacity improvements at Lamascote sewage pumping station.</p> <p>More detailed hydraulic modelling will be undertaken as and when development sites come forward through the planning process. As funding has been set aside by Severn Trent to accommodate development capacity need and further work is required to determine the final split across each SDL it is not appropriate to break this funding down to each specific development area.</p>	Amend table to read 'Notional modelling indicate sewerage capacity improvements will be required to accommodate additional foul flows from sites at East Stafford.' and '£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.' Delete 'TBC'.

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PS 74 Severn Trent Water – waste water	Appendix D	M123	Yes	Yes		<p><b>Stone Town West and South Infrastructure Requirements</b></p> <p>The proposed housing development to the west of Stone lies within the sewerage catchment that drains to an existing sewage pumping station at Westbridge Park. Severn Trent have indicated that whilst more detailed hydraulic modelling will be required to assess sewerage capacity, the additional foul only flows from 500 dwellings is not expected to have significant impact on sewer capacity. Should modelling indicate additional capacity is required then this will be funded by Severn Trent and planned to coincide with development phasing.</p> <p>Capacity issues are not envisaged with the proposed employment site due to the proximity to the sewage treatment works.</p>	Amend table to read 'Notional modelling indicate additional flows from housing is not expected to have significant impact on sewer capacity with foul flows draining to an existing sewage pumping station at Westbridge Park. Capacity issues are not envisaged with the new employment area due to the proximity of the sewage treatment works. and '£5.2m identified for all SDLs at Stafford and Stone. Investment allocated when new development is delivered.' Delete 'TBC'.

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PS 75 Mr Lufton	Para 6.28		Yes	Yes		Supports development at Eccleshall but consider constraints to the north, north west and west in terms of flood plain, access and historic landscape features.  Whilst development to the east of Eccleshall is to of high sensitivity, this is not a constraint.	
PS 76 The Coal Authority	The Plan For Stafford Borough - Publication		Yes	Yes		A very small area of Stafford has been subjected to coal mining which will have left a legacy. Within Stafford Borough, the legacy issues are not extensive; for example there are only three recorded mine entries within the Borough. The Plan does not raise any fundamental issues associated with the interests of The Coal Authority.	
PS 77 Staffordshire Housing Association	Policy C1		Yes	Yes		The wording "New housing must provide an appropriate mix of dwelling types, tenures and sizes including a proportion of affordable housing" needs qualifying further to avoid conflict when developers offer certain types of affordable housing (house types) that do not reflect the overall mix of house types on the overall site. The document needs to be more specific about housing types. The wording should say that the % of 1 and 2 bed apartments, and 1, 2 3 and 4 bed houses should reflect the property type mix across	Add the following text to the policy: 'The Mix of Affordable Housing <b>Property Types</b> will reflect the % of property types across the whole of the development site and are to be approved by the council'

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						<p>the whole site.</p> <p>The document should also be more specific about the level of tenure types required for the affordable housing i.e. What % of intermediate properties and what% level of affordable rented units as well as more detailed definition of what types of products are classed as intermediate. For Example, Discount Market (75% of entry level Market Value), Shared Ownership, Shared Equity</p>	<p>'The Mix of Affordable <b>Tenure Types</b> will reflect the following (75% Social/Affordable Rent Units 25% Intermediate Units) and are to be approved by the council'</p> <p>'Open market units - means those dwellings to be constructed on the site pursuant to the planning permission for sale on the open market but excluding Affordable dwellings'</p> <p>'Social / affordable rented units - means those affordable dwellings which will be owned and managed by a Registered Provider and which will be let</p>

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							<p>on a social or affordable rent only basis.'</p> <p>'Intermediate Housing Units - Means those Affordable dwellings which are not social/affordable rented units and which will be provided at a price below the market value through one or more of the following:-</p> <ul style="list-style-type: none"> <li>• Shared Ownership Units</li> <li>• Shared Equity Units</li> <li>• Discount Market Units (75% of entry level Market Value).' </li></ul>
PS 78 Staffordshire	Policy C2		Yes	Yes			

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Housing Association							
PS79 Broad Eye Windmill	Policy Stafford 1 – Stafford Town		Yes	Yes		Question why there is no mention of the Mill in Stafford, which is a well visual landmark in the town.	
PS 80 Action Parkside	Policy Stafford 2 – North Stafford		Yes	No	Effective	Raises issues of impact on highways, access to housing and employment from Beaconside and the A34.	
PS 81 Keep Westbridge Park Green	Policy Stone 1 – Stone Town		Yes	No	Justified; Effective; Consistent with national policy	<p>Provision of mixed use development at Westbridge Park is not explained, justified by the evidence base or illustrated on the proposals map.</p> <p>There are conflicting messages in the document regarding whether retail is required in Stone or not.</p> <p>This change will make the Plan sound because it removes imprecision and ambiguity. The deletion of the allocation of undefined land within the designated green infrastructure for undefined development for which there is no stated justification will make</p>	The words "including the provision of mixed use development at Westbridge Park" should be deleted from Policy STONE 1.

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						the Plan compliant with national guidance.	
PS 82 Keep Westbridge Park Green	Para 5.2	M17	Yes	No	Justified; Effective; Consistent with national policy	Para 5.2, point 17 - Key Objectives - Stone  Question the justification for mixed use development at Stone. The objective should focus on green infrastructure and the River Trent.	Key objective 17 should be reworded to:  "... Stone as a centre for retail, leisure, canal <b>and river</b> based and community facilities.
PS 83 Keep Westbridge Park Green	Policy E8		Yes	No	Justified; Effective; Consistent with national policy	Policy E8 is inconsistent with the National Planning Policy Framework relating to town centres which requires a 'town centres first'.	The second para of Policy E8 amended to read:  "Town centre uses shall be required to locate in town centres and permission for edge of centre and out of centre retail development will only be granted on the basis of a sequential approach to site selection that demonstrates that

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							there are no sequentially preferable sites that are suitable, available and deliverable".
PS 84 Trustees of Stone Common Plot	Policy Stone 1 – Stone Town		Yes	Yes		Raises concern about the effect of development on the town and states recreation land off Old Road could be under increased pressure.	
PS 85 J Glover	Policy N3		Yes	No	Justified	Proposals for wind turbines in the Plan are excessive and not justified.	
PS 86 Mr N Bostock	Policy Stafford 4 – Land East Of Stafford	M44	Yes	No	Positively prepared	Concerned that the additional traffic generated by development will result in traffic grid-lock and an increased risk of accidents.  No housing development east of Stafford until the road is built with other sites used as alternatives.	Build a new road across the River Sow.

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PS 87 AMEC on behalf of The National Grid	The Plan For Stafford Borough		Yes	Yes		National Grid owns and operates the local gas distribution network.  Land north of Stafford SDL lies in close proximity to the 21 Audley / Alrewas high pressure gas pipeline and no structures should be built over, under or within the zone of the pipeline.	
PS 88 Mr S Machin	Policy Stafford 4 – Land East Of Stafford		Yes	No	Justified	Concern about loss of natural habitat and farmland regarding land east of Stafford.	Amend site boundary to protect the setting of Beacon Hill.
PS 89 Tetlow King on behalf of South West HARP Planning Consortium	Spatial Principle 2		Yes	No	Justified; Effective	Welcome decision to exclude housing provision for military households and Gypsies and Travellers from the wider housing target.  Concern that 500 dwellings a year will not meet the affordable housing needs of the Borough.	
PS 90 Tetlow King on behalf of South West HARP Planning	Policy C1	M72	Yes	No	Effective	Support the Council's policy to encourage a variety of dwelling types and sizes.	Amend the 2 <sup>nd</sup> bullet point to read as follows: '... the final mix will be determined in line with <b>local needs</b> ,

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Consortium							Government policy...'
PS 91 Tetlow King on behalf of South West HARP Planning Consortium	Policy C2		Yes	Yes		Support a higher affordable housing target in the most viable areas of Stafford Borough.	
PS 92 Tetlow King on behalf of South West HARP Planning Consortium	Policy C3	M73	Yes	Yes		Support the Council's policy to encourage the development of a range of specialist housing, including extra care accommodation, to meet the varied local needs across the borough.  Concerned that point b) of this policy is too restrictive and will prevent extra facilities coming forward.	Amend bullet point b. to read as follows: 'Ensuring any new developments are located in <b>or adjoining</b> a settlement within the settlement hierarchy...'
PS 93 Tetlow King on behalf of South West HARP Planning Consortium	Policy C5		Yes	No	Consistent with National Policy	We are concerned that this policy does not take into account the potential development of affordable housing via cross-subsidy on rural exception sites, methods which are supported in the NPPF.	Amend bullet point b to read as follows: "b. The site delivers either 100% affordable housing (defined as social rented, affordable rented and

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							<p>intermediate housing) in perpetuity (there is no right to Buy or Right to Acquire on rented properties and that shared ownership sales and re-sales are capped at 80%) or over 50% affordable housing on a cross-subsidised scheme (see description below)</p> <p>Where no public grant for affordable housing is available, the Council will consider affordable housing schemes cross-subsidised by general market housing. The general market aspect of the scheme should not exceed 50% of the total dwellings</p>

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							proposed and the whole scheme will be subject to an open-book viability assessment.
PS 94 The Theatres Trust	Policy C7		Yes	No	Effective; Consistent with national policy	<p>We do not support the document as there are some inconsistencies regarding the protection of the Borough's community facilities. There is no policy for all community facilities.</p> <p>The wording of the policy would only require minor tweaking to ensure all community facilities were included throughout the Borough to harmonize with the NPPF.</p>	<p>Policy C7 amended to include all the Borough's community facilities and that the description of community facilities be transferred from para.9.32 to para.11.22.</p> <p>The title should change to Social, Recreational, Cultural and Community Facilities (or similar) to reflect para.11.22.</p>

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PS 95 The Theatres Trust	Para 11.22	M67	Yes	No	Effective; Consistent with national policy	<p>Para 11.22 refers to social and cultural facilities which comprise more than just sport and recreation - cultural facilities also include libraries, museums, cinema and theatre which are not dealt with in this policy.</p> <p>The wording of the policy would only require minor tweaking to ensure all community facilities were included throughout the Borough to harmonize with the NPPF.</p>	<p>Policy C7 amended to include all the Borough's community facilities and that the description of community facilities be transferred from para.9.32 to para.11.22.</p> <p>The title should change to Social, Recreational, Cultural and Community Facilities (or similar) to reflect para.11.22.</p> <p>We suggest that the description for community facilities at para.9.32 is updated to "health and wellbeing" to reflect item 17 of the NPPF.</p>

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PS 96 The Theatres Trust	Policy E8		Yes	No	Effective; Consistent with national policy	<p>Policy E8 concerns Centres and the accompanying text includes an excellent description (which could be updated) for the term "community facilities" at para.9.32, but this term is not used in the actual policy.</p> <p>For clarity, the items in the policy are numbered for ease of reference, and that the para "Support will be given to proposals ....." on page 83 includes the term "community facilities". This policy only covers facilities in centres, not elsewhere, therefore is not consistent with NPPF items 70 and 156.</p>	Policy E8 numbered and that the para "Support will be given to proposals ....." on page 83 includes the term "community facilities".
PS 97 Mrs M Minshull – repeated PS570	The Plan For Stafford Borough		Yes	Yes		Representation presents a site in Gnosall to be considered in the Plan for housing development.	
PS 98 Lingreen Properties Limited	The Plan For Stafford Borough		Yes	Yes		Supports the document with conserving the Green Belt boundary and attracting new businesses.	

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PS 99 Mr I Moss	Policy Stafford 3 – West Of Stafford		Yes	No	Positively prepared; Justified; Effective	<p>Concern that the land west of Stafford does not relate to the setting of Stafford Castle, proximity to the M6 and lack of information.</p> <p>Consideration should be given to altering the alignment of the Western bypass.</p>	
PS 100 Mr P Windmill	Para 6.51, 6.53 And 6.54		Yes	No	Positively prepared; Effective; Justified; Consistent with national policy	<p>The methodology to calculate the requirement for new allocations of land for new housing is considered to be so fundamentally flawed as to make the plan unsound as windfall sites are not taken in consideration.</p> <p>Question whether the strategy will achieve sustainable development due to the dominance of greenfield development. Allowance should be made in the plan for the continuation of the completion of homes on "Windfall" sites.</p>	<p>Delete paras 6.51, 6.53 and 6.54.</p> <p>Insert a windfall assumption into the Plan (instead of the existing Para 6.51)</p> <p>The "residual requirement" for new allocations to replace the table in Para 6.54 could be along the following lines:-</p> <p><b>Requirements</b></p> <p><b>For new housing in the whole of Stafford Borough =</b></p>

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							<p><b>10,000</b> (30% for locally generated demand and 70% for in-migration - see the Development Strategy section of the Plan)</p> <p><b>Completions</b></p> <p><b>2011 - 2012 = 425</b> (See Land for New Homes 2012)</p> <p><b>Potential</b></p> <p><b>" Windfall" completions expressed as a range from A) 6517 to B) 5130</b></p> <p>A) a continuation of the average for the last 15 years' (19 years x 343) B) a reducing the annual average</p>

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							<p>completion rate over the plan period from 340 to 200 (19 years x 270)</p> <p><b>Residual requirement to be met by site specific housing allocations A) 3058 to B) 4445</b></p> <p><b>Potential new housing for military personnel 400</b></p>
PS101 Mr P Windmill	<p>Policy Stafford</p> <p>2 Policy Stafford</p> <p>3 Policy Stafford</p> <p>4 Policy Stone 2</p> <p>Policy C7</p> <p>Policy Stone 1</p>		Yes	No	<p>Justified;</p> <p>Effective;</p> <p>Consistent with national policy</p>	<p>Object to scale of housing growth on Strategic Development Locations (SDLs) with lack of evidence to demonstrate infrastructure delivery and viability. Concern about affordable housing delivery and off-site road infrastructure delivered. Greater emphasis on brownfield land and reduced greenfield development should occur due to uncertainty. Support master planning prior to applications submitted on SDLs. Lack of information – Community Infrastructure Levy. Support for new development at Stone. Apply post 2021 phasing approach to Stafford and Stone. Apply a maximum figure per SDL with</p>	

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						housing numbers – market & affordable, density, open space, community. Concern about loss of playing fields. Concern about mixed use development at Westbridge Park and conflict with NPPF para 74.	
PS102 Mr P Windmill	Policy C6		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Lack of site provision for gypsies and travellers to meet objectively assessed need. New sites to be identified at Strategic Development Locations.	
PS103 Mr P Windmill	Plan For Stafford Borough		Yes	No	Consistent with national policy	The Plan should make reference to High Speed 2 and the proposed route through Stafford Borough due to landscape impact and infrastructure.	Add HS2 route to Key Diagram and add a para in the Spatial Portrait section.
PS104 Sport England	Policy Stafford 1		Yes	Yes		Support the vision and key objectives as well as Spatial Principle 7. Policy Stafford 1 questioned on new infrastructure funding, location of provision, new grass pitches, implement local standards. Policy Stone 1 to refer to sports halls and swimming pools. Link new facilities to impact on future education provision.	Clarify new provision linked to infrastructure and local standards. Identify strategic network.

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PS105 Sport England	Policy Stone 1		Yes	Yes		Support new sport infrastructure provision. Query new Artificial Grass Pitch only at Stone, located at school sites.	Refer to Sports Facility Calculator Identify new provision with management cost
PS106 Sport England	Para 8.9	M52	Yes	Yes		Amend housing allocation boundary on Stone key diagram from Manor Hill Primary School	Amend boundary to exclude playing field
PS107 Sport England	Policy C7	M77 & M78	Yes	No	Consistent with national policy	Support the policy but must comply with updated study and including all new types of sports facilities. Identify new locations and network properly maintained with off site contributions.	Identify specific proposals, study policy update with NPPF para 74.
PS108 Sport England	Para 11.22		Yes	Yes		Welcome opportunity to allocate open space through Neighbourhood Plans but support a strategic approach for site provision including multi-pitches to be identified in the new Local Plan	Identify multi-pitch provision and allocate site
PS109 Sport England	Para 11.23		Yes	Yes		Local standards to be provided alongside multi-sports strategic framework.	Allocate strategic multi-pitch hubs
PS110 Sport England	Policy I1		Yes	No	Positively prepared; Justified; Effective;	Update Infrastructure Delivery Plan policy to reflect all of sports facilities identified including the updated sports strategy.	Update the Infrastructure Delivery Plan policy

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					Consistent with national policy		
PS111 Sport England	Para 13.24		Yes	No	Consistent with national policy	Include reference to major sports facilities	Include reference to major sports facilities
PS112 Sport England	Appendix A	M111	Yes	Yes		Update Appendix A with the new sports strategy replacing PPG17 Assessment 2009	Update Appendix A with the new sports strategy.
PS113 Sport England	Appendix D		Yes	No	Consistent with national policy	Appendix D to include all recreation provision including new pools, multi-use sports halls, playing fields.	Update Appendix D with all new recreation provision
PS114 Sport England	Appendix G	M125	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Appendix G to include all recreation provision including new pools, multi-use sports halls, playing fields.	Update Appendix G with all new recreation provision
PS115 Miss S Moulton	Spatial Vision & Key Objective		Yes	Yes		Land at Audmore, Gnosall being proposed for new development.	None stated

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PS116 C Hyland	Spatial Principle 3		Yes	Yes		Support Eccleshall identified as a Key Service Village with continued protection for green space and small scale housing.	None stated.
PS117 Barratt Homes (trading as BDW Trading) Ltd	Para 3.13		Yes	Yes		Support for delivery of Neighbourhood Plans or a Sites & Allocations document to deliver the new strategy and development.	None stated
PS118 Trine Developments	Whole Plan		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to the housing provision set at 500 per year as an under-estimate of need in Stafford town. Figure should be increased to 550 per year in line with RSS Phase 2 Panel Report plus MOD housing.	Increase housing provision to 550 per year plus 500 for MOD housing, gypsies and 8 hectares for employment.
PS119 Barratt Homes (trading as BDW Trading) Ltd	Policy Stafford 1		Yes	No	Effective	Object to majority of housing development at three strategic locations in Stafford making the strategy ineffective due to education and highway limitations.	None stated.
PS120 Mr T Kelt	Para 5.2		Yes	No	Positively prepared; Justified; Effective.	A new health centre is referred to for Stone but not shown in Stone policies	Remove key objective 14.

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PS121 Mr T Kelt	Policy Stone 1		Yes	No	Justified; Effective.	Lack of justification for new mixed use development at Westbridge Park, Stone and no clarification about area to be used.	Remove reference to development at Westbridge Park
PS122 Mr T Kelt	Para 8.13	M54	Yes	No	Justified; Effective.	Object to WYG evidence of current over-trading in Stone with no need for a new supermarket.	Remove additional retail need for Stone
PS123 Mr T Kelt	Para 8.13	M54	Yes	No	Positively prepared; Effective	Inconsistent statements about scale of comparison retail space for Stone and the Borough.	Remove comparison floorspace reference in Policy Stone 1 and para 8.13
PS124 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 4.1		Yes	Yes		Support the key issues identified with new housing required to meet the population's needs including affordable housing through the strategy proposed.	None suggested
PS125 J Ross Developments	Para 2.5	M2	Yes	No	Effective	Rewrite to provide clarification on the proportion of housing stock being vacant	Delete last sentence of para 2.5
PS126 Lufton & Assoc's for Barratt	Para 5.1		Yes	Yes		Support key objectives 21, 22 & 25 to deliver market and affordable housing in Key Service Villages	None suggested.

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Homes (trading as BDW Trading) Ltd							
PS127 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Spatial Principle 1		Yes	Yes		Support the delivery of housing provision, affordable housing and economic prosperity in line with Government policy	None stated.
PS128 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Spatial Principle 2		Yes	Yes		Support housing provision of 500 per year as a minimum.	None stated.
PS129 J Ross Developments	Para 2.19	M5 – M7	Yes	No	Effective	Use up-to-date 2011 Census figures to justify the Plan's market assumptions	Use 2011 Census figures
PS130 J Ross Developments	Para 2.24		Yes	Yes		Delete para 2.24 except for the first sentence. This is a plan not a tourist guide.	Delete para 2.24 except for the first sentence

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PS131 J Ross Developments	Para 3.1		Yes	No	Justified; Effective; Consistent with national policy	Welcome retention of the West Midlands Regional Spatial Strategy (WMRSS) approach but this should be clearly explained in the Plan.	Fully explain the post WMRSS position.
PS132 J Ross Developments	Para 3.8		Yes	No	Justified.	Explain the post WMRSS housing market position.	Explain housing need within the housing market.
PS133 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Spatial Principle 3		Yes	No	Positively prepared; Justified.	Support for Eccleshall as a Key Service Village to be provided with a greater proportion of new development compared to other Key Service Villages due to extent of services and facilities available.	Amend Spatial Principle 3 to identify Eccleshall and Gnosall above other Key Service Villages
PS134 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 6.28		Yes	No	Positively prepared; Justified.	Support for Eccleshall as a Key Service Village to be provided with a greater proportion of new development compared to other Key Service Villages due to extent of services and facilities available.	None stated.
PS135 Lufton & Assoc's for	Para 6.41		Yes	No	Positively prepared;	Object to scale of new housing provision at Stafford on three strategic locations due to	None stated.

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Barratt Homes (trading as BDW Trading) Ltd					Justified; Effective.	lack of past delivery rates, infrastructure viability concerns and ineffective strategy.	
PS136 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 6.49		Yes	No	Positively prepared; Justified; Effective	Concern about a development moratorium being required due to lack of housing delivery at Stafford through strategic locations. Robust monitoring required with further information about infrastructure.	None stated.
PS137 J Ross Developments	Para 3.10		Yes	No	Justified	Object to substantial additional development being restricted north of Stafford with impact on price, not demand due to North Staffordshire urban regeneration initiatives. Support new development at Stone.	Delete reference to North Staffordshire housing market preventing Stone development.
PS138 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 6.52		Yes	No	Justified	Strategic Housing Local Availability Assessment is out of date regarding information from development industry.	None stated.

