

**New Stafford Borough
Local Plan 2020 - 2040:
Issues and Options
Responses**

**Agents and
Developers -
Part 1**

3 February - 21 April 2020

Coding	Name:	Organisation:	Page Number
44	R Baskeyfield	Hourigan Connolly	1
45	Chris Simmons	Chaser Lark	25
46	Graham Fergus	First City Ltd	31
47	Niall Beattie	Trine Developments Ltd	43
48	Angela Smedley	Fisher German	48
49	Alex Jones	Adlington Retirement Living ((registered as Gladman Retirement Living Ltd)	50
50	Raleigh Hall Properties Ltd	CT Planning	55
51	Mr N Talbot	Mr N Talbot	65
52	Mr T Talbot	Mr T Talbot	67
53	Jessup Brothers Ltd	Jessup Brothers Ltd	70
54	Andrew Hiorns	Hallam Land Management	75
55	Stoford Properties	Stoford Properties	131
56	Nic Scott	Pickstock Homes	139
57	Land owner Land adjoining Stafford Road and Blurtons Lane at Fieldhouse Farm, Eccleshall and Land to the north of Stone Road and east of the Burbage, Eccleshall	Savills	152
58	Lord Stafford Estates	Lord Stafford Estates	169
59	West Midlands Housing Association Planning Consortium	Tetlow King Planning	190
60	S Rabjohns	Mr Breakwell	194
61	Commercial Estates Projects Ltd.	Avison Young	196
62	The Strategic Land Group	Emery Planning	250
63	Graham Heath	Graham Heath Group Ltd	274
64	Clarkes Farms Ltd and Dugmore Family	Clarkes Farms Ltd and Dugmore Family	309

STAFFORD LOCAL PLAN

ISSUES & OPTIONS CONSULTATION 2020

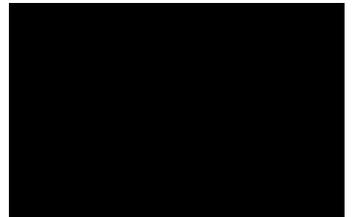
RESPONSE ON BEHALF OF MR R BASKEYFIELD

LAND WEST OF SHELMORE WAY & KNIGHTLEY WAY, GNOSALL

Report Drafted By	Report Checked By	Report Approved By
MH	MH	MH
05.03.20	09.03.20	13.03.20

This document has been prepared by Hourigan Connolly Limited trading as Hourigan Connolly.

No part of this document may be reproduced without the prior written approval of Hourigan Connolly.



CONTENTS

	PAGE NUMBER
1. INTRODUCTION	2
2. GNOSALL	3
3. THE SITE & SURROUNDING AREA	4
4. PLANNING HISTORY	8
5. STATUTORY AND OTHER DESIGNATIONS.....	9
6. EXISTING DEVELOPMENT PLAN CONTEXT	12
7. THE EMERGING LOCAL PLAN	15
8. THE VISION & BENEFITS OF ALLOCATION FOR RESIDENTIAL DEVELOPMENT	16
9. DELIVERABILITY OF DEVELOPMENT	18
10. RESPONSE TO QUESTION 5.O	20

Appendix 1: Location Plan.

1. INTRODUCTION

- 1.1 This document has been prepared by Hourigan Connolly on behalf of Mr R Baskeyfield (hereafter referred to as our client) in response to consultation by Stafford Borough Council (hereafter referred to as the Council) on the Issues and Options Local Plan.
- 1.2 This document comprises a site specific response to Question 5.O in relation to land owned by our client and which lies to the west of Shelmore Way and Knightley Way, Gnosall. We are instructed that the site has not been promoted through the Development Plan previously. The land in question is identified in the Ordnance Survey extract enclosed at **Appendix 1** and a Call For Sites Form is enclosed separately. Additionally, this document makes submissions on the role of Gnosall in the settlement hierarchy and how the settlement might assist in meeting some of the housing needs set out in the emerging Local Plan.

2. GNOSALL

GNOSALL

- 2.1 Gnosall is the largest village in Stafford Borough and it is the largest settlement in the Borough outside of the County Town of Stafford and the Market Town of Stone.
- 2.2 Gnosall has a range of shops and services and public transport facilities in order to meet day-to-day needs.
- 2.3 Local facilities include a Primary School, Co-op, sports centre, swimming pool, library and a number of public houses and restaurants. The centre of the village where many of these facilities are to be found is easily accessible from the site.
- 2.4 There are bus stops located within walking distance of the site at the junction of Audmore Road and Knightley Road and also on Brookhouse Road.
- 2.5 We are firmly of the view that Gnosall is a location to which growth should be directed to in the emerging Local Plan and we support its classification as a Large Settlement in the settlement hierarchy.

3. THE SITE & SURROUNDING AREA

SITE LOCATION

3.1 The Grid Reference of the site is:

- Easting: 382545.
- Northing: 321211.

A location plan is enclosed at **Appendix 1** identifying the site.

SITE DESCRIPTION

3.2 This unremarkable parcel of undeveloped land is located on the edge of the built up area of Gnosall, on its western boundary.

3.3 The site extends to circa 4.21 hectares.

3.4 The site is in agricultural use (arable) and a small group of trees are located in the north east corner of the land which surround a shallow pond. We know from the ecological work¹ associated with the adjacent Hollies development mentioned below that the pond is shallow, overshadowed and provides poor habitat for protected species. Moreover, the agricultural land provides poor habitat given ground disturbance associated with arable farming.

3.5 Boundaries to the site generally comprise hedgerows interspersed with hedgerow trees.

3.6 A Public Right of Way (PROW) crosses the site (see Chapter 5 for further details).

THE SURROUNDING AREA

3.7 To the north lies a recently completed development by Linden Homes called the Hollies which is accessed from Knightley Road (Hourigan Connolly dealt with the planning appeal by way of a Public Inquiry for the outline planning application relating to this site²). The streets within this development are Daffodil Drive and Tulip Walk.

¹ See Core Document 6 to the Public Inquiry Documents – Ecological Appraisal.

² LPA Reference: 13/19051/OUT. PINS Reference: APP/Y3425/A/14/2210911.



Figure 3.1 – The Hollies Development By Linden Homes Lying To The North Of The Site.

- 3.8 To the north east of the site is a parcel of land extending to circa 1 hectare which was registered as a Village Green in 2010 and which was subsequently donated to the Parish Council by Taylor Wimpey in 2012.
- 3.9 The eastern portion of the Village Green (extending to 0.47 hectares) had previously been the subject of an application for detailed planning permission by Beth Johnson Housing Association (Reference Number: 07/09039/FUL). That application was refused by the Council and an appeal to the Secretary of State was lodged. Inspector Vyse who subsequently considered the appeal at a Hearing found that the site was suitable for development but dismissed the appeal by letter dated 2 January 2009 on the basis that the Appellant had failed to provide an appropriate financial contribution in respect of public open space (PINS Reference: APP/Y3245/A/08/2083386). Given the status and ownership of the land it is considered that it is highly unlikely development will be proposed on this land. However, the previous planning history establishes that this land was considered suitable for development before it was registered as a Village Green.
- 3.10 Beyond the Village Green is Gnosall Health Centre. This is served by 7 GPs and associated support staff. A pharmacy is also located within the health centre. The health centre is open between 08:00 and 18:30 Mondays to Fridays. There is a late surgery on specified days when the health centre remains open until 20:30. The Health Centre is well used by local residents and has a substantial car park.
- 3.11 Gnosall Health Centre comprises a large modern detached building two storeys in height and was built by David McLean. It is bounded by security fencing. Detailed planning permission for the health centre was granted by Notice dated 27 January 2005 (Reference Number: 04/02300/FUL).

- 3.12 To the east of the site lie residential properties located on Shelmore Way and Knightley Way. The properties backing on to the site from Shelmore Way are predominantly two storeys although at the northern end of Shelmore Way a number of bungalows back on to the site. Those properties backing on to the site from Knightley Road are all bungalows.
- 3.13 To the south is Gnosall Rugby Club accessed via Forresters Lane.
- 3.14 Hollies Brook runs along the western boundary of the site beyond which is further agricultural land. The brook lies within a tree lined corridor.

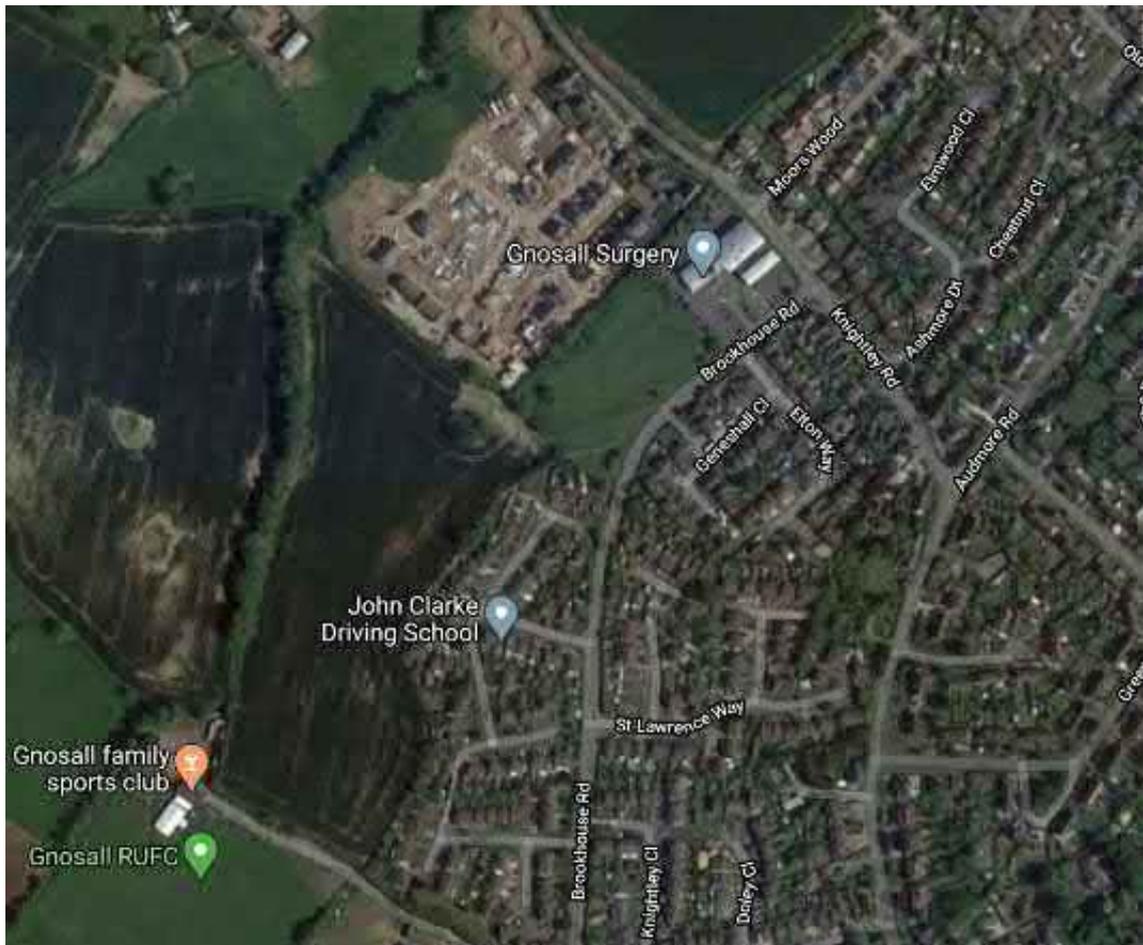


Figure 3.2 – Ariel Photograph Of The Site & Surrounding Area – Source: Google Maps.

LINKAGES

- 3.15 A PROW (Gnosall 100) runs through the site and affords access to the countryside to the north via other footpaths (Gnosall 101 and 33). Therefore, the surrounding village and associated facilities are highly accessible on foot.
- 3.16 Vehicular access between the site and Gnosall could be provided via the Hollies development and Knightley Road.

3.17 It is worthy of note that in respect of the appeal relating to the adjoining development the parties agreed that:

- The proposed means of access to the appeal site was considered appropriate and raised no issues in relation to highway safety.
- There were no capacity issues associated with the existing local highway network.
- The appeal proposals did not create any capacity issues on the local highway network.

SUMMARY

3.18 In summary this unremarkable looking site lies on the edge of the built up area of Gnosall and it is located in close proximity to shops and services to meet day-to-day needs.

4. PLANNING HISTORY

PLANNING APPLICATIONS/DECISIONS

- 4.1 The site has no relevant planning history in relation to its promotion for residential development.

5. STATUTORY AND OTHER DESIGNATIONS

HERITAGE DESIGNATIONS

- 5.1 The site does not contain any designated historic environment assets.

FLOOD RISK AND DRAINAGE

- 5.2 An extract from the floodmap for planning is set out below and shows that the majority of the site is not at risk of flooding from either rivers or seas or surface water. Those parts of the site which are at risk of flooding from Hollies Brook would simply not accommodate any built development but provide opportunities for waterside recreation space and flood attenuation facilities.



Figure 5.1 – Extract from Floodmap For Planning.

PUBLIC RIGHTS OF WAY (PROW)

- 5.3 As shown in Figure 5.2 below a PROW (Gnosall 100) runs along the northern boundary of the site and which provides a pedestrian connection to the village and wider countryside.



Figure 5.2 – PROW Gnosall 100 – Source: Staffordshire County Council Interactive Mapping.

5.4 The PROW would be retained as part of any development proposals.

TREE PRESERVATION ORDERS (TPOs)

5.5 We are instructed that there are no TPOs on the site.

ECOLOGY

5.6 The site is not subject to any specific national or local ecological designations.

LANDSCAPE

5.7 The site is not subject to any specific landscape designations.

AGRICULTURAL LAND QUALITY

5.8 Agricultural land quality assessment work undertaken by the owner's agent suggests that the land is Grade 3. Whilst a detailed intrusive survey would be required to determine whether the land is Grade 3a (and therefore at the lower end of best and most versatile classification) or Grade 3b (not best and most versatile) the quality of the land is comparable with other agricultural land surrounding the settlement which has been promoted for development by others.

AIR QUALITY

- 5.9 The site is not within an Air Quality Management Area and there are none nearby. The site is located on the edge of existing settlement which is dominated by existing residential properties.

GROUND CONDITIONS

- 5.10 There are no known archaeological or geological interests associated with the site location.
- 5.11 Again, referring to the adjacent Hollies development the outline planning permission contains no conditions in relation to ground conditions and hence at this stage it is assumed that the site is free of any contamination that would need to be remediated.

6. EXISTING DEVELOPMENT PLAN CONTEXT

6.1 In this Chapter we look at relevant planning policies from the existing Development Plan.

6.2 In this case the Development Plan comprises:

- The Plan for Stafford Borough (adopted 19 June 2014).
- The Plan for Stafford Borough Part 2 (adopted 31 January 2017).
- The Gnosall Neighbourhood Plan (adopted 24 November 2015).
- Minerals Local Plan for Staffordshire (2015 – 2030) (adopted 16 February 2017).
- Waste Local Plan for Staffordshire (2010 – 2026) (adopted 4 April 2013).

6.3 In terms of the settlement hierarchy Gnosall is a designated Key Service Village identified under Spatial Principle 3 - Stafford Borough Sustainable Settlement Hierarchy.

6.4 Spatial Principle 4 – Spatial Housing Growth directs 12% (1,200 dwellings) of the housing requirement (10,000 dwellings) to Key Service Villages over the Plan period (2011 – 2031). However, by 31 March 2015³ the 1,200 figure had been exceeded by 10.83% (1,330 dwellings) due to high rates of development in other Key Service Villages, a point which we refer to later. Consequently, the Plan for Stafford Part 2 made no residential allocations in Key Service Villages.

6.5 An extract from the Council's interactive Policies Map appears below:

³ See Table 1 on Page 5 of the Plan for Stafford Part 2.



Figure 6.1 – Extract From Stafford Borough Interactive Proposals Map

- 6.6 As can be seen from Figure 6.1 the Settlement Boundary (red line) for Gnosall includes the Hollies development to the north⁴. Consequently, the site is currently located in the countryside, but it is bound by existing residential development on two sides with leisure related development (Gnosall Rugby Club) located to the south. Allocation of the site for housing therefore represents a logical extension to the settlement.
- 6.7 All of the land surrounding the settlement is within 15 km of the Cannock Chase Special Area of Conservation (SAC) (highlighted pink on the Policies Map) where Policy N6 of the Plan for Stafford is relevant, and which requires mitigation for residential development. In that respect standard mitigation (in the form of commuted sum payments for habitat improvements) could be secured from any development of the site in the same way that they were for the adjacent Hollies development and other developments in the Borough.

⁴ The Settlement Boundary reflects that shown in the Settlement Boundary Map of the Gnosall Neighbourhood Plan.

6.8 An extract from the Mineral Local Plan appears below

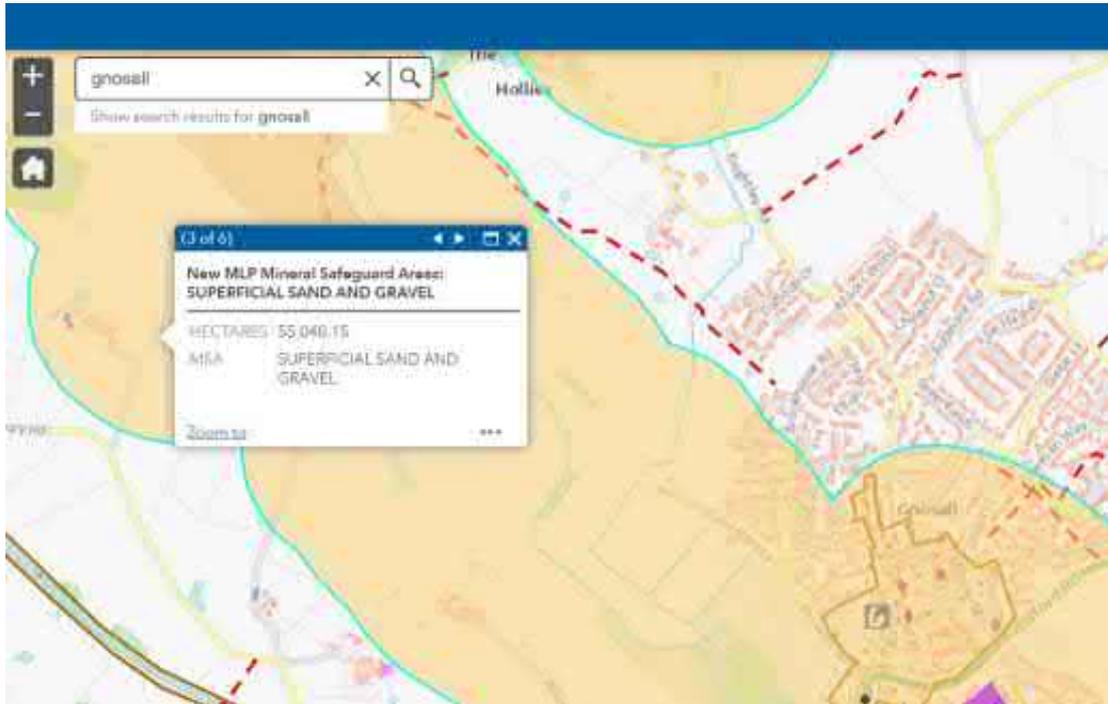


Figure 6.2 – Extract From Staffordshire Minerals Local Plan Policies and Proposals Map.

6.9 Part of the site and much of the surrounding area falls within a mineral safeguarding area where Policy 3 of the Staffordshire Minerals Local Plan is relevant. As this deals with planning applications it is not relevant at this point however the extraction of sand and gravel from the site would have an adverse impact on local resident's amenity and it is considered that it would not be feasible to extract such a small quantity of sand and gravel from this site. This allocation should not be seen as an impediment to development of the land for new homes as mineral extraction is neither considered viable or appropriate.

7. THE EMERGING LOCAL PLAN

7.1 In terms of the emerging Local Plan our client supports the identification of Gnosall as a Large Settlement.

7.2 Our client supports the principle of further growth in Gnosall although it is evident from Table 5.3 of the Issues and Options document that other villages have witnessed much higher proportions of growth in respect of the existing Local Plan.

Table 5.3 Growth experienced by the Key Service Villages in the current Local Plan (April 2011- March 2019)

Key Service Village	Number of Dwellings granted during the adopted Plan for Stafford Borough 2011-2031 as at 31st March 2019	Percentage growth in the settlement 2011-2019 as at 31 March 2019 (%)
Eccleshall	340	27%
Gnosall	167	9%
Hixon	166	24%
Great Haywood	318	41%
Little Haywood / Colwich	22	2%
Haughton	11	4%
Weston	14	3%
Woodseaves	43	18%
Barlaston (Green Belt)	19	2%
Tittensor (Green Belt)	17	6%
Yarnfield (Green Belt large brownfield site)	279	55%

Figure 7.1 – Extract From Table 5.3 Stafford Local Plan – Issues & Options.

7.3 As the largest of the Key Service Villages there is an opportunity through the emerging Local Plan to rebalance previous rates of development through focusing development at Gnosall and in that respect our client's site is a prime candidate for allocation for new homes for the reasons stated herein.

8. THE VISION & BENEFITS OF ALLOCATION FOR RESIDENTIAL DEVELOPMENT

THE VISION

- 8.1 This is an exciting opportunity to deliver a plan-led, high quality residential development that will be attractive to all sections of the community. It would be a development with generous areas of open space fostering a feeling of well-being. Development presents an opportunity to provide for future generations in a sustainable location.

BENEFITS

ECONOMIC

- 8.2 The construction of new homes would contribute to generating full-time equivalent (FTE) jobs within the construction industry over the build period, which would be a benefit to the economy of the local area.
- 8.3 Moreover, the proposals would also generate additional expenditure within the local economy, supporting local shops, services and businesses. This level of expenditure would in turn support jobs in the Borough as well as potentially creating additional public sector jobs (e.g. teachers, doctors etc.) as a direct consequence of the proposals and additional residents.
- 8.4 The development will supply a quantum of new affordable housing, helping to address substantial local affordable housing needs by providing opportunities for lower income households to own their own home or to secure rented accommodation.
- 8.5 New residents occupying the development would also generate demand for health, education and other services off the site (e.g. schools, hospitals, public administration), thus supporting further public sector employment.
- 8.6 Lastly, the proposals would generate an additional capital receipt for Stafford Borough Council via New Homes Bonus payments, based on the properties adding to the net supply of housing in the Borough.
- 8.7 Overall it is evident that the proposals are fully commensurate with the economic dimension of sustainable development and would represent a significant economic boost for the area.

SOCIAL

- 8.8 There is no doubt that this site would make a meaningful contribution to meeting housing need within the local community.
- 8.9 Indeed, increasing the overall supply of housing improves affordability by redressing supply/demand issues and reduces prices overall thereby allowing more people access to the housing market and enhanced social mobility, which is a positive social benefit.
- 8.10 The proposals could also result in the creation of a high-quality living environment comprising a mix of dwellings and would support any future community's health, social and cultural well-being. It would also facilitate the creation of jobs within the local labour pool, both during construction and the operational phase.
- 8.11 The site is considered to be well located in relation to local services and has the potential to reduce reliance on the private motor vehicle. For these reasons, it is considered that the proposals would also be socially sustainable.

ENVIRONMENTAL

- 8.12 The development proposals represent an opportunity to enhance the biodiversity credentials of the subject site through management of existing trees and hedges, supplementary landscaping with additional planting of trees, and carefully designed areas of open space with selected native species.
- 8.13 The site is privately owned with public access limited to the route of the PROW only. Access along the Brook towards the Rugby Club could be enhanced and therefore make a positive contribution to the network of greenways in the Borough. This would be a benefit to the health and wellbeing of people in the area.
- 8.14 New homes would be constructed to meet the latest environmentally-conscious standards which are energy efficient and incorporate energy saving principles.

9. DELIVERABILITY OF DEVELOPMENT

AVAILABILITY

- 9.1 The land is privately owned and is available for development. There are no covenants or other restrictions affecting the land that would preclude or delay residential development.
- 9.2 The land is clearly available for development and subject to the site being received favourably by the Council and allocated as a residential development site, the Council could expect the submission of an outline planning application within 6 months.
- 9.3 Subject to the grant of outline planning permission the site would be marketed and sold to a residential developer.
- 9.4 It should be noted that there is already interest in the site from developers.

SUITABILITY

- 9.5 The only impediment to the site being developed for housing is that it is in the open countryside. Subject to the site being allocated and included within the Settlement Boundary, the site is entirely sustainable.
- 9.6 Whilst part of the site is at risk of flooding no development would be proposed in the flood risk area. As the site extends to circa 4.21 hectares and allowing 30% of the site area for flood risk areas, open space and other infrastructure leaves a potential net developable area of 2.947 hectares (3 hectares rounded). On this basis the site could yield the following number of dwellings:
- Circa 75 dwellings at 25 dwellings per hectare.
 - Circa 90 dwellings at 30 dwellings per hectare.
 - Circa 105 dwellings at 35 dwellings per hectare.
 - Circa 120 dwellings at 40 dwellings per hectare.

ACHIEVABILITY

- 9.7 This greenfield site has no known viability issues.
- 9.8 All necessary utilities are available nearby and could be connected to the site.
- 9.9 As set out above an outline planning application could be expected to be submitted within 6 months of a residential allocation being confirmed. Subject to the grant of outline planning

permission the site would be market and sold to a residential developer. The Council could expect the site to be fully developed within 5 years.

- 9.10 Furthermore, given the absence of any viability issues any scheme would provide a policy compliant suite of planning obligations in respect of affordable housing etc.

CONCLUSION

- 9.11 The site is available, suitable and achievable and should be considered positively by the Council and allocated for residential development.

10. RESPONSE TO QUESTION 5.O

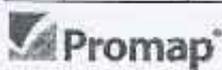
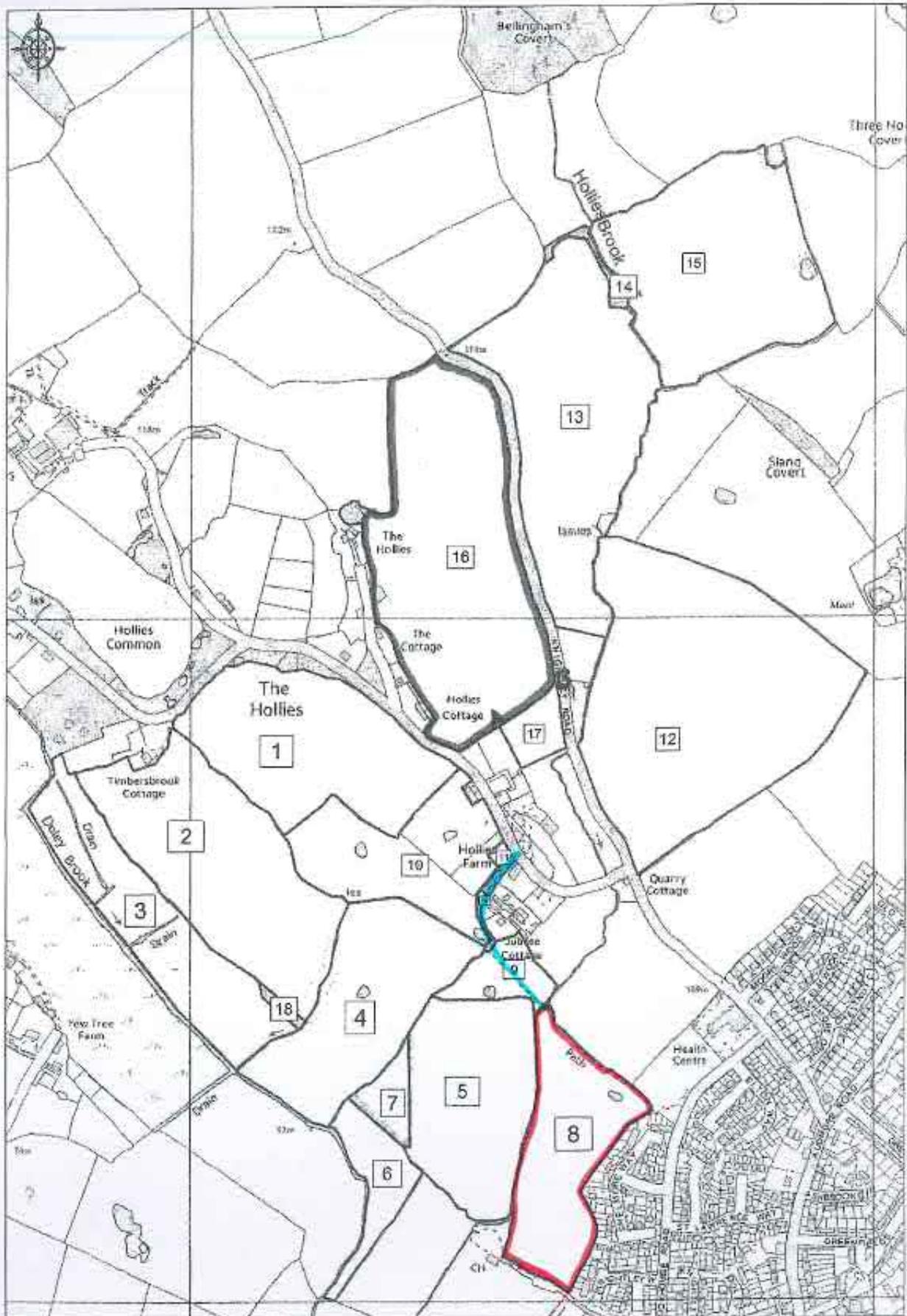
10.1 Question 5.O is set out below:

“Are there any additional sites over and above those considered by the SHELAA that should be considered for development? If so please provide details via a “Call for Sites” form”.

10.2 The previous Chapters of this document have set out why our client’s site should be allocated for residential development. However, we have also completed the Call for Sites form and this is enclosed separately with this submission.

Appendix 1

The Estate of the Late Reginald Owen Simpson



Ordnance Survey. © Crown Copyright. 2015. All rights reserved.
License number 10002432. Parcel Book - 17594



NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organization will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**New Stafford Borough Local Plan 2020-2040
"Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	Chris	Graham
Surname	Simmons	Fergus
E-mail address		
Job title	Trustee	Planning Consultant

(If applicable)		
Organisation (if applicable)	Chaser Lark	First City Limited
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by **12.00 noon Tuesday 31 March 2020**.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details
- will not be published.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name **Chris Simmons** Organisation **Chaser Lark**

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?