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PS139 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Spatial Principle 7		Yes	Yes		Support Spatial Principle 7	None stated.
PS140 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Policy Stafford 1		Yes	No	Positively prepared; Justified; Effective	Object to substantial new housing being delivered through three strategic locations at Stafford, not the optimal strategy with risk of infrastructure and viability issues. Lack of information on new transport / road infrastructure delivery and funding.	None stated.
PS141 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Policy Stafford 2		Yes	No	Positively prepared; Justified; Effective	Concern about scale of new development at land north of Stafford with lack of evidence on viability, delivery of transport infrastructure, poor integration with adjoining areas, biodiversity, impact on open countryside and HS2 proposed line.	Reduce north of Stafford allocation to 1,500 new homes with mitigation for HS2 route and biodiversity.
PS142 Lufton & Assoc's for Barratt	Policy Stafford 3		Yes	No	Positively prepared; Justified.	Concern about delivery & funding of Stafford Western Access Improvement with lack of support for wider transport strategy. Land	Amend policy for phasing after 2021.

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Homes (trading as BDW Trading) Ltd						west of Stafford phased to after 2021.	
PS143 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Policy E4		Yes	Yes		Support Policy E4.	None stated.
PS144 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Policy C2		Yes	No	Justified	Object to level of affordable housing provision being unviable and concern about economic viability requirement. Cross subsidy of market to affordable housing reduce overall housing delivery.	Reduce affordable housing targets.
PS145 Lufton & Assoc's for Barratt	Para 6.28		Yes	Yes		Support for new development east of Eccleshall not being constrained by higher sensitivity to the historic landscape.	None stated.

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Homes (trading as BDW Trading) Ltd						Reference to Staffordshire County Council's Historic Environment Character Assessment.	
PS146 J Ross Developments	Para 3.15		Yes	Yes	Justified	Support Stafford as a Growth Point linked to post West Midlands Regional Spatial Strategy approach and housing market.	More explanation of Growth Point
PS147 Creswell Parish Council	Whole Plan		Yes	No	Positively prepared; Justified; Effective	Concern about lack of transport infrastructure provision for Strategic Development Locations at Stafford, lack of detailed master plans provided including a new perimeter road north of Stafford, insufficient plan-led approach, concern about increased traffic congestion, lack of progress to deliver development south of Stafford, employment provision at A34 with lack of transport infrastructure, pressure on Beaconside Road, out-dated Infrastructure Delivery Plan approach of 2,000 new houses not 3,000. Concern about limited extent of Phase 1 Eastern Distributor Road, pressure on the existing road network through Stafford town centre. Lack of delivering the plan's vision and key infrastructure requirements. Traffic congestion pressures on Creswell Grove due to new employment development at Raleigh Hall and Ladfordfields Industrial Estates. Up-	A Delivery Strategy is required along with the new Local Plan as well as detailed master plans.

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						front delivery of new infrastructure to avoid future congestion and pressure on services in Stafford. Lack of evidence to show viability and justification for the scale of new development at Stafford.	
PS148 South Staffordshire Council	Para 3.12, Policy N6, Duty To Co-Operate	M10	Yes	No	Positively prepared; Justified.	Support land south of Stafford not identified for new development; Further clarification and commitment to a new Regional Logistics Site through joint study; Support Cannock Chase Special Area of Conservation criteria for new development Supportive relationship between the two authorities for Duty to Co-operate.	Revised wording provided for clarification on new Regional Logistics Sites.
PS149 Peacock & Smith for WM Morrison Supermarkets Plc	Policy Stone 1					Primary Shopping Area for Stone to be amended to include the Morrison's store as a defined area where retail development is concentrated. Amend Stone town centre boundary to include the whole car park area.	Amend Primary Shopping Area and Town Centre boundaries for Stone
PS150 Creswell Parish Council						Concern about lack of transport infrastructure provision for Strategic Development Locations at Stafford, lack of detailed master plans provided including a new perimeter road north of Stafford, insufficient plan-led approach, concern about increased traffic	None stated.

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						congestion, lack of progress to deliver development south of Stafford, employment provision at A34 with lack of transport infrastructure, pressure on Beaconside Road, out-dated Infrastructure Delivery Plan approach of 2,000 new houses not 3,000. Concern about limited extent of Phase 1 Eastern Distributor Road, pressure on the existing road network through Stafford town centre. Lack of delivering the plan's vision and key infrastructure requirements. Traffic congestion pressures on Creswell Grove due to new employment development at Raleigh Hall and Ladfordfields Industrial Estates. Up-front delivery of new infrastructure to avoid future congestion and pressure on services in Stafford. Lack of evidence to show viability and justification for the scale of new development at Stafford.	
PS151 Creswell Parish Council	Para 1.1		Yes	No	Effective	Lack of detail for highway infrastructure to support new development north of Beaconside with uncertainty about deliverability and effectiveness.	None stated
PS152 Creswell Parish	Para 1.2		Yes	No	Consistent with national	Ineffective vision and place-making objectives, inconsistent with National Planning Policy Framework requirements due	Area master plan to define highway infrastructure

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Council					policy	to lack of transport infrastructure.	
PS153 Creswell Parish Council	Para 1.3		Yes	No	Effective;	Lack of detailed strategy to deliver the vision and development strategy	Include further detail on the strategy and delivery
PS154 Creswell Parish Council	Para 2.25		Yes	No	Justified	Concern about new highway infrastructure north of Stafford impacting on open countryside and lack of detailed information about the proposal	Further information about highway proposal
PS155 Creswell Parish Council	Para 3.3		Yes	No	Effective; Justified	Concern about impact on new development and increased population on the existing road network and congestion.	Detailed highway infrastructure strategy for area.
PS156 Creswell Parish Council	Para 3.5		Yes	No	Effective; Justified	Plan fails to meet requirements for new infrastructure, accessible services due to congestion and increased pollution.	Include more defined policies.
PS157 Creswell Parish Council	Para 3.12		Yes	No	Effective; Justified	Concern about lack of agreement to deliver the Eastern Distributor Road to Junction 13 of M6 motorway.	None stated.

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PS158 Creswell Parish Council	Para 3.13		Yes	No	Effective;	Creswell Parish Council is prevented from producing a Neighbourhood Plan due to the north of Stafford Strategic Development Location.	None stated.
PS159 Creswell Parish Council	Para 3.15	M27	Yes	No	Effective;	Concern about lack of Eastern Distributor Road and impact on Stafford town centre and its new developments from traffic congestion arising from incidents on the M6 motorway.	New Local Plan to include a policy to deliver the Eastern Distributor Road.
PS160 Creswell Parish Council	Para 3.16	M27	Yes	No	Effective	Concern about lack of Eastern Distributor Road and impact on Stafford town centre and it's new developments from traffic congestion arising from incidents on the M6 motorway.	New Local Plan to include a policy to deliver the Eastern Distributor Road.
PS161 Creswell Parish Council	Para 3.17	M27	Yes	No	Effective; Justified	Concern about lack of Eastern Distributor Road and impact on Stafford town centre and it's new developments from traffic congestion arising from incidents on the M6 motorway.	New Local Plan to include a policy to deliver the Eastern Distributor Road.
PS162 Creswell Parish Council	Para 3.20		Yes	No	Effective	Concern about new development increasing congestion with no confidence of new highway infrastructure delivered through the new Local Plan.	Improve traffic movements in Stafford.
PS163 Creswell Parish	Para 5.1		Yes	No	Effective	Concern that the spatial vision is non-deliverable due to lack of new infrastructure provision.	The new Local Plan to include a deliverable, timely

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Council							outcome
PS164 Creswell Parish Council	Spatial Principle 1		Yes	No	Effective; Consistent with national policy	Support the wording but concern about lack of reality to deliver provision due to developers leading preparation of Area Master Plans so not plan-led but minimal.	A defined strategic delivery plan for the area.
PS165 Creswell Parish Council	Para 6.23		Yes	No	Effective; Justified; Consistent with national policy	Support the wording of Spatial Principle 7 but concern about lack of detail within the new Local Plan leading to increased congestion and lack of transport infrastructure, as witnessed previously.	A pro-active new Local Plan to deliver new infrastructure.
PS166 Creswell Parish Council	Para 6.64		Yes	No	Effective; Justified	Support the wording of Spatial Principle 7 but concern about lack of detail within the new Local Plan leading to increased congestion and lack of transport infrastructure, as witnessed previously.	Evidence of a pro-active new Local Plan to deliver new infrastructure.
PS167 Creswell Parish Council	Policy Stafford 1		Yes	No	Effective; Justified	Concern about lack of clarity on the Northern Access Improvement Scheme, limited transport enhancements along Beaconside and lack of certainty for the Eastern Distributor Road. Non-existent master plan for land north of Stafford and details on new highway infrastructure, lack of public	Evidence of an integrated transport strategy for Stafford town.

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						transport provision and ineffective link through phase 1 of the Eastern Distributor Road.	
PS168 J Ross Developments	Para 4.1		Yes	No	Effective	Support delivery of new specialist accommodation for the elderly consolidated with services and facilities in order to free up existing housing for families, to be identified with new sites. Important to safeguard retail and service provision in existing centres including larger villages.	Further information on meeting these challenges.
PS169 Creswell Parish Council	Para 7.36	M27	Yes	No	Effective; Justified	Concern about limited extent of Phase 1 Eastern Distributor Road not overcoming traffic capacity issues in the local area.	None stated.
PS170 Creswell Parish Council	Para 9.16		Yes	No	Effective; Justified	Concern about increased traffic movement from new development at Raleigh Hall and Ladfordfields employment areas impacting on Creswell Grove and residential amenity	Consideration of traffic impacts on rural communities
PS171 Creswell Parish Council	Para 10.5		Yes	No	Effective; Justified	Support the local transport network to enable local residents to access services but concerned about lack of detail for new developments at Stafford leading to more congestion and lack of detailed strategy to deliver new transport infrastructure.	A detailed strategy for transport is required.

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PS172 Creswell Parish Council	Policy I1		Yes	No	Justified	Concern about inaccurate evidence in the Infrastructure Delivery Plan assessing new development for 2,000 new houses north of Stafford rather than 3,000 in transport infrastructure terms impacting on Stafford.	Provide an up-to-date publicly consulted upon infrastructure delivery plan.
PS173 Creswell Parish Council	Para 13.3		Yes	No	Positively prepared; Effective; Justified	Concern about inaccurate evidence in the Infrastructure Delivery Plan assessing new development for 2,000 new houses north of Stafford rather than 3,000	None stated.
PS174 Creswell Parish Council	Para 13.21		Yes	No	Effective; Justified	Concern about inaccurate evidence in the Infrastructure Delivery Plan assessing new development for 2,000 new houses north of Stafford rather than 3,000	None stated.
PS175 A G & H Barnett & Son	Policy Stone 1 / Policy Stone 2			No	Justified; Effective	Object to the single strategic housing location at Stone with additional locations required east of Stone. Bridging the railway line is not an overriding constraint, nor electricity provision or delivery.	Identify land east of Stone for development and amend Policies.
PS176 Hilderstone Parish Council	Para 12.22		Yes	No	Justified	Concern about provision of renewable energy sources, implications of wind power and effect on the rural environment.	Further consultation required on wind power proposals.
PS177 J Ross Developments	Para 5.1		Yes	Yes		Support the vision except for reference to local needs because Eccleshall can provide development for rural hinterlands beyond	Amend reference to local need related to Key Service Villages.

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						immediate local requirement due to services and facilities.	
PS178 J Ross Developments	Para 5.2		Yes	Yes		Support Key Objectives 21, 22, 24 & 25.	None stated.
PS179 Cannock Chase AONB Partnership	Policy N7	M98	Yes	No	Consistent with national policy	Support Policy N7 but concern about the focus on habitat rather than including landscape. Policy and text wording amended to reflect landscape aspects.	Amend policy and text wording as set out in rep.
PS180 Mr R Hine / Sustainability Matters	Whole Plan	M49	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy.	<p>Concern about lack of targets for carbon reduction and environmental protection, inconsistent with Government policy and monitoring approach. Level of growth is unjustified for a local derived plan and inconsistent with sustainable development to be defined in the Plan. Object to scale of growth at Stafford town due to impact on sustainable development. Windfall development to be included in housing calculations with 30% - 70% need split.</p> <p>Policy Stone 1 to include living over the shop encouragement to reduce vacancy.</p> <p>Support settlement boundaries with strategy defining release of greenfield land after brownfield land is delivered inside and</p>	<p>None stated</p> <p>Amend Policy Stone 1.</p> <p>None stated</p>

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						<p>outside boundaries. Support Policy N1 and conversion design approach.</p> <p>Economic development through a mix of sites but challenge to level of provision at 160 hectares over the Plan period.</p> <p>Town centres to be supported provided historic environment is protected with out of town locations to be avoided in line with Government policy sequential approach.</p> <p>Carbon reduction to be specified in Spatial Principle 1. Para 12.14 to refer to 2008 Climate Change Act with 50% target. Further explanation of achieving renewable energy targets in the Plan. Support Code of Sustainable Homes, SUDS and BREEAM standards.</p> <p>On-site renewable energy to be required on Strategic Development Locations including District heating systems.</p> <p>Target for household recycling rates and new development to maximise walking &amp; cycling provision.</p> <p>Support Policy N4 but query monitoring</p>	<p>None stated</p> <p>None stated</p> <p>Include reference to 2008 Climate Change Act.</p> <p>Amend Strategic Development Location policies.</p> <p>Include targets</p> <p>Include targets and</p>

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						<p>linked to delivery of green infrastructure. Policy N5 to refer to appropriate assessment whilst policy for SSSI's goes further than Government policy.</p> <p>Support landscape policies and Policy N1 but include reference to tranquillity. Support historic policy and Borough area.</p> <p>Green Belt supported with Government policy to be included in the Plan. Support new amenity improvements but effective deliverability to be demonstrated including for allotments.</p> <p>Support Policy T1 to cover urban and rural areas subject to nature of sites with target. Concern about new road schemes for Stafford leading to greater car use. Car parking to be restricted and increase Stafford railway station improvements. Support more walking and cycling routes.</p> <p>Support Policy E6 but amend reference to sustainable tourism opportunities to avoid less accessible rural locations. Policy E7 to include nature conservation interests for marinas and moorings.</p>	<p>amend SSSI reference in policy</p> <p>Include tranquillity maps</p> <p>None stated</p> <p>Include reference to rural locations for sustainable transport</p> <p>Add reference to sustainable tourism.</p>

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		M59				<p>Policy E2 to have greater emphasis on local food production and agriculture with protection of agricultural land.</p> <p>Provision of new infrastructure is crucial for new development delivery but concerned about significant expenditure and funding required leading to Section 106, CIL and viability issues. Concern that social infrastructure will not be provided.</p>	<p>Add text to protect quality agricultural land.</p> <p>None stated.</p>
PS181 Ms A Holland	Para 3.5		Yes	No	Justified; Consistent with national policy	Concern about surface water run-off and flooding to be addressed by new developments, particularly in Key Service Villages. Severn Trent Water to manage strategic waste water infrastructure.	Evidence base to mitigate for climate change and updated flood maps.
PS182 Cannock Chase AONB Partnership	Policy N6		Yes	No	Consistent with national policy	Support Policy N6 but concern about development being directed to other areas of the Area of Outstanding Natural Beauty.	Amend policy text to add a new criteria.
PS183 Ms A Holland	Para 12.19		Yes	No	Justified; Consistent with national policy	Object to wind farm allocated sites in the new Local Plan at Gnosall Heath and impact on the countryside with preference for use of the canal network.	Amend section following updated evidence base.

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PS184 Ms A Holland	Para 12.19		Yes	No	Justified; Consistent with national policy	New development to deliver solar panels and electricity generation through policy.	Further evidence on energy generation, wind power and solar.
PS185 Ms A Holland	Para 6.61		Yes	No	Justified; Consistent with national policy	Maintain the existing settlement boundaries to avoid land abuses.	Re-instate the settlement boundaries.
PS186 TF Planning	Policy Stafford 1, Policy Stafford 4, Policy T1 & T2, Policies Map	M27 & M69	No	No	Positively prepared, Justified, Effective, Consistent with national policy	Object to the Eastern Distributor Road being included on the Policies Map but only referenced at para 10.5 with no policy reference and no justification for the protected route. There is no supporting evidence to prove deliverability of the Eastern Distributor Road, no consultation or engagement with Parish Council or local communities contrary to the Statement of Community Involvement. Object to Phase 1 of the Eastern Distributor Road linking to the southern route across floodplain areas.	Delete all references in the Plan to the Eastern Distributor Road, amend the policy and policies map for land east of Stafford to refer to an estate distributor road and delete the protected route from the policies map.
PS187 Creswell Parish Council	Whole Plan		Yes	No	Positively prepared; Justified; Effective	Concern about uploading representation.	None stated.

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PS188 Stan Robinson (Stafford) Ltd	Policy E3		Yes	Yes	None given	Support Policy E3 to deliver sustainable economic development in rural areas.	None stated.
PS189 Stan Robinson (Stafford) Ltd	Policy E4	M63	Yes	No	Effective	Support Policy E4 with amended criteria (i) to emphasis mitigation of impacts, criteria (v) regarding the transport strategy, criteria (vii) related to water supply issues, add the words 'if necessary' to criteria (viii), (ix), (x) and (xi).	Amend criteria (i), (v), (viii), (ix), (x) and (xi) as stated in representation.
PS190 Paul Sharpe Associates for Fradley Estates	Policy Stone 2		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Promoting land east of Stone and objecting to Policy Stone 2 for a single Strategic Development Location west of Stone together with a limit of 500 new houses post 2021 based on protecting the North Staffordshire urban regeneration initiatives. Growth in the housing market at the strongest part of the Borough should be encouraged to deliver market and affordable housing. Limited housing at Stone is contrary to sustainable development and Government policy. Housing west of Stone is poorly integrated and impacts on the Green Belt whilst 100 houses east of Stone would benefit from existing infrastructure including highways and has limited nature conservation value. Evidence demonstrates crossing the West Coast mainline is not a constraint for this reasonable alternative site.	Amend Policy Stone 2 to increase above 500 housing provision and include 100 new houses on land east of Stone

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PS191 Paul Sharpe Associates for Fradley Estates	Para 8.24		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to new housing development at Stone restricted by infrastructure and North Staffordshire urban regeneration initiatives as well as the housing allocation west of Stone. Housing to be provided across a range of sites including land east of Stone. Object to development delayed until after 2021 as growth needed now, with lack of Council evidence regarding historic house buildings rates.	Land east of Stone to be allocated for 100 new houses.
PS192 Paul Sharpe Associates for Fradley Estates			Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to new housing development being restricted in Stone due to impact on delivery of new affordable housing. Challenge the evidence that 30% affordable housing is deliverable across Stafford Borough.	None stated.
PS193 Paul Sharpe Associates for Fradley Estates	Spatial Principle 7		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to the distribution of housing to Key Service Villages, which should be reduced as this exceeds the proportion of 8% at Stone as the second settlement in the hierarchy. Object to the criteria based policy for delivering new development rather than site allocations. Less sustainable in transport terms but the new policy is more liberal in releasing housing outside of Stone. Increase	None stated.

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						housing numbers across the area to be realistic.	
PS194 Paul Sharpe Associates for Fradley Estates	Spatial Principle 4		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to housing provision distribution and annual delivery rates proposed. Further growth potential at Stone to be delivered as not effected by Green Belt. Growth Point status includes new housing development at Stone with investment. No evidence of adverse impacts on urban regeneration initiatives and post 2021 phasing in opposition to sustainable development. Challenge the strategy delivery approach with increased levels at Stone compared to Stafford and villages.	Amend the proportions of the development strategy – Stafford 72%, Stone 17%, Key Service Villages 6% and rural areas 5%.
PS195 Paul Sharpe Associates for Fradley Estates	Spatial Principle 3		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	No objection to the Sustainable Settlement Hierarchy but object to the proportion of new development within the hierarchy leading to less sustainable development which is inconsistent with Government policy. Historically housing delivery in rural areas has been too high.	None stated.
PS196 Paul Sharpe Associates for Fradley	Spatial Principle 2		Yes	No	Positively prepared; Justified; Effective;	Object to the level of new housing provision at 500 per year which is set deliberately low to minimise pressures. This approach is inconsistent with Government policy and the	Amend housing target to 600 – 700 new houses per year.

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Estates					Consistent with national policy	Growth Point as well as lacking an evidence base.	
PS197 Creswell Parish Council	Policy Stafford 2		Yes	No	Positively prepared; Justified; Effective;	Concern about failure to load main response onto the e-consultation system.	None stated.
PS198 Lufton & Assoc's for Wassall family	Para 3.14		Yes	Yes	None given	Support neighbourhood planning and Site Allocations Plans if neighbourhood plans not delivered through Parish Councils.	None stated.
PS199 Lufton & Assoc's for Wassall family	Para 4.1		Yes	Yes	None given	Support key issues & challenges to deliver new housing through new supply. Support spatial distribution and housing at Key Service Villages.	None stated.
PS 200 Mrs A Crane	Policy Stafford 4 – East Of Stafford	M44				Objects to development east of Stafford due to loss of greenfields, wildlife, biodiversity and the openness associated with agricultural land as well as increased flooding. Although the entire Eastern Distributor Road is necessary there is limited evidence to indicate that it is deliverable. Concern about traffic implications and lack of public	None Stated

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						transport. Concern that the actual number of new houses to be built is 6,300 rather than 5,500 and there is no site identified for Ministry of Defence housing.	
PS201- Mr J Heal	Policy Stone 1 Town Centre			No	Positively prepared; Justified; Effective; Consistent with national Policy	<p>Objects to the inclusion of a mixed use scheme at Westbridge Park.</p> <p>Suggests that the inclusion of a supermarket on part of the site will reduce the available space for the food and drinks festival by about 30% resulting in a substantial reduction in the capacity to hold outdoor events.</p> <p>The addition of a large car park as part of the development will exacerbate the risk of flooding.</p> <p>There is no evidence of need for an additional supermarket in the town, which will take trade away from existing shops in the town centre.</p> <p>There should be no scope for selling park land and building a supermarket. Concern about Council's approach to the public.</p> <p>All information on the risks of flooding in the flood plain at Westbridge Park should be made available before any sort of new</p>	

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						development is allowed.	
PS202 – Blank Representation							
PS203 – J Ross Developments	Para 3.11		No	No	Justified Effective Consistent with national Policy	Concern that there is insufficient clarity regarding key cross boundary issues being addressed following the RSS abolition and how the plan needs to be changed to reflect this.	Update para 3.11 to provide clarity on the cross border issues and RSS abolition
PS204 - A new leisure centre for Westbridge Park	Policy Stone 1 Town Centre		Yes	Yes		Support the provision of a mixed use allocation at Westbridge Park to provide for improved leisure facilities. A medical practice could be part of the mixed-use scheme. The rapid growth of Stone will also need to expanded educational facilities.	
PS205 - Strutt and Parker for Harrowby Estates	Para 3.14		Yes	Yes		Support	
PS206 - Strutt and Parker for Harrowby Estates	Para 5.1		Yes	Yes		Provide for local needs in the Borough's villages should not just relate to the provision of affordable housing. Smaller villages with good facilities should be allowed to grow if suitable sites exist.	