Section	6	Paragraph	6.17- 6.21	Table	
Figure		Question	6Hb	Other	

2. Please set out your comments below

Question 6Hb

The importance of supporting a prosperous rural economy is emphasised by paragraph 63 of the NPPF. Planning policies should enable the sustainable growth of all types of business in rural areas.

Brocton is a medium sized Tier 5 settlement. It has a good range of facilities and services, including a garage/convenience store, post office, village hall, church, with employment on the business park.

Brocton Business Park contains 30,316 sqm of floorspace, together with open storage/compound space of 9,918 Syds. There are seven established companies operating from the site and there is very little turnover. That is why we are promoting an expansion of the business park on land to the south west of the Park that will access through the existing site onto the A34.

It is important that in this instance that:

- the scale of the proposal is appropriate to its location and sensitive to its surroundings;
- there is high demand for commercial floor space, the current accommodation is fully let, and the delivery of new business premises is critical to the continued success of the business park.
- It will not have an adverse impact on the character and setting of the village;
- It exploits the opportunity to make the location more sustainable, in particular by public transport;
- the expansion does not conflict with neighbouring land uses;
- the expansion will not result in a severe impact on the local/strategic highway network.

All material, planning issues will be addressed via a pre app, or through a planning application, and architects have been briefed so we will follow up this submission very shortly.

The economy of Brocton requires support to ensure that the businesses already in the village can have the opportunity to expand and grow and to ensure the future vibrancy of the community.

If the development does not take place, the consequences could be that the businesses relocate to areas that can provide the expansion land they need, forcing employees to either commute, creating the potential of a dormitory settlement, or the employees will relocate with their jobs.

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council no later than **12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organization will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk



**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	Mr	
First Name	Graham	
Surname	Fergus	
E-mail address		
Job title (if applicable)	Planning Consultant	
Organisation (if applicable)	First City Limited	
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name Graham Fergus		Organisation First City Limited			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section	10	Paragraph	8.23 -8.26	Table	
Figure		Question	8H/8Id	Other	
2. Please set out your comments below					
<p>Question 8H</p> <p>The Local Plan should introduce a policy requiring 10% of affordable homes delivered on major development sites to be constructed to M4(3) wheelchair user standard.</p> <p>Bungalows can be constructed most cost effectively to wheelchair access.</p>					

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council no later than **12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organization will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	Mr	
First Name	Graham	
Surname	Fergus	
E-mail address		
Job title (if applicable)	Planning Consultant	
Organisation (if applicable)	First City Limited	
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name **Graham Fergus** Organisation **First City Limited**

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?

Section **10** Paragraph **9.43 -9.47** Table

Figure Question **9Ma** Other

2. Please set out your comments below

Question 9M

The Local Plan should NOT designate sites as Local Green Spaces (LGS) through the Local Plan.

It is clear Local Green Space designation is a way to provide special protection against development for green areas considered of particular importance to local communities. See the Great Haywood Neighbourhood Plan.

This concept was confirmed in the NPPF (paragraph 99-100) as any green area of particular importance to a local community designated as such through a local plan or neighbourhood development plan. The designation should only be used:

1. where the green space is in reasonably close proximity to the community it serves;
2. where the green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including a playing field), tranquillity or richness of its wildlife; and
3. where the green space concerned is local in character and is not an extensive tract of land.

The Planning Practice Guidance confirms that if land is already protected by Green Belt policy, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

It is also unclear which parts of the Borough would be subject to this designation nor how Policy C5 of the adopted plan and 'rural exception sites' sits with proposed LGS designations.

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organization will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	Mr	
First Name	Graham	
Surname	Fergus	
E-mail address		
Job title (if applicable)	Planning Consultant	
Organisation (if applicable)	First City Limited	
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by 12.00 noon Tuesday 31 March 2020.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name **Graham Fergus**

Organisation **First City Limited**

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?

Section	8	Paragraph	8.25	Table	
Figure		Question	8l	Other	

2. Please set out your comments below

Question 8l

The Council can suggest this policy, but it will be resisted by landowners and most developers as bungalows are 'land hungry'.

I do realise how popular bungalow planning applications are with Planning Committees. However, the reality of the situation is that when profit is the primary motivation this policy will be resisted as there is little incentive for developers to build a bungalow when there is more profit in building a house.

Market bungalows are also expensive to build with the heavy up-front costs of the foundations and the roof compared to the cost of constructing a house.

There is no doubt that as a country we need more bungalows to be constructed in view of the ageing population and the existing stock declining as older bungalows are demolished to provide the space for new houses.

Without any incentives or government intervention, why should house builders choose needs over profit?

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council no later than **12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organization will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**New Stafford Borough Local Plan 2020-2040
 "Issues and Options" Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	Niall	Graham
Surname	Beattie	Fergus
E-mail address		
Job title (if applicable)	Director	Planning Consultant
Organisation (if applicable)	Trine Developments Limited	First City Limited
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the "Issues and Options" document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council by **12.00 noon Tuesday 31 March 2020**.

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council's website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Niall Beatie		Organisation Trine Developments Limited			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph	5.46	Table	5.6a/5.7
Figure		Question	5E	Other	
2. Please set out your comments below					
Question 5 E					
<p>We are strongly of the view that recent housing delivery levels which has been substantially above the LHN represents a positive upward trend that is now further supported by the lowest bank interest rate in living memory. These factors should provide the confidence for the Council to take positive steps to support a spatial strategy which encourages further diversification in the employment base in Stafford and very firmly steers the Local Plan housing strategy towards the upper end of the range recommended in the EHDNA report of 647dpa (711 dpa PCU) to align with the more ambitious regeneration strategy (Scenario F Past Trends Growth rate) including the Stafford Station Gateway project.</p> <p>In terms of the future growth of Stafford and Stone we support the tried and tested approach of sustainable urban extensions with linked Infrastructure.(Spatial Option 2) We do not support any of the Strategic Development Locations (Table 5.7) or a Garden Community Spatial Option 4) which is contrary to the NPPF and would have a lengthy lead in time associated with the infrastructure. This element of the housing provision should be directed towards the eastern edge of Stafford where the greatest progress has been made with delivering new housing, with the remainder principally focused development across the Key Service villages.</p> <p>Barlaston is a Key Service Village under the current Local, Plan with a good range of facilities and services however it is constrained by the Green Belt.</p> <p>Greater flexibility would allow Barlaston to grow in a sustainable way on the periphery with linked infrastructure.</p> <p>We have suggested that there is the potential for limited housing (up to 43 affordable dwellings) controlled by a Section Agreement to maintain these as local needs units in perpetuity, on land off Old Road on the northern edge of the settlement without overwhelming the village and its services.</p>					

As you aware we have submitted a comprehensive pre application statement to the Council setting out the context for this proposal.

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council no later than **12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk



FISHER GERMAN EMAIL RESPONSE – 18 MARCH 2020
LAND AT BOWERS LANE RUGELEY

From: Angela Smedley [REDACTED]
Sent: 20 March 2020 18:15
To: forwardplanningconsultations
Subject: STAFFORD BOROUGH LOCAL PLAN – CALL FOR SITES - Land at Bower Lane, Rugeley
Staffordshire

Dear Sir/Madam

On behalf of our Client, Hartswood Farming, please find a site submission attached in respect of Bower Lane, Rugeley.

The site lies adjacent to the sustainable town of Rugeley, within the West Midlands Green Belt. Considering the difficulty of meeting the unmet needs of Birmingham and the Black Country, we consider there is considerable merit in further release of Green Belt land in sustainable locations within the Birmingham Housing Market Area (HMA). Whilst Stafford is its own HMA, Cannock Chase District Council is within the Birmingham HMA and thus there will be significant development pressure. Should a request for assistance in meeting unmet needs be forthcoming from Cannock Chase under the Duty to Cooperate, Green Belt land in Stafford could be released for Birmingham/Cannock Chase related development

I trust that the content of the submission is self-explanatory. However, if you have any questions, or require further information, please do not hesitate to contact me.

Kind regards

Angela



Google Earth

© 2020 Google

A460

35013



Page 49

600 m



Forward Planning
 Stafford Borough Council
 Civic Centre
 Riverside
 Stafford
 ST16 3AQ.

23rd March 2020

To whom it may concern,

Adlington Retirement Living (registered as Gladman Retirement Living Ltd) develop exceptional quality, specialist retirement apartments with extensive communal facilities for those in need of care (Use Class C2). Adlington has a fantastic track record of delivering class leading developments, with recently completed schemes in Otley winning 'What House' Gold Award for best retirement development in 2017, and our Macclesfield development winning the 'What House' Silver Award for 2019 in the same category. We also have a fantastic development in Stafford called Brooklands House.

These comments provide Adlington's representations to the New Stafford Borough Local Plan 2020-2040 Issues and Options document consultation.

Question 3.A "Do you agree that the Vision should change?"

It is considered that Para 3.3 point c should be amended to say "specialist accommodation for the elderly" in order to provide greater clarity.

The current vision is highly detailed and extensive. It may be appropriate to make it more concise. However, the current vision lends its support to the development of specialist elderly accommodation, and this should not be lost in any new vision. The NPPF states that the housing need of specific groups, including the elderly should be addressed, and any new vision for Stafford should reflect this, particularly in light of the growing demographic need.

Question 4a "Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?"

The new local plan should require that new buildings be built to currently adopted building regulations. Requiring buildings to exceed these standards may be unduly onerous on developers, and stifle potential new development. If this approach is taken forward by the Council it must be appropriately viability tested and the exact standards sought would need to be consulted upon.

Question 4.C "Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?"

Policy support should be lent to proposals that include reasonable levels of onsite sustainable energy generation; however, it should not be a mandatory requirement. If this is taken forward as a mandatory requirement the council will need to clarify what level of energy should be generated from sustainable onsite resources in percentage terms, and what constitutes a "large development". The % requirement would also need to be viability tested.

Question 8.A "Should the council continue to encourage the development of brownfield land over greenfield land?"

Paragraph 117 of the NPPF provides that:

"Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. "

Furthermore, paragraph 118 of the NPPF states that 'substantial weight should be given to the re-use of brownfield land within settlements for homes and other identified needs. As such, a policy to encourage the re-use of the brownfield land would appear to be sound in accordance with the NPPF. The policy should make clear that support will be given for the re-use of brownfield land in settlements for homes, including for the elderly, and meeting identified needs. However, if a greenfield site is preferable for the use/to meet a local need, this should not be excluded.

Question 8.B "Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough?"

The NPPF states (at Paragraph 123) that where there is a shortage of land for meeting identified housing needs, it is especially important that plans and policies avoid homes being built at low densities (i.e. if there is an identified housing need, high densities should be pursued). The NPPF further states that minimum densities should be employed where there is an existing or anticipated shortfall of land for meeting identified housing needs (para 123). There is therefore National Policy support for the implementation of minimum densities for housing development.

It is therefore reasonable to set minimum density standards, with regard to the established local character of the area. However, should there be an identified need or shortfall, the minimum density in the area should not be used as a guide to what the maximum density of an area should be. If there is an identified need for specific accommodation types in an area, the established minimum density should not be used to determine the acceptability of any proposal that exceeds the established density of the area.



adlington.co.uk



Question 8.C- "Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?"

The NPPF states that policies should support development that makes efficient use of land where there is availability and capacity of infrastructure and services, and the prospect of further improvement to promote sustainable travel modes (Para. 122c). Higher density development should therefore be encouraged in areas that have good sustainable transport links. Setting higher minimum density thresholds in such areas would be an effective way to encourage such development.

Question 8.F "Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?"

This proposed mix of housing sizes seems appropriate, although it is unclear on what basis the recommended range has been arrived at. Further justification will be needed on this.

Question 8.I: "Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?"

The HEDNA (Jan 2020) produced by Lichfield's notes the following:

"Older households are projected to grow significantly in the Borough over the plan period" Over 65's will increase by 34% by 2040, the fastest growing age group in the Borough. Different types of accommodation are required to meet their needs, and this variety of housing needs to be considered going forward to ensure a sufficient supply is provided across the various sub-market areas.

There is a small gap currently in the provision of extra care and sheltered housing which is projected to grow by 2027."

It is therefore clear that the older population, as it is across the country, is going to grow significantly in Stafford. The PPG has identified a 'critical need' for specialist elderly accommodation. The notion that there is only a small gap in the provision of extra care and sheltered housing is based on the Staffordshire Extra Care and Sheltered Housing report (2018). The methodology used in this is not in accordance with the PPG or best practice in the industry. A new assessment should be produced to identify the need for different types of specialist elderly accommodation.

The EDHNA notes that the need for 120 units of extra care and sheltered accommodation in the plan period, which is a surprisingly low figure and one that needs to be further reviewed, is based on a "continuation of past trends in terms of proportion living in care homes and the supply of elderly housing units". As provision of extra care accommodation in Stafford is currently limited, owing to the relatively new nature of the extra care market, to suggest that a need figure is arrived at by continuing a past trend would appear to be flawed – if you project forward little, you will end up with little – similarly, care homes are closing so projecting this

forward again would not appear sensible. The Council should utilise the SHOP@ tool suggested in the PPG to support the legitimacy of this need figure.

Turning to the substance of Question 8.I, the policy seems solely concerned with providing more bungalows, which, there is no doubt a need for, but, as identified in the EDHNA there will be many people requiring care and assistance on a daily basis and for whom a bungalow would not offer much assistance. The best form of accommodation for meeting this need is C2 extra care accommodation whereby residents continue to live in the comfort of their own apartment but also have 24-hour staffing, care on site and extensive communal facilities. Positive policy support should be given to proposal seek to meet the need for specialist elderly accommodation which is only going to grow over the plan period.

Adlington supports proposals to boost the number of specialist accommodation units for the elderly, but there is a need to formerly recognise the variety of models and Use Classes that can be leveraged to address this need.

Question 8.K, point b “In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?”

This proposal would seem reasonable and could ensure developments that might otherwise be unviable are provided in Stafford.

The Council should also consider a robust strategy for routinely considering the benefits of financial contributions for provision of off-site affordable housing to allow the Council to embark on its own housing delivery programme, to address both the market and affordable housing shortfall across the Borough.

The policy should also build in some flexibility on the mix and tenure of affordable housing provision on a particular site. For example, there should be an acknowledgement that provision of affordable units within an apartment building for example, causes problems and additional costs for registered social providers which then limits the nature/tenure any affordable housing provided on site.

However, the council should clarify in any new policy that the provision of affordable housing applies specifically to Use Class C3 residential. Other Use Classes, such as C2 Extra Care proposals should not be required to provide affordable housing. The need for specialist accommodation for the elderly is acknowledged as a critical issue nationally. The upfront set up costs, and the ongoing running costs of a C2 Extra Care development are significantly higher than that of C3 market housing. In addition, the floor space devoted to the communal facilities necessary for such development significantly affect saleable space. Combined, these factors make the provision of affordable housing unviable.

To conclude, we trust that the Council have found these representations constructive and if you would like to discuss the delivery of an Adlington style product or any of the points raised in the representation, please do not hesitate to contact either myself, Liza Woodray or Robert Gaskell at Adlington using the contact details below.

Please could we be kept informed of progress moving forward and added to the consultation database.

Sincerely,

Alex Jones
[Redacted]

Cc.
Robert Gaskell
[Redacted]

Liza Woodray
[Redacted]



adlington.co.uk
[Redacted]



[Redacted]



[Redacted]

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mrs
First Name		P
Surname		Kreuser
E-mail address		[REDACTED]
Job title (if applicable)		
Organisation (if applicable)	Raleigh Hall Properties Ltd	CT Planning
Address	c/o CT Planning	[REDACTED]
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mrs P Kreuser		Organisation CT Planning			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.B	Other	
2. Please set out your comments below					
See Additional Sheet					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	6.H	Other	
2. Please set out your comments below					
See Additional Sheet					

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk



**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
LAND AT RALEIGH HALL INDUSTRIAL ESTATE, ECCLESHALL, STAFFORD ST21
6JL**

QUESTION 6B

This representation is made on behalf of Raleigh Hall Properties Ltd with regards to employment land provision at Raleigh Hall Industrial Estate. It is submitted that the expansion land at Raleigh Hall Industrial Estate allocated in the Plan for Stafford Borough should be retained in the emerging Stafford Borough Local Plan 2020-2040. Policy E4 of the Plan for Stafford Borough seeks to deliver 4 hectares of new employment land at Raleigh Hall Recognised Industrial Estate. A plan showing the site boundary of the expansion land marked red is attached (drawing reference : 5134.99A). An outline planning application (20/31862/OUT) has been submitted to Stafford Borough to deliver 13,700 square metres of employment floorspace on the allocated expansion site.

Raleigh Hall Industrial Estate is a well-established and well-maintained employment facility, family owned and operated since 1980. The site, including



the allocation, provides a valuable local employment resource in the rural area creating additional jobs and investment opportunities. This point is acknowledged at paragraph 6.6 of the Issues and Options Consultation Document where it states that..... **“there are a number of important employment premises distributed throughout the rural areas of the Borough which all make valuable contributions to the economic prosperity of the Borough. “**

To ensure optimal future economic prosperity in the Borough, the Council should ensure that employment development is supported in the rural areas in the emerging Local Plan. Raleigh Hall Recognised Industrial Estate is one such site where economic development should be supported. The site is well located to the north of Eccleshall to serve as a local employer in a rural area whilst enjoying good transport links to Stafford, Stoke-on-Trent and the M6.

The expansion land is well related to the existing industrial estate and can be delivered without any significant impacts on the environment; as evidently supported by the Inspector into the Plan for Stafford Borough when he approved the allocation in Policy E4. The requisite highway improvements required by Policy E4 have been implemented (15/21729/FUL). With regards



to the importance of Raleigh Hall as a rural employment site, the Inspector in his Report referred to Raleigh Hall at Paragraph 102, stating:-

“.....Policy E4 sets out specific proposals for extensions and criteria for Raleigh Hall and Ladfordfields RIEs. These are significant employment sites in the rural area, mainly based on former MOD buildings, providing uses and jobs which contribute to the rural economy and meet local needs. Policies E3 & E4 encourage the sustainable expansion of these sites, with modest additional land allocations, which would have a positive economic impact on nearby villages, and have the support of the landowners and existing employers and businesses. Although these are relatively small-scale allocations, they will provide opportunities for new investment and expansion of existing firms at these established rural industrial estates.”

This position has not changed; Raleigh Hall remains a significant and valuable local employer in the rural area.

It is therefore submitted that the allocated expansion land at Raleigh Hall Recognised Industrial Estate set out in Policy E4 of the Plan for Stafford Borough should be retained in the emerging Stafford Borough Local Plan 2020-2040

PMK/CMF/5475
13 March 2020



**STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION
LAND AT RALEIGH HALL INDUSTRIAL ESTATE, ECCLESHALL, STAFFORD ST21
6JL**

QUESTION 6H

This representation is made on behalf of Raleigh Hall Properties Ltd with regards to employment land provision at Raleigh Hall Industrial Estate. It is submitted that the expansion land at Raleigh Hall Industrial Estate allocated in the Plan for Stafford Borough should be retained in the emerging Stafford Borough Local Plan 2020-2040. Policy E4 of the Plan for Stafford Borough seeks to deliver 4 hectares of new employment land at Raleigh Hall Recognised Industrial Estate. A plan showing the site boundary of the expansion land marked red is attached (drawing reference : 5134.99A). An outline planning application (20/31862/OUT) has been submitted to Stafford Borough to deliver 13,700 square metres of employment floorspace on the allocated expansion site.

Raleigh Hall Industrial Estate is a well established and well maintained employment facility, family owned and operated since 1980. The site, including





the allocation, provides a valuable local employment resource in the rural area creating additional jobs and investment opportunities. This point is acknowledged at paragraph 6.6 of the Issues and Options Consultation Document where it states that..... **“there are a number of important employment premises distributed throughout the rural areas of the Borough which all make valuable contributions to the economic prosperity of the Borough. “**

To assist the rural economic in the Borough, the Council should ensure that employment development is supported in the rural areas in the emerging Local Plan. Raleigh Hall Recognised Industrial Estate is one such site where economic development should be supported. The site is well located to the north of Eccleshall to serve as a local employer in a rural area whilst enjoying good transport links to Stafford, Stoke-on-Trent and the M6.

The expansion land is well related to the existing industrial estate and can be delivered without any significant impacts on the environment; as evidently supported by the Inspector into the Plan for Stafford Borough when he approved the allocation in Policy E4. The requisite highway improvements required by Policy E4 have been implemented (15/21729/FUL). With regards



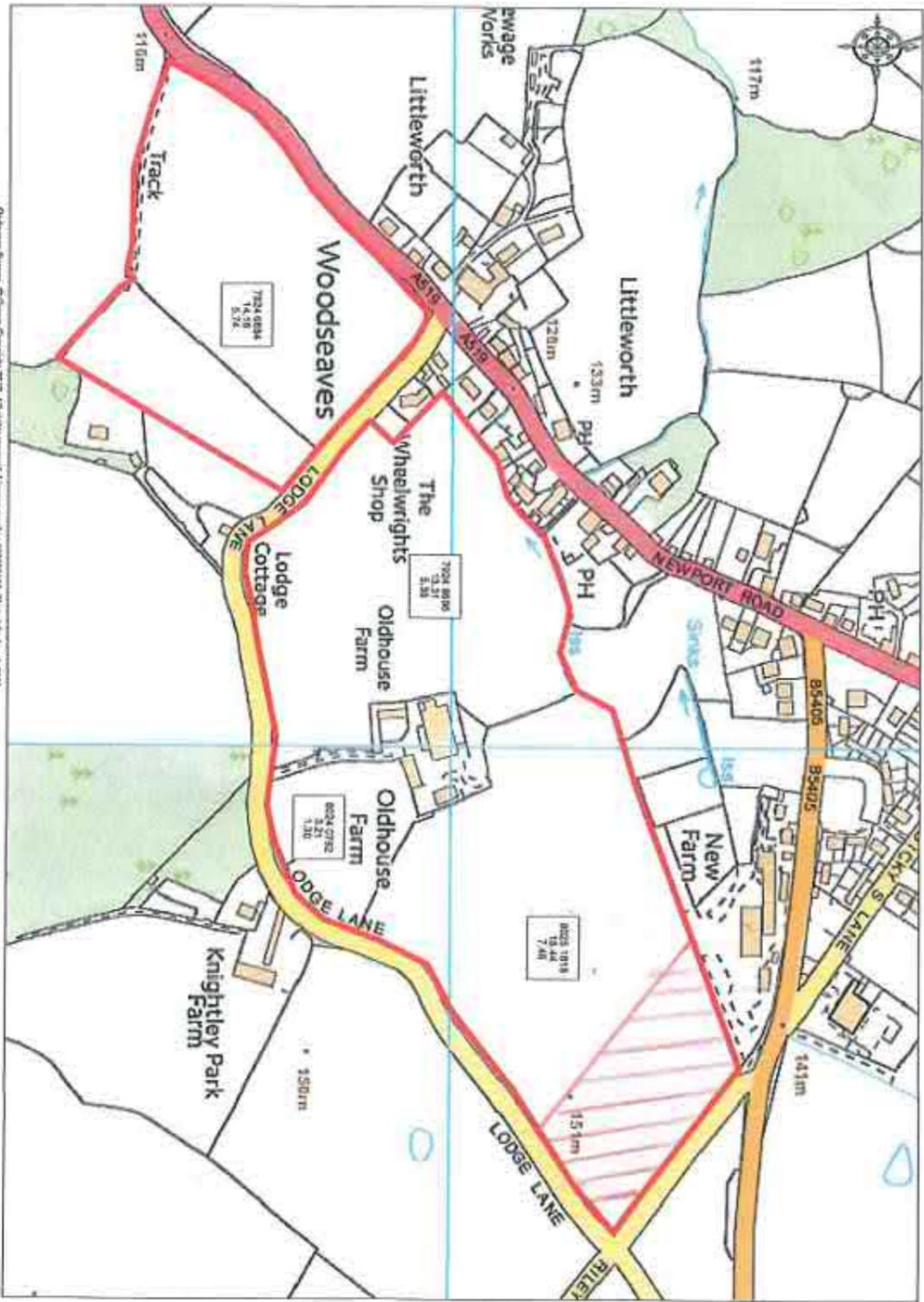
to the importance of Raleigh Hall as a rural employment site, the Inspector in his Report referred to Raleigh Hall at Paragraph 102, stating:-

“.....Policy E4 sets out specific proposals for extensions and criteria for Raleigh Hall and Ladfordfields RIEs. These are significant employment sites in the rural area, mainly based on former MOD buildings, providing uses and jobs which contribute to the rural economy and meet local needs. Policies E3 & E4 encourage the sustainable expansion of these sites, with modest additional land allocations, which would have a positive economic impact on nearby villages, and have the support of the landowners and existing employers and businesses. Although these are relatively small-scale allocations, they will provide opportunities for new investment and expansion of existing firms at these established rural industrial estates.”

This position has not changed; Raleigh Hall remains a significant and valuable local employer in the rural area.

It is therefore submitted that the allocated expansion land at Raleigh Hall Recognised Industrial Estate set out in Policy E4 of the Plan for Stafford Borough should be retained in the emerging Stafford Borough Local Plan 2020-2040

PMK/CMF/5475
13 March 2020



Promap
LANDMARK INFORMATION GROUP

Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number: 100020121. Third Party: 10284

Mr Nigel Talbot,

24th March 2020

Stafford Borough Local Plan 2020-2040
Issues and Options Stage Consultation.

Dear Forward Planning Team,

I am the owner of the above farm which borders Woodseaves which is edged in red on the attached map. This is a key service village within Stafford Borough. I wish part of my land to be considered for future development in the Stafford Borough local plan 2020 – 2040.

There is a lack of building development land within the current Woodseaves settlement boundary. I would therefore wish to put forward for consideration for development part of field number 8025 1818. This field borders Riley Lane, Lodge Lane and touches the B5405 Woodseaves to Great Bridgeford Road.

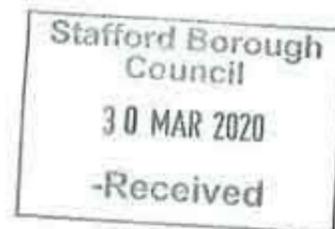
I am prepared to offer the land for a multi use development that can / will provide some or all of the following options. 1) Affordable housing on an exception site basis for local parishioners with a connection to the Parish of High Offley. 2) Allotments as there is a local call to the Parish Council for allotments. 3) Car Parking for the adjacent school as there is a danger on the highways around the school at the start and end of the day. 4) Housing development under normal terms but this must include BUNGALOWS as there call for these in the area by aged parishioners. Also a play area as Woodseaves currently has no play equipment facilities for youngsters.

The area hatched in red on the attached map is the land I wish to put forward at this time. Although if you feel that a larger area would be more useful in determining the housing needs of Woodseaves, I would be interested in putting further land forward if this helps the current housing land shortage.

Yours sincerely,

Nigel Talbot.

Forward Planning Team,
Stafford Borough Council,
Riverside,
Stafford.
ST16 3AQ.



Mr Ted Talbot,

24th March 2020

Stafford Borough Local Plan 2020-2040
Issues and Options Stage Consultation.

Dear Forward Planning Team,

I am the owner of the above farm which borders Woodseaves which is edged in red on the attached map. This is a key service village within Stafford Borough. I wish part of my land to be considered for future development in the Stafford Borough local plan 2020 – 2040.

There is a lack of building development land within the current Woodseaves settlement boundary. I would therefore wish to put forward for consideration for development part of field number 2253 on the attached map. This field borders the A519 Newport to Eccleshall Road with good access of this road and within the current 30mph speed limit, and a safe large visibility splay is easily achieved. It also borders the properties and the school in Dickies Lane Woodseaves.

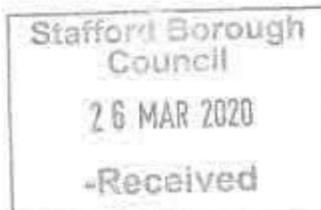
I am prepared to offer the land for a multi use development that can / will provide some or all of the following options. 1) Affordable housing on an exception site basis for local parishioners with a connection to the Parish of High Offley. 2) Allotments as there is a local call to the Parish Council for allotments. 3) Car Parking for the adjacent school as there is a danger on the highways around the school at the start and end of the day. 4) Housing development under normal terms but this must include BUNGALOWS as there call for these in the area by aged parishioners. Also a play area as Woodseaves currently has no play equipment facilities for youngsters.

The area edged in red on the attached map is the land I own. The area hatched in blue is the area I wish to put forward at this time for development.

Yours sincerely,

Ted Talbot.

Forward Planning Team,
Stafford Borough Council,
Riverside,
Stafford. ST16 3AQ



Mr Ted Talbot,

Stafford Borough
Council
29 APR 2020
-Received

28th April 2020

**Stafford Borough Local Plan 2020-2040
Issues and Options Stage Consultation.**

Dear Forward Planning Team,

Please find enclosed a copy of the letter and map that I sent to you on "4th march 2020. This follows a communication from Alex Yendole stating the location map was missing from the letter.