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PS207- Strutt and Parker for Harrowby Estates	Para 5.2		Yes	Yes		Key objective 21 should include all villages in the Borough, not just key service villages. This is particularly the case with the village of Sandon.	Include all villages in Key objective 21
PS208 - Strutt and Parker for Harrowby Estates	Spatial Principle 6 (SP6)		Yes	Yes	N/A	Rural sustainability includes re-use of agricultural buildings and new buildings to provide rural employment opportunities.	
PS209 - Strutt and Parker for Harrowby Estates	Policy E1		Yes	Yes	N/A	The recognition of the need for transport links to provide rural employment is welcomed and supported.	
PS210 National Federation of Gypsy Liaison Groups	Para 3.5		Yes	No	Consistent with National Policy	The plan fails to acknowledge national Planning Policy for Traveller Sites.	Include reference to Planning Policy for Traveller Sites
PS211 National Federation of Gypsy Liaison Groups	Policy C5	M79	Yes	No	Effective; Justified; Consistent with National Policy	Residential development is a term which includes residential caravans and thus Gypsy and Traveller pitches. It is unreasonable to apply this policy to such sites as it would be contrary to National guidance.	Make clear this policy does not apply to Traveller sites

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PS212 National Federation of Gypsy Liaison Groups	Policy T1	M68	Yes	No	Justified	Requirement (b) is not justified. Some developments clearly do not need Transport Assessments or Travel Plans. This requirement should only apply to developments generating significant levels of traffic.	Add the words "generating significant levels of traffic" after "developments" in para (b)
PS213 National Federation of Gypsy Liaison Groups	Policy C6	M113	Yes	Yes	N/A	This policy is supported but criteria g is inappropriate for a Traveller site	Remove criteria g from the policy
PS214 National Federation of Gypsy Liaison Groups	Policy N2		Yes	No	Justified; Effective	It would be unreasonable to apply the "sustainable construction" requirements to residential caravans. This would make provision for Gypsies and Travellers virtually impossible.	Apply the "sustainable construction" requirements only to build housing development
PS215 National Federation of Gypsy Liaison Groups	Policy N6		Yes	No	Justified; Effective	It is wholly unrealistic to set a 12 mile limit. No development over 1 mile can have any impact	
PS216 National Federation of	Policy N8		Yes	No	Justified; Effective; Consistent	It is unrealistic to apply the requirement set out in the final para to Gypsy sites. This would virtually prevent any Gypsy and	Apply the final; para only to "New buildings", not to

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Gypsy Liaison Groups					with national policy	Traveller site provision	"New development"
PS217 Lufton & Associates for Wassall family	Para 5.2		Yes	Yes	N/A	The key objectives 21, 22 & 25 are supported. In relation to key objective 25 the recognition that the provision of open market and affordable housing in the Key Service Villages in supporting viable, sustainable and prosperous rural communities is supported.	None Stated
PS218 Lufton & Associates for Wassall family	Spatial Principle 1 (SP1)		Yes	Yes	None Stated	Support National Planning Policy Framework and the presumption in favour of sustainable development.  The New Homes Bonus, 106 agreements and/or CIL will be an important contributor to local government finance to provide for community facilities.  The planning system should ensure that there is an adequate supply of good and deliverable sites for new residential development to provide for new homes.	None Stated
PS219 Lufton & Associates for Wassall family	Spatial Principle 3 (SP3)		Yes	Yes	None Stated	The principle of the Settlement of the Settlement Hierarchy to provide balanced housing and employment growth is supported.  The recognition of Great Haywood as a Key	None Stated

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						Service Village is welcomed. It has excellent services and facilities, and together with Little Haywood provides a choice of services and facilities.	
PS220 Lufton & Associates for Wassall family	Para 6.31					<p>The recognition of Great Haywood as a Key Service Village is welcomed. It has excellent services and facilities, and together with Little Haywood provides a choice of services and facilities. Therefore it would be suitable for a housing allocation to the north of the village in terms of accessibility, sustainability and planning criteria.</p> <p>Any development allocation north of the village could also assist with potential physical and landscape mitigation for the planned HS2 rail alignment to the benefit of the wider community.</p>	None Stated
PS221 Lufton & Associates for Wassall family	Para 6.41		Yes	Yes	Not Stated	<p>The over reliance on housing in Stafford Town has resulted in lower levels of affordable housing provision in Stafford Town.</p> <p>The reliance on three Strategic Sites in Stafford Town risks the delivery of housing, particularly in relation to transport and education provision together with concerns about viability not demonstrated.</p>	None Stated

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PS222 Lufton & Associates for Wassall family	Spatial Principle 7 (SP7)		Yes	Yes	Not Stated	The principles outlined are supported.	None Stated
PS223 Lufton & Associates for Wassall family	Policy Stafford 1 Stafford Town		Yes	No	Justified; Effective	<p>The strategy for housing is too focused on Stafford Town. The evidence base and in particular the Sustainability Appraisal and the Habitats Regulation Assessment does not demonstrate that focusing major development in only three main locations is the optimal strategy in terms of key regeneration, sustainability and planning objectives.</p> <p>There is a significant risk to the delivery of housing with reliance on these limited strategic locations particularly in relation to mitigating the impact on the highway network and providing funding for adequate education facilities.</p> <p>There is limited information to demonstrate that funding and delivery mechanisms for the Western Access Improvement Scheme or the Eastern Access Improvement Scheme are secure.</p> <p>It is further noted that the traffic modelling for the North of Stafford has been predicated on</p>	None Stated

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						an allocation of 2,000 dwellings and not 3,100 dwellings as now proposed.	
PS224 Lufton & Associates for Wassall family	Policy Stafford 2 - North Of Stafford		Yes	No	Positively prepared; Justified; Effective	There is no clear evidence that the allocation north of Stafford is viable. The access and transport strategy for the site is not clearly defined; the employment at Redhill will be poorly integrated into the Town. Land south of Marstongate Farm should be protected for green infrastructure. The allocation should be reduced to 1500 – 2000 houses and incorporate mitigation measures to reflect the biological importance of the site and wider linkages.	Reduce the scale the development to 1,500 to 2,000 dwellings and incorporate mitigation measures to limit the impact of the HS2 proposed line.
PS225 Lufton & Associates for Wassall family	Policy Stafford 3 -West Of Stafford		Yes	No	Positively prepared; Justified; Effective	Lack of supporting evidence to demonstrate that the Western Access Improvement Scheme is deliverable. Phase 1 of the Western Access Improvement Scheme has limited wider benefits other than access to the land west of Stafford. Allocations deliver later in the Plan period.	
PS226 Lufton & Associates for Wassall family	Para 7.28		Yes	No	Positively prepared; Justified; Effective	There is no clear evidence that the allocation north of Stafford is viable. The access and transport strategy for the site is not clearly defined, the employment at Redhill will be poorly integrated into the	Reduce the scale the development to 1,500 to 2,000 dwellings and incorporate mitigation

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						Town. Land south of Marstongate Farm should be protected for green infrastructure. The allocation should be reduced to 1500 – 2000 houses and incorporate mitigation measures to reflect the biological importance of the site and wider linkages.	measures to limit the impact of the HS2 proposed line.
PS 227 Fulford Parish Council	Policy Stone 1, Stone Town		Yes	No	Justified	There is no need for a further large retail outlet in Stone.  There is a need for increased and better sports facilities in Stone and the surrounding areas, including Fulford parish but this is not to be delivered through 'mixed use development' on Westbridge Park.	Remove the wording 'including provision of mixed use development at Westbridge Park'.
PS228 J Ross Developments	Para 6.3		Yes	Yes		Welcomes the positive approach set out in Para 6.3	None Stated
PS229 Inland Waterways Association, Lichfield Branch	Policy E7		Yes	No	Justified; Effective; Consistent with National Policy	Object to the inclusion of criteria h restricting permanent moorings along the canal network	Amend criteria h to read: 'There are a limited number of permanent moorings for residential purposes, appropriate to the location.'

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PS230 Gratton Planning Services Ltd on behalf of H & H Holman Properties Ltd	Policy C3 Para 6.27 Para 6.64 Para 11.14	M73	Yes	No	Positively Prepared	<p>Clause b in Policy C3 is too restrictive as it is unlikely that suitable sites would be found in Key Service Villages (KSVs), such as Eccleshall, to accommodate a viable extra care scheme.</p> <p>Para 6.27 to give greater clarity should be provided to specify whether the SHLAA has sufficient land available to accommodate specialist housing for older people.</p> <p>Para 6.64 should state that the settlement boundaries for KSV should be based on up to date information and the needs of the various types of development envisaged.</p> <p>Para 11.14 should be amended to take account of the amended wording of clause by inserting “and immediately adjoining” in the second sentence between the words “within” and “settlements”</p>	<p>Amend criteria clause b. of Policy C3 to read “b. Ensuring that any new developments are located in or adjoining a settlement within the settlement hierarchy.....”</p> <p>Amend para 6.27 to state that the SHLAA may not provide definitive evidence regarding the suitability of potential development sites.</p> <p>Amend para 6.64 to confirm that when settlement boundaries are established proper account will be taken of needs of specialist housing for older people.</p>

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							Amend para 11.14 by insertion of the words “and adjoining” in the second sentence.
PS231 J Ross Developments	Para 6.4		Yes	No	Justified; Effective	Express concerns regarding deliverability of 500 dwellings per annum given under delivery in the past. Spatial Principle 1 should be made more flexible to make up for the low completions early in the plan period.	Expand para 6.4 to provide more detail on how targets are to be met over the Plan period and how past poor delivery addressed.
PS232 Seddon Homes	Policy SP2		No	No	Justified; Effective; Positively Prepared; Consistent with National Policy	The Plan should be providing more than 10,000 houses to meet the needs for both market and affordable housing. Provision to be made for smaller sites such as that adjacent to Aston Bank Farm, Doxey to come forward in advance of large strategic sites. The strategy for Stafford Town is insufficiently flexible to adapt to the market and will lead to continued under-delivery of homes.	Amend the Plan to be more flexible enabling smaller sites to be delivered.
PS233 J Ross Developments	Para 6.11		Yes	No	Justified	The 2011 Census shows that population is significantly greater than 2010 Mid Year estimates. Therefore additional provision to meet the needs of surrounding areas should be included by flexibility for population increases.	

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PS234 J Ross Developments	Para 6.12		Yes	No	Justified	Further information about where 70% in-migration is generated from and evidence of how new development will undermine the 'fragile' North Staffordshire housing market. Clarify age profile and whether it brings disproportionate demands in terms of schools, transportation etc...	Provide further information in the Plan text.
PS235 Woodland Trust	Policy Stafford 2 North Of Stafford		Yes	No	Positively prepared; Justified; Effective	The following wording should be added to Policies relating to new Strategic Development Locations: "Ensuring that development does not damage the integrity of the Cannock Chase Special Area of Conservation (SAC), nature conservation interests and Local Nature Reserves, as detailed in Policies N4 - N6'.	
PS236 Moreton Developments Ltd	Para 6.25		Yes	Yes	None stated	Support for use of 'third tier' of sustainable villages for future market housing.	None stated
PS237 Woodland Trust	Policy N4		Yes	No	Consistent with national policy	Suggest that Policy N4 is not consistent with national policy as it does not support creation of semi-natural habitats like native woodland or the expansion of native woodland	Amend criteria c. to read 'Protecting, conserving, enhancing AND EXPANDING the natural and historic Environment...'

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PS238 Woodland Trust	Policy N5		Yes	Yes	None stated	Support Policy N5	None stated
PS239 Woodland Trust	Para 13.24		Yes	No	Positively prepared; Justified; Effective	Critical infrastructure should state that woodland is a component of Green Infrastructure to be consistent with policies N4 and N5.	Amend Green Infrastructure notes set out in table to read- 'Includes open space; NATIVE WOODLAND; SANGs and Flood alleviation'
PS240 Moreton Developments Ltd	Para 6.30		Yes	Yes	None stated	Hixon should have greater levels of housing development than other Key Service Villages as it would have greater sustainability benefits through reducing the levels of workers needing to travel in to the village from elsewhere.	Allocate housing development to Hixon.
PS241 Moreton Developments Ltd	Para 6.40		Yes	Yes	None stated	Support that incursions into Green Belt are not justified	None stated
PS242 J Ross Developments	Para 6.28		Yes	Yes	None stated	Eccleshall has a large number of services for a small population and should therefore be a location for new development, supported by increased spending capacity.	Include reference to Eccleshall's growth potential.

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PS243 - Taylor Wimpey UK Ltd (Interests at Stone)	Spatial Principle 2 (SP2)	M102	No	No	Positively prepared; Justified; Effective; Consistent with national policy	<p>Council failing to meet full objectively assessed housing need as set out in the RSS Phase II Panel report and fails to address the accumulated shortfall since 2006 whilst not having a 5 year housing land supply. A 20% buffer should be applied due to a history under delivery.</p> <p>Update para 13.22 to take account of the most recent information on the 5-year land supply and address lack of cross boundary consultation with other authorities to plan for addressing housing provision.</p> <p>The Council must demonstrate further that they have positively embraced the requirements of statute in respect of the Duty to Cooperate.</p>	<p>Include further justification of housing provision and historic shortfalls evidence to be addressed as well as requirements from 2006.</p> <p>Recognise the absence of a 5 year land supply and plan for greater provision earlier in the plan through allocations.</p> <p>Para 13.22 should be updated take account of the most recent information on the 5-year land supply.</p>
PS244 J Ross Developments	Para 6.37		Yes	Yes	None Stated	Highlights that there are no major physical constraints on the delivery of new development at Key Service Villages.	None Stated
PS245 Taylor Wimpey UK Ltd (Interests	Spatial Principle 4 (SP4)		Not Stated	No	Positively prepared; Justified;	There should be greater growth in the town of Stone, as it is the second largest settlement in the borough, in order to promote delivery	Amend housing distribution to make more provision at

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at Stone)					Effective; Consistent with national policy	and significantly boost supply, particularly in the early years of the plan.  Supports the increased growth for Stafford Town but questions whether the actual quantum of development is deliverable.	Stone and reduce level at Stafford town.
PS246 Taylor Wimpey UK Ltd (Interests at Stone)	Spatial Principle 7 (SP7)		Not Stated	No	Positively prepared; Justified; Effective; Consistent with national policy	Support provision of Settlement Boundaries but concern about boundary for Stone not been fully assessed or evidence to justify their extent. The boundary must have regard to the same criteria used for the other settlements.  The boundary for Stone must include sufficient scope for the proposed scale of development in the Plan for housing, employment and other uses commensurate with its principal role.  Highlight that their site TW 1 could be incorporated into a modified Stone settlement boundary.	Amend the Settlement Boundary for Stone to include land shown in Plan TW1.
PS247 J Ross Developments	Spatial Principle 4 (SP4)		Yes	No	Justified; Effective	Questions why 8% of growth distributed to the rest of the rural settlements when these settlements do not form part of the settlement hierarchy. More growth should be located in KSVs	Amend to direct 25% of future growth to the rural areas and at least 20% should be in the Key Service

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							Villages.
PS248 Taylor Wimpey UK Ltd (Interests at Stone)	Policy Stone 2 - West & South Of Stone		Not Stated	No	Positively prepared Justified Effective	Object to the Strategic Development Location at Stone as less appropriate, due to landscape impact and deliverability, than site promoted south of Eccleshall Road.	Amend Stone housing allocation from north to south of Eccleshall Road.
PS249 Taylor Wimpey UK Ltd (Interests at Stone)	Policy Stone 1 Stone Town		Not Stated	No	Positively prepared; Justified; Effective	Suggest that there should be increased housing provision at Stone and that the identification of the SDL will not minimise the impact on the local landscape	Amend Stone housing allocation from north to south of Eccleshall Road.
PS250 Taylor Wimpey UK Ltd (Interests at Stone)	Policy N2		Not Stated	No	Positively prepared Justified Effective	There is no evidence that sets out how the level of environmental standards proposed for most developments are viable.	Include further evidence to demonstrate environmental building standard proposed are viable.
PS251 Taylor Wimpey UK Ltd (Interests at Stone)	Policy I1		Not Stated	No	Positively prepared Justified Effective Consistent with national policy	The evidence supporting implementation and delivery is not robust, and the planned growth and infrastructure and is not deliverable over the plan period.  Concerned about lack of details for the Community Infrastructure Levy (CIL) and therefore not delivering the required level of	Amend policy to be flexible to allow development to proceed where full requirements would make development unviable.

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						<p>funding for infrastructure provision. If CIL is not progressed until after the Plan adoption it will render development unviable due to increased costs.</p> <p>CIL must be further advanced so that the level of funds which can be tested, viably delivered and inputted into the Infrastructure Delivery Plan for new provision.</p> <p>Additional viability evidence is needed for the Strategic Development Locations to ensure the proposals are deliverable and that the scale of infrastructure and policy burdens does not mean viably is threatened.</p>	
PS252 Les Stephan Planning for the Moore Family Trust	The Plan For Stafford Borough - Publication		Not Stated	Not Stated	None Stated	<p>Support the spatial vision and key objectives; the sustainable settlement hierarchy; provision of mixed use communities and the identification of Little Haywood as a Key Service Village. However concern about Spatial Principle SP4 for distribution with a greater quantum of development allocated to rural areas and Key Service Villages. Concern about the use of existing settlement boundaries restricting the distribution of growth needed for each settlement.</p>	None Stated

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PS253 Ingestre with Tixall Parish Council	The Plan For Stafford Borough - Publication		Not Stated	Not Stated	Not Stated	Concerned that additional traffic associated with the Eastern Strategic Development Location will have implications for road networks	None Stated
PS254 Housing Plus	The Plan For Stafford Borough - Publication	M72	Yes	Yes	None Stated	Support the percentage and thresholds of affordable housing, stating that 30% affordable housing is viable and achievable on sites in the Borough. There should be a minimum of 3 habitable rooms within new homes to ensure that smaller homes are fit for the future.	Amend criteria 2 of Policy C1 to read: '... dwelling types on site, with a minimum of three habitable rooms.'
PS255 Hinson Parry on behalf of Trustees of Stafford Common land	The Plan For Stafford Borough - Publication		Not Stated	Not Stated	Not Stated	Proposing land at Stafford Common is exchanged north of Beaconside to avoid being surrounded by new housing development.	Amend the land north of Stafford boundary.
PS256 Hinson Parry on behalf of Mr J Lockley	The Plan For Stafford Borough - Publication		Not Stated	Not Stated	Not Stated	Land north of Stafford boundary amended to include Mr Lockley's land as part of the development and avoid potential conflict with future residents due to agricultural activities.	Amend the land north of Stafford boundary to include land

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PS257 Centro	The Plan For Stafford Borough – Publication		Not Stated	Not Stated	Not Stated	Centro supports the principles of The Plan for Stafford Borough particularly in relation to public transport and cross border provision.	None Stated
PS258 Stone Food and Drink Festival CIC	Policy Stone 1 Stone Town		Yes	No	Positively prepared Justified Effective Consistent with national policy	Object to the provision of mixed use development on Westbridge Park encompassing the entire park with insufficient event space to accommodate festivals whilst the development is not sufficient to fund the new leisure facilities. Concern expressed that the supermarket will have a detrimental effect on the town centre's shops and businesses.	Amend policy to delete the words "including the provision of mixed use development at Westbridge Park"
PS259 Defence Infrastructure Organisation	Para 2.8	M3	Yes	Yes	None Stated	Welcomes recognition of Beaconside Barracks at Stafford.	Insert the words "By 2015/16 the level of personnel...." on second line of para 2.8
PS260 Defence Infrastructure Organisation	Spatial Vision And Key Objectives		Yes	Yes	None Stated	Support Key Objective 1 which acknowledges a need to provide homes for military personnel.	None Stated

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PS261 Defence Infrastructure Organisation	Spatial Principle 2 (SP2)		Yes	Yes	None Stated	The Ministry of Defence (MOD) supports the recognition of the need to provide military housing and welcomes the inclusion of military housing as an additional figure to the general requirement for 500 houses per annum.	None Stated
PS262 Defence Infrastructure Organisation	Spatial Vision And Key Objectives		Yes	Yes	None Stated	The MOD welcomes the fact that the Plan recognises the role of the MOD will have in helping to strengthen and diversify the economy in the spatial vision.	None Stated
PS263 Defence Infrastructure Organisation	Spatial Vision And Key Objectives		Yes	Yes	None Stated	Key Objective 10 The MOD welcomes the recognition that public sector organisations, such as the MOD, will be supported in the Borough.	None Stated
PS264 Defence Infrastructure Organisation	Policy Stafford 1 - Stafford Town		Yes	Yes	None Stated	The MOD welcomes the recognition of the MOD within the policy particularly the inclusion of the requirement to provide Service Family Accommodation units. Support the inclusion for further development of MOD land at Stafford as a military base.	None Stated
PS265 Defence Infrastructure Organisation	Para 7.6		Yes	Yes	None Stated	The MOD supports the statement that it will continue to work in close partnership with the MOD.	None Stated

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PS266 Defence Infrastructure Organisation	Policy E2		Yes	No	Justified	Suggest that the policy should be extended to include existing Ministry of Defence sites to enable operational development to take place without the requirement to justify a countryside location.	Policy to include existing MOD sites to ensure that development required for operational purposes is not restricted due to site location.
PS267 Defence Infrastructure Organisation	Policy E5		Yes	No	Consistent with national policy	Suggest that the policy is more restrictive than the NPPF as it appears to limit infill development in the Green Belt to only the major developed sites set out in Policy E5.	Amend policy to clarify the position of infill in the Green Belt beyond the Major Developed Sites are not under more restriction than the NPPF.
PS268 Defence Infrastructure Organisation	Para 6.13		Yes	Yes	None Stated	Express support for the recognition of separate housing provision for Service Family Accommodation properties.	None Stated
PS269 Raleigh Hall Estates	Para 6.16		Yes	Yes	None Stated	Support the level of employment provision over the plan period and the growth aspirations set out in the Spatial Vision and Key Objectives.	None Stated

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PS270 Raleigh Hall Estates	Policy E1		Yes	Yes	None Stated	Support the provision of adequate employment land supply, including site expansion. Promoting development in rural areas is welcomed, particularly within Recognised Industrial Estates (RIE) such as Raleigh Hall.	None Stated
PS271 Raleigh Hall Estates	Policy E2		Yes	Yes	None Stated	Support development at Raleigh Hall Industrial Estate in the rural area to support economic growth and the creation of jobs.	None Stated
PS272 Raleigh Hall Estates	Policy E4		Yes	Yes	None Stated	Support the identification of Raleigh Hall Industrial Estate as a Recognised Industrial Estate (RIE) suitable for expansion with further work on infrastructure taking place.	None Stated
PS273 Grainger PLC	Spatial Principle 2 (SP2)		Yes	No	Justified; Effective; Consistent with national policy	The provision of 500 new homes per year for the plan period, throughout the Borough, is considered to be insufficient and is not consistent with the West Midlands RSS Phase II Panel Report to meet housing requirements. Further explanation about meeting cross-border housing requirements and Duty to Co-operate.	Amend the plan to set out a minimum target of 550 dwellings per annum.  Identify additional new homes in non Key Service Villages to be distributed throughout the rural area.

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PS274 Grainger PLC	Spatial Principle 3 (SP3)		Yes	No	Justified; Effective; Consistent with national policy	SP3 is unsound as the settlement hierarchy reduces development opportunities in smaller settlements such as Great Bridgeford and Ranton.	Amend SP3 to extend the list of KSV to include more settlements, specifically Great Bridgeford and Ranton, or recognise the roles of other settlements in meeting the Borough's development needs for new housing delivery.
PS275 Grainger PLC	Spatial Principle 4 (SP4)		Yes	No	Justified Effective Consistent with national policy	The distribution of the housing provision set out in the policy does not provide for a sufficient scale and type / tenure of new homes development in the rural areas, given that a large quantum of the existing population is located in the rural areas and there is a large reservoir of SHLAA sites to provide housing growth. There is too much emphasis on Stafford town and the quantum of housing development apportioned is not deliverable. Suggest that the 5-year land supply is deficient and that the blanket 10% discount on existing commitments is not justified.	Amend proposed apportionment of new housing by reducing the percentage for Stafford Town and increasing allocations to the rural area or Key Service Villages if the number and range of KSV identified is to be increased. Provide more details on the

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						Consider that the approach to a moratorium is not justified and will unduly restrict the ability of specific settlements to meet their respective housing needs	5 year housing land supply. Delete para 6.49 referring to a housing moratorium.
PS276 Grainger PLC	Spatial Principle 6 (SP6)		Yes	Yes	None Stated	Support criterion (iii) in SP6 and para 6.60	None Stated
PS277 Grainger PLC	Spatial Principle 7 (SP7)		Yes	No	Effective	There should be consideration of development in settlements not in the settlement hierarchy. The final para of policy needs to recognise whether sites are deliverable or developable.  Where the reusing of previously developed land is to be encouraged (provided it is not of high environmental value ) regard should be had to whether sites are deliverable, and developable.	Reword the final para to recognise greenfield sites may need to be released to meet housing requirements.
PS278 Grainger PLC	Policy Stafford 1 - Stafford Town		Yes	No	Effective	Provide clarification for table 6.54 that 5,560 new homes to Stafford Town, where as Policy Stafford 1 seeks to provide 5,500 new homes.  Provide clarification on whether the provision for Service Family Accommodation is included or is not included in the figures.	Amend the Plan to provide a more dispersed housing strategy and reducing reliance on three strategic sites at Stafford to meet the delivery of 5,500

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						<p>Question whether the Strategy is deliverable for Stafford town as it will take some time for Strategic Development Locations to progress.</p> <p>The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs.</p>	<p> dwellings. If Stafford locations are not deliverable provide greater proportions to rural areas.</p>
PS279 Grainger PLC	Policy Stafford 2 - North Of Stafford		Yes	No	Justified	<p>The context of SP2, SP3 and SP3 should be considered regarding the land north of Stafford.</p> <p>There is no indicative phasing of development to demonstrate regard to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations Suggest that Stafford Town will be unable to deliver the levels of housing over the plan period.</p> <p>The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs.</p>	<p>Amend the Plan to provide a more dispersed housing strategy and reducing reliance on the strategic site north of Stafford to meet the delivery of 3,100 dwellings. If Stafford locations are not deliverable provide greater proportions to rural areas.</p>

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PS280 Grainger PLC	Policy Stafford 3 - West Of Stafford		Yes	No	Justified	<p>The context of SP2, SP3 and SP3 should be considered regarding the land west of Stafford.</p> <p>There is no indicative phasing of development to demonstrate regard to the impact of the current recession on the housing market and the necessary and significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations</p> <p>Suggest that Stafford Town will be unable to deliver the levels of housing over the plan period.</p> <p>The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs.</p>	Amend the Plan to provide a more dispersed housing strategy and reducing reliance on the strategic site west of Stafford to meet the delivery of 2,200 dwellings. If Stafford locations are not deliverable provide greater proportions to rural areas.
PS281 Grainger PLC	Policy Stafford 3 - East Of Stafford		Yes	No	Justified	<p>The context of SP2, SP3 and SP3 should be considered regarding the land east of Stafford.</p> <p>There is no indicative phasing of development to demonstrate regard to the impact of the current recession on the housing market and the necessary and</p>	Amend the Plan to provide a more dispersed housing strategy and reducing reliance on the strategic site west of Stafford to meet the delivery of

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						<p>significant amount of new infrastructure which is required to support the significant number of new homes proposed in the strategic development locations</p> <p>Suggest that Stafford Town will be unable to deliver the levels of housing over the plan period.</p> <p>The strategy should have regard to genuinely deliverable and developable sites to meet the full and objectively assessed needs.</p>	2,200 dwellings. If Stafford locations are not deliverable provide greater proportions to rural areas.
PS282 Grainger PLC	Policy E2		Yes	No	Consistent with national policy	Criteria iv is inconsistent with national policy as it will not allow each settlement to provide for its objectively assessed needs where the settlement is not identified as a Key Service Village (KSV).	Criterion (iv) should be deleted.
PS283 Grainger PLC			Yes	No	Justified	The distribution of new housing set out in SP4 will not facilitate the provision of rural housing and will consequently not support the provision of affordable housing in rural communities.	Amend policy to allow market housing in the rural areas, outside of the settlements identified by (SP3), which would facilitate the provision of significant additional affordable housing to

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							meet local needs.
PS284 Grainger PLC	Policy C5		Yes	No	Consistent with national policy	<p>The policy does not recognise the ability of settlements not included in the sustainable hierarchy to provide additional housing development and is unduly restrictive.</p> <p>Some market housing should be allowed where this would facilitate the provision of significant additional affordable housing to meet local needs.</p>	Delete criterion 1 which requires a sequential approach to development, and amend the policy text to allow housing development in other rural settlements.
PS285 Mr G & C Leese	Policy C5		Not Stated	No	Justified	<p>Objects to limiting the size of extensions to 70% of the original dwelling size and considers that Policy C5 part C (ii) is unnecessary, as Policy N1 design is adequate to deal with design issues.</p> <p>Extensions or alterations are design matters perfectly well coverable by N1. Form is more objectively and reasonably dealt with in sub criteria 'g' and 'h'.</p>	<p>Amend Policy C5 to deal with new development and replacement dwellings only.</p> <p>In Policy N1 remove the words "at a minimum" and replace it with "where material".</p> <p>Alternatively keep the wording in Policy C5 criteria c but in the second line end at the word "should" and delete remainder</p>

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							before sub criterion (ii) to read ".... be appropriate in design and appearance to the type and character of the existing dwelling and the surrounding area".
PS286 Mr G & C Leese	Policy E2		Not Stated	No	Justified Effective	<p>Policies E2, E3, E4 and all other policies which may be said to contribute to reasoning on the rural economy and land use are unsound.</p> <p>Clarity should be provided in Policy E2 whether the list of things to be encouraged and listed, is meant to be exclusive.</p>	<p>Amend policy wording to replace the words "land and buildings" with "land already in / last in economic use"</p> <p>Policy E2 first para should end "encouraging the following non-exclusive list of uses. These are some preferred options but no brownfield site will be left without a genuinely beneficial use."</p>

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							In Policy E2 sub criterion 'x' to become "in exceptional circumstances, development will be allowed on Greenfield sites to help ...." There should then be a 'xi', "where no other reasonable and beneficial use can be found for a Brownfield site then housing, including Park Homes or similar, will be considered".
PS287 Mr G & C Leese	Policy C5		Not Stated	No	Justified Effective	The policy must include provision for the recycling of brownfield sites for viable uses. No use should be implicitly or explicitly ruled out and - specifically - recycling the site for housing should be included as a possibility if it is shown that future economic use is not practicable.	Amend policy to provide less restriction on the brownfield development.

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						<p>The policy is far too prescriptive to cover all circumstances and should be generally reworded to be positive and say that such schemes can come forward, rather than demanding that every proposal meet all those criteria.</p> <p>It would be better that C5 be reserved for applying to Greenfield applications. The recycling of Brownfields to save pressure on Greenfields elsewhere is a sustainable aim.</p>	
PS288 J Ross Developments	Para 6.49		Yes	Yes	None Stated	Moratoriums should be used with great care and only after the reasons why the development strategy has become unbalanced are clearly understood following extensive consultation with developers and land owners.	None Stated
PS289 Mr G & C Leese	Policy E1		Not Stated	No	Justified Effective	The Plan must include provision for the recycling of their brownfield site to a viable use and such sites beyond existing boundaries. No use should be implicitly or explicitly ruled out and - specifically - recycling the site for housing should be included as a possibility if it is shown that future economic use is not practicable	<p>Amend criteria (f) line 2 to read "re-using existing buildings and brownfield land" and remove the words "in or adjacent to villages"</p> <p>The Policy should end with the words</p>

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							"similar principles will be applied to the important need to recycle Brownfield sites beyond Settlement Limits and it will be ensured that no Brownfield land is left without a reasonably beneficial use."
PS290 Mr D Bowers	Para 2.22		Not Stated	No	Not Stated	The portrait does not adequately deal with the wider Stone town area and the southern edge of the town. Promoting land next to Aston-by-Stone for retail development.	Para 2.23 should say "derived, inter alia, from the ..."  Insert the following words at para 2.23 : "the south of the town has an inchoate end at present and this Plan continues that with parcels of land given no planned future. Part of the Green Infrastructure area is not in public ownership and the

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							<p>Plan provides no way of influencing its usage. The Plan refers to the potential need for a supermarket after 2015 but ignores and fails to plan for a prime location which has been looked at for that purpose, amongst others. "</p> <p>Alternatively para 2.23 could end "It is equally important to plan properly for the wider settlement and, not least, the southern end of Stone. The opportunity is being taken to work with stakeholders to provide an integrated plan for the use of well-located development land above the flood plain</p>

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							whilst providing Green Infrastructure for the town into the foreseeable future."
PS291 Mr D Bowers	Para 3.3		Not Stated	No	Not Stated	The southern end of Stone is a sustainable area on the edge of Stone and has been excluded from use by an unsound settlement boundary.	The settlement boundary for Stone should be amended.
PS292 J Ross Developments	Policy E8		Yes	Yes	None Stated	Support policy and the inclusion of Eccleshall as Key Service Village within the settlement hierarchy	None stated
PS293 J Ross Developments	Para 11.9		Yes	No	Effective	Question the aims of this para as it is unclear how this is to be delivered in practice.	None stated
PS294 Mr D Bowers	Para 4.1		Not Stated	Not Stated	Not Stated	Refer to suggest changes	Inserted the following wording after the last bullet point "This will mean planned development locations to use town edge land above the flood area and release riverside land to public use. Some retail use will be necessary out of

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							historic shopping zones and this will be located away from valued natural or community assets adjacent to existing road systems”.
PS295 - Mr D Bowers	Para 5.1		Not Stated	Not Stated	Not Stated	The plan should adopt a more positive approach for the four areas of land to the south of Stone Town.	Amend the 3 <sup>rd</sup> heading in the Stone town spatial vision to read as follows “By 2031, the market town of Stone will not have ...”
PS296 - Mr D Bowers	Para 5.2		Not Stated	Not Stated	Not Stated	The objectives set out in para 5.2 cannot be delivered. No site is specified to deliver a new mixed use town centre development.	None Stated
PS297 - Mr D Bowers	Spatial Principle 1 (SP1)		Not Stated	Not Stated		Objects to the inclusion of the existing boundary for Stone	Insert the following in para 3 of SP1 “out of date or the attempted application of detailed policies herein would conflict with sustainable principles”

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							<p>At the end of the first para insert the following "It is recognised in particular that this policy is needed to over-ride others because of the attempt to draw a strict settlement limit at the edge of many places, especially Stone, beyond which town edge land would otherwise be wrongly regarded as deep in the open countryside. This is not realistic. It would be planning negatively and likely to preclude worthwhile proposals being judged on their true merits."</p>

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PS298 - Mr D Bowers	Spatial Principle 2 (SP2)		Not Stated	Not Stated	Not Stated	SP2 nor SP5 should not be unduly prescriptive or used to hold back sustainable development in Stone	Insert the following text at the end of policy SP5 "Nothing in these figures should be used as an argument for holding back any consent which could be issued for otherwise desirable job creating and/or sustainable developments"
PS299 - Mr D Bowers	Policy Stone 2 - West & South Of Stone		Not Stated	Not Stated	Not Stated	The current boundary around Stone is inappropriate as it excludes elements such as the Strategic Development Locations and Employment Locations	The boundary should encompass both sides of the town, its river corridor and go around clients' land.
PS 300 Mr D Bowers	Chapter 8 Stone					Questions the deliverability of new development at Stone town without the use of Bower's land for retail. Westbridge Park is valuable.	
PS 301 Mr D Bowers	Policy E8					Further retail provision is needed at Stone. The Plan should specifically refer to the Bower's land.	

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PS 302 Mr J Baker	Policy Stafford 2 – North Of Stafford		Yes	No	Justified, effective	Concern about land north of Stafford being a significant incursion into the countryside with no clear boundary.  HS2 will be very close to the SDL	Restrict new development allocation to a much smaller area north of Common land and Marston road.
PS 303 Stone Festival (Mr J Sayer)	Policy Stone 1 – Stone Town			No	Effective	Concern about the phrase 'mixed use development' not being precise and leading to other development apart from retail and leisure.  Define the extent of development at 'Westbridge Park' is not defined – either the existing built-on area, or the whole Park including the current green area.	Define the extent of the new development area including physical limits.
PS 304 Mr M Lunn	Spatial Principle 6		Yes	No	Effective, consistent with national policy	The policy does not address rural affordability which is a real problem in the Borough. It fails to identify locations for new development for family housing.	The plan to include a mix of housing types for each settlement to deliver a choice of housing needs.

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PS 305 Mr M Lunn	Spatial Principle 7		Yes	No	Positively prepared, consistent with national policy	The policy does not address rural affordability which is a real problem in the Borough. It fails to identify locations for new development for family housing.	The plan to include a mix of housing types for each settlement to deliver a choice of housing needs.
PS 306 Miss C Scott	The Plan For Stafford Borough - Publication			No	Positively prepared, justified, effective	Concern about new development at land east of Stafford with viability issues for the developer to fund and deliver road improvements and infrastructure to overcome existing congestion.  Concern about impact on existing housing due to topographical levels, pollution, lack of drainage, loss of open spaces.	
PS 307 Mr R Tonge	Para 2.5	M2	No	No	Effective	Provide clarification in terms of 1.5% housing stock empty for more than 6 months.	Amend para
PS 308 Mr R Tonge	Para 3.10		Yes	No	Justified	Concern about housing at Stone leading to out migration and increasing housing prices.	
PS 309 Mr R Tonge	Para 3.11	M9	Yes	No	Effective	The Plan should wait until RSS is abolished and reassess requirements.	
PS 310 Mr R Tonge	Para 4.1		Yes	Yes	Effective	Question how the Plan will make provision for an ageing population	

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PS 311 Mr R Tonge	Para 5.2		Yes	Yes		Support Key Objective 24	
PS 312 My R Tonge	Para 9.11	M61	No	No	Justified	Object to the text pre-empting the Site Allocations DPD or the Parish Plan by considering de-allocation of employment land at Hixon currently within the Recognised Industrial Estate boundary. There is a continuing need for employment.	Remove the statement that land will be de-allocated.
PS 313 My R Tonge	Spatial Principle 2		Yes	No	Justified	Clear linkages required between the amount of housing land, which is based on a growth strategy, and the amount of employment land, which is based on past take-up rates.	The section requires further justification
PS 314 Mr R Tonge	Para 6.30			Yes	Yes	Hixon has major employment provision, a role to be stated in the Plan to be maintained or expanded.	
PS 315 REG Windpower	Policy N3	M1 & M86	Yes	No	Consistent with national policy	Support policy but concern about over-restrictions regarding landscape not being consistent with national policy.  Concern about purpose of the map restricting wind power opportunities to certain areas being misinterpreted.	Amend policy to state that schemes will be approved if impacts can be made acceptable. Amend text for map reference

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PS 316 Mr I Lofthouse on behalf of Inglewood Investment Company	The Plan For Stafford Borough - Publication		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about housing provision based on outdated figures with delivery being unrealistic. Lack of clarity regarding policies linked to 'Green Infrastructure', SANGS implications and environmental infrastructure will impact on viability	Amend policy text to clarify scale of housing provision and delivery.  Provide further information on SANGS and mitigation required.
PS 317 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 2.2		Yes	Yes		Support spatial influences of neighbouring local economic areas although no clear boundaries in reality. Consider there is greater interaction between Stone with the Birmingham City region than North Staffordshire and that development will not undermine regeneration initiatives.	
PS 318 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 2.24		Yes	Yes		Support the recognition of Stone as a focus of retail, commercial activity and employment.	
PS 319 Lufton & Assoc's for Barratt	Para 5.2		Yes	Yes		Support key objectives 13, 15 & 19.	

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Homes (trading as BDW Trading) Ltd							
PS 320 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 6.4		Yes	No	Positively prepared; Justified	The RSS Examination was not conclusive about housing provision for Stafford Borough, with reliance on significant growth at Stafford. No evidence to demonstrate that development at Stone will impact on the North Staffordshire conurbation urban regeneration.	
PS 321 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Spatial Principle 3		Yes	Yes		Welcome recognition of Stone in the settlement hierarchy.	

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PS 322 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 6.24		Yes	No	Positively prepared; Effective; Justified; Consistent with national policy	<p>Welcome recognition of Stone in the settlement hierarchy.</p> <p>It is not accepted that housing development in Stone will have a significant impact on regeneration initiatives in North Staffordshire.</p> <p>Limited development with the villages in the North Staffordshire Green Belt is supported to provide quality housing for executives.</p>	
PS 323 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd			Yes	No	Positively prepared; Effective; Justified; Consistent with national policy	<p>Welcome recognition of Stone in the settlement hierarchy.</p> <p>It is not accepted that housing development in Stone will have a significant impact on regeneration initiatives in North Staffordshire.</p> <p>Limited development with the villages in the North Staffordshire Green Belt is supported to provide quality housing for executives.</p>	

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PS 324 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 6.24		Yes	No	Effective	Evidence base recognises that new development at Stone is relatively unconstrained by physical infrastructure. Implications of HS2 impact are difficult to quantify but alignment to the west is clearly an absolute constraint. There could be impacts on rail services for Stone. Development east of Stone could be delivered in the long-term without the need for a new railway crossing, subject to local highway infrastructure improvements.	
PS 325 Mr I Lofthouse on behalf of Inglewood Investment Company	Chapter 6 – Development Strategy		No	No	Positively prepared; Effective; Justified; Consistent with national policy	Concern that the housing provision is based on outdated figures and delivery is unrealistic. Concern about policy requirements from green infrastructure reducing development viability.	Amend policy text to clarify scale of housing provision and delivery.  Provide further information on SANGS and mitigation required.
PS 326 Mr I Lofthouse on behalf of Inglewood Investment Company	Para 13.24		No	No	Positively prepared; Effective; Justified; Consistent with national policy	Concern about policy requirements from green infrastructure reducing development viability.	Provide further information on SANGS and mitigation required.

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PS 327 Mr I Lofthouse on behalf of Inglewood Investment Company	Para 12.1		No	No	Positively prepared; Effective; Justified; Consistent with national policy	Concern about policy requirements from green infrastructure reducing development viability.	Provide further information on SANGS and mitigation required.
PS 328 Mr T Hutchinson on behalf of Providence Land Limited	Spatial Principle 2		Yes	No	Positively prepared: Justified; Effective; Consistent with national policy	Concern about housing provision of 500 new homes per year due to serious backlog from previous years, not based on up-to-date household projections, projections fails to reflect Stafford town and Growth Point position, fail to deliver affordable housing requirements and meet objectively assessed needs. To meet all these requirements the figure should increase from 10,100 to 11,000 over the Plan period.	Increase the annual rate to at least 550 dwelling per year and encourage higher levels of growth (up to 700 dwellings per year)
PS 329 Mr T Hutchinson on behalf of Providence Land Limited	Para 6.10	M19 – M20	Yes	No	Positively prepared: Justified; Effective; Consistent with national policy	Object to statement that 6 years housing land supply is available when evidence demonstrates it is less than 3 years. The para is not up to date	Provide an up-to-date housing land supply figure and revised SHLAA.