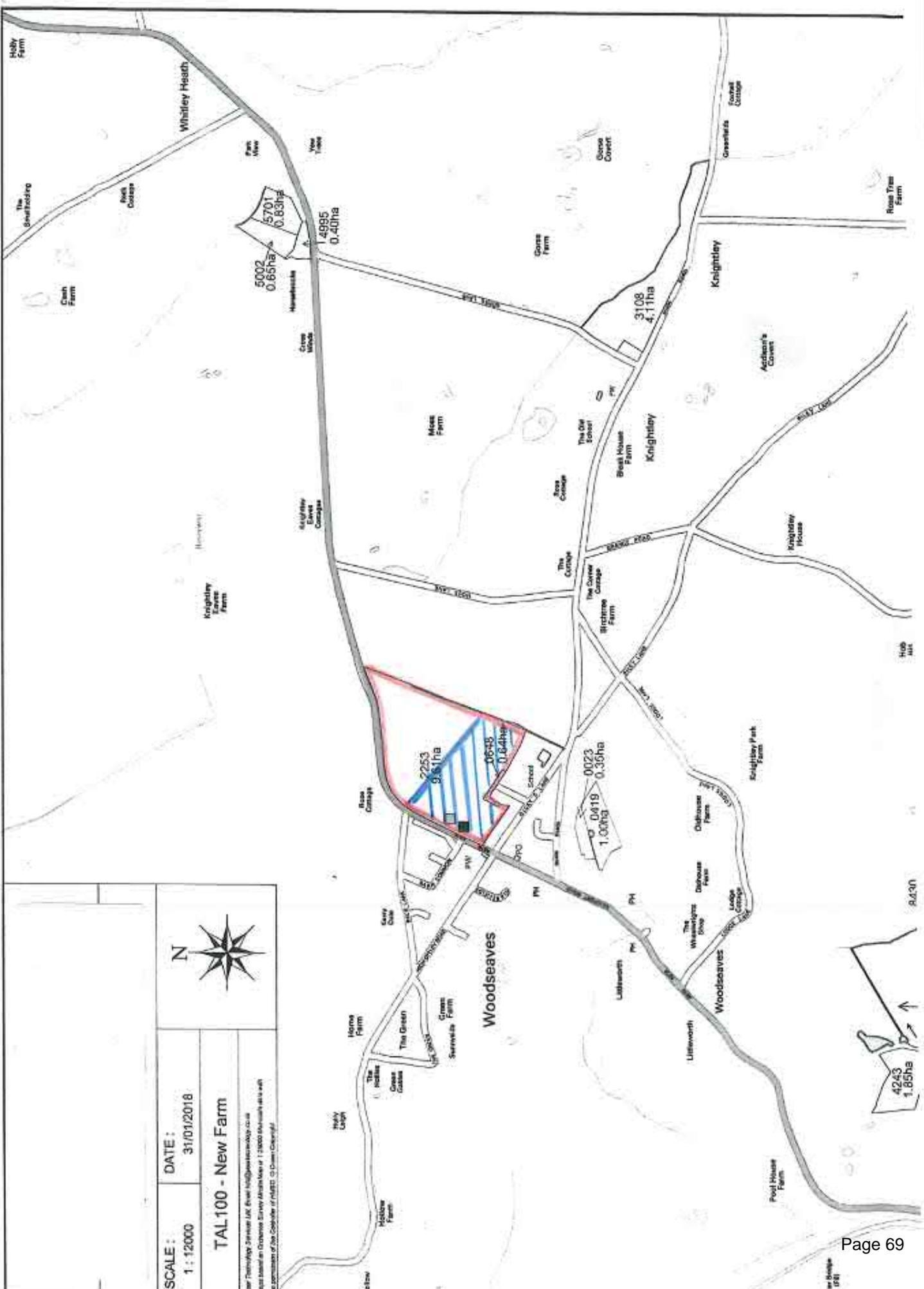
Many thanks,

Yours sincerely,

pp. 

Ted Talbot.

Forward Planning Team.
Stafford Borough Council.
Riverside,
Stafford. ST16 3AQ



SCALE: 1:12000

DATE: 31/01/2018

TAL100 - New Farm

Plan Produced by: [unreadable] Ltd. Email: [unreadable]
 All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted in any form or by any means, electronic, mechanical, photocopying, recording, or by any information storage and retrieval system, without the prior written permission of the publisher or copyright owner.

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		John
Surname		Heminsley
E-mail address		[REDACTED]
Job title (if applicable)		Planning Consultant
Organisation (if applicable)	Jessup Brothers Ltd	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan- or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation Jessup Brothers Ltd			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Chapter 5 Strategy	Paragraph		Table	
Figure		Question	5B	Other	
2. Please set out your comments below					
Support the partial catch up approach to reflect accelerated headship rates amongst 15-34 year olds, so the higher figures in E or F in the table.					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Chapter 5 Strategy	Paragraph		Table	
Figure		Question	5D	Other	
2. Please set out your comments below					
Agree. We have a particular interest in land at Great Haywood and support the inclusion of this settlement in the list of large settlements.					

Please see attached document which lists answers to other questions in Chapters 5 and 8.

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

FURTHER COMMENTS ON BEHALF OF JESSUP BROTHERS LTD
NEW STAFFORD BOROUGH LOCAL PLAN 2020-2040
ISSUES AND OPTIONS CONSULTATION

Chapter 5 Strategy

Question 5F – The spatial scenarios considered to be the best options are 3, 5 and 6 which support development in large settlements.

Question 5H – Agreed that only growth options 3, 5 and 6 which are the ones identified as NPPF compliant should be considered.

Question 5P – In some cases settlement boundaries are appropriate, but in others flexibility would be beneficial.

Question 5Q – It is not agreed that the methodology used to define settlement boundaries is correct. One of the criteria used is barrier features, which in the case of the SHELAA in Great Haywood has identified the existing railway embankment on Mill Lane as a reason why the settlement boundary should not be extended westwards beyond this feature. This fails to reflect how close the site immediately to the west of the railway bridge and south of Mill Lane is to the centre of the village, much closer than other sites 06.10 and 13 listed in the SHELAA. It is within easy walking distance of local shops, pub, health centre and churches. In addition there are existing village facilities beyond the bridge, including a café, farm shop and plant nursery. Mill lane also has a bus service. It is logical for the settlement boundary to be extended to include all of these areas of land.

Chapter 8 Delivering Housing

Question 8A – It is Government policy to encourage development of brownfield sites but viability needs to be taken into consideration.

Question 8B – It is Government policy to increase densities where appropriate but consideration of local character must always be a relevant factor to take into account.

Question 8C – Higher densities are appropriate where there are existing good frequency bus services and lower parking standards can be adopted in order to maximise density subject to the point on character above.

Question 8D – NDSS requirements are quite high and typically add 10sq.m. to the size of a house, so there are implications in relation to land requirements and development costs. Setting a minimum standard of floor area of at least 85% of NDSS is more realistic.

Question 8E – See answer to 8D.

Question 8F – It is not clear whether the range is meant to deal with site specific factors and some specialist housing schemes for the elderly are likely to be 100% 1 and 2 bed and there may be other local needs for 1 and 2 bed affordable units, so some flexibility needs to be applied to allow for this.

Question 8G – It is noted that the number of older people is projected to increase by 34.7% giving a need for 1,111 care home, extra care and sheltered spaces across the Borough, so clearly more 1 and 2 bed accommodation is needed.

Question 8H – Realistically all affordable dwellings should be wheelchair accessible so 10% is not particularly onerous apart from flats on upper floors.

Question 8I – It is appropriate to have reduced garden sizes or communal open spaces for small bungalows but a blanket policy requiring a minimum % of bungalows on all major development sites is not practicable.

Question 8K – It is unlikely that the higher end of the annual affordable range will be achievable. However it would help if 100% affordable sites were permitted on land not available for general market housing.

Question 8M – Agreed that this would help to maintain future supply of rural exception sites.

Question 8N – As there are relatively few people on the self-build register it is not considered necessary to have a specific policy applying to all large sites which would be difficult to justify.

Question 8O – Agreed that this is a sensible way of meeting a local requirement for self-build plots.

Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

26 March 2020
Our Ref: H1/Staf/Issues/Response

Dear Sirs

**Stafford Local Plan 2020-2040
Issues and Options Consultation**

This response is made on behalf of Hallam Land Management Limited to the Issues and Options Consultation Document for the new Stafford Local Plan. Hallam Land are a major promoter of development, working across the United Kingdom and are part of the Henry Boot Group of companies. Further information on Hallam Land and its activities can be found at <https://www.hallamland.co.uk>.

We are pleased to submit this response to the Issues and Options consultation as Hallam are a landowner in Stafford and have promoted developments at Stafford town and at Stone, as the council will already be aware. We are concerned to ensure that the new Local Plan promotes above all a sustainable, attractive and dynamic borough.

Our view is that the significance of Stafford as the principle location for growth be retained and that this offers the most sustainable approach. Our land off Milton Road (within Berkswich but adjacent to Baswich and Weeping Cross/Walton on the Hill) can contribute to the continued growth and enhancement of Stafford town and the sustainability of adjacent local communities. Our proposals, which we call Walton Garden Village, shows the potential for around 225 new homes, a new medical centre and local shopping, along with significant new public open spaces. Our aim in promoting the development in 2014, was to provide a very high quality development appropriate to the local character of the site and to meet in the process, local needs for new facilities, affordable housing and open spaces. The council's reasons for refusing the scheme at that time were that there was no need for the development because other land was allocated and available although there were no objections to the proposals from statutory authorities. The need for further land to meet the new housing requirements will mean that new sites within the town must be identified, and therefore we consider the Milton Road site to be appropriate for development early within the new plan-period. We have enclosed our short summary brochure that describe our proposals for information.

We have responded to the various questions posed by the Issues and Options consultation document. We have done this in the attached table, which we have created from the list of

questions in Appendix 1 of the document. We have provided this in MS Word and trust you will be able to capture the text as necessary for any reproduction you wish to do.

General Comments

Our overriding general comment on the consultation is that the context for the Plan should fully recognise the imperative for action to address climate change. The Plan period is from 2020 to 2040, which is just 10 years before the Government's committed objective of achieving UK national carbon neutrality. This is a critical period within which the country will need to change and most actions will need to be undertaken to ensure the objective is achieved. The spatial strategy, that is where development is located, how it is connected and the way in which it is served, designed and delivered are critical factors in delivering this national commitment.

This means that the Local Plan options must be informed by a framework that identifies the most sustainable options, and a framework that can test and evaluate the contribution of each option to carbon neutrality. The process of plan preparation must be to ensure that those options that achieve the greatest benefit in terms of carbon neutrality must be preferred.

Our concern is that the issue of climate change in the Issues and Options consultation appears to concentrate mostly on issues of energy generation, energy efficiency and water efficiency – all of which are important but are simply components of what must be a larger strategy across the Borough (and sub-region) to achieve carbon neutrality. Without this, it is difficult to see how the Local Plan contributes to this central objective, and to see that the spatial strategy adopted represents the most appropriate strategy. And, in due course, to effectively evaluate its performance against this central objective.

The Government has committed through the Paris Agreement to reduce carbon emissions and through section 5(8) of the Planning Act it must explain how policy set out in its national policy statements takes account of its commitments under the Paris Agreement. In our view, this is an obligation that should also relate to local authorities through their local plans. Although not legally a requirement in the same way, it is clear there is a similar imperative for local government to demonstrate that it too is responding to this national Government commitment.

In our view, the central factor in achieving carbon neutrality is the location of development. Development should concentrate on existing urban centres and extend in ways that reinforce the primacy of those centres and be connected in highly sustainable ways, avoiding travel by car wherever possible, as this contributes the greatest to carbon emissions, and will do so for the plan period, despite advances in technology, such as electric cars. Concentration helps support essential services, such as retail, culture and such like that need a critical mass of people and are increasingly vulnerable to economic change and competition, and helps support, and be served by, sustainable local public transport systems. The Plan must concentrate on ways to grow the existing urban network of towns and larger villages and achieve attractive and vibrant places, not promote plans that

disperse growth and risk undermining the vibrancy of the existing communities. The priority must be to grow the existing urban network in optimal sustainable ways.

Options to develop new towns and villages or 'Garden Settlements', are rarely more sustainable choices unless capacity no longer exists because a town or location has met its limits because of nationally recognised parameters, such as Green Belts, AONBs, or absolute physical constraints such as flood risk areas or steep landform and such like, where development would not be possible or sustainable. That is not the case with Stafford, as there is capacity for the town to grow further. This must be done in ways that primarily reduce the need to travel by car and therefore locations must be well served by public transport and have access to facilities such as schools, shops and healthcare. In our view, Stafford must look more meaningfully at public transport strategies including bus lanes (dedicated and shared), and guided bus routes and the potential of new technologies, such as on-demand PT to ensure development is well connected and journey times reduced and PT prioritised.

New towns are also less sustainable options than growing existing communities unless they are of sufficient scale and critical mass to effectively be largely self-contained. Even then, they are unlikely to provide higher-order facilities such as regional/sub-regional shops or health care or major cultural venues that require sub-regional sufficient catchments. It is likely that employment will mean there is significant travel by car to get to work, and facilities may compete with established centres and threaten their viability. Local people may feel that Stafford and other settlements are at their limits, but this is not the case. The issue is that people have become disillusioned with growth where it does not deliver attractive new places. It is seen as adding congestion, with poor and/or late facilities, and not being relevant to existing communities. The test of the planning system (and the Local Plan) is to ensure these matters can and are addressed effectively.

The way development is designed and delivered needs to improve to address these concerns. Improvements to infrastructure, local facilities including green spaces, and particularly public transport must make the urban network more efficient, and the design of the development improved, and the Local Plan should set high standards for these aspects and ensure they are delivered and enforced.

It is also the case that the Plan should consider in much more detail the requirements for enhanced Green Infrastructure including carbon sequestration and biodiversity net gain. Carbon sequestration is the long-term storage of carbon dioxide emissions in plants and soils. It is required to contribute to carbon neutrality and ensure that within local areas, remaining carbon emissions are compensated for. Similarly, it is Government policy to achieve biodiversity net gains. This may mean that large new areas need to be created to achieve biodiversity gains for the Plan as a whole. The Local Plan should identify what is required and ensure this is part of a coherent Green Infrastructure Plan for the Borough that also reflects the opportunities for multifunctional GI.

In summary, our view on the Local Plan is that it must be set within a framework to deliver Carbon Neutrality in terms of the location, type and performance of the built and natural environment. The simple assessment through the sustainability appraisal framework is

insufficient and simply compares relative options – a framework must be set that works back from Carbon Neutrality, identifying what is required to achieve that goal, and strategies and proposals prepared to deliver against those requirements. It is our view that alternatives to grow the existing settlements sustainably should be fully exhausted before alternatives, such as new towns, are considered.

We hope these points and our responses to the questions are helpful.

Yours faithfully

A black rectangular redaction box covering the signature of Andrew Hiorns.

Andrew Hiorns

Encl. Response Table

Cc	Jonathan Collins	Hallam Land Limited
	Richard Walters	Hallam Land Limited

Section 1 – Introduction	
Question number	Section 1 – Introduction
1.A.	<p>Is the evidence that is being gathered a suitable and complete list?</p> <p>No, see below.</p>
1.B.	<p>Have any key pieces of evidence necessary for Stafford Borough’s new Local Plan been omitted?</p> <p>The Strategic Development Options study should consider the contribution to carbon neutrality more explicitly and quantify the expected outcomes from each option</p> <p>Sustainable Transport and Public Transport measures and connectivity potential</p> <p>Renewable energy potential and locations assessment</p> <p>Green Infrastructure and biodiversity assessments (the ‘Nature Recovery’ plan identifies biodiversity but does not consider appropriate landscape measures to ensure the locations are also suitable against wider Green Infrastructure objectives)</p>
Section 3 Vision and Strategic Objectives	
3.A.	<p>Do you agree that the Vision should change?</p> <p>We agree the Vision should change and should be more succinct and focused on delivering a sustainable and dynamic place.</p>
3.B.	<p>Do you agree that the Vision should be shorter?</p> <p>Yes, as above</p>
3.C.	<p>Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?</p> <p>Yes, absolutely, see general Comments in the covering letter.</p>

3.D.	<p>Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication?</p> <p>There is duplication that can be avoided, but the objectives should reflect the specific characteristics of the places/locations too.</p>
3.E.	<p>Is the overall number of Objectives about right?</p> <p>We feel they are too long. It is important the objective can be evaluated properly as the plan progresses and is implemented. The criteria against which it would be judged needs also to be explicit.</p>
3.F.	<p>Should there be additional Objectives to cover thematic issues? If so what should these themes be?</p>
<p>Section 4 Sustainability and Climate Change</p>	
4.A.	<p>Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.</p> <p>We have commented that this narrow focus is not sufficient to properly deal with issues of Climate Change.</p> <p>a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?</p> <p>This could be a requirement, however it is important to set this within a framework that identifies the plan's overall approach to Climate Change, and does not disadvantage development locally against other competing locations. The Government's approach is to ensure that the Building Regulations provide the framework to achieve this objective.</p> <p>b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?</p> <p>As we have stated, there is a need for an overall Climate Change strategy that identifies, inter alia, the role the Local Plan must play in achieving Carbon Neutrality, and to then to develop the Local Plan framework to achieve that objective. This would include policies on the location of development (Spatial Strategy), performance of development, transport and Green Infrastructure/biodiversity measures/policies.</p>
4.B.	<p>Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?</p> <p>This will depend on what the viable potential is for various forms of energy technologies; some will be specific to particular locations, such as wind turbines. The priority first, however, is to ensure energy savings through design, the more energy saved then the less requirement there will be for renewable energy (or any other energy). Measures such as super-insulated properties, passivhaus, and similar initiatives to reduce energy consumption should be evaluated. The siting of energy generation plants and wind turbines should be assessed on a case by case basis, although suitable locations for energy plants can be identified within the plan.</p>

161

Appendix 2

Policy Theme and Questions	
4.C.	<p>Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?</p> <p>The council should have a policy requiring the developments to investigate and evaluate local provision of renewable energy and for this to be factored in to the schemes. It may be that sources are not viable, or have a disproportionate effect on the overall viability and may also affect other objectives, such as affordable housing. The assessments should look at reducing energy consumption too as part of an overall energy strategy. But this approach would allow decisions to be made against an informed background.</p>
4.D.	<p>Should the council allocate sites for wind energy developments in the Local Plan?</p> <p>It can, if informed by an assessment of suitable viable locations.</p> <p>If so, where should they be located?</p> <p>This will depend on the above.</p>
4.E.	<p>Should the council implement a higher water standard than is specified in the statutory Building Regulations?</p> <p>Again, this can be achieved if it is part of an overall coherent strategy and defensible and does not lead to schemes being unviable or uncompetitive against locations which do not apply higher standards.</p>
Section 5 The Development Strategy	
5.A.	<p>a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?</p> <p>Yes</p> <p>b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.</p> <p>There is merit in retaining the policy in our view.</p>
5.B.	<p>a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements?</p> <p>What is your reasoning for this answer?</p> <p>b) Should a Partial Catch Up rate allowance be incorporated?</p>
5.C.	<p>In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031?</p> <p>Yes</p> <p>If a discount is applied should it be for the full 6,000 new homes currently accounted for</p>

	<p>in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?</p> <p>This will depend on the confidence the council has that the requirement will be delivered and when. The Council argued forcibly that the proposals were deliverable within the Plan period and prepared and produced evidence to that effect, despite objections from others, and this position was accepted by the Inspector. The Council runs the risk of a lack of confidence in its own position to now argue that the housing strategy cannot be delivered. To what extent there will be a shortfall would need to be established through a careful assessment of the existing commitments and proposals.</p>
5.D.	<p>i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Yes</p> <p>ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy? Yes, if it can be demonstrated that these are sustainable locations for development and that measures are put in place to ensure Climate Change objectives are met, and dispersed development does not simply meet demand for village housing for commuters that has little relationship to the needs or requirements of the local community.</p>
5.E.	<p>The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath/Rough Close.</p> <p>Should these areas be identified in the Settlement Hierarchy for development?</p> <p>Yes, subject to the above at 5D</p>
5.F.	<p>a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?</p> <p>In general, yes.</p> <p>b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?</p> <p>An option that concentrates entirely on the existing urban area is unlikely to be deliverable whilst retaining a dynamic mixed-use area, while a dispersal option is highly unsustainable, and also unacceptable, as would concentrating only on a new settlement.</p> <p>c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer</p> <p>The best option is one likely to represent a growth of the existing urban pattern, so a combination of scenarios. This might be extended to include for a new settlement, if that settlement is of a scale and location to reinforce the existing urban network, and critically can be fully connected in a way that does not undermine climate change objectives. It is not reasonable or sustainable to concentrate solely on a new settlement.</p>

162

Appendix 2

5.G.	<p>Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough’s future housing and employment land requirements?</p> <p>Yes, but the suitability of this option will depend critically on whether it is able to contribute effectively to the Climate Change imperative, and crucially represents a more effective way to reduce carbon emissions – not simply comparatively but in absolute terms, as should be the case in all options.</p> <p>If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate? Please explain your answer.</p> <p>These will need to be fully evaluated and sufficient information does not yet exist in the studies undertaken to evaluate the locations in the terms we refer to above, although the closer and larger options to Stafford are perhaps more likely to offer the greatest potential.</p>
5.H.	<p>i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?</p> <p>Yes, we agree.</p> <p>2. ii) If you do not agree what is your reason? 3. iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option. None</p>
5.I.	<p>Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?</p> <p>Please explain your answer.</p> <p>No, the Garden Community option should not be an automatic inclusion because of ‘growth pressures’ on existing urban areas. Those pressures must be addressed first. The new settlement must be shown to offer benefits in terms of climate change objectives that cannot be met equally by growing the existing urban network. A ‘preference’ for locating growth away from existing residents because they do not wish it to be close by is not a sufficient reason as invariably, the real cost of this approach is additional emissions and a reduction in overall environmental quality. These hard realities need to be addressed. The objectives must include making existing urban areas sustainable, attractive and well served as a priority.</p>
5.J.	<p>What combination of the four factors:</p> <ol style="list-style-type: none"> 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount

	<p>4. No Garden Community / Garden Community</p> <p>Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.</p> <p>Our preference, subject to the comments we have made is for</p> <ol style="list-style-type: none"> 1. Growth Options E,F,G 2. Partial Catch up 3. Discount 4. Garden community should only be considered where its contribution to climate change objectives compared with the alternatives can be clearly demonstrated
5.K.	<p>Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable?</p> <p>Yes If not, what would you suggest and on what basis?</p>
5.L.	<p>Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why.</p> <p>It is important that there remains an overall balance of employment and housing and decisions about the loss and replacement of employment land should be made in this context. It is important that accessible employment remains within the urban area and close to the towns and served by public transport to reduce the need to travel by car to work.</p>
5.M.	<p>Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan?</p> <p>New employment should be located within the urban area and located to be accessible to the housing growth locations.</p> <p>If not, what would you suggest and on what basis?</p>

163

Appendix 2

Policy Theme and Questions	
5.N.	<p>Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable? If not please explain your reasoning. Yes.</p>
5.O.	<p>Are there any additional sites over and above those considered by the SHELAA that should be considered for development?</p> <p>Not that we are aware of.</p> <p>If so please provide details via a "Call for Sites" form</p>

5.P.	<p>Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary?</p> <p>Yes, but boundaries where they are proposed need to be carefully drawn to allow for necessary elements of sustainable growth.</p> <p>If not please provide reasons for your response including the specific settlement name.</p>
5.Q.	<p>Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.</p> <p>Yes</p>
Section 6 Delivering Economic Prosperity	
6.A.	<p>a) What level of employment space provision for the Plan Period 2020-2040 do you consider to be optimal? b) Do you consider the distribution between business classes proposed by Table 6.1 appropriate? Please explain your answer.</p>
6.B.	<p>To ensure optimal economic prosperity, do you consider that the Council should: a) Allocate employment land so that it extends existing employment premises/areas in the Borough?</p> <p>Yes, if land is available and appropriate as this is the most sustainable option.</p> <p>b) Allocate employment in both urban and rural areas?</p> <p>Some additional employment allocations will no doubt be required and should be located to be accessible to growth locations and the existing urban area.</p>
6.C.	<p>Which specific locations (if any) do you think would benefit from the increased provision of employment premises? If so, for what type of activity?</p>
6.D.	<p>In allocating employment land should the Council consider a zoning approach* in order to encourage higher value-added activities? *Note - where site allocations in specific locations have specific Use Classes nominated to them</p> <p>It is important that where the council wishes to see high quality employment that sites are safeguarded for these uses. Otherwise, appropriate sites may be taken up by other employment uses which are more expedient. The aim must be to allocate land to reflect the overall objectives of the employment strategy and not necessarily simply reflect short term commercial requirements. Although enough land needs to be provided to meet these commercial requirements.</p>
6.E.	<p>Should the Council propose a policy preventing the redevelopment of employment premises to residential units?</p> <p>Release of existing employment sites needs to be considered against an overall balance of employment and housing. While housing is a priority, this should not mean that viable employment locations are lost, which may encourage less sustainable patterns of growth and development.</p> <p>If so, should the scope of such a policy be limited in any way? Please explain the rationale for your answer.</p>

The policy should specify that existing employment land is safeguarded unless exceptional criteria can be demonstrated for instance including that the land is no longer appropriate for employment due to environmental considerations, is not viable for this use and that this has been tested by a period of open marketing.

164

Appendix 2

Policy Theme and Questions	
6.F.	<p>a) Where do you consider small and medium size units should be made available?</p> <p>Small and Medium-sized units can be appropriate within smaller communities and within mixed use areas, but pressure for housing often displaces these uses to fringe estates which may be less accessible. Policies to require a mix of uses within the urban area and within specific growth locations can help ensure a more sustainable pattern of development, and also create more vibrant and dynamic places.</p> <p>b) Do you consider there are any other issues relating to building type and size which may be potentially restricting economic opportunity within the Borough?</p> <p>Please explain the rationale for your answer.</p> <p>The plan needs to provide sufficient land to meet the variety of employment land and building requirements, and ensure there are sufficient choices for employers to locate where they feel best able to meet their customers needs. Restricting growth in certain sectors, such as B8 may be detrimental to the performance of the economy.</p>
6.G.	<p>a. Do you consider that a lack of suitable office space is a potential barrier to inward investment within the Borough?</p> <p>Yes</p> <p>b. Where should the council seek to encourage the development of modern office space?</p> <p>Please explain the rationale for your answer.</p> <p>The plan should identify locations where high quality office space is encouraged, and sites safeguarded for this purpose. The amounts and locations must reflect assessments of the potential, and the plan can be an instrument in encouraging a greater proportion of offices – the plan can lead the market as well as follow, supported by a proactive economic development strategy..</p>
6.H.	<p>To assist the rural economy should the Council:</p> <p>a) Allocate land for employment purposes throughout the rural areas of the Borough?</p> <p>Yes, within appropriate settlements, and balanced with housing and local needs. If so, which area(s) do you consider would be appropriate for this purpose?</p> <p>b) Extend existing rural business parks? Where appropriate, as above. If so, which ones?</p>
6.I.	<p>To assist the rural economy should the Council:</p> <p>a) Seek to allow for the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies? As above, this should be informed by assessments of need.</p>

	<p>Should there be any restrictions or conditions to such expansion? b) Propose a policy stipulating the installation of super-fast broadband to all new business development in the rural areas of the Borough?</p> <p>Yes, this is a measure that will enhance the sustainability of more dispersed/remote locations and is likely to be required to ensure they are and remain viable.</p>
6.J.	<p>To assist the rural economy should the Council consider a policy stipulating the installation of super-fast broadband throughout the rural areas of the Borough? Yes, as above</p>
6.K.	<p>Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion? If so please provide details. We are not aware</p>
6.L.	<p>The Visitor Economy is considered by Policies E6 (“Tourism”) and E7 (“Canal Facilities and New Marinas”) in the currently Adopted Local Plan. a) Do these Policies continue to be sufficient in their current form or do they need adjustment? If so, how? What is defined as the visitor economy is actually the provision of leisure and cultural facilities, which equally apply to the residents of the towns. While in this regard, we are all visitors, we feel a more expansive policy framework should be developed to cover the wider aspects of encouraging and controlling leisure, tourism and night-time economy type uses. b) Are there any Visitor Economy themes that should be more explicitly addressed? If so, which? Cultural developments</p>

165

Appendix 2

Policy Theme and Questions	
	Section 7 Delivering Town Centres that address Future Needs
7.A.	<p>a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre? Yes If not please give a reason for your response</p> <p>b) Based on the evidence in the Stafford Borough Town Centre Capacity Assessment do you agree with the level of future retail convenience and comparison floorspace provision? No Comments</p>
7.B.	<p>a) Do you consider that the future approach to the centre of Stafford, Stone and Eccleshall should be based on their respective distinctive characteristics? Yes</p> <p>b) Stafford and Stone have a proposed town centre boundary as well as a Primary Shopping Area boundary, with Eccleshall having a local centre boundary. Are these boundaries appropriate for future centre uses? No Comments</p> <p>If not please provide a reason for your response and an updated map (if appropriate). c) For Stafford a number of new development sites are suggested within the town</p>

	centre area. Do you consider these sites are sufficient to meet future needs or are there other locations to consider? If so please specify. No Comments
7.C.	Do you consider with the local impact floorspace thresholds proposed for Stafford, Stone and Eccleshall to be appropriate? If not please provide reasons for your response. Yes
	Section 8 Delivering Housing
8.A.	Should the council continue to encourage the development of brownfield land over greenfield land? Yes, brownfield land can provide more sustainable locations for housing but sites should be considered in terms of their suitability to provide for a range of potential uses against appropriate frameworks for those uses.
8.B.	Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? Yes, but parallel design standards need to be enforced to ensure design remains of a high quality If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Densities should set a range that are appropriate to local character and influences. A minimum should be set to avoid densities being unnecessarily low. Why do you think this? This approach reflects local character and ensures developments are sustainable.
8.C.	Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area? Yes, as this is a key factor in achieving more sustainable developments – higher densities are appropriate in areas well served by public transport.

166

Appendix 2

Policy Theme and Questions	
8.D.	Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough? Yes, although we would expect that minimum standards are already being achieved.
8.E.	In the New Local Plan should the Council a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? Only to new build, conversions may pose specific design issues that mean minimum standards cannot be achieved. b) Only apply the Nationally Described Space Standards to new build dwellings? Yes c) Not apply the Nationally Described Space Standards to any development? Please explain your answer. N/A
8.F.	Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community? Yes
8.G.	Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford? The mix should reflect as far as is possible the needs of the local community the housing is designed to serve, and should be informed by surveys at local levels. If so, are there any areas where this is a particular problem? Smaller homes are required in the town centre and near other centres, for younger people and also to allow downsizing to allow those wishing to move to more manageable property close to local facilities. Bungalows are required as well as flats.