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PS 330 Canal and River Trust	Policy Stone 1		Yes	Yes		Provide more clarity to the wording in the Tourism section at criteria (ii) for "canal-based regeneration initiatives in Stone town centre"	Criteria ii should be made clearer to include an indication of regeneration initiatives and uses.
PS 331 Mr T Hutchinson on behalf of Providence Land Limited	Spatial Principle 4		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	The Key Service Villages should provide a focus on rural housing growth due to national housing, economic, travel to work patterns with a minimum of 20% housing delivery including affordable homes	Amend Spatial Principle to read: “ • Stafford 72% • Stone 8% • Key Service Villages 20%  The Rest of Rural Area should accommodate solely exceptions affordable housing which shall be additional to the annual targets.”

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PS 332 Canal and River Trust	Policy E7		Yes	No	Effective; Justified	Generally support policy but concern about over-restrictions on permanent residential moorings away from settlements as unsound.	Amend criterion (h) to read as follows:  "Away from settlements in the settlement hierarchy, marinas and moorings with limited service facilities will be accepted provided it can be demonstrated that any proposed permanent residential moorings are required specifically in association with the operation of the development or that there are specific circumstances justifying their provision, taking account of the nature, scale and location of the development."

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PS 333 Mr T Hutchinson on behalf of Providence Land Limited	Para 6.50	M23	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	The Strategic Housing Land Availability Assessment is flawed: it does not assess deliverability or developability correctly and includes many sites where ownership is unknown and viability unproven.	Amended SHLAA and cross-refer to the Plan's key findings.
PS 334 Mr T Hutchinson on behalf of Providence Land Limited	Para 6.54		Yes	No	Positively prepared, justified, effective, consistent with national policy	The Key Service Villages provide a vital role in meeting day to day needs of those living in the Stafford countryside and should be the focus of rural housing growth.	The table should show new provision of 1,629 for Key Service Villages to reflect a total requirement of 2,200 (20% of 11,000).
PS335 Mr I Caplan	Para 1.17		Yes	No	Effective, justified, consistent with national policy	Object to limiting new residential moorings away from settlements.	Remove restriction on provision of residential moorings in marinas away from existing settlements.
PS336 Mr I Caplan	Para 1.17		Yes	No	Effective; Justified; Consistent with national policy	Object to the condition limiting the introduction of new residential moorings away from settlements.	Remove restriction on provision of residential moorings in marinas away from existing settlements.

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PS 337 Mr T Hutchinson on behalf of Providence Land Limited	Para 6.55	M23	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Consider the Strategic Housing Land Availability Assessment and the 5 year housing land supply is flawed as it does not assess deliverability or developability correctly and includes many sites where ownership is unknown whilst showing 6 years supply rather than 3 years.	Amended SHLAA and cross-refer to the Plan's key findings.
PS 338 Mr T Hutchinson on behalf of Providence Land Limited	Para 11.8		Yes	No	Positively prepared, justified, effective, consistent with national policy	The level of development would not meet the need for affordable housing, as set out in the updated Strategic Housing Market Assessment (2012).	Increase housing numbers to 700 per year to achieve affordable housing need.
PS339 Homes and Communities Agency	The Plan For Stafford Borough		Yes	Yes		Support 40% affordable housing for Stone, Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor and Yarnfield with 30% for Stafford town and other Borough areas.  Support provision of gypsies and travellers within the Plan.  Support Stafford town policy protecting historic setting and skylines.	Split tenure for the affordable units into rent and home ownership.  Set space standards for 1 bed apartments.

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PS 340 Indigo Planning on behalf of Seddon Homes	The Plan For Stafford Borough		No			<p>Promoting land east of Stone for 34 new homes and other land areas around Stone. Concern that the Plan will not result in a sustainable pattern of development, fails to respond to evidence base.</p> <p>Support the vision and objectives but the housing requirement should be at least 11,000 dwellings due to under supply, RSS evidence base and delivering affordable housing. Stone should receive more than 8% of housing development and object to the housing allocation at Stone as less deliverable than other areas.</p>	
PS 341 Mr R Tonge	Para 6.15		Yes	No	Effective	<p>Consider that employment land development rates across the Borough are erratic with large amounts developed in one location in a short period of time due to B8 uses. A larger employment requirement is necessary to meet needs and types of businesses.</p>	
PS 342 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 8.1		Yes	No	Positively prepared; Justified	<p>Support Stone being identified as a second settlement in the Borough but should be supported with a greater scale of new development and not delayed until 2021.</p>	

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PS 343 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Policy Stone 1 – Stone Town Centre		Yes	No	Positively prepared; Justified	Housing development to Stone is very modest compared to size and role of the town.	
PS 344 Lufton & Assoc's for Barratt Homes (trading as BDW Trading) Ltd	Para 8.2		Yes	No	Justified	Evidence base recognises that new development at Stone is relatively unconstrained by physical infrastructure. Implications of HS2 impact are difficult to quantify but alignment to the west is clearly an absolute constraint. There could be impacts on rail services for Stone. Development east of Stone could be delivered in the long-term without the need for a new railway crossing, subject to local highway infrastructure improvements.	

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PS 345 G Paris	Policy Stafford 4 – East Of Stafford	M44	Yes	No	Justified; Effective	The transport evidence base for the new Plan concludes that the majority of proposed housing in the Plan for Stafford Borough should, for strategic reasons, be to the west and north of the town. Any major development to the East of Stafford would: ' <i>require the provision of the Stafford Eastern Bypass which (would be) an expensive and damaging solution, and based upon the evidence of highway modelling increased levels of congestion would result</i> '. Therefore it is not appropriate to allocate land east of Stafford and question delivery.	Delete the Eastern Distributor Road (EDR) protected line. Identify smaller housing sites for this area of Stafford.
PS 346 Savills on behalf of Taylor Wimpey / Bellway	Spatial Principle 1		Yes	No	Justified; Consistent with national policy	The RSS set higher levels of growth (550 homes a year) from 2006 based on housing need evidence. Stafford Borough has under delivered since 2006. Housing provision to be based on the most up-to-date evidence.	Amend housing provision to meet unmet needs since 2006 and latest evidence
PS 347 Savills behalf of Taylor Wimpey / Bellway	Policy Stafford 1 – Stafford Town		Yes	No	Positively prepared; Justified; Effective	Policy 1 sets out to deliver 5,500 new homes at Stafford. That is not consistent with Spatial Principle 4 which states that 72% (7,200) homes will be delivered at Stafford. Based on the assessment in the Table following para 6.54, amend figure to 5,560 homes at Stafford.	In policy Stafford 1, delete “5,500” and replace with “5,560”

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PS 348 CT Planning on behalf of St Modwen	Para 7.36	M27	Yes	No	Positively prepared; Justified; Effective	Promoting land at Main Road, Milford for residential development. Object to the identification of the Eastern Distributor Road impacting on development of the site with lack of evidence.	
PS 349 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 1 – Stafford Town		Yes	No	Positively prepared; Justified; Effective	Unclear how housing provision for military personnel is included in the Plan with reference to “ <i>up to 400 homes</i> ” for service personnel. Impact on housing market and affordability if not delivered.	<p>Include a justification for level of military personnel housing.</p> <p>Numbering the 1<sup>st</sup> para. under the title Housing “1”</p> <p>Delete “<i>including additional provision for Ministry of Defence personnel</i>” from the end of that para;</p> <p>- deleting criterion v;</p> <p>- insert a new para after criterion iv) which reads: “2 Provide 400 [or the appropriate figure having justified the</p>

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							<i>level of provision] new Service Family Accommodation units to meet the requirements of Ministry of Defence Personnel”</i>
PS 350 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 1 – Stafford Town		Yes	No	Positively prepared; Justified; Effective	Restriction on loss of employment land to other developments should not apply to new allocations, such as land west of Stafford.	Under employment, amend the 2 <sup>nd</sup> proper para to read as follows  <i>“Except where sites are allocated by this plan for alternative uses, development or conversions...”</i>
PS351 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 1 – Stafford Town		Yes	No	Justified; Effective	Concern that small scale employment is not strategic and should not be identified for land west of Stafford due to proximity to the town centre.	Delete strategic employment notation at West Stafford from the key diagram.

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PS352 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford	M117	Yes	No	Justified Effective	Due to close proximity of the new allocation west of Stafford to the town centre any new local employment should be located within the district centre.	<p>Amend iv to read: “opportunities for local employment should be incorporated into the district centre. This could take the form of a mix of local uses/facilities such as the school, retail (A1), food &amp; drink (A3/4/5), small scale offices (A2/B1), care provision.”</p> <p>Add to para 7.29 “Land West of Stafford is well-located close to significant existing employment provision in and close to the town centre. The local plan also provides for significant future employment close to the site through the delivery of 36,000</p>

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							square metres of new retail space and 45,000 square metres of new office in the town centre. This proposed floorspace has the potential, at typical employment densities, to accommodate 5,600 jobs.”
PS353 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford	M40	Yes	No	Justified Effective Consistent with national policy	There is no need to set out requirements for drainage, flood management and surface water within the policy as this is already addressed through national policy. There are no significant flooding issues for land west of Stafford.	Either delete criteria vii or amend to read: “drainage and flood management measures will be implemented to ensure that the development is not at significant risk from flooding and that risk elsewhere is not increased. Sustainable Urban Drainage features should be designed and integrated as

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							part of the network of green infrastructure”
PS354 Mr J Griffiths	Para 2.12		Yes	No	Justified Effective	The role of Staffordshire University should be amended to reflect the consultation on a single site university based at Stoke-on-Trent.	Amend Plan to state current role of the University at Stafford.
PS355 Mr J Griffiths	Policy Stone 1 – Stone Town		Not stated	No	Justified; Effective	<p>Concern that reference to a mixed use development at Westbridge park and its use as a Destination Park with Green Infrastructure are incompatible.</p> <p>Further clarification about the amount of new additional food retailing floorspace required in Stone and over what time periods.</p> <p>Consider that the policy concentrates too much on recreation` activities and does not mention cultural activities such as theatre, performing arts and dance.</p>	Amend policy to specify role of Westbridge Park, the amount of food retailing space required and greater emphasis on cultural activities.
PS356 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Justified; Effective; Consistent with national policy	<p>Consider that criterion xi should be deleted as it is repeated in criteria xvii regarding Suitable Alternative Natural Greenspace.</p> <p>Evidence base underpinning the impact of new housing on the Cannock Chase SAC to</p>	<p>Delete criterion xi as it is unnecessary and confusing.</p> <p>Further evidence of demographic drivers</p>

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						reflect age of population. Confusion between Community Infrastructure Levy and Section 106 delivery. A suitable approach needs to be found regarding SANGS to enable it to be considered in relation to whole plan viability.	required for housing impact on the SAC and viability impact
PS357 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Justified	There is no evidence base to justify any works the A518 Newport Road and its roundabout	Delete from xiii “and improvements to...its roundabout;”
PS358 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Justified	Requirements xvi and xiii are repeats; and are not consistent	Delete xvi and amend xiii to read  “support delivery of the Stafford Western Access Improvement from Martin Drive to Doxey Road;”
PS359 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Justified; Effective	It is unclear that any SANG, if provided on-site, should be provided in association with a MUGA and destination children’s park (criteria xx). It also requires multi-use games areas but is not apparent that more than one MUGA is required.	Amend xx to read: “Creation of a new destination park for childrens play and multi-use games area;”

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PS360 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Positively prepared; Justified Effective Consistent with national policy	Evidence base underpinning the impact of new housing on the Cannock Chase SAC to reflect age of population. Confusion between Community Infrastructure Levy and Section 106 delivery. A suitable approach needs to be found regarding SANGS to enable it to be considered in relation to whole plan viability.	Further evidence of financial information required for housing impact on the SAC and viability impact
PS361 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Justified Effective Consistent with national policy	30% affordable housing is not viable in Stafford Town and that many of the assumptions set out in the viability report are incorrect, particularly regarding infrastructure and the costs associated with lifetime homes.	A viability assessment should be carried out as set out in para 173 of NPPF.
PS362 Mr J R Prichard	Spatial Principle 2		None stated	None stated	None stated	Object to new housing development to the Key Service Villages, particularly Gnosall. All villages in the Stafford Borough area should have some level of development.	
PS363 Mr J R Prichard	Para 12.22		None stated	None stated	None stated	No further wind turbine development in the countryside due to landscape damage and rural area.	

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PS364 St Modwen	Para 7.36		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Promoting land at Milford Road, Stafford with amendment to the settlement boundary based on well defined features.	Amend Policies Map to include land at Milford Road.
PS365 Staffordshire Wildlife Trust	Policy Stafford 1 – Stafford Town		Yes	No	Consistent with national policy	Riverside and Kingsmead are in floodplain which is inconsistent with other policies in the document.	
PS366 HOW Planning on behalf of Grasscroft Homes and property	Spatial Principles 1 And 2		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Support SP1 and the presumption in favour of sustainable development.  Concern that SP2 fails to provide an adequate housing requirement due to recent appeals, lack of 5 year land supply, deliverable sites, past under-delivery.  Promoting land at Knightley Road, Gnosall.	Amend housing requirement to 550 new homes, address shortfall in first 5 years, projected demolitions and the 20% buffer over Plan period. Release land from the Green Belt.
PS367 Savills on behalf of Taylor	Policy C7		Yes	No	Justified; Effective	Concern that the open space standards set out in Appendix G are higher than existing provision without any justification. Concern	Further justification for open space provision.

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Wimpey / Bellway						that Suitable Alternative Natural Greenspace is in addition.	
PS368 Staffordshire Wildlife Trust	Policy N4		Yes	No	Positively prepared; Justified; Consistent with national policy	<p>The plan needs to enhance and restore natural assets to comply with the NPPF.</p> <p>Policies should state that there should be no net loss of biodiversity on development sites.</p> <p>Concern that the biodiversity evidence base is not sufficient to properly inform selection of sites.</p>	<p>Up to date survey and mapping of local wildlife sites, BAP habitats, ecological networks.</p> <p>Revised and updated GI strategy with no 'white' areas, and more detailed specifications for identified project areas</p> <p>Policies to state no net loss of biodiversity, habitats and species on development sites in all areas.</p>

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PS369 Savills for Taylor Wimpey / Bellway	Policy N2		Yes	No	Positively prepared Justified Effective Consistent with national policy	Concern that the policy regarding BREEM standard for non-residential dwellings conflicts with the NPPF, as it requires developers to demonstrate that such an approach is not viable. Whole Plan viability needs to be completed. Concern that standards such as BREEAM constantly change and place onerous requirements.	Delete requirement for meeting BREEAM standards
PS370 Staffordshire Wildlife Trust	Para 7.8	M35 & M53	Yes	No	Effective	Stafford Town Key diagram is unclear - olive green areas are not labelled in key. Northern most green infrastructure area is labelled Existing GI, when in Stafford North Concept Plan it is marked as New green infrastructure.	None Stated
PS371 Savills on behalf of Taylor Wimpey / Bellway	Policy N1		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that the plan requires compliance with the Building for Life standard which is outside the control of the local authority and could change significantly with changes affecting the viability of development.	Delete criterion c.
PS372 Staffordshire Wildlife Trust	Para 7.21		Yes	No	Justified; Consistent with national policy	Consider options for reducing volumes of foul water by removing surface water volumes from combined sewer networks via retro fitting of SuDs.	Feasibility study for retro-fitting of SuDs for surface water control

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PS373 Savills on behalf of Taylor Wimpey / Bellway	Policy N6		Yes	No	Justified Effective Consistent with national policy	Concern that the policy requires mitigation measures to be secured prior to development being approved and Section 106 agreements. The 12 mile zone of influence is not supported by the 2012 visitor survey. Concern that the policy delegates decisions to a document outside the Councils control.	The Plan to set out assessment of the cumulative impact on viability of standards. Further information required on the zone of influence and financial contributions.
PS374 Savills on behalf of Taylor Wimpey / Bellway	Para 13.24		Yes	No	Justified Effective	It is unclear the types of development sites which will provide financial contributions. Why are contributions sought from strategic schemes, but not other smaller schemes?	Further explanation is required as to from where contributions will be sought.
PS375 Staffordshire Wildlife Trust	Para 7.28		Yes	No	Justified Consistent with national policy	New Green Infrastructure areas have not been planned using up to date information on local wildlife sites or ecological networks in the area, and make no reference to the borough Green infrastructure Strategy or Staffordshire Biodiversity Action Plan.  GI areas are not based on any requirements for species or habitat mitigation necessary as part of the development of the sites.	Further information on habitats and species at allocation sites linked to existing networks.

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PS376 Home Builders Federation	Whole Plan	M28	Not stated	No	Effective Justified Consistent with national policy	<p>Duty to cooperate: Failure of neighbouring districts to adequately assess their housing needs could result in Stafford Borough taking more housing growth.</p> <p>Policy SP2: There is inconsistency between Policy SP2 and Policy Stafford 1 – Stafford Town. Policy SP2 as it does not include additional requirements for military.</p> <p>Policies SP3 and SP4: The settlement hierarchy is poorly aligned with market demand; thus resulting in reduced housing delivery.</p> <p>Policy SP7: The plan should provide greater clarity as to when neighbourhood plan are expected to be adopted, as well as when the site specific allocation document would be prepared.</p> <p>Concern that the restrictions set out in Policy Stone 1 criteria ii may impede housing delivery and SHLAA identifies insufficient sites.</p> <p>Concern about Plan viability regarding proposals that outperform implementation of national standards of design and construction</p>	<p>Amend the Plan to provide clarity for when neighbourhood plans adopted, and site specific allocation document would be prepared.</p> <p>Greater clarity between Policy SP2 and Policy Stafford 1- Stafford Town regarding the provision for military housing.</p>

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						and suggest that the affordable housing viability study is out of date. Whole Plan viability needs to be assessed.	
PS377 Staffordshire Wildlife Trust	Policy Stafford 3 – West Of Stafford		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that part of the allocation is in the floodplain and the Burleyfields concept diagram illustrates a housing allocation on the Biodiversity Alert Site, whilst the policy requires protection for the Biodiversity Alert Site (BAS).	Ensure no development takes place on the BAS.
PS378 Savills on behalf of Taylor Wimpey / Bellway	Appendix D - Infrastruc ture		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that the whole of the western access route is required when the Transport evidence base specifies this is not the case.  More than 400 homes should be delivered prior to the western access route implemented. Detailed site specific transport assessment will determine detailed impacts and level of contribution.	Delete "Western Access...in five sections:" Amend "2" to say 'contributions to facilitate delivery of the link from Martin Drive to Doxey Road (adjacent railway line).'  Under headings Requirements, Phasing and Capital Cost delete all text

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							from "3" onwards  Under Funding delete all text from "1. SDL developer" onwards.
PS379 Savills on behalf of Taylor Wimpey / Bellway	Appendix D - Infrastructure		Yes	No	Justified; Effective	Provide clarity that contributions are only required from within Zone of Influence, except large developments that need to be screened individually.	
PS380 Staffordshire Wildlife Trust	Para 7.32		No	No	Justified; Consistent with national policy	Concern that housing and employment allocation not prepared with the most up to date information on local wildlife sites and ecological networks in the area.  Concern that new GI areas are not large enough to mitigate habitat / species loss, and there is little or no GI proposed in mixed use areas	Concept plans to be based on up to date environmental information.

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PS381 Savills on behalf of Taylor Wimpey / Bellway	Policy Stafford 3 – West Of Stafford		Yes	No	Positively prepared; Justified; Effective	Absence of a master plan for land west of Stafford should not prevent granting of planning permission for applications which constitute sustainable development provided it does not prejudice the ability to deliver the wider allocation.	<p>Delete 2nd sentence of policy.</p> <p>Add the following new text: “The area West of Stafford includes previously developed land, two parcels of land on which planning permission has already been granted, and land allocated for residential development (site HP9) in the Adopted Local Plan. Developers and landowners West of Stafford are working with the Councils, statutory bodies and local stakeholders to prepare a masterplan for the area. Applications within the strategic development</p>

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							location, ahead of an agreed masterplan, will be permitted provided they constitute sustainable development provided and would not prejudice the ability to deliver the wider allocation.”
PS382 Staffordshire Wildlife Trust	Para 7.36		Yes	No	Positively prepared; Justified Consistent with national policy	Concern that housing and employment allocation not prepared with the most up to date information on local wildlife sites and ecological networks in the area.  Concern that new GI areas are not large enough to mitigate habitat / species loss, and there is little or no GI proposed in mixed use areas	Plan to be based on up to date ecological information consistent with GI strategy, Biodiversity Action Plan (BAP) and Staffordshire BAP.

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PS383 English Heritage	Policy Stafford 3 – West Of Stafford		Yes	No	Justified; Consistent with national policy	<p>Concern about the scale and extent of development proposed impacting on the setting and significance of Stafford Castle, a scheduled monument and designated heritage asset. A more detailed analysis is required.</p> <p>Concern that the supporting Sustainability Appraisal does not appropriately considers the policy and the associated strategic allocation relating to historic environment.</p>	Reduce the allocation for land west of Stafford to impact on the historic environment and reflect through the concept plan.
PS384 Gnosall Parish Council	Plan For Stafford Borough					<p>Concern that the removal of Residential Development Boundaries will result in a free for all regarding housing development.</p> <p>Concern about scale of allocations at 629 dwellings to the villages and impact on Gnosall with lack of transport infrastructure and flooding</p> <p>Suggest that the map showing potential sites for wind turbines may cause housing blight. Questions whether the plan could require all new housing to be built with solar panels.</p>	None stated

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PS385 M Hughes	The Plan For Stafford Borough					The 20 year time horizon is unrealistic given the potential changes that will occur over time.  Concerned that the number of houses could increase over time.	None stated
PS386 Environment Agency	Key Issues	M11	Not stated	Not stated	Not stated	Support the reference to the impact of climate change on flood risk and drainage issues. Suggest that drought should also be mentioned to ensure efficient use of water.	Include a reference to drought in the key issues section.
PS387 Environment Agency	Spatial Vision And Key Objectives	M13 – M14	Not stated	Not stated	Not stated	The creation of new green infrastructure is only mentioned for villages but should also relate to Stafford and Stone.	Include reference to GI creation at Stafford and Stone.
PS388 Environment Agency	Spatial Vision And Key Objectives	M15, M18 & M35	Not stated	Not stated	Not stated	Key diagram for Stafford amended to include the major rivers within the town.  A key objective avoiding new development in flood risk areas at Stone as well as Stafford	Amend Stafford key diagram to include major rivers within the town.  Amend Stone key objectives to include “avoiding development in flood risk areas”.

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PS389 Environment Agency	Policy Stafford 1 – Stafford Town	M32	Not stated	Not stated	Not stated	Under the heading 'Environment', add an additional bullet point 'Ensuring that the development does not harm but enhances any watercourse in the town'	
PS390 Environment Agency	Policy Stafford 2 – North Of Stafford	M39	Not stated	Not stated	Not stated	Ensure the reduction of run off rates to greenfield flows and open water storage solutions north of Stafford.	<p>Suggest that point iv be reworded as follows: 'A comprehensive drainage scheme will be delivered to enable development of the Strategic Development Location which will include measures to alleviate flooding downstream on the Marston Brook and Sandyford Brook'</p> <p>Amend the Stafford North Concept Diagram to identify the location of waterbodies, areas at risk of flooding downstream and</p>

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							location of the potential alleviation area.
PS391 Environment Agency	Policy Stafford 3 – West Of Stafford	M40 – M42	Not stated	Not stated	Not stated	<p>Para 7.29 to acknowledge the floodplain that affects this site. Both Floodzone 2 and 3 should be identified within the Concept Diagram.</p> <p>Amend bullet points within the Policy to refer to flooding and water drainage issues.</p> <p>Concept Diagram for the SDL to identify Floodzone 2 and 3.</p>	<p>Amend para 7.29 to acknowledge floodplain that affect site.</p> <p>Amend policy bullet point vii) to read 'A comprehensive drainage scheme will be delivered to enable development of the Strategic Development location which will include measures to alleviate flooding downstream on the Doxey brook and tributaries to the River Sow.'</p> <p>Bullet point xii) to refer to the culverted watercourses which cross the site.</p>

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PS392 Environment Agency	Policy Stafford 4 – East Of Stafford	M43	Not stated	Not stated	Not stated	Make reference to alleviate flooding downstream on the River Sow.	Amend bullet point viii) to read: “A comprehensive drainage scheme will be delivered to enable development of the Strategic Development location which will include measures to alleviate flooding downstream on the River Sow.”
PS393 Environment Agency	Policy Stone 1 – Stone Town	M51	Not stated	Not stated	Not stated	Para 8.8 should be amended to read ‘due to flood risk implications’	Amend para 8.8 should to read ‘due to flood risk implications’
PS394 Environment Agency	Policy N1	M81	Not stated	Not stated	Not stated	Add an additional bullet point within the ‘Space section’ to ensure that space should be made for water within the development layout to facilitate the implementation of SuDs.	Insert an additional bullet point
PS395 Environment Agency	Policy N2	M82	Not stated	Not stated	Not stated	Bullet point 1 under Sustainable Drainage should add the caveat that infiltration drainage should not be encouraged where underlying contamination is known to be	Insert a caveat regarding drainage.

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		M84				present in the ground.  The following sentence is inserted into the last para: "Any development that could lead to the degradation of the Water Framework Directive (WFD) status of the waterbody should not be permitted"	Insert a sentence for the WFD.
		M83				The following could be added to the first sentence of the last para in the SuDs section 'All new development must provide adequate arrangements for the disposal of foul sewage, trade effluent and surface water to prevent risk of pollution, by publishing a water management statement'  Replace 'standing water bodies' in the second line to 'surface water bodies'.  There is further scope for integration of waste management efficiencies in the plan.	Add an additional sentence to the last para of the SuDs section.  Amend 'standing water bodies' in the second line is changed to 'surface water bodies'.
PS396 Environment Agency	Policy N4		Not stated	Not stated	Not stated	There should be available capacity within sewerage infrastructure before development is occupied.  There should be a reference to hydraulic modelling in the policy for all developments	

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						<p>Add a point within point J to state that 'evidence should be provided by developers to demonstrate that there is adequate sewerage infrastructure already in place, or that it will be in place prior to occupation of the scheme. Development should not cause any deterioration either directly or indirectly to water quality and should not prevent a waterbody from achieving Good Ecological Status / Potential' under the Water Framework Directive'</p> <p>Bullet point F should first state that the presumption will be against any new development where damage is unavoidable, prior to considering mitigation and compensation proposals as under the WFD, the impacts of the development may still be unacceptable regardless of mitigation measures.</p> <p>Bullet point G could be strengthened by adding the following 'have suffered from past loss and degradation' to the first line.</p> <p>The following text is included in point J 'Where possible, try and overcome barriers to fish by supporting the construction of fish passes or removing barriers'</p>	

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PS397 Environment Agency	Glossary	M110	Not stated	Not stated	Not stated	Water Framework Directive (WFD) should be included in the Glossary.	Insert Water Framework Directive (WFD) should be included in the Glossary.
PS 398 Environment Agency	Appendix A - Local Plan Evidence Base		Not stated	Not stated	Not stated	River Basin Management Plans to be included as part of the Stafford Borough evidence base	Insert River Basin Management Plans to the evidence base
PS399 Inland Waterways Association Stoke on Trent Branch	Policy Stone 1 – Stone Town		Yes	No	Positively prepared	Concern that development at Westbridge Park will detract from the heritage and beauty of the town and result in less boaters mooring alongside the canal.  If a retail food store is required for the town and provision of improved leisure facilities are dependent on the scheme alternative sites should be considered to avoid harm to the canal side area.	
PS400 G Edwards & Haszard Family	Para 6.54 & Policy Stafford 1		Yes	No	Justified; Consistent with national policy	Increase housing provision from 500 new homes per year to 550 per year and increase Stafford town total requirement from 7,200 to 7,920 new homes. Increase new provision from 5,560 to 6,116 new homes on allocated	Amend para 6.54 and Policy Stafford 1 to increase Stafford town requirement to 7,920 and new

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						sites.	housing site provision to 6,115 new homes.
PS401 G Edwards & Haszard Family	Spatial Principle 2		Yes	No	Justified; Consistent with national policy	Object to housing provision of 500 per year, to be increased to 550 per year in line with Regional Spatial Strategy, Growth Point status, Government policy, to support increased employment growth and recent housing completion rates.	Increase housing figure to 550 per year.
PS402 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council	Development Strategy					Support the development strategy but require clarification on new office development and Policy C6 – Gypsies. Concern about an alternative strategy impacting on North Staffordshire urban regeneration strategy and increasing in-migration to the north of the Borough.	None stated.
PS403 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council	Spatial Principle 4					Support housing growth distribution towards Stafford in a sustainable manner.	None stated.

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PS404 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council	Spatial Principle 5	M30 & M48				Support the level of employment land and sites delivered through recent planning permissions although no phasing evident. Wording for office developments focused on Stafford and Stone town centre to be amended for clarity.	Amend Policy Stafford 1 and Policy Stone 1 to read "B1 (a) office development should only be permitted on employment sites outside the town centres if it can be proved, through a sequential assessment, that proposed development cannot be located within the town centre or edge of centre sites."
PS405 Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council	Policy C6	M74 & M75				Object to the wording 'or successor documents' as can not support unseen evidence. Concern about a new study with a reduced gypsy provision increasing pressure on neighbouring authorities with an updated study not available currently. Duty to Co-operate protocol to be signed in due course following considerations.	Delete the words 'or successor documents'.

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PS406 St Modwen Developments	Spatial Principle 2		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Lack of evidence and justification for level of development within the strategy through joint cross border working to meet NPPF requirements. Strategy fails to meet tested RSS Phase 2 requirements, fails to meet the backlog since 2006, has an unsound 5 year housing land supply statement and lacks Duty to Co-operate legal compliance	Justify housing provision, include shortfall early in the Plan period, increased level of housing growth and meet Duty to Co-operate.
PS407 St Modwen Developments	Spatial Principle 4			No	Positively prepared; Justified; Effective; Consistent with national policy	Support the general distribution of growth but increase proportions in Key Service Villages compared to Stafford and rural areas. Concern about delivery of Stafford Strategic Development Locations and seeking early delivery in Key Service Villages due to lack of 5 year supply	Reduce level of growth at Stafford and distribute housing to Key Service Villages.
PS408 St Modwen Developments	Spatial Principle 7			No	Positively prepared; Justified; Effective; Consistent with national policy	Support for Settlement Boundaries but should be established now for Stafford and Stone based on policy criteria rather than re-introduce the Residential Development Boundaries. Concern about lack of evidence to justify boundary and ability to deliver new development with two specific site changes in Stafford.	Define settlement boundaries for all settlements, provide evidence for boundaries and include two sites promoted.

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PS409 Walton Homes	Spatial Principle 2		No	No	Positively prepared; Justified; Effective; Consistent with national policy	SP2 & SP4 – object to scale of growth at Stafford and lack of proportion to Key Service Villages including Hixon. 500 homes per year to increase to 575 per year in line with household projections with greater focus on smaller deliverable sites rather than Stafford strategic sites. SP6 – Additional growth to support rural economy in Key Service Villages. SP7 – Object to unclear policy wording and implementation of settlement boundaries to meet development needs. C2 – Affordable housing targets too high for a fragile market, reduce to 15-20% C5 – Remove criteria c as too onerous with NPPF design positively prepared and expand criteria j to refer to site history.	SP2 – housing figure at 575 per year. SP4 – 20% to Key Service Villages. SP6 – growth to support local facilities. SP7 – delete brownfield land policy reference. C2 – 15-20% target. C5 – remove criteria c and expand criteria j
PS410 St Modwens	Policy Stafford 1			No	Positively prepared; Justified; Effective;	Re-use of employment land for housing to be encouraged rather than limited through criteria 4. Existing employment areas reference not needed in Stafford policy due to Policy E3.	Delete reference to existing employment areas. Criteria to include 'or' rather than 'and'.
PS411 St Modwens	Policy Stafford 3			No	Positively prepared; Justified; Effective;	Support development west of Stafford as deliverable with scale of infrastructure. Remove Castleworks area from Strategic Development Location due to consent. Concern about interactive maps not showing	Further evidence of deliverability provided for west of Stafford and remove Castleworks from the

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						mixed use designation.	designation.
PS412 St Modwen Developments	Policy E5			No	Consistent with national policy	Delete Policy E5 as inconsistent with NPPF para 89 regarding previously developed sites and openness.	Delete Policy E5.
PS413 St Modwen Developments	Policy E8			No	Positively prepared; Justified; Effective; Consistent with national policy	Object to restrictions at Stafford for retail warehouses / superstores being negative to development. Delete reference to need and loss of existing facilities section.	Delete reference to Stafford restrictions, need and loss of facility
PS414 St Modwen Developments	Policy N2			No	Justified; Effective; Consistent with national policy	Object to sustainable design features for new development due to impact on viability and cumulative impacts.	Further evidence to demonstrate viability of policy.
PS415 St Modwen Developments	Policy N6			No	Positively prepared; Justified; Effective; Consistent with	Cannock Chase SAC only relevant to housing development due to visitor trips generated rather than all development. Further evidence to be provided on mitigation measures and relevant reports.	Specify housing development in Policy N6.

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					national policy		
PS416 St Modwens	Policy I1			No	Positively prepared; Justified; Effective; Consistent with national policy	Robust evidence to demonstrate delivery of new development and infrastructure is required, particularly Appendix D. Lack of viability report and cumulative policy impact, lack of certainty to deliver from Community Infrastructure Levy as not progressed to show funding. CIL to be worked up alongside the new Plan. Implications for Strategic Environmental Assessment assuming policy requirements are fully met.	Further advance CIL and provide policy flexibility for development viability. Test funding streams and provide viability evidence.
PS 417 Natural England	Policy Stone 1	M50		No		Concern about the Habitat Regulations Assessment and nature conservation policies. Stone is within the zone of influence for Cannock Chase Special Area of Conservation.	Amend Policy to make reference to mitigation for Cannock Chase SAC.
PS 418 Natural England	Policy Stone 2	M57		No		Stone is within the zone of influence for Cannock Chase SAC and development requires mitigation measures.	Amend Policy to make reference to mitigation for Cannock Chase SAC.

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PS 419 Natural England	Policy C7			No		The policy does not include information on SANGS and should cross reference to Policy N6.	Amend policy to cross reference to policy N6
PS 420 Natural England	Policy N5	M8, M88, M91, M92, M93, M107		No	Justified	Supports the intent of the policy but does not consider as worded to be sound or legally compliant. References to Habitat Regulations Assessment can be misleading. Omission of alternatives and reasons of overriding public interest. Incorrect statement about HRA in supporting text. Clarity regarding air quality in relation to Cannock Chase SAC. Concern that points 2 and 3 place too much onus on the applicant to deliver mitigation. Confidence needed in the delivery of mitigation, particularly policy support of the Local Transport Plan.	In the policy delete word “unauthorised” and insert “protected species or any species or habitat of principal importance for nature conservation”  NPPF requires planning polices to promote the preservation, restoration and re-creation of priority habitats and the recovering of priority species populations – insert words to this effect.
PS 421 Natural England		M96		No		Supports the intent of the policy but does not consider as worded to be sound or legally compliant.	Policy to refer to zone of influence rather than distances, developer

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							contributions.  Amend para 12.39 for role of Natural England and supporting text to refer to on-going work of SAC Partnership.
PS 422 Natural England	Spatial Portrait	M4		Yes		A more joined up approach required throughout the plan in relation to European legalisation	Environment section to mention Cannock Chase SAC
PS 423 Natural England	Para 3.9	M8	Yes			Reference to HRA Directive is not correct	Replace word 'Directive' with the word 'Assessment'
PS 424 Natural England	Para 12.23	M87, M88 M94, M95				There are references which are out of date – particularly Regionally Important Geological Sites.	Make change to read Local Geological Sites in Policy N4. Policy N5 reference to preserve, restore and recreate priority habitats and aid the recovery of priority species and inclusion of reference to the Green Infrastructure

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							Strategy.
PS 425 Natural England	Policy N4	M89	Yes				Recommend inclusion of Green Infrastructure Strategy into policy.
PS 426 Natural England	Policy N7		Yes			Support the policy	
PS 427 Natural England	Policy N8					Support the policy	
PS 428 Natural England	Policy I1					Support the policy including environment infrastructure and welcome reference to Cannock Chase SAC in paras 13.16 & 13.17	
PS 429 Natural England	Glossary	M109					Recommend adding definition of Suitable Alternative Natural Green spaces
PS430 St Modwens	Sections 3 & 12. Policies I1 And E5		No	No	Positively prepared; Consistent with national	Support for Policy E5 and Meaford power station site for employment generating uses. Object to no reference in the Plan to Renewable Energy National Policy Statements with specific priorities. Add	Add to para 12.14 'The overarching National Policy Statement for Energy (EN-1) sets out the

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					policy	reference in para 12.14 and Policy I1 to Nationally Significant Infrastructure Projects. Amend para 9.21 with previous uses of Meaford power station site and Policy E5 National Policy Statements.	need for new nationally significant electricity infrastructure projects, highlighting the benefits of a diverse mix of all types of energy generation. The Government is committed to the diversification and decarbonisation of electricity generation and confirms that the need for new renewable and other electricity generation is urgent. EN-1 also emphasises the importance of fossil fuel generation in enabling security of supply and responding to peaks in energy demand.’ Add to Policy I1 ‘New Nationally Significant Infrastructure

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							<p>Projects (NSIPs) will be supported in line with the provisions of the relevant designated and draft National Policy Statements applicable to the proposal.</p> <p>Add to para 9.21 'In assessing redevelopment proposals of the Former Meaford Power Station site the Council will relate the proposals to the previously existing development of the site.'</p> <p>Policy E5 add words 'or infrastructure purposes consistent with relevant National Policy Statements, and Spatial Principle.'</p>

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PS431 Trentham Leisure Limited	Policy E6		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	New policy required to support restoration and regeneration with new development and its principles of The Trentham Estate and Gardens within the new Plan. Link to new development required for tourism and historic assets. Concern about guiding new development through Policy N8 & N9.	New policy to be included for 'New Development at the Trentham Estate and Gardens.
PS432 Trentham Leisure Limited	Policy N8	M97	Yes	No	Consistent with national policy	Policy N8 does not make provision for NPPF para 116 relating to exceptional circumstances for major development in designated landscape areas.	None stated
PS433 Trentham Leisure Limited	Policy N9		Yes	No	Consistent with national policy	Policy N9 is too restrictive, alongside NPPF para 134 due to requirements leading to a new policy for The Trentham Estate and Gardens.	New policy to be included for 'New Development at the Trentham Estate and Gardens.
PS434 Trentham Leisure Limited	Policy C5		Yes	No	Consistent with national policy	Policy C5 to include reference to infill development within the Green Belt at existing settlements linked to NPPF para 89 for brownfield redevelopment.	Add to Policy C5 'In addition to the above the following development will also be acceptable: a) appropriate limited infilling within villages and settlements in the Green Belt; and,

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							b) appropriate limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt provided that it would not have a greater impact on the openness of the Green Belt and purposes of including land within the Green Belt than any existing development.'
PS435 Mr A Christelow for Staffordshire County Council	Policy Stafford 1	M28	No	No	Justified	Concern about conflict with the Joint Waste Local Plan excluding waste uses from employment sites due to lack of reference to sui generis uses. Stafford is a preferred location for new waste management facilities.	Amend policy wording to read "...B2 and B8; or similar, compatible waste management uses will not ..."
PS436 Mr A Christelow for Staffordshire County Council	Policy Stone 1	M48		No	Justified	Concern about conflict with the Joint Waste Local Plan excluding waste uses from employment sites due to lack of reference to sui generis uses. Stone is a preferred location for new waste management facilities.	Amend policy wording to read "...B2 and B8; or similar, compatible waste management uses will not ..."

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PS437 Mr A Christelow for Staffordshire County Council	Policy E3	M30 & M62	No	No	Justified	Concern about conflict with the Joint Waste Local Plan excluding waste uses from employment sites due to lack of reference to sui generis uses. Recognised Industrial Estates are preferred locations for new waste management facilities subject to compatibility with existing uses.	Amend policy wording to read "...storage and distribution (B8), or similar and compatible waste management uses."  Amend para 9.14 to read "... (excluding B1 offices) or suitable and comparable waste management uses, subject to ..."
PS438 Mr A Christelow for Staffordshire County Council	Whole Plan		No	No	Consistent with national policy	Reference in Spatial Principle 7 to safeguarding mineral resources from sterilisation via new development is required in line with NPPF para 144.	Insert a new criteria after section (iii) to read "It will not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities."

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PS439 Mr A Christelow for Staffordshire County Council	Whole Plan		No	No	Justified; Consistent with national policy	Safeguarding existing waste management facilities from other forms of development is required in line with PPS10, para 33.	Insert a new criteria after section (iii) to read “It will not lead to the sterilisation of significant mineral resources, or compromise the continued operation or expansion of any existing waste management facilities.” Also between sections (i) and (j) add a new section to read “will not compromise the continuation of any existing lawful use.”
PS440 Staffordshire County Council - Transport	Policy Stafford 4	M44, M45, M47, M103, M105, M117	Yes	Yes		Support the Plan subject to replace of criteria xv, xvii & xiv with new wording to state the package of transport measures and highway infrastructure for land east of Stafford.	Replace criteria xv, xvii & xiv with the following new criteria “The Eastern Access Improvements is a package of complementary sustainable transport measures and

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							<p>highway infrastructure to be funded through a combination of public funds and developer contributions. Developers in the East of Stafford will be required to provide phase 1 of the Eastern Distributor Road between Beaconside and St. Thomas Lane, sustainable transport access, potential highway capacity improvements at A518/Blackheath junction and the A518/A513 Beaconside junction and potential traffic management measures along Beaconside and Weston Road. Public</p>

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							funds will contribute towards further sustainable transport measures including the Baswich Walking and Cycling route between Baswich Lane and Weston Road, bus service enhancements, including real time bus passenger information, and potential highway capacity improvements along Baswich Lane”
PS441 Staffordshire County Council - Transport	Para 10.5	M70		Yes		Concern about some historic protected routes protected in the new Local Plan through the Policies Map. Only new infrastructure required to deliver new development should be included. The County Council will review scheme in light of the new Local Plan.	Delete the following words from para 10.5 ‘Staffordshire County Council currently identifies a number of protected routes within Stafford Borough as shown on the Policies Map’. Amend Policies Map

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							to show key infrastructure.
PS442 Staffordshire County Council - Transport	Para 13.24		Yes	Yes		Concern about costs of critical infrastructure identified in the Plan with correct estimates / forecast costs included in an annual review of the Infrastructure Delivery Plan.	Delete costs listed under 'Highway, pedestrian and cycling' in table of para 13.24
PS443 Staffordshire County Council - Transport	Policy Stafford 1	M29 & M31, M33, M103, M112	Yes	Yes		Support the Plan subject to replaced wording at criteria ii under housing, criteria ii under infrastructure, reference to Eastern Access Improvements, Western Access Improvements and Northern Access Improvements being a package of measures rather than a single scheme.	Amend criteria ii for housing to read "East of Stafford linked to the Eastern Distributor Road from Beaconside to St Thomas Lane". Criteria ii for infrastructure to read 'Deliver the full Western Access Improvement Scheme, including the Western Access Route, between Martin Drive and A34 Foregate Street ... and Eastern Access Improvements.'