8.H.	Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible? Yes
8.I.	<p>a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? Yes</p> <p>b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? No, but options for smaller gardens and communal spaces can be acceptable and can be encouraged through design guidelines.</p> <p>c) Is there a need for bungalows to be delivered in both urban and rural areas? Yes, but locations need to be considered carefully to ensure they are appropriate.</p> <p>d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?</p> <p>Yes, the case should assess the need and appropriate locations for Extra Care Housing and also Care Homes.</p>
8.J.	Do you consider that there is no need for additional provision of student accommodation within the Borough? This should be subject to a specific demand assessment.
8.K.	<p>a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable? No, this is unlikely given viability considerations.</p> <p>b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient? This may help meet need, as well as other potential measures from central Government to encourage affordable market housing.</p>

167

Appendix 2

	Policy Theme and Questions
8.L.	Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas? Yes, where there is a demonstrable need and no other measures are available.
8.M.	In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations? This would be difficult to justify in all instances, although if there is no prospect of market housing coming forward this could represent a possible measure.
8.N.	<p>a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes? This should be subject to clear expressed demand and time limited.</p> <p>b) Should the council allocate plots for the purpose of self-build throughout the borough? There is no need if provided for within larger schemes.</p>
8.O.	<p>a) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents? Yes</p> <p>b) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site? This would be difficult to achieve and would require occupational restrictions in perpetuity.</p>

	Section 9 Delivering Quality Development
9.A.	Should the Council a. Have a separate policy that addresses Green and Blue Infrastructure? Yes b. Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network? Yes
9.B.	How should Plan Policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network? The overall GI strategy should identify where appropriate connections and spaces can be made to inform masterplans.
9.C.	Should the New Local Plan: a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate; This will depend on the quality and contribution of that zone considered against the benefits of that location for development. b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement; that approach can have potential , although again the benefits must be clear and quantifiable and the site appropriate in the first instance for development. c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites Yes, a period of 30 years future management is required.

168

Appendix 2

Policy Theme and Questions	
9.D.	How should Plan Policies have regard to the new AONB Management Plan and Design Guidance?
9.E.	Do you consider that the described approach will achieve the Council’s ambition of maintaining and increasing tree cover within the Borough? This should be assessed in detail Are there any further measures which you think should be adopted to further enhance these efforts? The council could consider establishing community forests where appropriate guided by the GI strategy
9.F.	Question 9.F Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No. But this will depend on the suitability of the locations Please explain your answer. If yes, are the following measures appropriate? a) Protecting and enhancing allotments, community gardens and woodland; Yes, where demand exists b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites; Yes c) Requiring major residential developments to incorporate edible planting and growing spaces; Yes d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities. Yes
9.G	Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting? Yes, development should minimise its impacts on its landscape setting; if it does not then it is less sustainable.

9.H	Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? There is no requirement for additional landscape designations in our view. If so, please explain where.
-----	--

169

Appendix 2

Policy Theme and Questions	
9.I.	Should the new local plan: 1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach? Broader historic landscapes should be taken into account in landscape assessments and in archaeological assessments, which should be required for major development. 2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines? Yes. 3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration. Yes 4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design. Yes 5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures. Yes
9.J.	Do you consider that the current “Design” SPD provides sufficient guidance for design issues in the Borough? The SPD should be reviewed and consider issues of sustainable design and carbon neutrality specifically, more closely. Please explain your rationale.
9.K.	Do you consider that the current “Shop Fronts and Advertisements” SPD provides sufficient guidance for shop front and advertisements issues in the Borough? No comments Please explain your rationale.
9.L.	To support a new Local Design Review Panel should the new Local Plan: a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision? Yes. It is important that the panel includes appropriate expertise b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc. Yes c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough. Yes
9.M.	Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan? Yes to protect recognised Green Spaces and not as a mechanism to frustrate otherwise appropriate development.

170

Appendix 2

Policy Theme and Questions	
9.N.	<p>a. Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? The southern part of Stafford has few accessible open spaces and provision there could take pressure off Cannock Chase.</p> <p>b. Are there any other Borough-wide facilities you feel should be associated with open space? No comments</p> <p>c. Are there any settlements that you believe are lacking in any open space provision? See above</p> <p>d. Should the Council seek to apply Play England standards to new housing developments? Yes</p> <p>e. Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? Yes</p> <p>f. Should the Council seek to apply Natural England's ANGSt to new development? Yes</p> <p>g. Should the Council seek to develop a bespoke standard in relation to open and/or play space? No, although account should be taken of local requirements and where the need justifies then provision could be required as part of major developments.</p> <p>h. Do you consider that developments of over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors (eg Play areas, open spaces, sports facilities)? Yes, where appropriate and well designed.</p> <p>i. Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? Yes, where appropriate</p> <p>j. Should the Council require all high density schemes to provide communal garden space? Schemes should demonstrate how access to open space is provided for to serve developments, this could include access to public space or private gardens.</p>
9.O.	<p>Should the Council:</p> <p>a. Seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities? Yes</p> <p>b. Identify within the New Local Plan 2020-2040 the site in which a new swimming pool should be developed? Yes</p>
Section 10 Environmental Quality	
10.A.	<p>The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;</p> <p>a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development? Yes</p> <p>b) Ensure all major development is accessible by regular public transport? Yes</p> <p>c) Enforce Air Quality Management Zones around areas of notable biodiversity importance? Yes</p> <p>d) Employ any further methods which you consider will aid in the improvement of air quality within the borough? Air Quality Assessments to accompany proposals for major developments and to include mitigation measures where appropriate.</p>

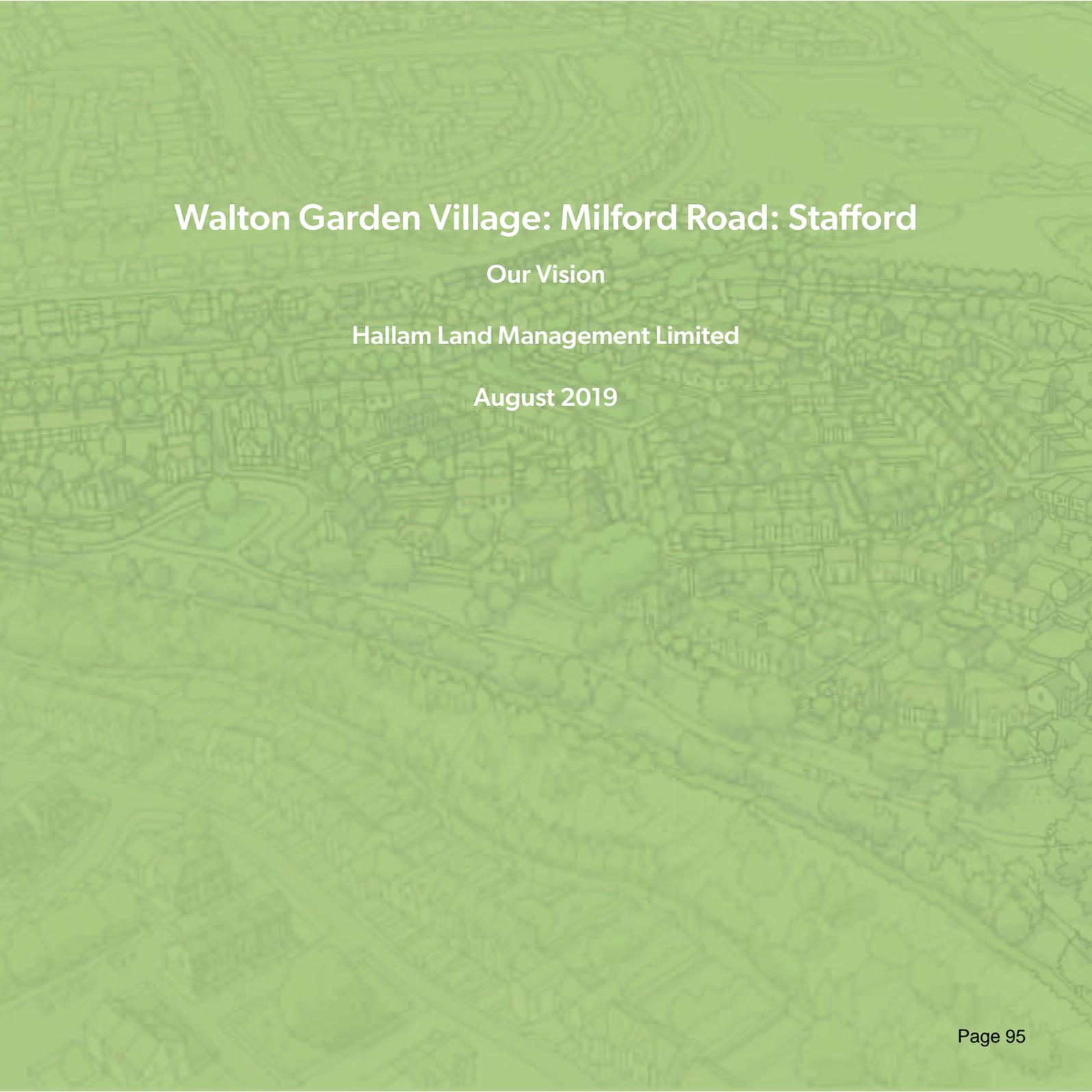
Policy Theme and Questions	
10.B.	The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impacts of NO2 particles on internationally designated sites. Therefore should the council enforce a scheme whereby any development likely to result in an increase of NO2 deposition on these sites in Stafford Borough must contribute to a mitigation programme? Yes
10.C.	The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the council; a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site? Yes b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development? Yes c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford borough? Yes
Section 11 Health and Wellbeing	
11.A.	a. Should the New Local Plan 2020-2040 continue to address health and well-being via relevant associated policies in the way the currently adopted plan does? No b. Or should an alternative approach to the integration of health and well-being issues into the New Stafford Borough Local Plan be adopted? Yes c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan? See below
11.B.	If at Question 11.A b you considered that the Council should adopt an alternative approach to the integration of health and well-being issues into the New Local Plan which potential model would you advocate? (see Para 11.10: Models A; B; C) What is your reasoning for this answer?
Section 12 Connections	
12.A.	Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan? No If not please give a reason for your response Proposals for sustainable transport must be significantly enhanced and reflect a much more proactive policy and proposals to reduce emissions.

172

Appendix 2

Policy Theme and Questions	
12.B.	a) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? Yes If not please provide a reason for your response. b) How do you consider that high quality walking and cycling networks can be developed through new development? New development must contribute to walking and cycling networks and off-street strategic cycle networks across the borough.

12.C.	<p>a) Is there is an issue with overnight lorry parking at certain locations within Stafford Borough? If so, where? No comments</p> <p>b) Is it appropriate to make provision for new overnight lorry parking at existing employment locations where new development will take place? No Comments</p> <p>If not please provide a reason for your response.</p>
12.D.	<p>a) Do you consider it is necessary to set local parking standards for residential and non-residential development ? Yes</p> <p>b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area? The standards should reflect the issues within each part of the borough.</p> <p>Please provide a reason for your response.</p>
12.E.	<p>Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford Borough? Please provide a reason for your response. Major developments should contribute to high quality internet connections as this can reduce the need to travel, and therefore contribute to carbon neutrality</p>
Section 14 Monitoring and Review	
14.A.	<p>a) Do you agree with the general approach to monitoring and reviewing New Local Plan policies and proposals? Yes, but given the need to achieve carbon neutrality by 2050, the plan should set out more precise, quantifiable criteria against which Local Plan policies are contributing (or not) to achieving these objectives.</p> <p>b) Are the currently employed indicators appropriate to monitor key planning policy issues? See above – we feel these need to be specific and quantifiable.</p> <p>If not please give a reason for your response</p>



Walton Garden Village: Milford Road: Stafford

Our Vision

Hallam Land Management Limited

August 2019



Hallam Land Management Limited is the strategic land and planning promotion arm of the Henry Boot Group of Companies.

Our business strategy is to create new land development opportunities and to maximise the value of land for our partners and stakeholders.

Our role is to promote and develop land opportunities through the complexities of the UK planning system. Hallam's strategic land and promotion expertise serves to work with the local planning authorities in helping landowners who are seeking to develop or promote land through the system.

Hallam has been acquiring, promoting, developing and trading in strategic land since 1990 and we operate throughout England, Scotland and Wales. Hallam has experienced land and planning teams based in Bristol, Glasgow, Leeds, London and Northampton, as well as the Sheffield head office, working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities.



Contents

- 1.0 Introducing Walton Garden Village
- 2.0 Our Vision
- 3.0 Set within Stafford
- 4.0 Part of the Local Community
- 5.0 Responsive to Local Features
- 6.0 Inspired by Local Character
- 7.0 Our Proposals
- 8.0 Developing a Rich Character
- 9.0 Delivering the Proposals
- 10.0 Contact Us

1.0 Introducing Walton Garden Village

This short “Vision” document presents our proposals to create a small new Garden Village on the outskirts of Stafford – we call **Walton Garden Village**, after the existing community at Walton-on-the-Hill nearby.

Here we summarise our Vision, describe the site and its features and then our plans, including proposals for housing, shops, a new medical centre and parks to serve the local community. We also describe how we aim to deliver an outstanding scheme.

Stafford is growing and needs new homes. This is our contribution to meeting the ongoing need for sustainable and attractive new places to live in the town. Our proposals are submitted to respond to the review of the Local Plan for Stafford (‘The Plan for Stafford Borough’) and in response to the ‘Call for Sites’. We have promoted the site in the past and the proposals will already be familiar to the authorities.

We trust the proposals can be considered by the authorities in updating the Local Plan.





Figure 1: Walton Garden Village Site





2.0 Our Vision of a 21st Century Garden Village

Our aim is to develop a contemporary Garden Village – a place that responds to the demands of modern life and yet is in harmony with its setting.

We propose a new community of 225 homes, with a local shop, a new medical centre and community parks, meeting the needs for housing and local facilities of a wide cross section of the community - this is what we mean by a new 'village'.

The aim is to evoke the spirit of the early garden village pioneers who rightly knew that development and nature – 'town and country' - could successfully be integrated; who felt that our towns must grow but that buildings need to be in harmony with their countryside settings. The communities they built met their own needs close to home - with generous open spaces and a soft, often imperceptible transition to the countryside beyond, and in the process considerably improving the ecological and landscape quality of the land they developed, and the lives of those living in the new communities.

This is the rich character found in places like Letchworth and Welwyn, Bournville and Hampstead, but also of smaller less well known villages such as Rhiwbina near Cardiff – modest, well planned new communities, catering for all sections of society. With cottages, bungalows, terraces, semi-detached houses and larger free-standing villas; a place where you know your neighbours, shop at the local store and walk your children to school – complete communities in their own right – a village community.

We aim to create a strong identity through design, both homes and the places where people meet; the streets, lanes, squares, crescents and parks – these are the common ground that binds the community physically and socially.

We want to create a distinct but recognisable local identity, reflecting local styles and building traditions, making it characterful and an addition to Stafford's heritage.

The landscape will create the 'garden' character, helping set the village into its wider landscape with avenue trees and planted squares, crescents and courtyards. Planting adds seasonal colour and visual variety, with large gardens and parks to run and play, relax and enjoy nature.

Our new Garden Village must also be 'of our time'. Buildings need to be sustainable and affordable to run. We must maximise the transport options that allow the community to lead sustainable and affordable lifestyles.

Walton Garden Village can set a precedent for new urban growth in Stafford; a place to aspire to, and a model of how a new community can be created, with homes and open spaces carefully integrated to shape a new and attractive countryside edge to the town.



Figure 2: Walton Garden Village





3.0 Set within Stafford

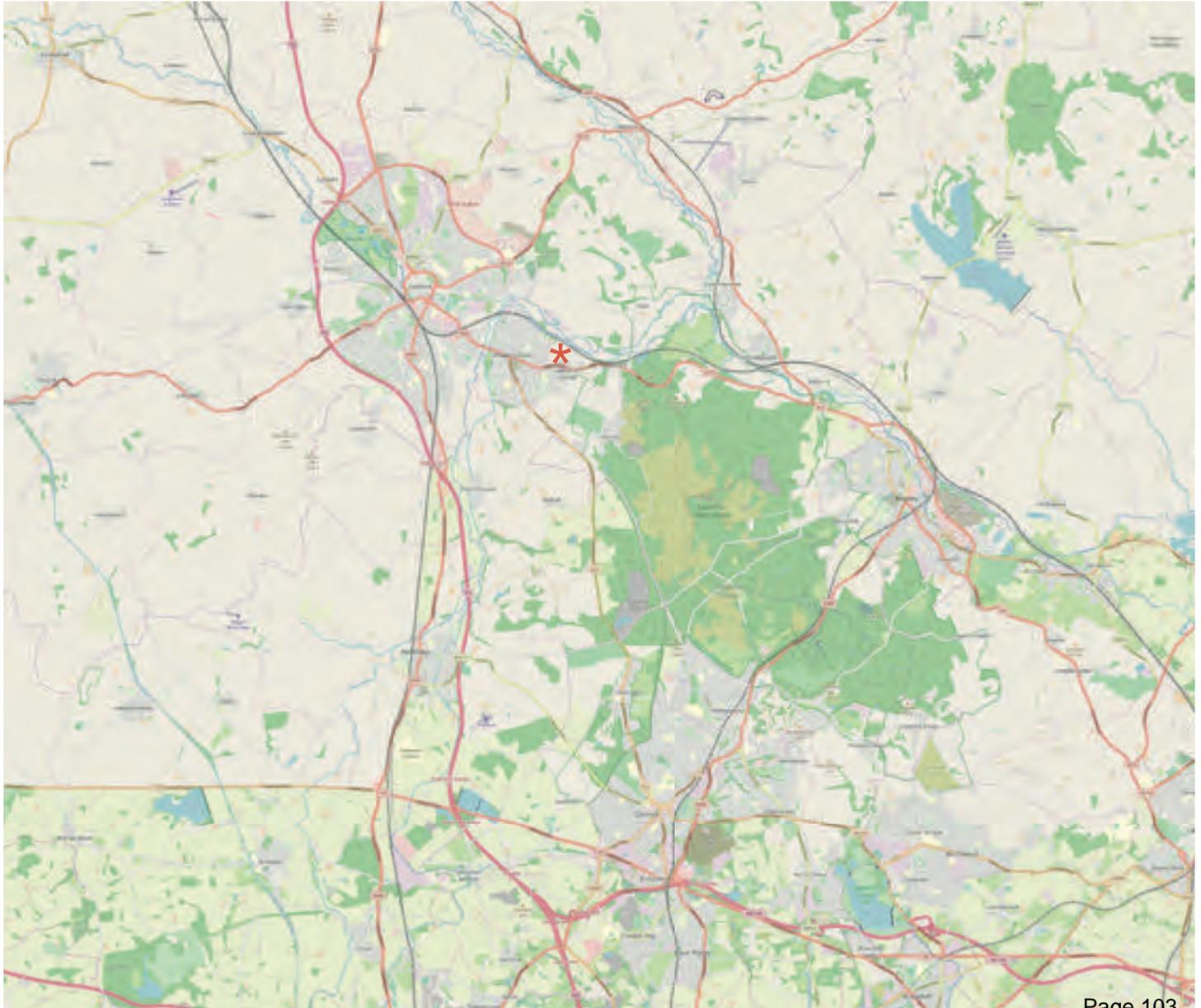
Stafford is a borough of 130,000 people located some 44 kilometres (27 miles) north west of Birmingham. Our Garden Village site is located on the south-east side of the town and off the A513 Stafford to Rugeley Road. The town centre is 4km to the west. The A513 joins with the A34 Cannock Road some 900m to the west to become a major arterial route into the town centre. Stafford railway station is in the town centre and at the junction of the Trent Valley Line and the Rugby-Birmingham-Stafford Line, and an important main line interchange on the West Coast Main Line.

The site falls within the parish of Berkswich, and on the edges of the wards of Baswich and Weeping Cross. Walton-on-the-Hill is to the south and is a much-expanded village but has no shops. Baswich is a mid-20th century housing estate and includes a local centre with schools, shops, health centre, and has the largest and best performing schools in the district.

The site has the main -line railway to the north and beyond that the Staffordshire and Worcestershire Canal and the River Sow. Cannock Chase Area of Outstanding Natural Beauty (AONB) is about 1km to the south and a popular recreational destination. The historic Shugborough Hall and Grounds, another popular destination, is to the south.



Figure 3: Location in Stafford





4.0 Part of the Local Community

The Census in 2011 provides a picture of the socio-economic characteristics of the local population. There are around 13,000 people in the wards and parish and generally the population is older and wealthier than the average for Stafford. The number of retired people and those over 60 is also higher than the Stafford average. The working age (16-74) population represents some 71% and for Stafford 74.3%. Houses are larger than the Stafford average with 91% detached and semi-detached compared with 69% in Stafford Borough. Car ownership and use is also higher, which may reflect the edge of town location.

Given these characteristics and particularly the aging population, there is a need to ensure a continued high quality public transport system locally, and to ensure local shops are accessible and sufficient capacity and access to local primary health care is available. With an aging population, and with little new housing for younger families locally, school rolls can fall and schools become less viable or rely on children from outside the local area, which is already beginning to occur. New housing will help rebalance the local community.

The wider area has a range of facilities.

- At the Weeping Cross Shopping Centre there is a butcher, bakers, hairdressers, travel agents, chemist and café amongst other shops and a new Co-op convenience store. There is also a medical practice and a library. There is a public house and restaurant at Milford to the south. There are no local shops at Walton on the Hill. The health centre is over capacity and needs new larger and better premises.
- Leasowes School is the nearest primary school and is less than 1km away. There is also St. Anne's Catholic Primary School nearby and the Berkswich Church of England Primary School. Walton High School, one of the largest in Stafford, is located opposite the site and within an easy walking distance.
- Wildwood Park to the west includes pitches, play areas and allotments. There are also play areas at Weeping Cross/Baswich. Walton Tennis Club is near to the southern edge of the site, with the Scouts Centre alongside.
- Much of the employment in Stafford is located on the eastern and northern fringes served by the A513 that connects to the M6 motorway. Major employers in the south include the town's largest industrial employer Alstom. The town centre is a major location for employment. There are several retail and other commercial uses in the south that also provide local employment.



Figure 4: Local Facilities



5.0 Responsive to Local Features

The site forms a broadly triangular shape which at its widest point from Milford Road to the railway line is about 765m and 620m wide between the existing rear gardens on Stockton Lane in the west and Green Gore Lane in the east. The site is 29.3 hectares overall. The land is intensively farmed. There is steeply sloping rough ground alongside the railway that includes scrub and plantation woodland but is limited as farmland, although is occasionally grazed.

The key features of the site include:

Plateau and Slopes

The site rises gradually from Milford Road to a fairly level central plateau, then slopes steeply to the River Sow valley to the north and less so to the east. At its highest the site is 110m AOD, with most of the proposed development at 105m AOD, which is the same height as Weeping Cross. The lowest point of the site is at about 85m to the north and east (a fall overall of 25m). For comparison, Walton on the Hill rises to a higher elevation of 115m AOD.



Figure 5: Plateau and Slopes



Landscape Boundaries

The site has some strong landscape boundaries. The northern boundary to the railway slopes steeply with undulations and woodland with tree and gorse/heather, which would remain and be reinforced. The western boundary to the existing housing has a broken hedge with some mature trees although mostly within the gardens, with a strong trees group at the south-western corner of the site.

The boundary to the south to Walton Fields has a steep embankment that was planted poorly as part of that development, and a stronger edge is required. There are two Tree Preservation Orders protecting individual trees.



Figure 6: Views of the Site Boundaries

Free-Draining

The site drains naturally and freely to its periphery, and there are no watercourses or ponds on the site. The future drainage of the site would follow this natural pattern, although new receiving swales and ponds would be required to control the surface water run-off.



Figure 7: Drainage



Limited Biodiversity

There are no nature conservation sites that directly affect the site.

Cannock Chase about 1.4km away, is a Special Area of Conservation (SAC) under the European Habitats Directive, due to the extensive occurrence of the Annex I lowland dry heath habitat.

The habitats within the site comprise mostly arable land with small areas of semi-improved grassland, plantation woodland, scrub and ruderal vegetation. Native hedgerows, domestic ornamental hedgerows and fences divide and border the site. Mature, native trees are scattered within the arable land although these habitats are no more than parish-level importance.

The likely fauna - including reptiles, invertebrates and badgers are likely to be also of parish-level importance and limited to the northern edges of the site. This part of the site has an interesting mosaic of habitats and could support local BAP species, such as grass snakes.



Figure 8: Ecology

Limited Historic Features

There are no Designated Heritage Assets (Listed Buildings, Scheduled Monuments or Conservation Areas) within the site.

Some of the nearest features of historic interest are:

St Thomas' Priory, a scheduled monument, about 1km north-west of the site.

Walton Bridge, a Grade II Listed Building, about 100m north of the site.

The Staffordshire and Worcestershire Canal Conservation Area boundary, about 100m north of the site.

The Walton-on-the-Hill Conservation Area, 250m south-east of the site.

On the site, there are two historic features:

a Medieval/Post-Medieval woodland boundary earthwork bank that has been partially destroyed during construction of the railway line; and

Stockton Farm, an 18th century farmstead which was demolished in the 20th Century; the foundations are of negligible archaeological interest.

Any archaeological remains that survive within the site are likely to be of no more than low importance.



Figure 9: Sites and Monuments Record



Varied Agricultural Value

Most the site is either Grade 3a or Grade 3b agricultural land quality. Parts of the site near the railway are Grades 4 and 5. Grade 3a is better quality, although typical of the fringes to the town and any expansion is likely to encounter similar quality land. Better quality soils can be conserved and re-used in the landscaping, including the verges, squares and crescents, and in the gardens.



Figure 10: Agricultural Value



Mostly Local Views

There are local views from Milford Road, and the bottom of The Rise, and views from certain locations across from Walton on the Hill. There are also views along Green Gore Lane and from the canal of the sloping undeveloped edges of the site.

There are more distant views of the site from the north beyond the canal and River Sow, and from the south from elevated locations within Cannock Chase, although these distant views of the site invariably include the backdrop of the town and of Walton on the Hill. The development of new woodland and the creation of the parklands would help blend the proposals into these views of the town.

View 1



View 3





Figure 11: Location of Views



Summary

- a new access from Milford Road would be required, the existing farm access could be used for emergency vehicle access and pedestrian access;
- The steeper slopes are less suited for development and can form part of the public open spaces, and some have biodiversity potential;
- A Public Right of Way crosses the site and will be maintained;
- The ecological interest is limited but there is considerable potential to enhance the site with grasslands and through the sustainable drainage system;
- There is little archaeological interest. The two known sites are damaged and have little remaining value;
- The site is mostly Grade 3a and 3b agricultural land quality and not unusual on the urban fringes of Stafford;
- The landscape boundaries vary. The boundaries could be strengthened further. There are major individual oak trees on the site that would be retained and protected.
- The drainage is to the north, east and south, and drains freely, and would be suitable for a sustainable drainage system to manage the run-off;
- Local views of the site are limited but those that do exist are important and care needs to be taken to create high-quality views and to retain existing landscape. The longer-range views are from the south and are invariably in the context of the surrounding urban development and the distance means the impacts are not significant.



Figure 12: Summary of Influences





6.0 Inspired by Local Character

We have studied the best elements of local built character to inform our proposals. The character includes mature suburbs and older villages, and rural villages beyond the urban edge.

The south-eastern edges of Stafford are made up largely of mid-20th century urban expansion with large private housing estates at Weeping Cross/Baswich and Walton on the Hill, which absorbed the earlier ribbons of development along Milford Road and Cannock Road. Some of the frontages have character, often with large individual houses along wide tree-lined streets.

Walton on the Hill has an historic core centred on the church of St. Thomas with several notable individual properties, and designated a Conservation Area in March 1977.

Milford is to the east and close to Cannock Chase. It is a small linear village with houses around Milford Hall. Generally, properties are a single plot deep to the road, and around Milford Common. There are many large properties with large well-planted gardens with mature hedges and trees.

Weeping Cross has large individual properties set alongside the road behind long well-planted front gardens. Most houses date from around the 1930-1960s, with several styles. Again, verges with street trees are distinctive, and mature boundary hedges, sometimes above low stone walls fronting some of the larger properties.

Some details include:

- Free-standing houses on large plots and semi-detached, terraces and bungalows;
- Strong treed-avenues with grass verges and well-planted front gardens with hedges, low walls and timber fencing;
- Dark red and maroon coloured brick beneath Staffordshire blue or brindled (red/brown/blue) clay roof tiles, sometimes patterned;
- White painted brickwork on cottages and individual houses;
- Cottages of modest width at 5-6m with 8m height and 40 degree or steeper roofs, sometimes with single storey extensions at right angles to the main roof;
- Eaves and gable details marked by stepped course of plain or decorative brickwork;
- Projecting roofs with deep overhangs in some cases;
- Timber windows, sash or side hung and set into walls to create a shadow line to enliven simple faces;
- Windows often with arched heads of bricks on their edge and sometimes in contrasting blue brick;
- Dormer windows
- Brick chimneys, sometimes of an ornate design



Figure 13: Local Character



7.0 Our Proposals

Here we outline our objectives and land use proposals.

Our Objectives

The objectives are to achieve a development that:

- Achieves an exemplary standard of design and defines a new edge to the town;
- Creates a distinctive and individually designed new community in Stafford;
- Creates a sustainable development that minimizes the impact on the environment;
- Respects existing resident's amenity by setting development back from the existing housing;
- Provides facilities people need such as local shopping and health care;
- Connects and provides links between the existing and new communities and to local facilities;
- Creates an accessible parkland setting and provides an attractive place to spend time with local play facilities;
- Responds to the park-edge setting, with high quality frontages to enhance the edge to the town;
- Retains and strengthens the landscape around the site, softening the development, and providing seasonal colour and interest, while promoting bio-diversity; and
- Ensuring a high quality access for vehicles and pedestrians.

Land Uses

New Homes

- The housing would be a mixture of sale and affordable homes, with a target of 30% affordable homes to meet local authority requirements. The types of housing would include a variety of sizes including 1, 2, 3, 4 and 5-bedroom homes, and a variety of forms including apartments, detached, semi-detached, terraces and bungalows.

New Shops

- A local convenience shop is proposed at the entrance from Milltord Road. This might provide around 200 sq. m net of retail space and be located within the proposed health centre complex, with parking to the rear. A pharmacy, associated with the health centre, might also be located alongside.



A New Medical Centre

- Our proposals include a new medical centre for the local area. This could replace the existing centre at Weeping Cross, and allow the health centre to expand and provide a better service to local people. Incidentally, the practice started in a house close to the site some ...years ago.

The new health centre would provide much needed additional primary health provision and would be one of the first elements developed on the site, at a prominent and accessible location fronting Milford Road.

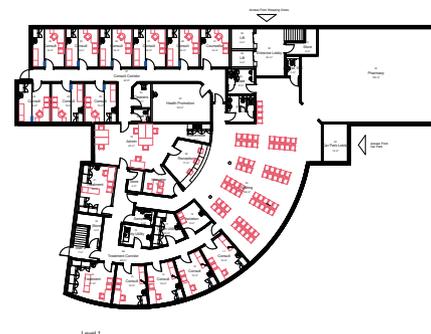
Open Spaces

- The proposals would create over 20 hectares of new green infrastructure, accessible to the whole community. This 'multi-functional green space' provides biodiversity and recreational potential. Three types of parks are proposed:

Formal Spaces within the housing area – comprising the central village square, crescent and other squares and courtyards. These spaces are overlooked by housing and provide structure and character to the development. Planting would be formal with colourful varieties to provide visual interest throughout the year.

Ecology area – this is the land between the development and the railway and includes the small woodland copse. This land remains largely unaffected and public access would be provided for, with some new planting to improve its biodiversity potential.

New parklands – would be created on the parkland to the east, as grasslands. The park would accommodate the sustainable drainage system with swales and ponds along the eastern edge of the scheme.



Initial Floor Plan for Proposed Medical Centre

Access

A single new access is proposed off Milford Road. This would be a T-junction with a right turning lane. This requires some slight road widening to accommodate the changes, and would also require the existing bus layby to be moved marginally to the east. The proposals have been agreed in principle with the Highways Authority - Staffordshire County Council, in the past.

The Junction would provide access to the main avenue that would run into the site and then form a loop around the site. The main avenue is proposed as a tree lined route.

The site is well connected by public transport. There are bus routes run along Milford Avenue stopping at the site entrance.

Most of the proposed housing is within 400m of the bus stop, so it is unlikely that operators would wish to run buses through the development itself, although routes would be agreed in due course.

Two potential emergency access points can be provided off Falmouth Avenue where there is an existing farm access to the site, and off Green Gore Lane. Both accesses would be gated always except when emergency vehicle access is required.

Figure 14: Propsoed Access off Milford Road

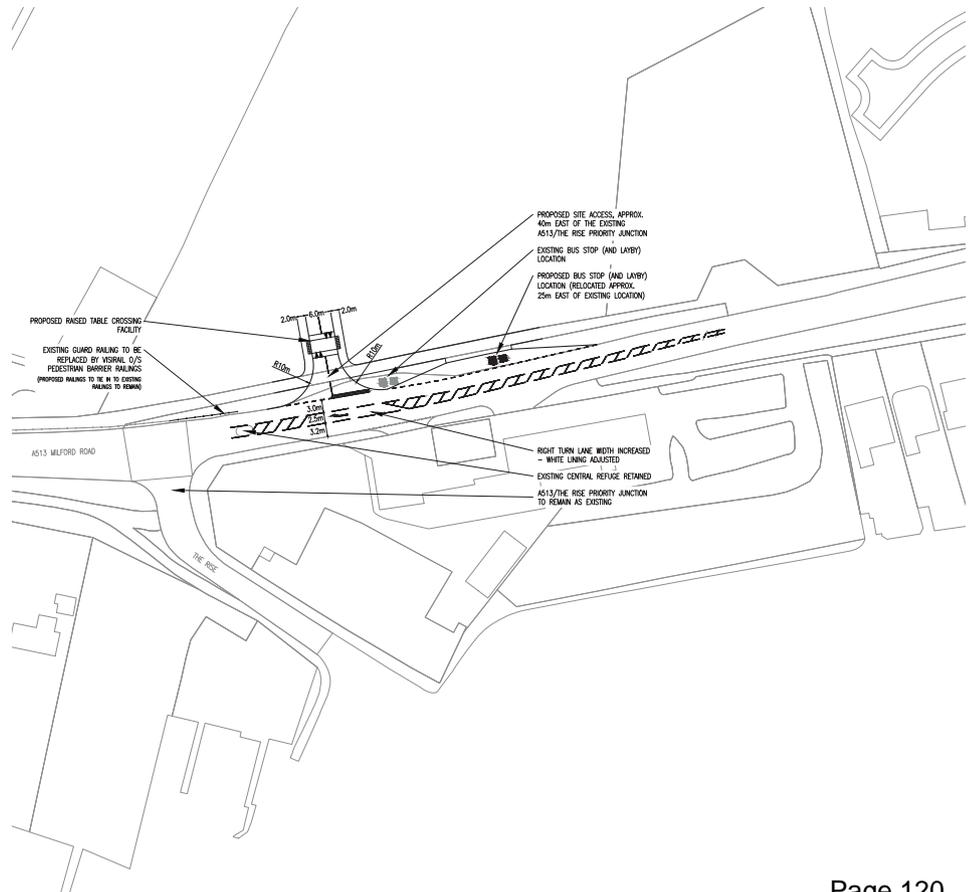




Figure 15: Our Illustrative Proposals





8.0 Developing a Rich Character

Our aim is to create a sustainable, attractive and successful new village – part of Stafford and connected locally, and with its own identity. We would reflect local building styles and traditions and create a distinctive garden village character with consistency in the design of the buildings, set within a generous landscape of tree-lined streets, public spaces and parklands. The parklands help define a new edge to the town and would provide an accessible and biodiverse new public park.

A wide variety of homes would be developed for all incomes from starter-homes through to larger family homes and apartments and bungalows. We will explore the potential for specialist housing such as extra care for the elderly.

The gateway to the scheme off Milford Road would be defined by new shops and the health centre. The convenience store provides local shopping for the community which doesn't have any existing shops close by. The new health centre meets the increasing needs of the local community for accessible health care.

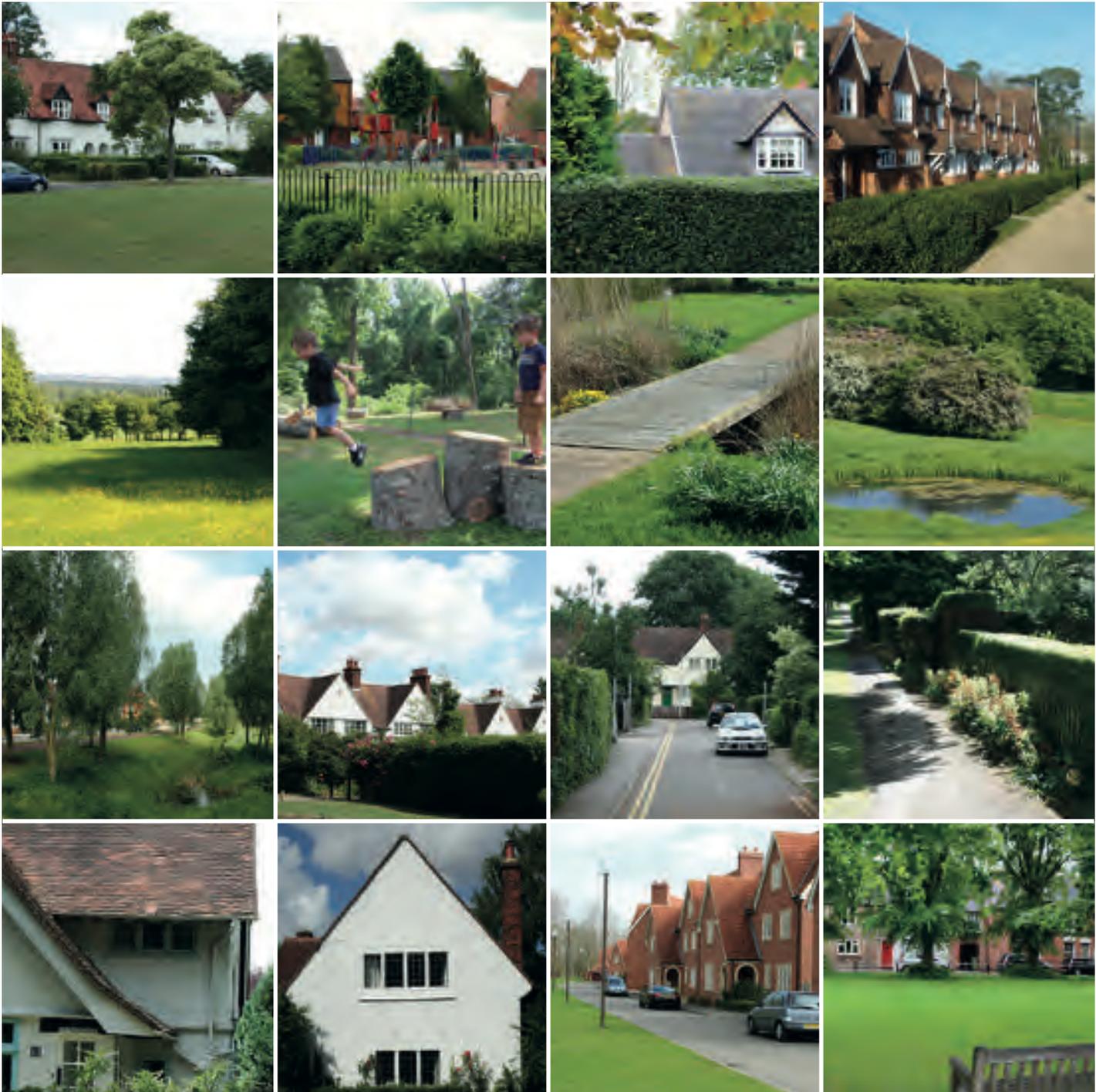


Figure 16: Developing a Rich Character



9.0 Delivering the Proposals

This submission is made in support of our response to the Stafford Local Plan 'Call for Sites'. We would like the site considered as part of the review of opportunities to meet ongoing housing needs within the Borough.

The Walton Garden Village proposal focuses growth on the existing town and can be served by existing infrastructure, and so represents a sustainable option. Our Environmental Assessment of the proposals that supported our planning application in 2014 demonstrated that the impacts of the development were not significant and could be readily mitigated – at that stage the council considered it had enough allocated housing land – the Local Plan review will consider the needs going forward and determine where new sites should be located – our view is that Walton Garden Village offers a sustainable location.

We are submitting this site as part of the Local Plan review and will be promoting the opportunity throughout that process – for housing, health centre, shops and new parkland – and responding at each of the key stages in the review process.

We trust you find the proposals as exciting as we do.

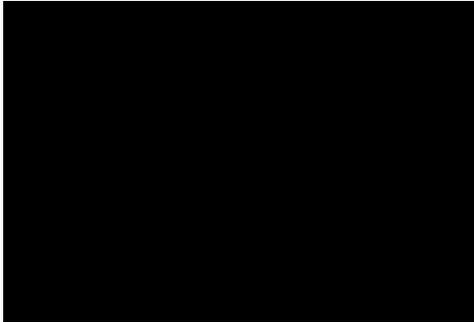




10.0 Contact Us

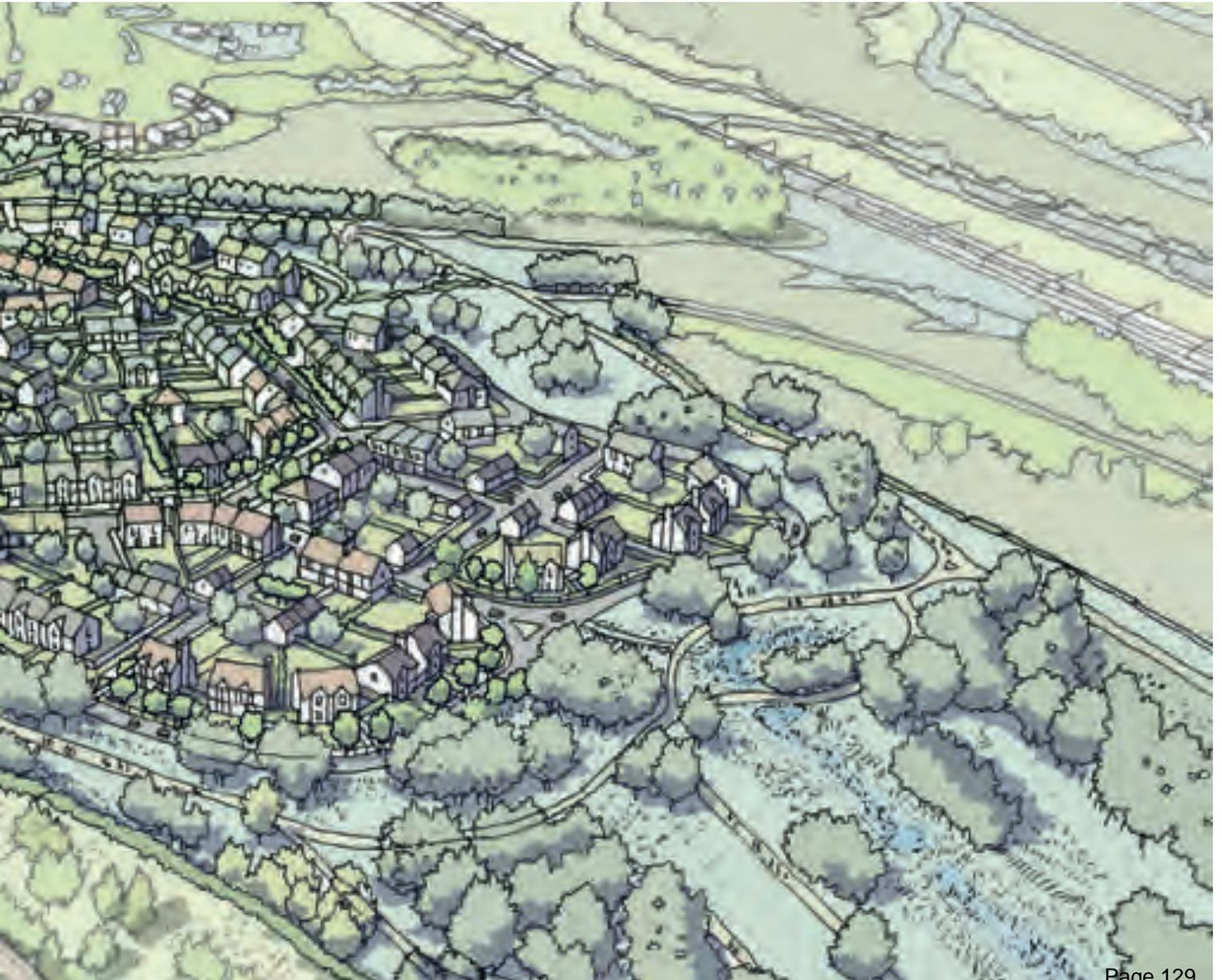
If you wish to learn more about our proposals for Walton Garden Village please contact:

Jonathan Collins
Regional Manager
Hallam Land Management Limited









[REDACTED]

New Stafford Borough Local Plan 2020-2040
“Issues and Options” Consultation - Response Form

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		<i>MR</i>
First Name		<i>PETER</i>
Surname		<i>LEAVER</i>
E-mail address		[REDACTED]
Job title (if applicable)		<i>DIRECTOR</i>
Organisation (if applicable)	<i>STOFORD PROPERTIES</i>	<i>JLL</i>
Address		[REDACTED]
Postcode		[REDACTED]
Telephone Number		[REDACTED]

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at:

www.staffordbc.gov.uk/new-local-plan- or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are

- Commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
Please complete a new Part B for each representation you wish to make.					
Name <i>Peter Leaver</i>		Organisation <i>JLL</i>			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	<i>5</i>	Paragraph		Table	
Figure		Question	<i>5.B</i>	Other	
2. Please set out your comments below					
<p>We support the proposed jobs growth agenda of the Council. As such, we consider that Scenarios E, F and G best fit this profile.</p> <p>We agree that a Partial Catch Up rate (PCU) should be applied. This would seem to be a logical response to tackle suppressed household formation experienced amongst young households in the Borough during the 2008 - 2012 recession.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	<i>5.</i>	Paragraph		Table	
Figure		Question	<i>5.C</i>	Other	
2. Please set out your comments below					
<p>A discount for existing supply should be made. However, it should not be applied for the full 6,000 consented and allocated land. Instead, an allowance should be made for a proportion of this supply not being delivered. It is not clear from the Issues & Options whether any such allowance has been made in the scenarios set out later in Section 5 under Table 5.8A.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	<i>5.</i>	Paragraph		Table	
Figure		Question	<i>5.D</i>	Other	
2. Please set out your comments below					
<p>The proposed settlement hierarchy refers to Stafford as a Tier 1 category settlement with “a key role in driving growth” as it has a “regionally significant service centre role providing employment, retail and other facilities”. We would agree with this assessment.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5.	Paragraph		Table	
Figure		Question	5.F	Other	
2. Please set out your comments below					
<p>Given the growth agenda, it is likely that a combination of spatial scenarios will be required. We favour the following three scenarios:-</p> <ul style="list-style-type: none"> • Intensification of town and district centres. • Intensification around the edges of larger settlements and strategic extensions. • String settlement/settlement cluster. <p>All of these scenarios utilise best existing infrastructure and services and provide the firmest base for further investment, particularly in the short to medium term. They also make optimum use of the strategic road and public transport networks.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5.	Paragraph		Table	
Figure		Question	5.G	Other	
2. Please set out your comments below					
<p>We are cautious about welcoming such an approach. A new garden community will require a significant scale of investment in new infrastructure. For example, according to the Strategic Development Site Options report produced by Aecom, the proposed new garden community at Meecebrook is not well connected in terms of transport for the proposed scale of development and is dependent on a new railway station and a new junction on the M6 motorway with a road link to the site. The delivery of this will involve the support and acquiescence of many stakeholders, some with competing interests, probably the acquisition of third party land, and substantial public funding. These factors will make it very difficult to predict with any certainty or confidence the likely scale and timescale of such developments.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5.	Paragraph		Table	
Figure		Question	5.H	Other	
2. Please set out your comments below					
<p>We do not understand why Growth Options 1 and 2 have been so readily discarded. Both these options identify Stafford as the principal focus for growth. This conforms with the 2019 settlement hierarchy, which describes Stafford as having a key role to play in driving growth.</p> <p>However, we are pleased to see that every option, with the exception of Option 4 (all development at new garden communities) which has also been discarded, includes “intensification of town and district centres” and “intensification of edges of larger settlements and strategic extensions”. This is a sound basis for consideration of the growth options.</p>					

We particularly support Growth Option 6. This combines “intensification of towns and district centres”; “intensification of edges of large settlements and strategic extensions”; and “string” settlement scenarios. This combination makes best use of existing settlement patterns and infrastructure.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.I	Other	

2. Please set out your comments below

For the reasons provided in our answer to Question 5.G, we are cautious about supporting a strategy that relies upon new garden communities due to the uncertainty about their delivery. In addition, for the reasons provided in our answer to Question 5.M (see below), we are not convinced that the favoured new garden community at Meecebrook is particularly suitable for large scale employment development.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.J	Other	

2. Please set out your comments below

We support the following combination of factors:-

- Growth Option Scenarios E, F or G.
- To include Partial Catch Up.
- Discount supply, but only to the extent that it is deliverable.
- No new garden community.

This combination reflects best the proposed job growth agenda of the Council, which we support, makes a reasonable and logical adjustment for previously suppressed local household formation, takes into account deliverable supply and de-risks the spatial strategy in terms of delivery.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.K	Other	

2. Please set out your comments below

We advocate that the highest scenario for employment land requirement is adopted - i.e. 181 hectares. This scenario is based on past take up rates and best reflects the market for employment land. The market for employment land over recent years has seen an imbalance of demand over supply, with this leading to an acknowledged shortage of good quality employment development land throughout the West Midlands (including Staffordshire). This is particularly so for industrial and warehouse development land of any scale.

For this reason, Staffordshire County Council has commissioned on behalf of the principal LEPs to the West Midlands Conurbation and itself the production of a study to assess the shortage of development in greater detail and to identify suitable locations (West Midlands Strategic Employment Sites Study). This study has yet to be published but is expected to confirm there is an obvious shortfall across Staffordshire, amongst other locations, and pressing need to bring forward new well located sites.

In addition, a requirement of 181 hectares will best enable the delivery of the Borough Council's ambitious job growth agenda. It is important that this agenda is not constrained or hindered by a lack or choice of good quality employment land.

The EDHNA (paragraph 7.93) suggests a 25% (B1A/B): 75% (B1C, B2, B8) split. The Issues & Options should reflect this, unless there is evidence to counter it.

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.L	Other	

2. Please set out your comments below

Yes. The next 20 years will continue to see the loss and release of old employment land, located on sites no longer suitable for modern industrial practices, for other uses, particularly for residential. This process should be factored in when projecting need.

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.M	Other	

2. Please set out your comments below

No. There is an imbalance in the supply of consented land, in terms of its geography.

The EHDNA refers to a supply of 74.14 hectares, as at 31.3.2019, with this being split between 48.51 hectares of consented land and 26.63 hectares of unconsented allocated land. Of the 48.51 hectares of consented land, only 11.45 hectares (i.e. 23.6%) is located in and around Stafford – the principal settlement in the Borough and strongest market for employment premises. This compares with 56% on land allocated in the previous Local Plan to Stafford.

32.53 hectares of consented land is located at Meaford Power Station, north of Stone. This represents over 40% of total supply – a disproportionate level given its location away from Stafford and the motorway network. The development is now coming on line (through St. Modwen), albeit very slowly, with just one unit built. 16.6 hectares is covered by the Order for Meaford Energy Centre (a gas fired power station). It could be argued that this function should not form part of the employment land supply and should be deducted from the supply figures. This would reduce total supply to less than 58 ha.

In summary, the current supply is skewed heavily to the north of the Borough, away from the principal settlement – the town of Stafford. As such, the spatial distribution for Stafford for the new plan should be greater than 56% in order to rebalance supply. This will recognise also the relative market strength of Stafford (as acknowledged by the EDHMA) and its key role in driving growth.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.N	Other	

2. Please set out your comments below

For the reasons provided in our answer to Question 5.M, we consider that the proportion of employment land for Stafford should be a minimum of 70% in the no garden community scenario.

It is difficult to see how 40% to 65% of all non-employment land is likely to be realistic or reasonable for a new garden community in the garden community scenario. This is for reasons of both location and timing. The preferred choice of a new garden community would seem to be Meecebrook. This site is not well located in terms of access to the strategic road network and will require a new junction on the M6 (which will take a long time to procure and deliver). Secondly, the EDHNA does not consider that any jobs will be delivered at the new garden community until 2030 - i.e. half way through the plan period.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5.	Paragraph		Table	
Figure		Question	5.O	Other	

2. Please set out your comments below

The SHELAA includes two sites which are controlled either wholly or in part by our clients, Stoford Properties. These are sites ID CRE01 and ID CRE02.

Site CRE01 takes in land owned by the Cantrill family. It lies adjacent to the northern built up edge of Stafford and is now the subject of an option agreement with Stoford. This site covers about 53.6 hectares and is split by the A34. The SHELAA considers this site suitable for housing.

Site CRE02 is large, at 113.5 hectares and takes in all land north of Redhill Business Park and west of the A34. We believe the boundaries to this site have been incorrectly drawn in the SHELAA, with the site transposed to the west. Instead, we believe the western boundary to this site is intended to be the M6 motorway.

If correctly drawn, this site takes in the Cantrill land west of the A34 (circa 22.4 hectares), which is already covered by IDCRE01, land owned by the Hilderley family (circa 60 hectares), and other land in separate ownership to the north (some which is also under the control of Stoford). The SHELAA considers this site suitable for employment.

To clarify and crystallise matters, we have submitted two separate “call for sites” response forms as part of this overall submission to the Issues and Options. These two submissions cover land controlled by Stoford and are summarised below:-

Site	Area (Hectares)	Proposed Development	Site Capacity
Land north of Redhill Business Park	33.33	Employment for B1c, B2 and B8	c. 100,000 sq m
Land at Redhill Farm	29.36	Housing	c. 700 dwellings

The submissions are supported by red line site plans and an illustrative phasing plan. The latter covers both sites.

The location of these two sites fits well within both the potential spatial scenarios of “intensification around the edges of large settlements as strategic extensions” and “string settlement”. They adjoin the built-up edge of Stafford and benefit from the strategic transport corridor of the A34.

The land north of Redhill Business Park is partly allocated for employment purposes (15.6 ha) and represents the best future employment site in the Borough. It enjoys a unique combination of characteristics which make it particularly suitable for B1c, B2 and B8 employment development. In addition, unlike potential new garden communities (such as Meecebrook), the majority of the site (i.e. a first phase of 24.3 ha) can be delivered almost immediately. This is for a number of reasons:-

- Much of the site is already allocated.
- It is a proven business location, demonstrated by the rate of take-up at Redhill Business Park.
- Necessary infrastructure is in place, with no major off-site highways improvements (such as a new junction on the M6) being required.
- Site constraints are limited and known, with mitigation strategies for the area already well developed.
- It is under the control of a single party, which is extremely experienced and successful in B Class development both locally and regionally.

The land at Redhill Farm lies to the east of the A34 and is adjacent to recent and proposed development on land allocated as North of Stafford. It is particularly suitable and sustainable for housing. Again, for similar

reasons referred to above, it is deliverable in the early stages of the plan period.

We consider both sites meet fully the principal tests set by PPG on the allocation of development sites. They are both suitable, available and achievable and will support fully the Borough Council's strategic objectives to bring forward good quality housing and foster economic growth.

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	Mrs
First Name	Nick	Katherine
Surname	Scott	Else
E-mail address	c/o Agent	[REDACTED]
Job title (if applicable)		Managing Director
Organisation (if applicable)	Pickstock Homes	Claremont Planning Consultancy Ltd
Address	[REDACTED]	
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020**. For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at:

www.staffordbc.gov.uk/new-local-plan- or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	3	Paragraph	3.9	Table	
Figure		Question		Other	Key Objectives – Areas outside of Stafford & Stone
2. Please set out your comments below					
<p>The Issues & Options draft document identifies eight key objectives for ‘Areas outside of Stafford & Stone’ that are intended to support the Vision for the Borough. Claremont Planning has concerns regarding the content of key objectives 21 and 25 which are as follows:</p> <p>21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character</p> <p>25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future</p> <p>Whilst the intention of both of these objectives is to support the delivery of housing in the rest of the Borough beyond the main settlements, there is potential conflict between the two objectives. If the authority is only encouraging small scale housing development at villages, it is unclear how it expects infrastructure and other associated development to be realised at such locations. This includes the provision of open space, habitat management restoration and creation, transport improvements or other local infrastructure and services. Restricting the size of development in such locations is also likely to impact on the delivery of affordable housing, whether through on-site provision or off-site contributions.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	3	Paragraph		Table	
Figure		Question	3.E	Other	
2. Please set out your comments below					
<p>The Issues & Options Consultation Document includes 28 Key Objectives, split geographically between Stafford, Stone, and Areas outside of Stafford & Stone. Most of the objectives are also quite lengthy and cumbersome, resulting in a lack of clarity regarding what the Plan is actually intending to achieve. It would be more effective to have fewer key objectives that are more concisely worded in order to emphasise what is most important. This would also reduce the risk of objectives contradicting or conflicting with other objectives.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	4	Paragraph		Table	
Figure		Question	4.A(a)	Other	
2. Please set out your comments below					
<p>a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?</p> <p>The Issues & Options Consultation Document rightly emphasises the importance of sustainability and climate change, recognising the potential effect of reducing energy consumption as part of efforts to tackle climate change. However, the suggestion that the new Local Plan require development to be built to standards in excess of the current statutory building regulations, although aspirational, is not considered to be fully justified. No evidence has been provided by the Council that such a requirement would be feasible or achievable, as it is considered that this would have significant implications for the design of new developments. It is likely that this will also significantly impact on costs and viability and could therefore result in other compromises for example the delivery of affordable housing or infrastructure.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	4	Paragraph		Table	
Figure		Question	4.C	Other	
2. Please set out your comments below					
<p>In certain circumstances, generation of energy from on-site renewables may be feasible and should be encouraged, however this is only likely to be possible on very large sites. If the Council is minded to pursue such a requirement, it should be only required on sites where this is possible and not at the cost of the provision of open space or other infrastructure. It may be more appropriate to include this in the Plan as a site-specific requirement on very large allocations, than a general requirement on ‘large developments’.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
5. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph	5.2	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>The Issues & Options Consultation Document identifies a plan period of 2020-2040 for the emerging Local Plan, while paragraph 5.2 confirms that the Plan will need to provide for at least a 15-year timescale. This is due to the provisions of Paragraph 22 of the NPPF, which identifies a minimum plan period of 15 years, from when the Plan is adopted.</p> <p>In order for the emerging Local Plan to meet these requirements therefore, the Local Plan will need to be progressed through preparation and examination and taken forward for adoption by 2025. Whilst this is achievable, the plan-making process can be convoluted and fraught with delays caused by a myriad of factors. This could include delays at the pre-submission stage if additional stages of consultation are required. Delays could also arise during the examination, where the Inspector may adjourn the examination in order to facilitate the preparation of further evidence, or request additional hearings to consider issues that arise during the examination process.</p> <p>Extending the plan period to provide more of a buffer to accommodate any delays, and ensure that the plan period is able to meet these requirements and does not need to be extended later in the process. Any extension to the plan period should be accompanied by a review of the housing requirement and spatial strategy, in order to ensure that the Plan is able to meet the needs of the entire plan period in full and without being reliant on an early review.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.A (b)	Other	
2. Please set out your comments below					
<p>The Planning Practice Guidance specifically states that <i>“there is no need for a plan to directly replicate the wording in paragraph 11 in a policy”</i>. Therefore it is considered that it is not necessary to retain this policy in the emerging Local Plan, and instead it would be more appropriate to include a brief reference to ensuring conformity with the NPPF and the presumption in favour of sustainable development.</p>					

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name Mrs Katherine Else | **Organisation** Claremont Planning Consultancy

2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5	Paragraph		Table	
Figure		Question	5.B (a) and (b)	Other	

2. Please set out your comments below

The past delivery rates for Stafford Borough, including 688 in 2015/16; 1010 in 2016/17; and 863 in 2017/18; demonstrate that the authority is capable of achieving high rates of delivery. As a result, it is considered that the authority should be aspirational when identifying the housing requirement, bearing in mind the provisions of Paragraph 59 of the NPPF which identifies the “*Government’s objective of significantly boosting the supply of homes*”. In addition, one of the tests for Local Plans to meet in order to be found ‘sound’ requires authorities to meet their objectively assessed needs, as a minimum, indicating support for planning for in excess of that requirement.