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PS444 Staffordshire County Council - Education	Para 13.15 And Appendix D		Yes	Yes		Phase of new primary school provision is unclear with new provision on strategic allocations in the short term.	<p>Amend para 13.15 end of second sentence to read: “in existing schools where possible.”</p> <p>Amend para 13.15 end of third sentence to read: “will be developed where appropriate.” Amend para 13.15 end of fourth sentence to read: “for each and phased accordingly.”</p> <p>Appendix D page 151, second column delete first sentence and third column replace 2016+ with 2011+. Delete first sentence of fourth &amp; fifth column.</p> <p>Appendix D page 153, second column delete first sentence and third column replace 2016+ with</p>

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							2011+. Delete first sentence of fourth & fifth column.
PS445 Staffordshire County Council – Economic Planning & Prosperity	Whole Plan					<p>Support for the plan to deliver the prosperity agenda and development growth. Support the employment land provision, Policy E1, delivering development at Stafford for housing and employment, Stafford town centre sites and integrated car parking provision.</p> <p>Key partnership working in the future will be linked to transport connectivity including car parking, new transport infrastructure to the north, east and west of Stafford, adequate funding through Community Infrastructure Levy. Partnership working also linked to learning and skills implications for school investment and new facilities.</p> <p>Support Policies C1, C2,, C3 and Strategic Development Locations work. Support natural and historic environment policies together with health and well-being approach through Policies E6, E7, C7, N1 &amp; N4 with library service provision. Further partnership working on Section 106 agreements and Community Infrastructure Levy funding streams. Support</p>	None stated.

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						approach for water resource approach and climate change initiatives.	
PS446 CPRE Local Office	Section 3 Policy Influences		Yes	No		Object to the growth strategy approach leading to development on land which is not truly sustainable development.	Acknowledge this position and amend policies.
PS447 CPRE Local Office	Section 4 Key Issues		Yes	No		A number of key issues concerns including growth, affordable housing, community integration to services, protecting the environment and landscape, climate change, regeneration and economic implications	None stated.
PS448 CPRE Local Office	Section 5 Spatial Vision And Key Objectives		Yes	No		Generally welcome the vision but question deliverability of quality sensitive development in the environmental context.	None stated.
PS449 CPRE Local Office	Para 6.15		Yes	No		Concern about the range of employment land figures with support for the labour supply approach rather than the past historic rates which support the general growth agenda.	Add an additional para to justify labour supply approach.
PS450 CPRE Local Office	Spatial Principle 2		Yes	No		Object to scale of housing growth driven by Growth Point approach with impact of new infrastructure undermining the quality of Stafford town links to open countryside. Provide for local need only to support RSS	None stated.

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						focus on urban regeneration initiatives rather than meeting the needs of other areas.	
PS451 CPRE Local Office	Spatial Principle 1		Yes	No		Scale of growth is unsustainable and should be amended to reflect sustainable development.	None stated.
PS452 CPRE Local Office	Policy Stafford 1		Yes	No		Concern about scale of development at Stafford's Strategic Development Locations and implications for transport infrastructure affecting existing network. Landscape impact of housing north of Stafford, west of Stafford development undermining green infrastructure. Concern about Stafford town centre new developments undermining the historic core shopping area.	None stated.
PS453 CPRE Local Office	Policy Stafford 2		Yes	No		Concern about development north of Stafford on landscape, level of employment land used and details for Northern Access Improvement Scheme.	None stated.
PS454 CPRE Local Office	Policy Stafford 3		Yes	No		Concern about housing development on green infrastructure with associated transport implications.	None stated.
PS455 CPRE Local Office	Policy Stafford 4		Yes	No		Concern about housing development on green infrastructure with associated transport implications.	None stated.

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PS456 CPRE Local Office	Policy Stone 1		Yes	No		Concern about housing development on high ground above Stone, traffic issues, links to town centre, mis-matching maps. Concern of employment growth on high ground, extending into open countryside along A34. Clarify mixed use development at Westbridge Park and reference to Conservation Area.	None stated.
PS457 CPRE Local Office	Policy Stone 2		Yes	No		Concern about housing development on high ground above Stone, traffic issues, links to town centre, mis-matching maps. Concern of employment growth on high ground, extending into open countryside along A34.	None stated.
PS458 CPRE Local Office	Section 9 Economy					Support for agricultural diversification in Policy E1 and E2. Concern about Policy E7 active canal frontages leading to new development and traffic generation.	None stated.
PS459 CPRE Local Office	Section 10 Transport		Yes	No		Concern about car ownership pressure to access services through the settlement hierarchy, to be reflected in amended T1 and T2 policies. Reference to HS2 due to landscape implications.	None stated.
PS460 CPRE Local Office	Policy Stafford 3		Yes	No		Settlement hierarchy approach is in conflict with reducing traffic movements and use of sustainable transport modes. Concern about access to jobs and social housing residents	None stated.

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						to services.	
PS461 CPRE Local Office	Spatial Principle 4		Yes	No	Justified; Effective	Object to unsustainable growth agenda leading to loss of agricultural land and implications for transport networks. Shortage of brownfield land to deliver new development across the Borough.	None stated
PS462 CPRE Local Office	Spatial Principle 5		Yes	No		Concern about lack of basis for using labour supply projections rather than past historic rates with lack of floor space verses employee numbers considered.	None stated.
PS463 CPRE Local Office	Spatial Principle 6		Yes	No		Support the general principles but concern about implementation.	None stated.
PS464 CPRE Local Office	Policy Stone 1		Yes	No		Spatial Principle 7 concern about settlement boundaries including areas adjacent to settlements to provide for development and loss of countryside.	None stated.
PS465 Maximus Strategic	Policy C1		Yes	No		Object to policy wording contrary to NPPF para 50 housing mix based on current and future trends rather than easing households and current waiting list information. Affordable housing mix delivered through Policy C2.	Delete last para and criteria of policy.

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PS466 Maximus Strategic	Policy E8	M65	Yes	No	Consistent with national policy	Object to restrictions on sale of goods by legal agreement in certain locations. Object to restriction on warehouses and supermarkets at Stafford without evidence of vitality and viability issues. Policy E8 to make reference to the Primary Shopping Area and no reference to secondary frontages.	Delete 3rd policy para. Add primary and secondary frontages to Policies Map. Add a section on sequential test and impact assessment for developments over 2,500 sq m.
PS467 Maximus Strategic	Policy N1		Yes	Yes		General support but minor change to reflect scale, layout to reserved matters. Development Briefs not necessary due to Design & Access Statement.	Delete criteria a under the Use section.
PS468 Maximus Strategic	Whole Plan		Yes	No	Justified; Effective; Consistent with national policy	Strongly object to the Stafford settlement boundary excluding areas of employment leading to requirement for meeting Policy E2 criteria.	Amend the Stafford settlement boundary to include SDLs,, employment and physical barriers.
PS469 Maximus Strategic	Spatial Principle 2			No	Effective; Consistent with national policy	Housing and employment tables to be included in SP2 and 10,000 new homes as a minimum figure to meet objectively assessed need. Reference to 400 new houses for Ministry of Defence. Greater proportion of employment land at Stafford to deliver the strategy.	Amend policy to include tables, minimum housing requirement, MoD housing and regular review / monitoring to meet needs.

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PS470 Maximus Strategic	Policy Stafford 1	M28	Yes	No	Justified; Effective; Consistent with national policy	Amend policy wording to specify that Ministry of Defence housing is over and above 7,200 new homes for Stafford to be consistent with SP2. Concern about level of housing commitments at Stafford with policy mechanism used to restrict development in other areas. Support post 2021 development at Stone. Concern about loss of employment land provisions in policy and specify range of job opportunities through other uses in Policy Stafford 1.	Amend policy wording to separate MoD housing provision with amendments to loss of employment land criteria – or rather than and.
PS471 Maximus Strategic	Policy Stafford 2		Yes	No	Justified; Effective; Consistent with national policy	Strongly support Development North of Stafford with evidence of deliverability provided as well as taking account of the proposed HS2 route to deliver 2,000 houses. Object to land area shown in the Policies Map as insufficient to deliver the scale of new development and associated infrastructure based on constraints. Concern about new secondary school and library provision with the need for a master plan prior to planning permission. Object to providing a new by-pass north of the development	Amend Policies Map to include larger area of land to deliver new development
PS472 Maximus Strategic	Policy T1	M68	Yes	No	Justified; Consistent with national	Object to new development providing Transport Assessments and Travel Plans as conflicts with para 193 of NPPF. Criteria d covers the policy requirements in criteria b.	Delete criteria b of Policy T1.

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					policy		
PS473 Maximus Strategic	Spatial Principle 5		Yes	No	Effective; Consistent with national policy	Object to the level of employment growth directed to areas outside of Stafford as being less sustainable in transport terms and reducing delivery of economic growth. 32% to rural areas is too high and should be reduced.	Greater proportion of employment growth to Stafford and include employment table in SP5
PS474 Bellway Homes	Section 3 Policy Influences		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about meeting Duty to Co-operate requirements of Localism Act. Further information on key outcomes and arrangements / agreements to be included for the Examination to proceed which is a current weakness in the Plan.	None stated.
PS475 Bellway Homes	Whole Plan					Evidence base for the new Local Plan to be fully up to date when tested at Examination to prove positively prepared, justified, effective and legally compliant.	None stated.
PS476 Bellway Homes	Section 2 Spatial Portrait					Note the 2011 Census information and Gnosall being the largest rural settlement in population terms.	None stated.
PS477 Bellway Homes	Section 4 Key Issues		Yes	No	Positively prepared; Consistent with	General support for key issues including long term sustainable growth, providing housing for rural communities as well as thriving centres such as Gnosall.	None stated.

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					national policy		
PS478 Bellway Homes	Spatial Vision And Key Objectives	M12	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Support Key Objective 25. Concern about Spatial Vision criteria c reference to meet the local needs of all communities and local need reference in criteria q.	Replace local need with full objectively assessed needs for market and affordable housing in criteria c. Replace local with assessed needs of the Borough in q.
PS479 Bellway Homes	Policy C1		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Amend point 2 of Policy C1 relating to housing mix to be negotiated with the developer and based on market demand, local need and viability.	Delete criteria a and b to be replaced by the words "However the final mix will be achieved through negotiation with the developer and influenced by market demand, local needs, viability issues and housing design requirements informed by Government policy.

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PS480 Bellway Homes	Policy C2		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to 40% affordable housing target in some rural areas as not supported by viability evidence and para 50 of NPPF not being justified. At Gnosall take account of schemes already delivered to address housing needs.	Delete 40% affordable housing target.
PS481 Bellway Homes	Policy E2		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about criteria iv of Policy E2 applying to new development at Key Service Villages but appropriate for other rural areas regarding essential local development needs.	None stated.
PS482 Bellway Homes	Policy I1		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about lack of evidence regarding whole plan viability and scale of obligations linked to policy burdens. Limited progress on the Community Infrastructure Levy approach for new strategic infrastructure.	None stated.

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PS483 Bellway Homes	Policy N1		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about delivering Lifetime Homes requirements above Part M of the Building Regulations due to increased costs, reduced affordability and unwanted features.	None stated
PS484 Bellway Homes	Policy N2		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about requirement to deliver Sustainable Drainage Systems and grey water recycling due to costs. Policy should be flexibly in meeting these requirements.	None stated.
PS485 Bellway Homes	Spatial Principle 2		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to figure of 500 new homes per year to be increased to 550 with lack of evidence through Strategic Housing Market Assessment missing vacant and second homes, outstanding housing need, and replacement dwellings. Housing figure ignores shortfall in provision from neighbouring authorities.	None stated.

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PS486 Bellway Homes	Spatial Principle 4		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Object to rigid annual targets of delivering new housing at Key Service Villages due to technical, marketing and infrastructure factors limiting controls. Greater proportions to Key Service Villages and included as indicative. Object to a moratorium.	Amend proportion to Key Service Villages and include the word 'indicative'.
PS487 Bellway Homes	Spatial Principle 7		Yes	No	Positively prepared; Justified; Effective;	Concern about the brownfield first approach to settlement boundaries prepared for Key Service Villages and over-reliance on Neighbourhood Plans extending timescales, lack of local engagement and negative referenda outcomes. Sustainable housing development should be permitted.	None stated.
PS488 Bellway Homes	Spatial Principle 6					Support rural sustainability and delivery of new facilities at Gnosall.	None stated.
PS489 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Para 6.50		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that insufficient housing provision has been made to meet housing needs in the Borough. It should not be considered that 90% of planning permissions will be delivered and therefore lower percentages used. Evidence is presented regarding sites which will not be implemented in the 5 year period leading to supply issues, demonstrated by	None specifically stated.

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						persistent under-delivery by the Castleworks appeal. Greater housing provision should be made to Stafford town to ensure the Plan is compliant with NPPF meeting objectively assessed needs. There should be no restrictions on bringing forward Strategic Development Locations.	
PS490 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy C1		Yes	Yes		No further comment	None stated
PS491 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy C2		Yes	Yes		No further comment	None stated
PS492 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy C3		Yes	Yes		No further comment	None stated
PS493 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy C7		No	No	Positively prepared; Justified; Effective; Consistent with	Clarification regarding open space in line with local standards that provision delivered by developers will be offset against financial contributions sought.	Amend Policy C7 and para 11.23 to stated that on site open space provision will be offset against financial

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					national policy		contributions.
PS494 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy E8	M66	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Policy E8 is inconsistent with Policy Stafford 2 by restricting retail development outside of the town centre.	Policy wording to recognise potential for local centres and neighbourhood shops through Policy Stafford 2. Amend 'Village and Neighbourhood Shops' section with a new sentence. "Such facilities will also be supported at Strategic Development Locations to meet local needs."
PS495 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy I1	M99	No	No	Positively prepared; Justified; Consistent with national policy	Agree that land north of Stafford can deliver the infrastructure stated in the Plan. However concern that reviews of the infrastructure requirements may place additional onerous provision. Any review to be subject to consultations.	Amend Policy I1 to specify that reviews of the Infrastructure Delivery Plan will be consulted upon.
PS496 Akzo Nobel UK Ltd c/o Jones	Policy N1	M80	Yes	No	Effective	Minor amendment to criteria c.	Amend criteria to read "... optimally addressed, or

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Lang LaSalle							conversely why it is not practical ...”
PS497 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy N2		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about amendments to Code for Sustainable Homes and BREEAM Standards could lead to development being unviable. Policy acknowledges viability testing will be required if considered unviable but policy to specify that standards could be waived.	Amend policy to state that if standards demonstrate new development is unviable these will be waived.
PS498 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy N4		Yes	Yes		No further comment	None stated
PS499 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy N5		Yes	Yes		No further comment	None stated
PS500 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy N6		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about lack of justification for Cannock Chase SAC requirements, to be updated with further evidence.	

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PS501 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Spatial Principle 2 (SP2)		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that the plan fails to meet objectively assessed need of 550 homes per annum and fails to address the shortfall accrued since 2006. The most recent household projections and population projections indicate greater household growth in future years. 500 houses per annum set as a minimum to provide flexibility and allow for the delivery of greater housing choice.	Increase housing provision in the Plan cover RSS figure and shortfall.  Housing targets should be expressed as a minimum.
PS502 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Spatial Principle 3 (SP3)		Yes	Yes	Not stated	Support the sustainable settlement hierarchy with the majority of the development being allocated to Stafford Town.	None Stated
PS503 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Spatial Principle 4 (SP4)		Yes	Yes	Not stated	Support the proposed distribution of housing development in Stafford due to scale of services and facilities.	None Stated
PS504 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy Stafford 4 - East Of Stafford		No	No	Positively prepared Justified Effective Consistent with national policy	The housing number for Stafford town to be greater than 5,500 homes. Concerned that land east of Stafford is not deliverable without the Eastern Distributor Road, landowner constraints. A greater portion of development should be allocated to the land north of Stafford.	Amend policy to provide for less housing at land east of Stafford in the Plan period and allow flexibility to provide more housing north of Stafford.

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PS505 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy Stafford 3 - West Of Stafford		No	No	Positively prepared Justified Effective Consistent with national policy	The housing number for Stafford town to be greater than 5,500 homes. Concerned that land west of Stafford is not deliverable due to the Western Access Improvement scheme flooding and nature conservation constraints as well as no master plan produced. A greater portion of development should be allocated to the land north of Stafford through flexibility and meeting housing needs.	Amend policy to provide for less housing at land west of Stafford in the Plan period and allow flexibility to provide more housing north of Stafford.
PS506 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Spatial Principle 7 (SP7)		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that the requirement to bring forward previously developed land through SP7 as a priority will prevent Strategic Development Locations on greenfield being delivered early in the Plan period. This is contrary to NPPF and there is a lack of housing land in Stafford.	Amend SP7 to clarify that Strategic Development Locations can be delivered to facilitate housing delivery in a sustainable way early in the Plan period.
PS507	Blank Representation						
PS508 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy Stafford 1 - Stafford Town		No	No	Positively prepared Justified Effective Consistent with national policy	Concerned that the overall quantum of housing for Stafford Town is insufficient, object to 10% discount and a higher housing requirement for Stafford Town is required. Promoting land north of Stafford	Amend policy text to support higher levels for Stafford Town.

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Rep No / Respondent	Section	Mod Ref No.	Legally Compliant?	Sound?	Reason for being unsound	Summary of representation	Changes requested
PS509 Akzo Nobel UK Ltd c/o Jones Lang LaSalle	Policy Stafford 2 - North Of Stafford		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Support the inclusion of land north of Stafford for housing provision, although greater numbers are required with the evidence base showing land to the north performs better than the other Strategic Development Locations in terms of less constraints and infrastructure, demonstrated through a master plan.	Amend Policy to clarify new housing is over and above 409 dwellings already permitted.
PS510 Sainsbury's Supermarkets Ltd	Policy Stafford 1 - Stafford Town		None Stated	None Stated	None Stated	Support an extended town centre with Sainsbury's to be included in the primary shopping area.	Modify primary shopping area boundary to include Sainsbury's.
PS511 Councillor Mrs J Tabernor	The Plan For Stafford Borough – Publication		Yes	Yes	None Stated	Support for The Plan for Stafford Borough – Publication	None Stated
PS512 N Penfold	Spatial Principle 2 (SP2) - Stafford Borough Housing		Not Stated	No	Positively prepared; Justified; Effective; Consistent with	Concern that the 2008 based household projections used as a basis to set housing targets will provide insufficient levels housing to meet future demographic and economic trends. The most up-to-date information should be used. Consideration should be	Amend policy to reflect revised household projections in the RSS Phase II Panel report as well as

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	& Employment Requirements				national policy	given to the backlog of needs including affordable housing. In addition the most up to date employment forecasts suggest that economic growth helps to underpin housing. Concerned that 40% requirement for affordable housing in certain settlements is not viable. The spatial strategy should direct growth to smaller sustainable settlements rather than focused on Stafford Town and large Strategic Development Locations with viability & infrastructure delivery risks. Concerned that the 2012 Strategic Housing Market Assessment fails to determine the levels of market and affordable housing, to be updated. Concern that the Local Plan does not meet the Duty to Cooperate requirements.	housing backlog.  Plan amended to show further viability work to ensure that Policy C2 is viable.
PS513 First City Limited	Policy Stafford 4 - East Of Stafford		Yes	Yes	None Stated	Supports land east of Stafford SDL with detailed evidence, housing delivery and a concept plan.	None Stated
PS514 Councillor A J Perkins	The Plan For Stafford Borough		Yes	Yes	None Stated	Support.	None stated

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PS515 First City Limited	Policy N6		No	No	Justified; Effective Consistent with national policy	Concern that the policy wording is inconsistent with neighbouring authorities regarding the Cannock Chase SAC, therefore not fulfilling the Duty to Cooperate.	Amend policy wording to reflect on-going work and mitigation, thus providing flexibility to new housing development.
PS516 Sainsburys Supermarkets Ltd	Policy N2		Not Stated	No	Justified; Consistent with national policy	Object to non-residential development meeting BREEAM standards due to lack of viability evidence and not consistent with whole plan viability in NPPF.	
PS517 Mr R G Jones	Policy Stone 1 - Stone Town		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that development at Westbridge Park would lead to safety issues with shoppers trapped in a flood prone building or on access roads. Impact of flooding downstream at Little Stoke or Aston. Increased runoff would alter fragile habitats in the area.	Amend Policy to delete Westbridge Park being an area of mixed development and retain as green infrastructure.
PS518 Sainsburys Supermarkets Ltd	Policy E8		Not Stated	No	Consistent with national policy	Policy E8 is not consistent with national policy as it resists retail warehouses and superstores in edge-of-centre and out-of-centre location.	Amend policy to remove restrictive para.

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PS519 Councillor A H Stafford Northcote	The Plan For Stafford Borough – Publicati on		Yes	Yes	None Stated	Support.	None Stated
PS520 Mr R Brown	The Plan For Stafford Borough – Publicati on		Not Stated	No	None Stated	Promoting land at Exeter Street, Stafford. The plan should release green field sites adjoining the urban area for housing development with infrastructure and green network benefits.	
PS521 The Garden Centre Group	Policy SP3		Not Stated	No	None Stated	Promoting land at Wolseley Bridge Garden Centre for brownfield development of housing land or mixed uses outside of the settlement hierarchy to support local needs.	Amend SP3 to encourage limited development outside of settlement hierarchy.
PS522 The Garden Centre Group	Spatial Vision And Key Objective s		None Stated	None Stated	None Stated	Support the vision for growth and sustain rural areas but should focus on investment generation and non-traditional employment, such as tourism and leisure.	Reference to investment generation.

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PS523 The Garden Centre Group	Spatial Vision And Key Objectives		None Stated	None Stated	None Stated	Key objectives should include reference to the re-use of land; a clear preference for brownfield sites which enhance existing landscape through sensitive new design.	Reference to re-use and brownfield land.
PS524 The Garden Centre Group	Spatial Principle 1 (SP1)		Not Stated	Not Stated	Not Stated	Support, as it creates a positive framework where the development needs can be met sustainability and efficiently.	None Stated
PS525 The Garden Centre Group	Spatial Principle 2 (SP2)		Not Stated	Not Stated	Not Stated	Housing and employment to be directed to sustainable locations at major road networks with emphasis on vacant brownfield sites. Employment land provision should recognise non-traditional employment uses such as leisure, retail, care and retail and not solely reliant on B1, 2 and 8 uses.	
PS526 The Garden Centre Group	Spatial Principle 3 (SP3)		Not Stated	Not Stated	Not Stated	Amend SP3 to allow limited development outside of the Towns and Key Service Villages, in sustainable locations. Vacant brownfield sites can offer a sustainable solution to meeting local development needs.	Amend SP3 to allow limited development outside of the Towns and Key Service Villages, on brownfield sites in sustainable locations.