Claremont Planning considers that scenario G represents an appropriate middle ground in respect of identifying a housing requirement, as this seeks to deliver growth above baseline estimates in terms of job creation. This would represent an increase when compared to the authority’s current requirements, but could be achieved in a sustainable way. This scenario would also accord with the Council’s Vision to deliver sustainable economic and housing growth, as well as enabling the delivery of an increased number of affordable dwellings.

With regards to Partial Catch Up rates, it is important for the authority to apply this uplift to the housing requirement. This will enable the Council to take account of suppressed and hidden households that have resulted in lower household projection rates. By applying Partial Catch Up rates, this will ensure that the housing requirement is more in accordance with long-term trends in relation to household formation and releases the unmet demand into the market, correcting recent trends.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.C	Other	
2. Please set out your comments below					
<p>It is not considered appropriate for the authority to discount previous Local Plan allocations that will be delivered during the emerging plan period, from the housing requirement for the emerging Local Plan. This is not considered a sound approach and is not considered to be justified by evidence. Whilst it is acknowledged that these dwellings will contribute towards meeting housing demand in Stafford Borough during the emerging plan period, discounting these dwellings from the emerging Local Plan is not a robust way to deal with this. The housing requirement should provide a full representation of the need for housing in the Borough, and no discounts should be applied.</p> <p>A more appropriate way of recognising the contribution that the previous Local Plan allocations can make to the emerging Plan could be through the housing supply, which is a route that other local authorities have pursued including at Eastleigh, Hampshire. An appropriate discount should be made however, to recognise the reality that in some cases allocations may never be fully delivered, or meet the expected housing numbers in full, due to technical matters for example. Therefore, it may be appropriate to include the allocations in the supply but ensure that sufficient other sites are allocated in the emerging Local Plan that will fill the gap should those previous Local Plan allocations not be fully delivered.</p>					
Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.D (i)	Other	
2. Please set out your comments below					
<p>The Council has adopted a more robust approach with regards to the settlement hierarchy in the emerging Local Plan than was the case in the adopted Local Plan. The emerging Plan recognises that whilst the two principle settlements are Stafford and Stone, beneath these towns sit a wide variety of settlements, some of which represent more sustainable opportunities for development than others. By incorporating 7 tiers to the settlement hierarchy, this enables differentiation between the smaller settlements, in order that appropriate levels of development can be directed.</p> <p>The settlement assessment paper establishes that Eccleshall is a “large village”, which is settlements of 500 or more dwellings that act as key service centres for the surrounding rural area by virtue of the range of services and facilities they possess. This is considered to be an appropriate characterisation of Eccleshall, as it is a sustainable settlement that benefits from a wide range of services and facilities, that sustain a significant local population.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.D (ii)	Other	
2. Please set out your comments below					
<p>The identification of smaller settlements within the settlement hierarchy is supported, as these settlements can make valuable contributions towards the delivery of housing, as outlined in Paragraph 78 of the NPPF. However, the distribution of development to smaller settlements should recognise that locations with more services and facilities are more appropriate to accommodate development. As a result, larger villages identified in the settlement hierarchy should be apportioned more development than small and medium sized villages.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.H	Other	
2. Please set out your comments below					
<p>Yes, Claremont Planning agrees that Options 1, 2 and 4 would not comply with the provisions of the NPPF. Option 1 would fail to deliver growth at other sustainable settlements by limiting development to Stafford and Stone, with Option 2 similarly restricting growth at a number of settlements across the Borough and does not acknowledge the urban area at North Staffordshire. Options 3, 5 and 6 set out in the Issues & Options Consultation document would provide more effective and appropriate strategies, and all recognise the contribution that Eccleshall, as a larger village, could make in supporting the delivery of development in a sustainable way.</p>					

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.

Name Mrs Katherine Else | **Organisation** Claremont Planning Consultancy

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section	5	Paragraph		Table	
Figure		Question	5.1	Other	

2. Please set out your comments below

A garden community should only be incorporated in the emerging Local Plan where there is sufficient evidence to justify its location and demonstrate that the development would be feasible.

A number of Local Plans have recently failed at examination due to the lack of justification for new settlements, including Sevenoaks, West of England JSP, and Uttlesford to name three examples. In other circumstances the Plan has only been found sound once a garden community has been deleted, for example at Hart District. These examples demonstrate that Local Plan Inspectors are not accepting vague references to new settlements, and such allocations are only succeeding at examination where sufficient evidence has been provided regarding the allocation and demonstrating that it is the most sustainable strategy against other reasonable alternatives.

As a result, if the Council is minded to pursue this strategy, it must only do so if sufficient information can be provided to fully justify this. This will include demonstrating that the garden community can be achieved within the plan period, as the lead in times for very large scale developments can often result in significant delays between identification at allocation stage and achieving first completions. As a result, there may be a risk that delivery would be delayed such that a garden community is not able to deliver dwellings within the emerging plan period, or insufficient numbers to enable the Council to achieve its housing targets. Therefore, it may be more appropriate and effective to pursue a spatial strategy that is more focused on smaller sites that are able to provide more certainty with regards to ongoing delivery.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.J	Other	
2. Please set out your comments below					
<p>Claremont Planning considers that the Council should promote the following as its Preferred Option with regards to the housing requirement:</p> <ol style="list-style-type: none"> 1. Growth Option Scenario G 2. Partial Catch Up Rates applied 3. No discount applied 4. No Garden Community <p>This will provide the Council with a requirement that will support sustainable job growth, takes into consideration suppressed household formation rates, does not inappropriately factor previous allocations into the housing requirement, and does not rely on a vague garden community proposal that may not be accepted by an Inspector or may not be possible to be realised within the plan period.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.A	Other	
2. Please set out your comments below					
<p>The Council should continue to encourage development of brownfield sites, however with the recognition that brownfield sites on their own are unlikely to provide sufficient sites to meet demand across the emerging plan period. There is a risk that if too much emphasis is placed on brownfield sites, this wrongly incentivises the redevelopment of employment and commercial sites resulting in an unbalanced Borough. Instead, the Council should encourage the redevelopment of brownfield sites that are unsuitable for other uses, but whilst recognising the significant contribution that sustainably located greenfield sites, in larger villages such as Eccleshall in particular, can make to housing delivery.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.E	Other	
2. Please set out your comments below					
<p>The Council should only include Nationally Described Space Standards as a policy requirement in the emerging Local Plan if justified by need and viability, as set out in the PPG and identified in paragraph 8.15 of the Issues and Options Consultation document. Any policy should also include provisions that permit development that does not fully accord with the standards, where it is fully justified. For example, this might be due to viability, technical constraints or other factors that mean that development is unable to accord with these standards.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.F	Other	
2. Please set out your comments below					
<p>If the Council wishes to identify housing mix within a policy in the emerging Local Plan, it should be applied with some flexibility and caution. Whilst the Council has identified an estimation of future need and demand and applied recommended ranges accordingly, this represents an estimation of what may be required, and may not reflect the actual requirement later in the plan period. It is also likely that there will be sites where it is not appropriate or feasible to provide a full range of dwellings, or there may be locations where only a specific type is required. For example, there will be a need to provide dwellings that cater specifically for older people, where only smaller units will be required. There should also be some flexibility provided following the grant of planning permission, so that it is possible for a developer to re-plan development and change the types of dwellings to accommodate fluctuations in the market that may result in lower demand for certain types of housing for example.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.H	Other	
2. Please set out your comments below					
<p>Whilst there is a need to provide accessible affordable housing, a policy requirement that 10% of affordable homes are wheelchair accessible should only be adopted if the Council can support this requirement with evidence from registered providers for example. If the requirement is to be adopted into emerging policy, some flexibility should be afforded to allow for developments where this is not required.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning Consultancy		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.I	Other	
2. Please set out your comments below					
<p>Whilst bungalows are an attractive form of residence for elements of society, particularly older or disabled people, they can represent an inefficient and land intensive form of development at a time when the Council is trying to boost housing delivery. It is likely that some locations will not be suitable or appropriate for bungalows, particularly in more urban locations where the Council should be attempting to achieve multi-level and higher density development. Conversely, there may be opportunities for developments to provide bungalows that would be able to meet a specific local demand and such provision should be supported where appropriate. In such cases, where development is meeting a specific need, the Council should apply flexibility as required in order to support such provision, for example relaxing policy requirements with regards to the mix of dwelling types and sizes, as well as the provision of on-site open space.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.K	Other	
2. Please set out your comments below					
<p>Previously, the Council has only managed to deliver on average 193 affordable dwellings per annum, against a target of 210 dwellings in 2013/14-2018/19, despite achieving housing delivery of approximately 683 dwellings per annum across the same period. As a result, it is considered unlikely that either 252 or 389 affordable dwellings could be delivered unless the Council can achieve significantly higher rates of housing delivery to support this. If the Council fails to boost housing delivery rates sufficiently, it will be unable to address the shortfall in affordable housing delivery between 2013/14 and 2018/19 and will accumulate further shortfalls going forward. The delivery of affordable housing should therefore be a significant factor in determining the appropriate housing requirement and establishing the strategy for delivery of housing in the emerging Local Plan.</p> <p>It is not considered that the supplementary supply of a diverse range of market housing would support a lower provision of affordable housing. The need for affordable housing arises where people are unable to access the housing market, and therefore specific provision is required to accommodate these people. It is not appropriate to suggest that market housing could meet this demand and failing to appropriately plan for affordable housing will result in further shortfalls in provision, and higher demands for temporary accommodation and other Council services.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mrs Katherine Else	Organisation	Claremont Planning		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	9	Paragraph		Table	
Figure		Question	9.F	Other	
2. Please set out your comments below					
<p>It is not considered appropriate to require all new developments to take an active role in securing new food growing space. Whilst this may be appropriate on some larger sites, it is unlikely to be effective or achievable on smaller sites. It would be more appropriate and effective to seek contributions from development towards community growing projects or allotment provision, where contributions could be pooled and larger more productive food growing spaces achieved.</p>					

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020**.

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

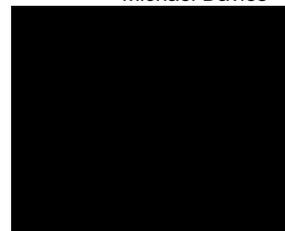
Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

30 March 2020
SBC I&O Response Mar 20



Alex Yendole
Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Michael Davies



Dear Alex

New Stafford Borough Plan 2020 – 2040: Issues and Options Consultation

Land adjoining Stafford Road and Blurtons Lane at Fieldhouse Farm, Eccleshall and Land to the north of Stone Road and east of the Burbage, Eccleshall

On behalf of the landowner of the above mentioned sites, we have prepared the following submission in response to the Stafford Borough Local Plan 2020 – 2040: Issues and Options Consultation.

Both sites are included within the Strategic Housing & Employment Land Availability Assessment (SHELAA) 2019 update as site references ECC06 and ECC07. Below we set out a response to relevant questions within the issues and options document in respect of these sites:

Question 1.A

Is the evidence that is being gathered a suitable and complete list?

The evidence set out within the Issues and Options document lacks consideration of the following evidence base documents:

- Strategic Transport Assessment
- Landscape Appraisal
- Heritage Assessment
- Infrastructure Delivery Plan
- Viability Assessment
- Green Belt Assessment

We consider that the Council should commission the above work to be undertaken and add it to the evidence base to support later stages of the emerging Local Plan (LP).

Question 1.B

Have any pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

The Local Plan Review has an important role in identifying where development should be located and providing a clear steer to Neighbourhood Planning Groups (NPGs). National Planning Policy Framework (NPPF) Paragraph 65 states that strategic policies should set out a housing requirement for Designated Neighbourhood Plan Areas (DNPAs). As the emerging LP is not at a stage to provide a housing requirement figure, we consider that the Council should work Eccleshall Parish as a designated Neighbourhood Plan Area to ensure local



housing requirements that may be contained in any future review of the Neighbourhood Plan are in conformity with the District's housing requirement and proposed distribution of development.

Where land is proposed to be allocated, we consider it important to engage landowners at the earliest stage possible. Such discussions between the District and NP should be transparent and evidence base documents produced should be publically available. Any evidence base documents which relate to housing requirements for the Eccleshall Parish within any emerging review of its Neighbourhood Plan should be made public and added to the evidence base of the emerging LP.

Question 3.D

Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

We believe that the spatially based objectives of the emerging Local Plan should be amended to reflect the characteristics of Stafford Borough's settlements. In particular we question the way that Eccleshall is contained in a category named: "Areas outside Stafford and Stone". As the third largest settlement in the Borough, we consider that it should be treated differently to other areas. At the very least there should be recognition of the settlement's status within the tier 4 of 6 as a "Large Settlement".

We object to the wording of objective 21, which states that areas outside of Stafford and Stone will: "Provide for high quality new small development at appropriate villages which reflects their distinctive character". We disagree that only small scale development is appropriate in areas outside of Stafford and Stone, as has been demonstrated by the fact that the Council's preferred Growth Options 3,5 and 6 all propose a spread of development across the settlement hierarchy. We do not support the objectives as they are currently worded approach, as we consider them to be contrary to paragraph 50 of the National Planning Policy Framework (NPPF) which requires a sufficient amount of housing to come forward where it is needed.

Question 4.A

Efforts to increase energy efficiency within the Borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

Question 4.A a)

Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?

We support the delivery of energy efficient developments. Their delivery should be controlled through a national standardised approach implemented through the Building Regulations. This would ensure a more consistent approach to building in energy efficiency to the future housing stock.

We urge the Council to take account of the technical feasibility and viability consequences that may arise from taking an approach to enforce standards which are in excess of the current statutory building regulations. There is a risk that an increase in build costs will not be sustainable and could impact on other site components such as affordable housing delivery.

The Council should consider advice within the Planning Practice Guidance (PPG) which states that Local Planning Authorities (LPAs) can set their own energy performance standards for new housing, but only up to

the equivalent of Level 4 of the Code for Sustainable Homes. Within this, any requirement would need to take account of credible evidence, particularly in relation to viability.

Question 4.C

Should the Council introduce a policy requiring large scale development to source a certain percentage of their energy supply from on-site renewables?

We acknowledge that the PPG supports the requirement for a proportion of energy used in developments to be from renewable sources. There is however no requirement for such provision to be 'on-site' (PPG reference ID: 6-012-20190315). We request that the Council provides further evidence which can demonstrate that a requirement for requiring on-site renewables on large scale developments. In this vein, we would welcome the Council providing examples of other policies or developments of such provision where this approach is workable and viable.

We note that the Council make particular reference to requiring such provision on "Large Scale Development". We question what the Council define this as being, as the NPPF defines "Major Development" as being where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. We therefore request clarity on the types of development sites that the Council consider to meet the "large scale development" threshold.

Question 4.E

Should the Council implement a higher water standard than is specified in the statutory Building Regulations?

Although we are generally supportive of policies to ensure water efficiency in developments, delivery of such provision should be implemented via a national standardised approach implemented through the building regulations. It is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach used in the Building Regulations.

We request that the Council provide further evidence of the requirement for and workability of implementing a higher water standard than is specified in the statutory building regulation. This would allow such provision to be "justified" as set out within paragraph 35 of the NPPF.

Question 5.A

- a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?**
- b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view?**

The wording of policy SP1 broadly addresses the requirements of the NPPF.

We do not consider that the provision of policy SP1 is required considering the existence of paragraph 11 of the NPPF. With this in mind and to ensure that the Plan can be future proofed in line with potential future amendments to the NPPF, we agree with the Planning Inspectorate's recent change in view, that policies such as SP1 are not required.

Question 5.B

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer?

We agree with the Council's position that the standard method should only be seen as a minimum base number. In addition to this baseline, a range of other factors should be taken into consideration to calculate Stafford's housing requirement, as set out in paragraph 60 of the NPPF.

We therefore agree with the Council's position to reject scenario A, B and C as they calculate housing requirement at or below the standard methodology figure of 408.

Scenario D considers housing requirements if baseline job growth of 5,920 jobs occurs over the period 2020 – 2040. We consider that the Council should reject this scenario, as it is not suitably ambitious and not reflective of the pro-growth stance the Council should be taking.

Scenario E should inform the determination of Stafford Borough's housing requirement. This scenario considers a "policy on" approach where around 12,500 new jobs are created in the Plan period. We support this scenario as it considers a positive pro-growth situation. We note that part of this growth is as the result of development of a Garden Community. The Council should consider how alternative forms of development at main settlements such as Eccleshall could ensure that the 500 homes per annum from 2030 accounted for from Option D at Meecebrook could be provided elsewhere in the Borough, should there be issues in the delivery of housing at the Garden Community, particularly in the early stages of the community's development. We therefore consider that in meeting this "policy on" scenario the Council should take into account alternative methods of delivering the level of growth envisaged to be delivered by a Garden Community.

Stafford Borough should not use scenario F or G to inform the determination of the housing requirement for the revised Plan. This is because there does not appear to be adequate evidence to support either scenario. F is based on past jobs growth trends, which is hard to generalise from, whereas scenario G concerns a "jobs boost" which is 50% above the baseline put forward in scenario D. This is flawed as a 50% increase appears to be relatively arbitrary and not based in a "policy on" scenario.

In tandem with the considerations set out in scenario E, we consider that the Council should also take account that there is a large unmet housing need in the Greater Birmingham Housing Market area (GBHMA) and in line with paragraph 11b and 65 of the NPPF, LPAs should assist neighbouring areas with unmet need, even if they are outside of the Housing Market Area (HMA) in question. We consider that as Stafford has limited Green Belt constraints and has direct transport links to Birmingham, that the Council should liaise with the HMA authorities to accommodate part of their unmet need.

b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

We agree with the Council's position set out in paragraph 5.8. It is true that the Sub National Household Projections (SNHP) draw on past trends, with this resulting in household formation rates being suppressed. This is particularly true of the 15-34 year old group, which make up 50% of the difference in long term trends of household formation.

This has been caused by a suppression of household formation within this group being projected forward in consideration of future housing requirements. A Partial Catch up rate is therefore essential to ensure that the Borough's housing requirement does not carry forward anomalies in past data, and takes account of the accelerated rates at which young people have been able to form households since the last recession.

Question 5.C

In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031?

If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

Please explain your reasoning.

The 2020 – 2030 housing requirement should be included, but reviewed in light of up to date Housing Delivery Test Results. Adjustments can then be made taking account of this and any under delivery that has occurred should also be allowed for.

Any undeveloped, but allocated sites should be considered on an equal playing field as those put forward within the current SHLAA and Local Plan process. Although existing allocations may be suitable for re-allocation, it is for the emerging Local Plan to determine this.

Question 5.D

- i. **Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?**
- ii. **Do you agree that the smaller settlements should be included in the Settlement Hierarchy?**

We agree that the key service villages should be re-categorised within an expanded settlement hierarchy. We support the identification of Eccleshall as a “large Settlement” (Tier 4) in the 2019 settlement hierarchy.

We support the statement made by the Council in paragraph 5.23 which quotes paragraph 137 of the NPPF, and states that the Council will: “demonstrate that it has examined all other reasonable options for meeting its identified need for development.” The Council should therefore clearly demonstrate how it has examined all options available for development to meet its housing requirement across a range of settlements. We consider that it is equally important to consider in relation to all settlements, and support work that is being undertaken to evidence the need for additional settlements to be identified within the settlement hierarchy.

Paragraph 5.17 of the Issues and Options consultation document states that The Key Service Villages so far have provided a total of 1,396 dwellings out of a adopted Local Plan requirement for 1,200 dwellings in the plan period. This demonstrates that there is a need for housing in these settlements which needs to be reflected in housing requirement for the 2019 Settlement Hierarchy. There should be no restrictions to growth within the Large Settlements as they are sustainable settlements (as demonstrated in the Settlement Assessment document (July 2018)) and are able to accommodate further growth.

As set out in our response to question 5.B a) we agree with the Council’s conclusion that the standard methodology calculation of an annual housing requirement of 408 dwellings per annum should be seen as a minimum. It therefore not clear why the Council has used this figure in appendix 1 to: “portion out what each sub-area’s “fair share” of housing need would be” (paragraph 12.6). We disagree with this method of portioning growth and consider that growth of each settlement should be considered on its own merits and certainly not in line with the standard methodology figure alone.

Question 5.E

The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath / Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

It may be appropriate for the Council to identify these areas within the settlement hierarchy, provided that they are suitably assessed alongside other settlements in the Borough.

We do not support provision of settlements in the north of the Borough as being in Tier 3 of the hierarchy. No suitable, achievable and available sites outside the Green Belt have been identified in the SHELAA in the North of the Borough so without any deliverable sites, we do not consider that the proposed Tier 3 settlements should be categorised above 'Large Settlements' in the proposed settlement hierarchy.

Question 5.F

- a) **In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?**
- b) **Are there any of these spatial scenarios that you feel we should avoid? If so, why?**
- c) **Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer**

We consider that a mixture of "string settlement / settlement cluster" and "Wheel' settlement cluster" are the most appropriate spatial scenarios for Stafford Borough. This will ensure the direction of growth to the most sustainable settlements, with new development able to utilize existing infrastructure and service, and importantly able to ensure that the critical mass of residents is present to ensure provision of new facilities which new and existing communities could utilise.

Question 5.G

Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements?

If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?

We question the viability and deliverability of the Council preferred Garden Community Option D – Meccebrook. We consider that delivery of 500 dwellings from the beginning of the site's development is over ambitious and not achievable. We consider that this trajectory should be revisited and further evidence provided to show that delivery is possible at such a rate.

Enough deliverable sites adjacent to existing settlements are available should any of the Garden Community / major urban extension option(s) that the Council decides to pursue does not provide the level of growth envisaged. This is particularly true of development sites located within and adjacent to "Main Settlements" which are particularly sustainable due to their proximity to existing shops, services and wider infrastructure.

Question 5.H

i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?

ii) If you do not agree what is your reason?

iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

We support preferred Growth Options 3 and 6. We consider that option 5 is not NPPF compliant, as it has not been demonstrated to be a justified and evidenced based option, as required by paragraph 35. We therefore request that the Council provides further evidence in respect of the deliverability of the garden settlement options at the rate proposed by the Council.

We are supportive of option 3. This will result in a spread of development across the new settlement hierarchy, with 10-20% of this being aimed towards large settlements in the Borough. This is the same proportion that has been made towards Stone – a single settlement. We consider that it should not be the case that the combined total of all “Large settlements” provides the same level of growth as required of a single settlement. We consider that the Council should revisit the level at which “Main Settlements” can deliver towards the Borough’s housing requirement.

We also support option 6, which seeks to concentrate development within existing transport corridors / clusters of communities. We seek clarification of the level of development which the Council proposes at individual transport corridors. Settlements such as Eccleshall, which contain a range of transport corridors should be key areas for growth.

Question 5.I

Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?

Please explain your answer.

In principle, we do not object to the provision of a Garden Community in Stafford Borough. We do however consider that further evidence is required in relation to the delivery and trajectory for delivery of housing as a result of such developments. The Issues and Options consultation document states that 500 dwellings per year from 2030 – 2040 could be delivered at Meecebrook (the Council’s preferred option D). The Council should revisit this trajectory and consider that delivery of housing, particularly on large scale complex sites such as this is rarely a simple flat line of delivery.

Once this exercise is complete and adequate evidence has been presented, then Stafford Borough will be in a position to present the option of a Garden as being justified, as set out in NPPF paragraph 35.

Question 5.J**What combination of the four factors:**

- 1. Growth Option Scenario (A, D, E, F, G);**
- 2. Partial Catch Up**
- 3. Discount / No Discount**
- 4. No Garden Community / Garden Community**

Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?

Considering our response to the questions above, in summary we consider that the Council's preferred strategy should comprise of the following:

1. Growth Option Scenario E
2. Partial Catch Up to be applied
3. A discount should not be applied
4. A garden community could be included, but the Council should produce further documents which can evidence deliverability of the settlement at the rate set out in the consultation document.

Question 8.K

a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?

b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?

As is stated at paragraph 8.29, the exact figure of affordable housing will be dependent on the level of growth eventually decided by the Council. The provision of affordable housing is therefore proportionate to the level of market dwellings provided. We support the sentiment that a lower provision of affordable housing can be sought, if this means that a diverse range of market dwellings is made available. A large number and more diverse range of market dwellings could in turn lead to lower house prices through greater choice and competition in the market. However further evidence in the form of assessments on a site by site basis is required to ensure suitable site and overall Plan viability.

Furthermore Paragraph 31 of the NPPF (2019) states that policy formation should take into account relevant market signals. The viability and deliverability of affordable housing should therefore be considered when formulating policy.

We consider that any affordable housing policy introduced through the Local Plan Review should be supported by appropriate evidence and include a clause ensuring that the affordable housing requirement being sought by the policy is subject to viability. This is to ensure that it is taken into account that every development site is different. This accords with paragraph 34 of the NPPF (2019) which states that plans should set the level of affordable housing provision required, however, such policies should not undermine deliverability.

Question 5.Q

Do you agree with the methodology used to define settlement boundaries?

If not please provide reasons for your response.

We generally agree with the approach taken to formulating a methodology to define settlement boundaries. We would however question why there is a requirement to consider settlement boundaries contained within the Stafford Borough Local Plan (adopted 1998), when this was superseded with settlement boundaries established within the Plan for Stafford Borough (adopted 2017).

Question 8.A

Should the Council continue to encourage the development of brownfield land over greenfield land?

Yes, development of brownfield land should be supported, as the use of previously developed land is supported by paragraph 117 of the NPPF. Nevertheless, it is not automatically the case that brownfield sites are always more suitable than greenfield. A more detailed review and response is therefore required. The comprehensive development of greenfield sites can deliver benefits to the wider community benefits by enabling a critical mass of residents, ensuring the viability of large scale infrastructure improvements.

Question 8.B

Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough?

If so do you consider:

- (i) the implementation of a blanket density threshold; or**
- (ii) a range of density thresholds reflective of the character of the local areas to be preferable?**

Why do you think this?

The NPPF encourages planning policies to make efficient use of land (Paragraph 122). We therefore consider that high density should be built into developments where it is appropriate. In this vein, we consider that additional guidance, as alluded to in option ii) in which potential density thresholds are reflective of the local area, could be useful guidance for applicants.

It is important however, that this is provided as guidance only, and that suitably flexibility to consider site specific characteristics at the planning application stage. In the interest of ensuring suitable scope to consider density on a site by site basis, we object to the implementation of a blanket density threshold as advocated in option i).

Question 8.C

Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

As set out in our response to Question 8.D, we consider that densities should be determined on a site by site basis. As set out in paragraph 123 of the NPPF, areas close to key transport corridors should be considered

for high density development. This may lead to an increase in density of development at key locations along road transport corridors.

Densities should reflect the likely provision of sustainable travel, taking account of the contributions and increase in critical mass of patrons that new development would bring about. This is particularly pertinent to large scale comprehensive development, which can provide benefits to future and existing residents.

Question 8.D

Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?

Whilst generally supportive of the ensuring optimum energy efficiency in developments, delivery of such provision should be implemented via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to building in energy efficiency to future housing stock.

Change to standards set out in the Building Regulations should be changed via changes to the Building Regulations themselves. It is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach used in the Building Regulations.

Furthermore, the Council has not recognised the technical feasibility and viability impacts that may be present. Any standard that is in excess of Building Regulations should be applied in such a way that it can be applied on a site by site basis, rather than in the form of a blanket requirement.

Question 8.E

In the New Local Plan should the Council

- a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?**
- b) Only apply the Nationally Described Space Standards to new build dwellings?**
- c) Not apply the Nationally Described Space Standards to any development?**

Please explain your answer.

We consider that the Council should pursue option C in respect of National Space Standards. This is because a blanket requirement for all new build dwellings to meet the standards would be unduly onerous.

We consider that space standards should be set to take account of local characteristics and markets.

Question 8.F Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?

We support the Council's approach of providing a "recommended range" of housing types to make up the housing mix. Nevertheless, the final housing mix for site should be determined on a site by site basis. This would ensure that there is enough flexibility for the developer and that site specific circumstances are taken into account.

Question 8.H

Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

Delivery of such provision should be implemented via a standardised approach implemented through the Building Regulations to ensure a consistent approach to future housing stock.

It is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach. The Council should also consider the questions of technical feasibility and viability that may be present.

Any requirement must be backed up with proportionate evidence to be considered “justified” under paragraph 35 of the NPPF. If evidence base is provided to back up such provision, we consider that a site by site approach should be taken. Delivery of such housing would need to be considered as a requirement along with other contributions required to make development acceptable in planning terms.

Question 8.I

a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?

b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?

c) Is there a need for bungalows to be delivered in both urban and rural areas?

d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?

We consider that any requirement for the provision of bungalows on development sites is unduly restrictive and onerous unless there is evidence which demonstrates at a site specific level that the provision of this type of dwellings is appropriate. Bungalows are land hungry and so if accessible homes are sought then methods of providing such accommodation should be considered such as maisonettes where those residents with accessibility needs can purchase a ground floor property.

Demand for specialist housing should not be considered exclusively through the provision of bungalows. Other types of accommodation is suitable for the provision of specialist accommodation, including Extra Care Housing, sheltered accommodation and adaptation of existing housing stock. Consideration should also be made for provision of bungalows is too narrow in its scope.

Question 8.N

a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes?

b) Should the council allocate plots for the purpose of self-build throughout the borough?

a) Whilst we recognise this approach may widen housing choice, on large scale allocations that are controlled by a single developer there is a risk that this approach could slow down the delivery of housing.

In addition there are also practical issues to consider, for example the day to day operation of such sites and consideration of potential health and safety issues of having multiple individual construction sites within one development. This therefore represents an onerous requirement.

The provision of such plots should be left to the discretion of the developer based on market trends, which are liable to change over the plan period. On larger sites we consider this requirement should be left to the developer's discretion.

b) We support the allocation of plots for the purpose of self-build housing. We are of the belief that this is the best way to ensure that need for self-build housing is met. Rather than place an arbitrary requirement on larger sites, which is onerous for land owners, developers and does not serve the specific needs of self-builders.

Question 9.A

Should the Council:

a) Have a separate policy that addresses Green and Blue Infrastructure?

b) Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

The amount and type of green and blue infrastructure should be determined on a site by site basis. Such details should only be considered at the planning application stage once a full suite of technical reports has been produced to inform this.

At a Borough wide level, specific opportunities to provide additional green infrastructure and help provide the “missing links” in the network may be present. However the identification of specific opportunities for additional green infrastructure should not be confirmed until the planning application stage.

Question 9.C Should the new Local Plan:

- a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;**
- b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;**
- c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites**

We do not consider that all sites should be required to undertake long term monitoring of biodiversity mitigation and enhancement measures on development sites. Monitoring requirements should be agreed on a site by site basis and the Council will need to sufficient justify through their evidence base any requirement to increase monitoring in accordance with paragraph 31 of the NPPF.

Question 9.E Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough? Are there any further measures which you think should be adopted to further enhance these efforts?

We support the Council's ambition to protect and enhance tree cover in the Borough. We have set out our comments on each of the proposed approaches below:

- ensuring that the existing tree stock within the Borough will be offered adequate protection from removal or damage – existing tree stock should only be protected where specific protection is afforded

in paragraph 175 of the NPPF. This includes ancient woodland, veteran trees and TPO designated trees.

- b) ensuring that any development which provides an opportunity to increase tree cover on site will do so – in general we support the requirement to plant trees on a site however this should be determined on a site by site basis.
- developing and later adopting a tree strategy which will see any and all development contribute to a scheme which will increase the tree cover across the Borough as a whole – the Council will need to provide evidence to support this proposal and a proposed formula on how contributions will be calculated will also be required. It is crucial that the viability of sites should be taken into consideration when doing so.

Question 9.F

Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No.

Please explain your answer.

If yes, are the following measures appropriate?

- a) Protecting and enhancing allotments, community gardens and woodland;**
- b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;**
- c) Requiring major residential developments to incorporate edible planting and growing spaces;**
- d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.**

We only consider that the Council should employ a policy which requires new development to take an active role in securing food growing spaces where the council's evidence base demonstrates a requirement as such. Proportionate evidence is required to ensure that the emerging Plan can be deemed as "justified" and therefore sound as set out in paragraph 35 of the NPPF.

There should be no blanket requirement for "major residential developments to incorporate edible planting and growing spaces". Provision, if it is justified, should only be required on a site by site basis

Question 9.G

Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

We are supportive of policies which look to protect the most valuable landscapes in the Borough. In the first instance, consideration of character areas can be useful in assessing landscape impact. Nevertheless, we urge the Council to include policy wording which makes it clear that landscape impacts vary on site by site basis and assessment should therefore take place on this basis.

Question 9.I

Should the new local plan:

- 1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach?**
- 2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?**
- 3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration.**
- 4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.**
- 5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.**

Below we set out our response to each of the five points set out as being required within the formation of the New Local Plan.

1. The Council should be careful not to discount the protection of designated heritage assets over the protection of historic environments at a more broad landscape scale. Any definition adopted must be careful to be compliant with the heritage policies of the NPPF in order to enable it to be justified.
2. Undesignated heritage assets have equal standing as designated heritage assets according to the NPPF (paragraph 197). It should be made clear within any future policy that consideration of settlement morphology, landscape and sight lines is not applicable to every development proposal.
3. Consideration of historic context in respect of proposals is understandable. It is however questionable if transport junctions and town centre regeneration need special mention in a historical context.
4. Imaginative incorporation of heritage assets into development is supported. But in some circumstances this may not be appropriate considering the value of the heritage asset and viability of the development.
5. We broadly agree with sentiment presented, but suggest that further criterion is added to deem when this is appropriate.

Question 9.J

Do you consider that the current “Design” SPD provides sufficient guidance for design issues in the Borough?

SPDs are required to build upon and provide more detailed advice on specific policies within a Local Plan (PPG reference ID: 61-008-20190315). We consider that a revised Design SPD should be consulted alongside or following adoption of the Local Plan. This is required to ensure that the SPD complies with the policies of the adopted Local Plan

Question 9.L

To support a new Local Design Review Panel should the new Local Plan:

- a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?**
- b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.**
- c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.**

We have set out our response to the above below.

- a. Design is subjective so there should be the opportunity for the applicant to justify their rationale for the design approach to be taken. There should be an opportunity to do this through pre-application discussions. Sufficient dialogue already takes place on large scale schemes, which then influences the development of design proposals. If a Local Design Review Panel approach is pursued, the Council should ensure that it follows the guidance set out in the PPG (Reference ID: 26-017-20191001).
- b. The adoption of nationally prescribed standards may assist in the design review process. However, the Council should ensure that there is enough flexibility to enable applicants to justify any deviation away from these standards if required.
- c. We support this proposal. However Local Characterisation studies should be undertaken at a scale which takes adequate consideration of the site specific characteristics.

Question 10.A

The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;

- a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?**
- b) Ensure all major development is accessible by regular public transport?**
- c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?**
- d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?**

Below we provide comment on A and B parts of question 10.A:

- a) We invite the Council to provide further details of the type of infrastructure that is referenced in question a). To ensure that any policy requirement to ensure the installation of such infrastructure is evidence based and justified as required by (NPPF Paragraph). From a practical perspective it would also be useful to be provided with examples of where such technology has been used and can be evidenced as a workable and viable solution.

b) We support the Council's ambition for all major development to be accessible by regular public transport. We do however question how the Council defines "major development". It should be made clear if the Council consider it to be reflective of the NPPF definition which considers for housing development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. We also seek clarification as to what the Council define "regular public transport" to be. It should be noted that sites of 10 dwellings in a small village may not be served by regular public transport. This does not automatically mean that development is unsustainable. Determination of the acceptability of development should take account of a wider range of considerations and not be restricted solely to the provision of regular public transport.

Question 10.C

The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable.

Therefore, should the council;

- a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?**
- b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**
- c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**

The below answer contains our response to the points raised in a) and b) of the above list.

a) We question how the Council defines "major development". It should be made clear if the Council consider it to be reflective of the NPPF definition which considers for housing development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. It is unreasonable to require that in effect, sites over 10 dwellings will require recycling and composting processing which is be unpractical on site. Such considerations should only be determined at the applications stage, more specifically matters of detail should not be considered in any depth until the reserved matters stage.

b) This is already required through provision of a construction management plan at the planning application stage. Such strategies should only be required at reserved matters stage, once contractors have been appointed and it is fully understood what their approach to the disposal of construction waste will be.

Question 12.A

Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan?

If not please give a reason for your response

We broadly agree with the general approach set out in 12.A, we support the delivery of sustainable transport solutions, which can be made more viable and delivered through contributions from development.

We withhold further comment related to the Council's transport approach until publication and subsequent consultation on the Integrated Transport Strategy has taken place. We expect this document to form part of the evidence base to influence policies within the emerging Local Plan.

Question 12.B

a) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? If not please provide a reason for your response.

b) How do you consider that high quality walking and cycling networks can be developed through new development?

a) We agree that in principle, large scale development in key location across Stafford Borough can lead to a widening of choice of transport solutions. However, the transport solutions will need to be discussed and agreed with the applicant during the pre-application process.

b) Through an increased critical mass of users for new routes and developer contributions likely associated with new development, high quality walking and cycling routes can be developed which serve new development, connecting them to existing developments and allowing new and existing residents to benefit from improved facilities.

Question 12.D

a) Do you consider it is necessary to set local parking standards for residential and non-residential development ?

b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area?

Please provide a reason for your response.

We do not object to the setting of local parking standards, as long as these standards are flexible enough to accommodate site specific characteristics and situations. The applicant should be able to justify the type and level of parking provided in a scheme at the application stage.

I trust that you find the representations set out above suitable for inclusion as a response to the consultation. Please do not hesitate to contact me should you have any questions regarding these representations.

Yours sincerely

Michael Davies
Director

30 March 2020
I&O Consultation Response



Alex Yendole
Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Michael Davies



Dear Alex

Representations to the Stafford Borough Local Plan 2020 – 2040: Issues and Options Consultation Document

Lord Stafford Estates

On behalf of Lord Stafford Estates, we have prepared the following submission in response to the Stafford Borough Local Plan 2020 – 2040: Issues and Options Consultation.

Savills previously submitted a range of sites for promotion in the call for sites process; sixteen sites under the ownership of Lord Stafford Estates and one site under the ownership of Costessey Ltd. These were submitted under cover of a letter dated 8th January 2018.

These sites were then included within the Strategic Housing & Employment Land Availability Assessment (SHELAA) 2019 update. For the avoidance of doubt, the sites are listed below with their respective SHELAA reference number:

Land owned by Lord Stafford Estates

Site Name	SHELAA Reference
Land west of Moss Lane, Yarnfield	SWY06
Ex-BT Training Site, Yarnfield	SWY07
Land north of Summerfields and Fieldside, Yarnfield	SWY08
Land west of Meadowview, Yarnfield	SWY09
Land north of Yarnfield Lane, Yarnfield	SWY10
Land north west of Yarnfield	SWY11
Brunswick Terrace, Stafford	STAFMB10
Land south of Brunswick Terrace, Stafford	STAFMB09
Wellbeing Park, Yarnfield Lane, Yarnfield, Stone ST15 0NF	SWY12
Land south of Yarnfield Lane, Yarnfield	SWY13
Land south west of Meece Road, Cold Meece	SWY14
Land at Beswick Green, Swynnerton	SWY15
Land off Park View, Swynnerton	SWY16
Land west of Top Lane, Beach Farm, Beech	SWY17
Land west of Biddles lane, Cranberry	SWY18
Land north of Chase Lane, Sandyford	SWY19

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



Land owned by Costessey Ltd

Site Name	SHELAA Reference
Land north of Early Lane, Swynnerton	SWY05

Below we set out a response to relevant questions within the Stafford Borough Local Plan 2020 – 2040: Issues and Options document:

Question 1.A

Is the evidence that is being gathered a suitable and complete list?

The evidence set out within the Issues and Options document lacks consideration of the following evidence base documents:

- Strategic Transport Assessment
- Landscape Appraisal
- Heritage Assessment
- Infrastructure Delivery Plan
- Viability Assessment
- Green Belt Assessment

We consider that the Council should commission the above work to be undertaken and add it to the evidence base to support later stages of the emerging Local Plan (LP).

Question 1.B

Have any pieces of evidence necessary for Stafford Borough’s new Local Plan been omitted?

The Local Plan Review has an important role in identifying where development should be located and providing a clear steer to Neighbourhood Planning Groups (NPGs). National Planning Policy Framework (NPPF) Paragraph 65 states that strategic policies should set out a housing requirement for Designated Neighbourhood Plan Areas (DNPAs). As the emerging LP is not at a stage to provide a housing requirement figure, we consider that the Council should work with DNPAs to ensure local housing requirements are in conformity with the District’s housing requirement and proposed distribution of development.

Where land is proposed to be allocated, we consider it important to engage landowners at the earliest stage possible. Such discussions between the District and NP should be transparent and evidence base documents produced should be publically available. Any evidence base documents which relate to housing requirements for DNPAs within emerging Plans should be made public and added to the evidence base, as the two are interlinked in informing the Plan’s overall housing requirement.

Question 3.D

Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

We are not supportive of the spatially-based approach taken to the objectives. Each settlement should be adequately assessed through the formulation of the emerging LP through the suitable examination of evidence base documents and consideration of consultation responses.

Objective 21 states that areas outside of Stafford & Stone will: “Provide for high quality new small scale housing development at appropriate villages which reflects their distinctive local character”. This is at odds with the promotion of a stand-alone garden settlement that has been presented by the Council as part of the consultation document. We consider that the cross over between objective 21 and 25 means that these objectives should be combined to form one objective regarding the delivery of housing in rural areas and their ability to support sustainable rural communities in the future. Consideration should also be made for the distinction between certain settlements within the rural area, and their ability to suitably accommodate development.

The Council’s preferred Growth Options 3, 5 and 6 all propose a spread of development across the settlement hierarchy. However the key objectives for areas outside of Stafford and Stone on page 29 state that only small scale housing development is appropriate within existing villages (Objectives 21 and 25). We do not support this approach, as it is contrary to the NPPF paragraph 50 which requires a sufficient amount of housing to come forward where it is needed.

Question 4.A

Efforts to increase energy efficiency within the Borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

Question 4.A a)

Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?

Whilst we are generally supportive of ensuring optimum energy efficiency in developments, delivery of such provision should be implemented via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to building in energy efficiency to future housing stock.

It is not clear from the Issues and Options document and accompanying evidence base what the rationale is for standards to be any different in Stafford Borough as opposed to a national approach within Building Regulations. The Planning Practice Guidance (PPG) states that Local Planning Authorities can set their own energy performance standards for new housing but they can only be set up to the equivalent of Level 4 of the Code for Sustainable Homes and any requirement will need to be based on robust and credible evidence paying careful attention to viability (PPG Reference ID: 6-009-20150327).

Furthermore, the Council has not taken account of the technical feasibility and viability consequences that may arise from taking this approach. Any standard that is in excess of Building Regulations should be considered where there is evidence to justify taking an alternative approach to national Building Standards. There is a risk that an increase in build costs will not be sustainable and could impact on other site components such as affordable housing delivery.

Question 4.C

Should the Council introduce a policy requiring large scale development to source a certain percentage of their energy supply from on-site renewables?

Further clarity is required with regard to the scale of development that would require such provision, along with the type of on-site renewables that would be required.

We acknowledge that the PPG supports Development Plan policies requesting a proportion of energy used in development in their area to be energy from renewable sources, but there is no requirement for the sources to be ‘on-site’(PPG reference ID: 6-012-20190315).

Further evidence would be required to justify the introduction of an on-site renewables policy, and furthermore to justify why on a site of that size, it is possible to deliver. If such a policy is evidenced as being required, a mechanism should be included to allow for further work to be required which evidence the viability and importantly the deliverability of such schemes. This would allow such provision to be “justified” as set out within paragraph 35 of the NPPF.

Where such an approach is to be considered by the Council, we would welcome evidence to demonstrate examples of other policies or developments where this approach is workable and viable.

Question 4.E

Should the Council implement a higher water standard than is specified in the statutory Building Regulations?

Although we are generally supportive of policies to ensure water efficiency in developments, delivery of such provision should be implemented via a national standardised approach implemented through the building regulations. It is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach used in the Building Regulations.

The Council appears to have not fully recognised the technical feasibility and viability impacts that may be present. If such requirements were made through changes to the Building Regulations, wider consultation with built environment professions could take place, informing the formation of the regulations. It is not the place of the planning system to place more onerous requirements on areas usually regulated through the Building Regulations.

Question 5.A

a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?

The wording of policy SP1 broadly addresses the requirements of the NPPF (2019), and it appears to be a rephrased version of paragraph 11 of the NPPF. Therefore it appears to address the requirements of the NPPF.

b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate’s view?

We do not consider that the provision of policy SP1 is required considering the existence of the NPPF. Policies which support the presumption in favour of sustainable development are already located within the NPPF (2019), specifically at paragraph 11. With this in mind and to ensure that the Plan can be future proofed in line with potential future amendments to the NPPF, we agree with the Planning Inspectorate’s recent change in view, that policies such as SP1 are not required.

Question 5.B

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements? What is your reasoning for this answer?

We are supportive of the Council’s statement within the consultation document that the standard method should only be seen as a minimum base number as other components of the need should be taken into account when calculating the Borough’s housing requirement. This ensures that the Council’s method of calculation conforms with NPPF and NPPG guidance on the subject.

By extension we support the Council’s position with respect to scenario A, B and C in which they reject further consideration of these scenarios due to them being at or below the calculation of housing requirement produced by the standard methodology.

We consider that scenario D provides a conservative estimate of the levels of housing growth required in Stafford Borough. Utilising a baseline forecast is not aspirational, and is not reflective of the pro-growth stance that the Council should be promoting.

Scenario E should frame the Council's annual housing requirement figure. This scenario is based on the Council's aspirations for the Borough, employing a "policy on" approach. This means that the figure more accurately reflects Stafford's growth ambitions. Nevertheless it should be considered how these growth aspirations can be delivered in the absence of delivery of a garden settlement at Meecebrook, in line with the Council's projection of 5000 dwellings in the Plan period, with delivery of 500 dwellings per annum. We consider that delivery of 500 dwellings per annum from the beginning of delivery of the Garden Settlement is unrealistic. The trajectory needs to build in a downturn in the market too. It is unlikely that 500 dwellings can be delivered consistently across a 10 year period or longer.

We suggest that the Council do not utilise housing requirement figures as set out in Scenario F and G. These figures are based on either past trends or future trends that appear to be set at 50% above the existing baseline without clear justification.

On a separate note, we consider that Stafford Borough should consider its position adjacent to the Greater Birmingham Housing Market Area (GMBA) when calculating housing need. There is a large unmet housing need in the GBHMA and in line with paragraph 11b and 65 of the NPPF, local planning authorities should assist neighbouring areas with unmet need, even if they are outside of the Housing Market Area (HMA) in question. Therefore, we consider that as Stafford is adjacent to the GBHMA, has limited Green Belt constraints and has direct transport links to Birmingham, the Council should liaise with the HMA authorities and potentially assist in accommodating some of the GBHMA's housing shortfall.

b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

We consider that the Council should incorporate a Partial Catch Up rate allowance. We agree with the rationale set out in paragraph 5.8 which sets out that as Sub National Household Projections (SNHP) draw on past trends, this results in household formation rates continuing to be suppressed, having been suppressed during the recession. This potential undercounting is particularly pertinent considering that headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long term trends.

We support this rationale and consider that the Council should employ a partial catch up rate when calculating the housing requirement. It is key that any anomalies within past trends are not projected forward in consideration of future housing requirements. This will ensure that household formation rates are rebalanced to take account of the accelerated rates young people are able to form households since the recession.

Question 5.C

In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031?

If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

Please explain your reasoning.

The 2020 – 2031 housing requirement should be included but based on current Housing Delivery Test results. Whatever requirement that has not been delivered and was planned for in the current adopted plan (which will become the previous plan period), must be allowed for. The only caveat to this being that adjustments may need to be made where the annual housing requirement has changed. This growth was planned for and should be delivered without delay. Any requirement for delivery of housing 2020 – 2040 must be considered separately

in the light of the number of dwellings that remain to be delivered as part of the current Local Plan and consider any further dwellings which are required to be delivered in addition. There cannot be a case where non-delivery of these dwellings is allowed to “fall between the cracks” and are not counted going forward.

Any undeveloped, but allocated sites should be considered alongside sites being put forward within the current SHLAA and Local Plan process. It should be the job of the emerging Local Plan to review existing allocations alongside new sites put forward. Although existing allocations may indeed be suitable for re-allocation through this Local Plan, they should be considered on a suitable level playing field.

Question 5.D

- i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?**
- ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?**

We agree with the point made in paragraph 5.20 of the consultation document, which states that it is important for the new Local Plan to direct the growth in housing supply to the locations best suited and most attractive to the market, whilst ensuring that no locations are overburdened or starved of growth.

We consider that it is equally important to consider in relation to all settlements, and support work that is being undertaken to evidence the need for additional settlements to be identified within the settlement hierarchy. We however question why Yarnfield has been removed as settlement listed on the hierarchy within the consultation document. It is not clear why this change has taken place between the currently adopted Local Plan and the consultation document. Yarnfield should be listed, as it can be seen as a more sustainable location than many of the other settlements listed in tier 4-6 of the hierarchy as proposed.

We support the statement made by the Council in paragraph 5.23 which quotes paragraph 137 of the NPPF, and states that the Council will: “demonstrate that it has examined all other reasonable options for meeting its identified need for development.” The Council should therefore clearly demonstrate how it has examined all options available for development to meet its housing requirement across a range of settlements.

The credentials of development at all settlements in the Borough and the inclusion of smaller settlements in the settlement hierarchy should therefore be supported. This also means that the spatially specific objectives set out in section 3 of the Issues and Options document should be re-examined to ensure there is not a such a large distinction made between Stafford, Stone and other settlements. Objectives for settlements within “Areas Outside of Stafford & Stone” should be considered in line with their specific characteristics.

Question 5.E

The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath / Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

It may be appropriate for the Council to identify these areas within the settlement hierarchy, provided that they are suitably assessed alongside other settlements in the Borough. Although these settlements may have been “overlooked” in the past, they should not be given any undue status above any other similarly assessed settlements.

Question 5.F

- a) **In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?**
- b) **Are there any of these spatial scenarios that you feel we should avoid? If so, why?**
- c) **Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer**

We agree with paragraph 5.30 which states that: "...specific local concerns will need to be considered alongside the strategic need for homes and employment opportunities." It is pleasing to see recognition of the need to provide for local needs, in addition to larger more strategic sites. We are particularly encouraged by the reference made to building in existing settlements and their relationships. Nevertheless, as set out in paragraph 5.31, we agree that the spatial form of development which emerges in the Plan is likely to follow a combination of the broad scenarios outlined, as is the case within the current strategy.

We support the proposed "wheel" settlement cluster, which seeks to focus development on Stafford and surrounding settlements. It is in this vein that we also support the dispersal of development across the Borough. The provision of differing sized sites is important to ensure housing choice, and capitalise on the expansion of smaller settlements leading to improvements for local services.

We consider that the Council should reassess whether "intensification of Town and District Centres" is a suitable spatial Strategy. There is need for a careful balance between increasing residential uses and hampering the attractiveness of leisure uses to locate in town and district centres, due to amenity issues related to noise and odour. Furthermore, it is also questionable whether location of dwellings in such locations would be able to provide family housing. We therefore consider that this strategy should be considered in tandem with other spatial strategies to ensure that suitably varied housing mix can be provided.

We also urge the Council to reconsider the level of emphasis placed on delivery of a garden community. Although some dwellings may be delivered up to 2040, it is yet to be adequately evidenced that delivery can occur by 2030 as the Council state, and certainly not at 500 dwellings per annum from year 1 as is set out in the consultation document. In any case delivery is likely to start lower, due to a lower number of outlets and build up to such a delivery level.

Question 5.G

Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements?

If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?

Please explain your answer.

We consider that subject to further detailed viability and feasibility work, a new garden community / major urban extension could provide for a proportion of the Borough's future housing and employment land requirements.

From review of the Council's "Strategic Development Options – Reasonable Alternatives Study" document, it appears that the Council favours development at Meecebrook (option D). We have obtained landscape advice from EDP which suggests that the quantum of development proposed would have a negative impact on the surrounding landscape.

EDP considers that, the southern and most northern quantum of the site is far more open than acknowledged by the SBC site appraisal. In the far north and south, the site is visually open and has intervisibility with the surrounding landscape.

Advice has also been sought from Savills Heritage in respect of the impact development of the site may have on the Grade I listed Swynnerton Hall. The advice sets out that due to the historic and functional connection between the Hall and the wider Swynnerton Park, it is considered that the wider setting of Swynnerton Hall makes a considerable contribution to its heritage significance.

It goes onto state that it is judged that development on the northern area of the Meecebrook Option Site, would adversely impact the setting of the Grade I listed Swynnerton Hall. Savills Heritage therefore considered that development should not take place in the northern most portion of the site, which is in close proximity to Swynnerton Hall.

Although we do not object to the principle of a garden community being developed, as set out above we have reservations regarding the quantum and scale of the proposed Meecebrook Garden Community. We consider that the proposed allocation boundary should not be subject of built development. However this area of the allocation could be considered for use as public open space and/or biodiversity offsetting for the overall development. We are happy to provide copies of the reports produced by EDP Landscape and Savills Heritage are available on request.

Question 5.H

i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?

ii) If you do not agree what is your reason?

iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

Any option (or a combination of thereafter) that Stafford BC take forward must be consider as “justified” as set out in the tests of Local Plan soundness within paragraph 35 of the NPPF. This means that the strategy followed must be appropriate, taking into account reasonable alternatives and based on proportionate evidence.

We agree that the only NPPF-compliant growth options are numbers 3, 5 & 6. Below we set out how we have come to this conclusion.

Option 3 concerns dispersal of development across the new settlement hierarchy. We note that this option includes drawing settlement boundaries for Tier 3 settlements. We consider that review of these boundaries must be evidence based, as the drawing of settlement boundaries encourages development in a location, even if the site is not allocated for development.

We also note that option 3 seeks to restrict growth in settlements that the Council deems to have provided enough dwellings during the current Plan Period. We consider that this blanket approach is not appropriate in targeting development at the most sustainable locations. The supporting text states that larger levels of growth could be progressed through a Neighbourhood Plan. It is not clear how this will work in practice, as Neighbourhood Plan policies are required to be in general conformity with those in the Local Plan.

Option 5 is broadly NPPF compliant because it considers development within the new settlement hierarchy. Although this is the case, we do question the degree to which a garden community is deliverable at the speed

which is set out by the Council. Stafford BC should consider at which point the garden community is likely to deliver housing, and if this is not delivered at the planned rate, what mechanism is in place to deliver housing elsewhere.

We consider that further work is required to examine the delivery of housing requirement within individual category settlements rather than considering all tier 3-6 settlements as being in the same category. There should be an appreciation of the different characteristics of these settlements.

Option 6 provides for the ability to build on and improve existing infrastructure, within and adjacent to larger settlements. This option, in combination with other considerations with regards to spatial strategy is useful in guiding development in Stafford Borough

Question 5.1

Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?

Please explain your answer.

In principle we support a garden community being considered as a potential option. Delivery of housing in a stand-alone settlement can contribute to meeting the Council's housing requirement. That said, such a positive impact can only occur if housing is delivered to the level required within the Plan period.

We challenge the Council's assertion that 500 dwellings can be delivered every year from the first year of development. This level of housing growth is unlikely to be achievable within the first years of development and consistently over the Plan period. Furthermore, the trajectory should factor in a downturn in the housing market which may cause the delivery rate of housing to slow. We request that further consideration is given to appropriate evidence base required to back up the conclusions that have been drawn. Much more detailed examination of all options for a garden community and or sustainable urban extension should be backed up with more robust evidence than is currently available.

In this vein, viability should be a consideration at the earliest stage, as this will be a key component to the success of a scheme at this scale, which is different to the usual delivery method of housing in the Borough, which in the current plan period has focused on large, existing settlements. Detailed consideration is also required to ensure that accompanying infrastructure can be funded and provided to ensure delivery of the new settlement – this is particularly relevant to delivery of the large settlement at Meecebrook.

Question 5.J

What combination of the four factors:

- 1. Growth Option Scenario (A, D, E, F, G);**
- 2. Partial Catch Up**
- 3. Discount / No Discount**
- 4. No Garden Community / Garden Community**

Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?

Considering our response to the questions above, in summary we consider that the Council's preferred strategy should comprise of the following:

1. Growth Option Scenario E
2. Partial Catch Up to be applied
3. A discount should not be applied
4. A garden community could be included, but the Council should produce further documents which can evidence deliverability of the settlement at the rate set out in the consultation document.

Question 5.P

Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary?

If not please provide reasons for your response including the specific settlement name.

We disagree with a blanket approach to all settlements of fewer than 50 dwellings not having a settlement boundary. We consider that a case for a settlement boundary to be applied to each settlement should be undertaken on a case by case basis. The following settlements which we believe contain fewer than 50 dwellings should be considered for inclusion of a settlement boundary:

- Cold Mecce
- Swynerton
- Beech
- Cranberry
- Sandyford

We consider that settlement boundaries should be drawn for these settlements, and potential locations for development identified. We disagree with the Council's criterion which states that absence of a "clearly defined village nucleus" is a reason to not have a settlement boundary. Furthermore, it is difficult to see how this criterion can be fairly applied across villages, as this is a subjective measure. We consider that the existence of settlement boundaries can provide certainty to communities, landowners and developers over the likely extent of development that, depending on changing requirements may be deemed appropriate during the Plan period.

Question 5.Q

**Do you agree with the methodology used to define settlement boundaries?
If not please provide reasons for your response.**

We generally agree with the approach taken to formulating a methodology to define settlement boundaries. We would however question why there is a requirement to consider settlement boundaries contained within the Stafford Borough Local Plan (adopted 1998), when this was superseded with settlement boundaries established within the Plan for Stafford Borough (adopted 2017).

Question 8.A

Should the Council continue to encourage the development of brownfield land over greenfield land?

Yes, development of brownfield land should be supported, as the use of previously developed land is supported by paragraph 117 of the NPPF. Nevertheless, it is not automatically the case that brownfield sites are always more suitable than greenfield. A more detailed review and response is therefore required. The comprehensive development of greenfield sites can deliver benefits to the wider community benefits by enabling a critical mass of residents, ensuring the viability of large scale infrastructure improvements.

Question 8.B

Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough?

If so do you consider:

(i) the implementation of a blanket density threshold; or

(ii) a range of density thresholds reflective of the character of the local areas to be preferable?

Why do you think this?

Paragraph 122 of the NPPF (2019) sets out the importance of planning policies and decisions to make efficient use of land taking into account; the identified need for different types of housing, local market conditions and viability, the availability and capacity of infrastructure, the desirability of maintaining an area's character and setting and the importance of securing well-designed and attractive places. We therefore consider that option ii relating to consideration of "a range of density thresholds relative of the character of the local areas" is the preferable option. This would allow for suitable consideration of the local character and distinctiveness that is within the Borough.

Within these broad density thresholds, sites should be assessed on a site by site basis because of varying site contexts and site specific circumstances and constraints. Specific circumstances could include access to public transport or certain design contexts. If option i) is taken forward it could lead to greater inflexibility and be obstructive in achieving good design that is appropriate to the local context. Therefore, we consider that a blanket minimum density requirement policy should not be included. Density should be assessed on a site-by-site basis, so option ii) is the most appropriate.

Question 8.C

Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?

We consider that densities should be determined on a site by site basis. Furthermore the adopted minimum density thresholds should reflect the availability of sustainable transport to be delivered as part of development, rather than the availability of such provision at present. Where availability of sustainable travel is greatest, opportunities to increase density should be considered and assessed against site constraints and prevailing market requirements.