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PS527 The Garden Centre Group	Spatial Principle 5 (SP5)		Not Stated	Not Stated	Not Stated	Support approach but employment development should relate to both traditional and non-traditional employment. Mixed use proposals should be identified.	Allocate mixed use policies and proposals in the Plan.
PS528 The Garden Centre Group	Spatial Principle 7 (SP7)		Not Stated	Not Stated	Not Stated	Support redevelopment of brownfield land but should also be outside of the Borough's towns and villages.	
PS529 The Garden Centre Group	Policy E1		Not Stated	Not Stated	Not Stated	Generally support sustaining the local economy but reference to mixed use policies and allocations for diversification of new economic development. Acknowledge non-traditional employment such as leisure, retail and care as creating significant amount of jobs in the local economy.	Amend policy to refer to mixed use allocations and other employment.
PS530 The Garden Centre Group	Policy E2		Not Stated	Not Stated	Not Stated	Generally support the policy but strongly agree with the development proposals for the redevelopment of brownfield sites to help enhance the landscape and setting of the surrounding area, where sensitively redeveloped.	
PS531 The Garden Centre Group	Policy E6		Not Stated	Not Stated	Not Stated	Support the policy but suggest that preference should be given to vacant brownfield sites for tourism development.	

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PS532 The Garden Centre Group	Policy E8		Not Stated	Not Stated	Not Stated	Agree that Stafford and Stone should be the primary focus for town centre development. However small-scale leisure and tourist uses outside existing town and village centres on brownfield sites should be favoured.	
PS533 The KE Brandon Trust	Policy Stafford 1 - Stafford Town		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern that the three Strategic Development Locations at Stafford are not deliverable in the short term with the strategy failing to provide sufficient choice and flexibility of housing sites. Need to delivery military housing and infrastructure. Promoting land off Beaconside to meet short term housing requirements.	Amend Policies Map to identify new housing site.
PS534 Mr McDyre on behalf of G Edwards and Haszard Family	Policy Stafford 1 - Stafford Town		Yes	No	Justified; Effective	Support proportion of development at Stafford. Housing provision for Stafford Town should be increased by 10% to 6,116 new homes. Promoting site at Old Croft Road, to be included as a strategic development location.	Amend housing provision from '5,500' to "at least 6,116".  Add to criterion b. as follows:- "South of Stafford at Old Croft, linked to the delivery, linked to the delivery of the Eastern Distributor Road through to Cannock Road (A34)"

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PS535 Harris Lamb on behalf of the Blurton Poultry Farm	Spatial Principle 4 (SP4)		Yes	No	Consistent with national policy	Limited infilling should be allowed at sustainable settlements in the GreenBelt, such as at Blurton. Plan not consistent with enabling beneficial uses in the Green Belt. Object to development restricted by North Staffordshire urban regeneration compared to sustainable locations such as the site on the edge of Blurton.	Amend the plan to allow limited Green Belt infilling.
PS536 Townson Estates PLC	Spatial Principle 4 (SP4)		Yes	No	Justified; Effective; Consistent with national policy	Scale of housing provision does not relate to the 2008 household projections, to be increased to 13,110 over the plan period. The quantum of housing allocated to Stone is too low, not reflecting the sustainability of the settlement, whilst there is too much housing to Key Service Villages and rural area. Support settlement boundary approach rather than Residential Development Boundaries. Promoting site at Walton Industrial Estate for housing as more sustainable than the proposed allocation West of Stone.	Increase housing number to 13,110 and allocation to Stone.  Identify site at Walton Industrial Estate for new housing development.
PS537 Royal Mail	The Plan For Stafford Borough-Publication		None Stated	None Stated	None Stated	Requirement to protect property assets within Stafford Borough. Support Policy E1. New housing development may require a new postal facility in the Borough through developer contributions.	None Stated

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PS538 Fisher German on behalf of The Inglewood Investment Company Ltd.	Para 6.64 And 6.66		Yes	No	Effective	Concern that new housing will not be delivered, in the short term, through neighbourhood planning and no specific commitment to bring forward a Site and Allocations DPD post adoption of the Local Plan.	Amend the Plan to provide a clear commitment to deliver a Site allocations and Policies Plan.
PS539 RPS on behalf of Barrett Homes	Stafford Policy 4 – East Of Stafford		Yes	No	Justified; Effective; Consistent with national policy	Promoting a new housing site east of Stafford. There is no justification for identifying the Eastern Distributor Road and future phases. Support increased housing at Stafford based on up-to-date evidence.	Remove all reference to the EDR, and only show the new road from Weston Road to Baswich Lane.
PS540 RPS on behalf of Barrett Homes	Para 3.12		Yes	No	Effective	Concern that there is not sufficient clarity in the Plan that the Duty to Co-operate has been fulfilled	Amend the Plan to provide greater clarity.
PS541 RPS on behalf of Barrett Homes	Para 3.15-3.17	M21	Yes	No	Effective	The Plan fails to meet the Growth Point requirements for 11,000 new houses through the RSS panel report.	Amend the Plan with up-to-date housing need.
PS542 RPS on behalf of Barrett Homes	Para 4.1	M21	Yes	No	Effective	The Plan fails to meet the Growth Point requirements for 11,000 new houses through the RSS panel report as well as delivering and managing the Borough's growth.	Amend the Plan with up-to-date housing need.

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PS543 RPS on behalf of Barrett Homes	Para 5.1	M21	Yes	No	Effective	The Plan fails to meet the vision and Growth Point requirements for 11,000 new houses through the RSS panel report.	Amend the Plan with up-to-date housing need.
PS544 RPS on behalf of Barrett Homes	Para 5.2		Yes	No	Effective; Justified	Concern that reference to Phase 1 of the Eastern Distributor Road (EDR) suggests further phases are proposed despite no funding of such proposals in the Local Transport Plan or the Infrastructure Delivery Plan. The evidence base does not justify the retention to the EDR route, which blights housing land for the future.	Remove all reference to the EDR, and only show the new road from Weston Road to Baswich Lane with policy to state 'provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas'.
PS545 RPS on behalf of Barrett Homes	Spatial Principle 1		Yes	No	Effective	Support for SP1 but the third para replicates the provisions in the NPPF para 14.	Delete third para
PS546 RPS on behalf of Barrett Homes	Para 6.7		Yes	No	Effective; Justified	Amend the SHLAA to correct errors in terms of deliverable sites. The housing requirements to be based on the most up to date evidence base available.	Update the SHLAA and provide up-to-date evidence of housing requirements

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PS547 RPS on behalf of Barrett Homes	Spatial Principle 2		Yes	No	Effective Justified	Concern that the plan is not based on the most up to date evidence and that the SHMA should be updated. Housing provision of 500 dwellings is not an appropriate level of growth for the Borough due to RSS evidence, population and household projections and recent Castleworks appeal decision.	Update the SHLAA and provide up-to-date evidence of housing requirements using 2010 figures.
PS548 RPS on behalf of Barrett Homes	Spatial Principle 3 (SP3)		Yes	Yes	None Stated	Support the identification of Stafford Town and Stone Town in the Settlement hierarchy	None Stated
PS549 RPS on behalf of Barrett Homes	Spatial Principle 4 (SP4)		Yes	No	Effective Justified	Amend the SHLAA to correct errors in terms of deliverable sites as it has not assessed all infill sites at Stafford town. Stafford should take more housing growth at the top of the settlement hierarchy and reduce the distribution to Key Service Villages and rural areas.	Amend the plan to increase housing for Stafford to 80% and reduce Key Service Villages to 8%, with rural area to 4%.
PS550 RPS on behalf of Barrett Homes	Para 6.54		Yes	No	Consistent with national policy	Concern that the housing provision table does not demonstrate how new provision will be delivered, nor does it make allowances for sites within the settlements allocated through the Sites and Allocations document. The table should take into account windfall sites.	Amend the Housing Provision table to include allowances for sites allocated through the Site policies Allocations document and include a windfall

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							allowance on infill sites later in the Plan Period.
PS551 RPS on behalf of Barrett Homes	Spatial Principle 7 (SP7)		Yes	No	Effective; Consistent with national policy	Agree with identifying settlement boundaries through the hierarchy but concern that the brownfield sequential approach is not consistent with the NPPF para 111.	Delete the final para of SP7.
PS552 RPS on behalf of Barrett Homes	Policy Stafford 1 - Stafford Town	M33	Yes	No	Effective; Justified	<p>Policy to correspond with SP2 in excluding military personnel from the 500 dwellings per annum.</p> <p>Remove references to the Eastern Distributor Road (EDR) from the plan and the Policies Map due to lack of evidence in the Local Transport Plan and Infrastructure Delivery Plan to demonstrate delivery and funding as a safeguarded route for future phases. Concern that using the term phase 1 is misleading as it implies that the whole route will be delivered within the plan period.</p>	<p>Amend the policy to clarify military housing approach in addition to the 5,500 new homes proposed for Stafford Town.</p> <p>References within the Plan and Policies Map amended to read or reflect “provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas’ Lane”.</p>

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PS553 RPS on behalf of Barrett Homes	Policy Stafford 4 - East Of Stafford	M29, M44 & M47	Yes	No	Effective	Concern about the sustainability of land east of Stafford failing to make public transport enhancements. Concern about viability of the allocation due to infrastructure costs. Remove references to the EDR from the plan and the Policies Map due to lack of evidence in the Local Transport Plan and Infrastructure Delivery Plan to demonstrate delivery and funding as a safeguarded route for future phases. Concern that using the term phase 1 is misleading as it implies that the whole route will be delivered within the plan period.	The Plan to provide clear evidence of delivery and viability for land east of Stafford, new infrastructure and 600 new homes.  References within the Plan and Policies Map amended to read or reflect “provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas’ Lane”.
PS554 RPS on behalf of Barrett Homes	Para 10.5	M29	Yes	No	Effective; Justifies; Consistent with national policy	Remove references to the EDR from the plan and the Policies Map due to lack of evidence in the Local Transport Plan and Infrastructure Delivery Plan to demonstrate delivery and funding as a safeguarded route for future phases. Concern that using the term phase 1 is misleading as it implies that the whole route will be delivered within the plan period.	References within the Plan and Policies Map amended to read or reflect “provision of a new road from Weston Road to Baswich Lane road bridge at St Thomas”.

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PS555 RPS on behalf of Barrett Homes	Policy C1		Yes	No	Justified	Housing development should be based on identified need and market demand rather than existing household and dwelling sizes in the locality.	Delete section a of the policy
PS556 RPS on behalf of Barrett Homes	Policy C2		Yes	No	Justified; Effective	The affordable housing economic viability study in 2011 is out of date. There is no evidence that the viability report adequately took into account the cost implications of policies contained in the Plan.	Amend the affordable housing requirements following an up to date viability report.
PS557 RPS on behalf of Barrett Homes	Policy C7		Yes	No	Effective	Concern that it is not clear how the open space standards will be applied. Appendix G is unnecessary and should be deleted because para 11.22 states that further details on implementation of the standards will be set out in a Supplementary Planning Document.	Amend the policy to replace the wording “the Local Standards set out in Appendix G” to “the Local Standards as set out in a new Open Space, Sport & Recreation Supplementary Planning Document”.  Delete Appendix G.
PS558 RPS on behalf of Barrett Homes	Policy N1		Yes	No	Effective; Justified; Consistent with	Disagree with using Building for Life and Secured by Design Principles as mandatory standards.	Delete the policy sections c. and l.

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					national policy		
PS559 RPS on behalf of Barrett Homes	Policy N2		Yes	No	Effective Justified Consistent with national policy	Due to the Government's Zero Homes policy only Part L of the building regulations is mandatory.	Delete references in the policy to requirement for residential developments to provide Code for Sustainable Homes standards.
PS560 RPS on behalf of Barrett Homes	Policy I1		Yes	No	Effective; Consistent with national policy	Concern that there is a significant gap in infrastructure funding. The scale of obligations and policy burdens may make the plan unviable with the Community Infrastructure Levy charging schedule to be provided. Planning obligations should only be sought where they meet the tests of NPPF para 204.	Amend the final sentence of the policy to read: "In assessing such requirements, the viability of developments will be a key consideration and development contributions sought will meet the tests of NPPF para 204."

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PS561 Mr S Stoney on behalf of Hallam Land	Policy Stafford 1- Stafford Town		Yes	Yes	Effective	Promoting land at Wootton Drive, Stafford for housing development. Support development at Stafford but delete the restrictive Residential Development Boundary (RDB) to enable growth.	Delete the Stafford RDB
PS562 Mr S Stoney on behalf of Baden Hall Enterprises and JT & DC Goucher	Sp3 Sp4 Sp6 (Ref. 6.6) Sp7		Yes	No	Effective; Justified; Positively prepared; Consistent with national policy	Promoting land at Coldmeece for sustainable mixed use development, through the Site Allocations Plan or Neighbourhood Plan. There should be a policy for to achieve high quality mixed use development with renewable energy in rural locations. Concern that the settlement hierarchy fails to meet market led demand areas.	Amend SP7 to support mixed use development in rural locations.
PS563 Mr S Stoney on behalf of Hallam Land Management Limited and the Davidsons Group	Policy Stone 2 - West & South Of Stone		Yes	No	Effective; Consistent with national policy	Support the inclusion of West of Stone for 500 homes with limited constraints and good infrastructure but concern that there is a restriction on delivery before 2021. Evidence provided including master plan and delivery framework.	Amend the policy to remove the restriction for development after 2021
PS564 Mr F Hayes on behalf of Castle Homes & Properties	Spatial Principle 2 Spatial Principle		Yes	No	Effective; Justified; Positively prepared; Consistent	Object to SP2 as it provides insufficient quantum of housing over the plan period and will not meet future housing requirements based on RSS evidence and recent appeal decisions. Object to SP4 with the proportions	Amend SP2 to provide housing figures in line with the NPPF and the most up-to-date

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Limited'	4 Policy Stone 2 - West & South Of Stone				with national policy	being distributed to the rural areas and key service villages are too high and therefore unsustainable. Suggest that there is insufficient growth being directed to Stone with additional land at Walton Heath required to deliver the strategy.	evidence.  Amend SP4 with increased housing proportion to Stone over and above that to Key Service Villages and the rest of the Rural Area.  Amend Policy Stone 2 to more than 500 new houses and provide flexibility to general areas west of Stone.
PS565 Mr S Stoney acting on behalf of Barratt West Midlands	Spatial Principle 2 Spatial Principle 4 Policy Stafford 1 – Stafford Town		Yes	No	Effective; Justified; Positively prepared; Consistent with national policy	Object to SP2 as it provides insufficient quantum of housing over the plan period and will not meet future housing requirements based on RSS evidence and recent appeal decisions. Object to SP4 as this constrains development growth at Stafford town. The Residential Development Boundary should be removed to allow for growth to deliver sustainable development through the strategy over the plan period. Promoting a site at Ashflats Lane, Stafford for new housing development, setting out evidence to demonstrate deliverability.	Amend SP2 with revised housing figures from 500 to 600-750 per year. Amend SP4 to remove growth constraints at Stafford Town.

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PS566 Mr J Butterworth and Bonds Hospital Estate Charity	Spatial Principle 2		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Concern about lack of joint working for land south of Stafford preventing future development. Land north of Stafford has viability and landscape concerns whilst land west and east of Stafford have infrastructure issues. The requirement for 500 houses per annum is too low.	Amend the Plan to identify land south of Stafford as an allocation.
PS567 Indigo Planning on behalf of Seddon Homes	Spatial Vision Spatial Principle 1 Spatial Principle 2 Policy Stone 1- Stone Town Policy Stone 2 West And South Of Stone		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Support the spatial vision and SP1. Object to SP2 due to insufficient housing provision, to be increased to at least 11,000 dwellings due to RSS evidence and recent appeals. Concern that SP4 only allocates Stone with 8% of growth, whilst smaller settlements receive 20% which is contrary to the NPPF seeking development in sustainable locations. Generally support the Stone policy but strongly object to land west of Stone as the most deliverable site, in contrast to other sites around the town. There should be more than one location for new housing at Stone to meet needs and should not be restricted to after 2021. There is lack of master planning and evidence to demonstrate delivery of the allocation at Stone.	Amend SP2 to provide a greater proportion of growth to Stone. Amend Policy Stone 1 to identify other smaller sites around the town.

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PS568 Indigo Planning on behalf of Commercial Estates Group	The Plan For Stafford Borough - Publication		No	No	Positively prepared; Justified; Effective; Consistent with national policy	Promoting land identified in the Plan east of Stafford. Support SP1 and the focus on Stafford Town as the principal settlement in the Borough. Concern that the housing requirement of 10,000 dwellings over the plan period is insufficient, with the target increased to 13,000. Support SP4 and the housing distribution but the target should increase from 7,200 to at least 9,360 with an additional allowance required for the accumulated shortfall against the RSS target. Support inclusion of land east of Stafford for 600 houses but suggest a larger extension to the east in the longer term, with delivery of the Beaconside extension to St Thomas Lane allowing for more development on the site. Policy N6 to be amended to remove the 400m buffer zone as this only relates to sites that are Special Protection Areas for birds. In addition the evidence base fails to provide a distinction between population and housing increases, and fails to distinguish between smaller and larger developments. Concern about developer contributions duplicating on-site and financial contributions. There is a drafting error in the penultimate para which should read "large developments between (not within) 400m and 12miles of the SAC will also be required to provide targeted	Amend SP2 to increase housing target to 13,000.  Amend table of SP4 to increase Stafford town housing target to 9,360.  Delete reference to 400m in Policy N6 and delete references to smaller and larger developments. Add clarity for developer contributions. Amend the penultimate para to read: "large developments between 400m and 12 miles of the SAC will also be required to provide targeted alternative green space within or close to the development site."

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						alternative green space within or close to the development site.”	
PS569 JT Parkinson	None Stated		None Stated	None Stated	None Stated	Land being promoted at Audmore Loop in Gnosall to be included in the Plan.	
PS570 Mrs M Minshull – repeated PS97	The Plan For Stafford Borough		Yes	Yes		Representation presents a site in Gnosall to be considered in the Plan for housing development.	
PS571 Milwood Homes	Para 3.14  Policy SP2  Para 6.10, 6.55 & 6.52  Policy 2 And 3 North And West Of Stafford		Yes	No	None Stated	<p>More detailed information to be included at para 3.14 regarding neighbourhood planning with links to the local strategic policies. SP2 housing provision should be greater than 500 homes per year to meet needs in the context of recent appeal decisions.</p> <p>Para 6.10, 6.52 and 6.55 relating to 5 year housing land supply need to be amended in light of the Castleworks appeal. Land at Ashflats, Stafford to be included as a deliverable site within the Plan. Strategy, not constrained by environmental issues. Object to the land north and west of Stafford due to a lack of a master plan produced. Policy C2 should be more specific for affordable housing and does not take into account site specifics, particularly in rural</p>	<p>Amend para 3.14 to provide more detail on neighbourhood planning.</p> <p>Policy N3 should specify that only schemes that are within the designated areas on the renewable energy opportunities map.</p>

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	Policy C2  Policy C5  Policy N3					areas. Support Policy C5 to facilitate sustainable rural communities but more support for developers in rural areas delivering market housing to subsidise affordable housing. Object to Policy N3 which should specify that only schemes within the designated areas on the renewable energy opportunities map should be permitted.	
PS572 Mr P Bowen	Policy Stafford 4 - East Of Stafford		None Stated	None Stated	None Stated	Three areas of land east of Stafford should be included in the Plan for housing development, being adjacent to the allocated sites with suitable existing infrastructure.	Amend Plan to identify further sites east of Stafford.
PS573 Mr M Barlow			None Stated	None Stated	None Stated	The number of houses at Stafford town should be reduced by 1,000 and transferred to the Key Service Villages to support employment growth. The scale of development at Stone is appropriate. The level of affordable housing should be 40% to deliver 1,200 affordable homes up to 2031.	Amend table of SP4 to reduce housing at Stafford and increase at the Key Service Villages.
PS574 Mr C Maddox	Para 2.26, 5.2, 6.28, 9.12,		Yes	No	Justified; Effective	Objects to the employment allocation at Raleigh Hall industrial estate due to loss of high quality agricultural land, flooding issues, impacts on the historic town of Eccleshall,	Remove the employment allocation at Raleigh Hall Industrial site.

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	9.13, 9.15, 9.16 And 9.17. Policies E1, E2 And E4					lack of adequate infrastructure and increased traffic impacting on local residents. New infrastructure would be too costly to be supported by new development.	
PS575 Highways Agency	Spatial Strategy	M68  M71  M112	Not Stated	Not Stated	Not Stated	Support the spatial strategy, with focus on the most sustainable and accessible locations. Support Policy T1 but references to GTA and to national policy in respect of the SRN better under part b and replacement of the word “consideration” with “maximising use” Amend part c to add reference to reducing road congestion and improving efficiency of the road network. Para 10.6 amended to take into account factors such as sustainability considerations and that development will only be acceptable where the impact on the network on the network can be sufficiently accommodated, as identified within evidenced based testing.  Add reference to the M6 modelling work in Appendix A.	Amend Policy T1 at criteria b and criteria c.  Amend para 10.6.  Add reference to modelling in Appendix A.

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PS576 Mrs MBL Booth	Para 6.29, 6.42, 6.43, 6.63, 6.64 And 12.22		Not Stated	Not Stated	Not Stated	Surprise that the population of Gnosall is greater than Eccleshall whilst having less services and facilities. More services at Gnosall before more housing development. Concern that the previous strategy has not restricted new rural housing so a future moratorium should be strictly enforced. Concern that removal of Residential Development Boundaries will lead to increased housing development before Settlement Boundaries are established. Concern that the map showing potential for wind turbines may cause blight, with less opportunities on areas close to Gnosall. Support Appendix C.	
PS577 P A Taylor	Plan For Stafford Borough		Not Stated	Not Stated	Not Stated	Promoting land at Hyde Lea for new specialist housing scheme to meet the needs of the ageing population including 50 bungalows and community facilities.	Amend Plan to identify site for new specialist housing.