Densities should reflect the likely provision of sustainable travel, taking account of the contributions and increase in critical mass of patrons that new development would bring about. This is particularly pertinent to large scale comprehensive development, which can provide benefits to future and existing residents.

Question 8.D

Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?

Whilst generally supportive of the ensuring optimum energy efficiency in developments, delivery of such provision should be implemented via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to building in energy efficiency to future housing stock.

Change to standards set out in the Building Regulations should be changed via changes to the Building Regulations themselves. It is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach used in the Building Regulations.

Furthermore, the Council has not recognised the technical feasibility and viability impacts that may be present. Any standard that is in excess of Building Regulations should be applied in such a way that it can be applied on a site by site basis, rather than in the form of a blanket requirement.

Question 8.E

In the New Local Plan should the Council

- a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?**
- b) Only apply the Nationally Described Space Standards to new build dwellings?**
- c) Not apply the Nationally Described Space Standards to any development?**

Please explain your answer.

We consider that the Council should pursue option C in respect of National Space Standards. This is because a blanket requirement for all new build dwellings to meet the standards would be unduly onerous.

We consider that space standards should be set to take account of local characteristics and markets.

Question 8.F Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?

We support the Council's approach of providing a "recommended range" of housing types to make up the housing mix. Nevertheless, the final housing mix for site should be determined on a site by site basis. This would ensure that there is enough flexibility for the developer and that site specific circumstances are taken into account.

Question 8.H

Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

Delivery of such provision should be implemented via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future housing stock.

Change to standards set out in the building regulations should be implemented via changes to the Building Regulations themselves. It is not clear what the rationale is for standards to be any different in Stafford Borough as opposed to the national approach.

Furthermore, the Council has not recognised the technical feasibility and viability impacts that may be present. Any standard that is in excess of Building Regulations should not be applied in a blanket fashion unless there is evidence base to suggest such an approach to suggest that 10% of affordable homes delivered on major development sites to be wheelchair accessible.

Any requirement must be backed up with proportionate evidence to be considered "justified" under paragraph 35 of the NPPF. If evidence base is provided to back up such provision, we consider that a site by site approach should be taken. Delivery of such housing would need to be considered as a requirement along with other contributions required to make development acceptable in planning terms.

Question 8.I

a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?

b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?

c) Is there a need for bungalows to be delivered in both urban and rural areas?

d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?

We consider that any requirement for the provision of bungalows on development sites is unduly restrictive and onerous unless there is evidence which demonstrates at a site specific level that the provision of this type of dwellings is appropriate. Bungalows are land hungry and so if accessible homes are sought then methods of providing such accommodation should be considered such as maisonettes where those residents with accessibility needs can purchase a ground floor property.

Demand for specialist housing should not be considered exclusively through the provision of bungalows. Other types of accommodation is suitable for the provision of specialist accommodation, including Extra Care

Housing, sheltered accommodation and adaptation of existing housing stock. Consideration should also be made for provision of bungalows is too narrow in its scope.

Question 8.K

a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?

b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?

As is stated at paragraph 8.29, the exact figure of affordable housing will be dependent on the level of growth eventually decided by the Council. The provision of affordable housing is therefore proportionate to the level of market dwellings provided. We support the sentiment that a lower provision of affordable housing can be sought, if this means that a diverse range of market dwellings is made available. A large number and more diverse range of market dwellings could in turn lead to lower house prices through greater choice and competition in the market. However further evidence in the form of assessments on a site by site basis is required to ensure suitable site and overall Plan viability.

Furthermore Paragraph 31 of the NPPF (2019) states that policy formation should take into account relevant market signals. The viability and deliverability of affordable housing should therefore be considered when formulating policy.

We consider that any affordable housing policy introduced through the Local Plan Review should be supported by appropriate evidence and include a clause ensuring that the affordable housing requirement being sought by the policy is subject to viability. This is to ensure that it is taken into account that every development site is different. This accords with paragraph 34 of the NPPF (2019) which states that plans should set the level of affordable housing provision required, however, such policies should not undermine deliverability.

Question 8.N

a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes?

b) Should the council allocate plots for the purpose of self-build throughout the borough?

a) We object to the Council's proposal to introduce a policy requiring all developments with a site capacity over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes.

Large scale developments, such as allocations of over 100 units, are often controlled by a single constructor / developer. The design; development; construction and release of such sites are therefore organised in a controlled manner through a single point.

By applying the 5%, bringing forward an allocation of 100 units would lead to the provision of at least 5 Self / Custom-build plots, and thus multiple separate contracts would need to be agreed, with a similar number of individual planning permissions also being required.

There is often a Design Framework / Code for the formation, design and layout of a development. It would be difficult for self-builders, who usually require an element of or complete individuality, to conform to this requirement. Thereby resulting in part of a development appearing unplanned, or discouraging take up of the plots by self-builders.

Practically, the day to day operation and management of residential construction sites and consideration of issues, such as deliveries, staff resourcing, and health and safety, also remains the sole responsibility of the single constructor / developer.

On a site of 100 or more units there would therefore be a number of individual construction sites within one development. Having several individual, likely to be novice self-builders, on a single wider site will lead to logistical; management and other conflicts which would lead to neighbour, environment and construction conflicts.

Additionally, it is considered unlikely that self-build individuals would wish to take a plot on a large scale (100 unit plus) housing development constructed by a single developer. Indeed, it is understood that on the Council's Register only 45 serviced plots of land are sought within Stafford Borough.

An arbitrary fixed percentage across sites of 100 units or more is considered inappropriate and is contrary to the NPPG which seeks the engagement of landowners and their encouragement to consider Self / Custom-build.

b) We support the allocation of plots for the purpose of self-build housing. We are of the belief that this is the best way to ensure that need for self-build housing is met. Rather than place an arbitrary requirement on larger sites, which is onerous for land owners, developers and does not serve the specific needs of self-builders.

Question 8.O

a) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents?

b) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site?

The consultation document proposes that in settlements with less than 50 dwellings, which are not included within the settlement hierarchy, should allow self-build only developments as infill, capped at 10% (i.e. a maximum of 5 dwellings). This is proposed to prevent the stagnation of communities which can force residents to move away from their communities when there is no suitable accommodation in the vicinity.

Whilst we agree that this can be the case, we disagree that the provision of self-build exclusively would be able to meet this demand. Not all residents that are willing or able to engage in self-build housing. It places an undue requirement on residents who are looking to stay within communities if they need to undertake a self-build project to stay in their communities and ensure that there is not stagnation. The provision of small scale housing development to meet local needs should be supported, rather than a prescriptive tenure and cap on development.

Question 9.A

Should the Council:

a) Have a separate policy that addresses Green and Blue Infrastructure?

b) Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

In relation to green and blue infrastructure required within development sites, the amount and type of infrastructure should be established at the application stage and be determined on a site by site basis. There should be consideration of the site specific circumstances that dictate this.

At a Borough wide level, specific opportunities to provide additional green infrastructure and help provide the “missing links” in the network may be present. However the identification of specific opportunities for additional green infrastructure should not be confirmed at the plan making stage. Rather, determination of the type, amount and location of such infrastructure should be considered at the planning application stage.

Question 9.C

Should the new Local Plan:

- a) **Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;**
- b) **Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;**
- c) **Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites**

We agree that the Borough’s designated sites should be protected. However, it is important to recognise the potential opportunities that development can bring to enhance these assets further. This particularly relates to the Cannock Chase SAC where new residential development within 8km of the SAC is expected to provide a financial contribution to reduce the development’s recreational impact on the SAC. Any development within 8km of the SAC which propose significant open space that new residents could use in lieu of travelling to Cannock Chase SAC should be supported by the Council as it should decrease the recreational impact on the SAC.

We do not consider that all sites should be required to undertake long term monitoring of biodiversity mitigation and enhancement measures on development sites. Monitoring requirements should be agreed on a site by site basis and the Council will need to sufficient justify through their evidence base any requirement to increase monitoring in accordance with paragraph 31 of the NPPF.

Question 9.E

Do you consider that the described approach will achieve the Council’s ambition of maintaining and increasing tree cover within the Borough? Are there any further measures which you think should be adopted to further enhance these efforts?

We support the Council’s ambition to protect and enhance tree cover in the Borough. We have set out our comments on each of the proposed approaches below:

a) ensuring that the existing tree stock within the Borough will be offered adequate protection from removal or damage – existing tree stock should only be offered protection where the trees are within Ancient Woodland, TPO designated, veteran trees, Category A or Category B trees in accordance with paragraph 175 of the NPPF. Trees not within these categories should not be protected.

b) ensuring that any development which provides an opportunity to increase tree cover on site will do so – in general we support the requirement to plant trees on a site however this should be determined on a site by site basis and tree planting should only be required on appropriate sites.

c) developing and later adopting a tree strategy which will see any and all development contribute to a scheme which will increase the tree cover across the Borough as a whole – the Council will need to provide evidence to support this proposal and a proposed formula on how contributions will be calculated will also be required. Sites that can provide tree planting within their own site should not be required to provide contributions for tree planting elsewhere and the viability of sites should be taken into consideration.

Question 9.F

Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No.

Please explain your answer.

If yes, are the following measures appropriate?

- a) Protecting and enhancing allotments, community gardens and woodland;**
- b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;**
- c) Requiring major residential developments to incorporate edible planting and growing spaces;**
- d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.**

We only consider that the Council should employ a policy which requires new development to take an active role in securing food growing spaces where the council's evidence base demonstrates a requirement as such. Where there is proven demand for such facilities in an area, then provision within a development should be explored.

A evidence based approach should be taken in relation to the protection of food growing spaces. Their protection should be based on evidenced need and demand for such facilities, in ensuring that they can be sustainable community assets. Proportionate evidence is required to ensure that the emerging Plan can be deemed as "justified" and therefore sound as set out in paragraph 35 of the NPPF.

There should be no blanket requirement for "major residential developments to incorporate edible planting and growing spaces". Provision, if it is justified, should only be required on a site by site basis, where provision is considered in light of other contributions and community facilities that may be required as part of new developments.

Question 9.G

Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

We are supportive of policies which look to protect the most valuable landscapes in the Borough. In the first instance, consideration of character areas can be useful in assessing landscape impact. Nevertheless, we urge the Council to include policy wording which makes it clear that landscape impacts vary on site by site basis and assessment should therefore take place on this basis.

Question 9.I

Should the new local plan:

- 1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach?**
- 2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?**
- 3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration.**
- 4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.**
- 5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.**

Below we set out our response to each of the five points set out as being required within the formation of the New Local Plan.

1. Any broad definition applied must be evidence based. The Council should be careful not to discount the protection of designated heritage assets over the protection of historic environments at a more broad landscape scale.
2. Undesignated heritage assets have equal standing as designated heritage assets according to the NPPF (paragraph 197). It should be made clear within any future policy that consideration of settlement morphology, landscape and sight lines is not applicable to every development proposal.
3. Consideration of historic context in respect of proposals is understandable. It is however questionable if transport junctions and town centre regeneration need special mention in a historical context.
4. Imaginative incorporation of heritage assets into development is supported. But in some circumstances this may not be appropriate considering the value of the heritage asset and viability of the development.
5. We broadly agree with sentiment presented, but suggest that further criterion is added to deem when this is appropriate.

Question 9.J

Do you consider that the current “Design” SPD provides sufficient guidance for design issues in the Borough?

SPDs are required to build upon and provide more detailed advice on specific policies within a Local Plan (PPG reference ID: 61-008-20190315). We consider that a revised Design SPD should be consulted alongside or following adoption of the Local Plan. This is required to ensure that the SPD complies with the policies of the adopted Local Plan.

Question 9.L

To support a new Local Design Review Panel should the new Local Plan:

- a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?**
- b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.**
- c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.**

Below we have provided our response to questions A, B and C as set out above.

- a.** This is an onerous requirement. Design is subjective, so there should be ample opportunity for the applicant to put forward their thoughts / rationale of the design approach that has been taken. It should also be more carefully considered what a “complex or large-Scale Development” is defined as. Explanation is required through use of appropriate evidence base to enable the policy to be carried forward in a manner that is transparent and easily transferable between different sites and locations.
- b.** Nationally prescribed standards do not require instruction via the Local Plan. Although they can be useful as a guide, site specific consideration of space standards is required on a site by site basis. We also consider that the Council should examine the recently published National Design Guide in ensuring that its findings in relation to planning for beautiful, enduring and successful places are taken into consideration as an evidence base document.
- c.** In principle, this is a positive suggestion and should be followed through. Nevertheless, it should also be considered where local characterisation studies are taking place, that they are undertaken at a scale which takes adequate consideration of the site specific characteristics.

Question 10.A

The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;

- a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?**
- b) Ensure all major development is accessible by regular public transport?**
- c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?**
- d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?**

Below we provide comment on A and B parts of question 10.A:

- a)** The Council should be more specific about what infrastructure is and related cost of installing it. We consider that changes to the Building Regulations would be the best way to ensure that further review can take place and that a nationally standardised approach to provision of such infrastructure would allow for uniformity and sharing of best practice to take place more readily. This would allow for the cost of the chosen technology to come down in price as a consensus is reached and economies of scale are realised.

b) We support the Council's ambition for all major development to be accessible by regular public transport. We do however question how the Council defines "major development". It should be made clear if the Council consider it to be reflective of the NPPF definition which considers for housing development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. We also seek clarification as to what the Council define "regular public transport" to be. It should be noted that sites of 10 dwellings in a small village may not be served by regular public transport. This does not automatically mean that development is unsustainable. Determination of the acceptability of development should take account of a wider range of considerations and not be restricted solely to the provision of regular public transport.

Question 10.C

The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable.

Therefore, should the council;

a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?

b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?

c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?

The below answer contains our response to the points raised in a) and b) of the above list.

a) We question how the Council defines "major development". It should be made clear if the Council consider it to be reflective of the NPPF definition which considers for housing development, where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. It is unreasonable to require that in effect, sites over 10 dwellings will require recycling and composting processing which is be unpractical on site. Such considerations should only be determined at the applications stage, more specifically matters of detail should not be considered in any depth until the reserved matters stage.

b) This is already required through provision of a construction management plan at the planning application stage. Such strategies should only be required at reserved matters stage, once contractors have been appointed and it is fully understood what their approach to the disposal of construction waste will be.

Question 12.A

Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan?

If not please give a reason for your response

We broadly agree with the general approach set out in 12.A, we support the delivery of sustainable transport solutions, which can be made more viable and delivered through contributions from development. This provides benefit to incoming residents to those developments, as much as does so for existing residents of the settlements concerned.

We withhold further comment related to the Council's transport approach until publication and subsequent consultation on the Integrated Transport Strategy has taken place. We expect this document to form part of the evidence base to influence policies within the emerging Local Plan.

Question 12.B

a) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? If not please provide a reason for your response.

b) How do you consider that high quality walking and cycling networks can be developed through new development?

The below answer contains our response to the points raised in a) and b) of question 12.B:

a) We agree that in principle, large scale development in key location across Stafford Borough can lead to a widening of choice of transport solutions. We agree with the principle set out in supporting text paragraph 12.5 that: "...Whilst high quality walking and cycling networks, together with supporting facilities will be promoted, it should be recognised that these transport choices to access to local services and facilities will still be largely restricted to more urban locations, with rural areas still relying on motorised personal transport.

b) Through an increased critical mass of users for new routes and developer contributions likely associated with new development, high quality walking and cycling routes can be developed which serve new development, connecting them to existing developments and allowing new and existing residents to benefit from improved facilities.

Question 12.D

a) Do you consider it is necessary to set local parking standards for residential and non-residential development ?

b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area? Please provide a reason for your response.

We do not object to the Council producing local parking standards to set guidelines on what the highways authority will expect to be provided on a development site. However, a blanket requirement for parking standards across Stafford Borough without consideration of site specific locational requirements is onerous. Consideration should be made of current and future sustainable transport options to the site in question. In this vein, the applicant should be allowed to justify the level of parking provision they have proposed.

I trust that you find the representations set out above suitable for inclusion as a response to the consultation. Please do not hesitate to contact me should you have any questions regarding these representations.

Yours sincerely



Michael Davies
Director



Stafford Borough Council
Forward Planning
Civic Centre
Riverside
Stafford
ST16 3AQ

Date: 30 March 2020
Our Ref: LS M3/0608-27

By email only:
forwardplanning@staffordbc.gov.uk

Dear Sir/Madam

RE: STAFFORD BOROUGH LOCAL PLAN ISSUES AND OPTIONS

We represent the **West Midlands Housing Association Planning Consortium** which includes all the leading Housing Associations (HAs) across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region. As significant developers and investors in local people, HAPCs are well placed to contribute to local plan objectives and act as long-term partners in the community. We welcome the opportunity to make comments on this document.

Question 5.B a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer?

The Planning Practice Guidance (PPG) recognises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. We recommend that Councils set ambitious housing requirement figures in order to ensure that housing need is being met. As mentioned in paragraph 5.10 of the Issues and Options document, the PPG is clear that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing development.

Considering this, we suggest that the Council pick an ambitious yet realistic approach to maximising the delivery of affordable housing through adopting a housing requirement figure that provides a higher overall housing growth across the District. The NPPF seeks a sustainable supply of housing, in sustainable locations, to support local communities; we strongly recommend that the Council takes the most ambitious approach which will best meet housing needs, while balancing local constraints. This should ensure that the full range of affordable housing needs are met, including specialist needs of the elderly; affordable housing and specialist housing and care for the elderly should have separate targets within the new Local Plan to ensure each are regularly monitored and reviewed so that any shortfalls can be addressed.

Question 8.B Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough?

The NPPF encourages the efficient use of land and doesn't set a prescribed minimum density standard. A site's capacity is dependent on its characteristics, surroundings and locality and therefore a range of density threshold would seem more appropriate than a blanket standard. As the consultation document notes it is more appropriate that densities are maximised in sustainable location with access to good public transport connections.



Directors
J Sneddon BSc (Hons) MRTPI
J M Adams BA (Hons) BTP MRTPI
J Stacey BA (Hons) Dip TP MRTPI
I Warner BSc (Hons) Dip TP MRTPI

Question 8.D Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?

We understand that there is an argument to be made to the benefits of applying the Governments' Nationally Described Space Standard (NDSS), particularly with regard to the social benefits such as aiding to improve resident's mental health, overcrowding and accessibility. However, the NDSS is not a building regulation and remains solely within the planning system as a form of technical planning standard, therefore it is not essential for all dwellings to achieve the standard in order to provide a good quality of living.

Question 8.E In the New Local Plan should the Council a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? b) Only apply the Nationally Described Space Standards to new build dwellings? c) Not apply the Nationally Described Space Standards to any development? Please explain your answer.

We advise the Council not to apply the NDSS across all residential development. Doing so would undermine the viability of development schemes and through viability testing of application proposals, will result in fewer affordable homes being delivered. In addition, many households may not desire, or require housing that meets these standards, as it will result in for example, higher rental and heating costs. There will be occasions where it is neither practical nor necessary to achieve the NDSS.

In order for the Council to implement the NDSS it must be demonstrated that it is being done to address a *clearly evidenced need*, as set out in the Planning Practice Guidance.

Question 8.H Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?

We understand the need to incorporate a proportion of dwellings to meet the category standard, as set out in Building Regulations Part M, in order to provide for those in need. Therefore we would support a policy requirement of 10% wheelchair accessible affordable homes where it can be robustly evidenced that it is necessary and viable for housing associations to do so.

Therefore, before the Plan incorporates the Government's *Accessibility and Wheelchair Housing Standards*, we request that the Council undertakes a thorough assessment of need and viability and tests the impact of the introduction of these standards. The PPG states:

"There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *The accessibility and adaptability of existing housing stock.*
- *How needs vary across different housing tenures.*
- *The overall impact on viability."*

(Housing: optional technical standards, paragraph 007, Reference ID:56-007-20150327)

The same section of the PPG also provides additional guidance and resources in terms of how Local Planning Authorities can undertake and inform their assessments. It is recommended the Council refers to this guidance before it proceeds with seeking to incorporate the Accessibility Standards.

Introducing the standards will inevitably create cost implications on Housing Associations. An assessment into the Cost Impacts of the Accessibility and Wheelchair Housing Standards¹ found that the Category 2 access standards varied from £520-£940 per dwelling, **excluding** costs of additional land associated with the requirements of the standards. It is therefore important that the standards are introduced through a robust evidence base, which includes a thorough assessment of viability.

¹ Housing Standards Review: Cost Impacts (EC Harris for DCLG, September 2014)

Question 8.I a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?

Paragraph 11 of the NPPF requires that planning policies positively seek opportunities to meet the development needs of their area. If the Council believes there is significant demand for bungalows in the Borough then they should look at demonstrating this demand.

The delivery of housing, and affordable housing is frequently made more challenging and squeezed by planning requirements. Bungalows typically require a larger footprint than multiple storey houses which may lead to the delivery of a lower quantity of houses on any one particular site. Robust viability testing would be required to justify any increase in development requirements, particularly those that may cause the delivery of affordable housing to be reduced.

Question 8.K a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable? b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?

We are pleased that the Council has commissioned an Economic and Housing Development Needs Assessment (EHDNA, January 2020) to determine the Council's housing needs requirements from 2020 to 2040. The EHDNA provides an important evidence base to the new local plan which will justify the development plan strategy.

As Housing Associations, WMHAPC are keen to boost the supply of affordable housing within the Borough and we would support an ambitious housing requirement which would facilitate the delivery of more affordable homes. We are mindful that the target needs to be ambitious but achievable. For that reason we would therefore support 252 units per annum being set as a minimum target which is expected to be exceeded rather than a cap to development.

Housing Associations working in partnership with LPAs can be the catalyst to significantly increasing the supply of affordable homes. We recommend that the Council engage directly with its local Housing Associations, including our members, to set a local definition of affordable housing that will encourage delivery of a diverse range of affordable housing types that will meet local needs. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan.

As Stafford Borough is predominantly rural in nature we recommend that the Council take a proactive approach to allocating rural exception sites. In addition, we encourage Stafford Borough Council to introduce a locally specific policy on entry-level exception sites that enables the delivery of affordable housing-led schemes that are aimed at first-time buyers and renters, and also seek to allocate land specifically for these sites to encourage further delivery in addition to rural exception sites. It is important to note that unlike the policy on rural exception sites the NPPF does not seek to secure affordable housing delivered on entry-level exception sites *in perpetuity*, so it would be inappropriate to require this in a local policy.

We do not consider that delivering a diverse range of market housing is an appropriate alternative to the delivery of a sufficient number of affordable houses. While it is important that the Council looks to deliver a wide variety of market houses, there are also a variety of affordable housing products such as affordable rent, shared ownership and discounted market housing among others, which address the housing needs of local population. These are often local needs that cannot be met by market housing. We encourage the Council to maximise the delivery of nationally defined affordable housing products (see Annex 2 of the NPPF) where possible and where there is demand.

Question 8.L Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?

Given that the Council has identified the potential to deliver housing in designated rural areas, we support the Council in considering the setting of a lower threshold of five dwellings for seeking affordable housing delivery on-site where this is achievable, and viable.

Question 8.M In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?

The National Planning Policy Framework (NPPF, 2018) has a commitment to significantly boost the supply of homes through ensuring that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. We would support the conversion of rural exception sites to allocations in order to assist in the fulfilment of the commitments of the NPPF.

We would like to be notified of further consultations on the Local Plan Review by email only to [REDACTED] Please ensure that the **West Midlands HARP Planning Consortium** is retained on the consultation database, with **Tetlow King Planning** listed as its agent.

Yours faithfully

[REDACTED]

LEONIE STOATE BSc (HONS) MSc
ASSISTANT PLANNER
For and On Behalf Of
TETLOW KING PLANNING

[REDACTED]

cc: Accord

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Anna Nevin – Health and Housing Manager

MR D BREAKWELL FOR S RABJOHNS EMAIL RESPONSE – 31 MARCH 2020

From: BREAKWELL David [REDACTED]
Sent: 31 March 2020 10:44
To: List-ForwardPlanning-SBC
Subject: Stafford Borough Local Plan 2020-2040

My client, Steven Rabjohns has requested that I resubmit the proposal submitted in the 2018 for the land shown in the attached plan. This site was considered under the 2018 process as Site ID HIX05.

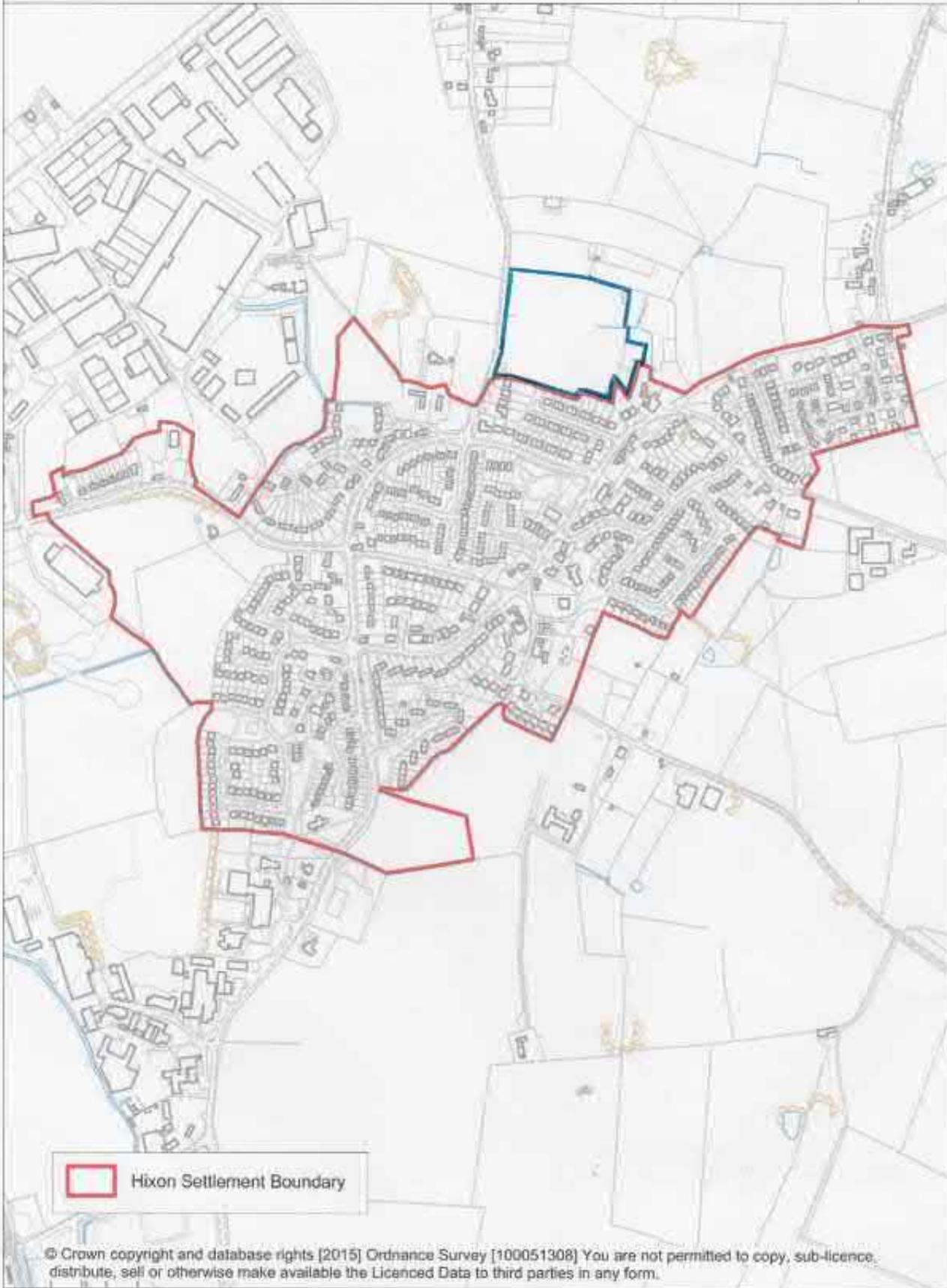
Kind regards

David Breakwell

Map 1: Hixon Settlement Boundary

Not to scale

Date: November 2015



Stafford Borough Local Plan Issues and Options Representations by Commercial Estates Projects Ltd

March 2020

Contents

1.	Introduction	1
2.	Responses to Questions.....	2

Appendices

Appendix 1 – Land at Tixall Road: Site Location Plan

Appendix 2 – Review of Housing and Employment Need Evidence by Hatch Regeneris

Prepared By Craig Alsbury

Status: Final

Draft Date: 31 March 2020

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 Avison Young is instructed by Commercial Estates Projects Ltd (“CEP”) to make representations in respect of the Stafford Borough Local Plan Issues and Options document, published by the Borough Council in February 2020. CEP is part of CEG (previously known as Commercial Estates Group). CEG has a longstanding relationship with the Borough having promoted and secured the Stafford East SDL in the Council’s Local Plan Part 1. This development, now known as Church View, is being delivered by Redrow Homes and is nearing completion.
- 1.2 To the immediate east of Church view, CEP has a controlling interest in land to the north and south of Tixall Road (see Location Plan at **Appendix 1**), and is keen for this to be allocated for housing and associated development in the new Local Plan. The land is ideally located to accommodate sustainable development and, at some 70ha gross, is capable of making a significant contribution to housing delivery in the Borough. We currently estimate the capacity of the site to be between 1,200 and 1,500 dwellings. The site is available and achievable.
- 1.3 CEP is fully supportive of the Borough Council’s growth ambitions but is keen to ensure that, whatever spatial strategy it adopts, it capitalises on the growth potential that Stafford continues to offer and takes full advantage of its sustainability credentials, which far exceed those of any other settlement in the Borough.
- 1.4 CEP is keen to discuss the potential of the Tixall Road land with the Borough Council and, to that end, we will be in contact shortly to arrange a call or meeting if circumstances allow. In the meantime, if you have any questions about the site or these representations, please do not hesitate to contact Craig Alsbury on 0121 609 8445 or 07831 106876.

2. Responses to Questions

Question 1.A

Is the evidence that is being gathered a suitable and complete list?

- 2.1 In addition to the evidence that the Council has stated it intends to compile, it will need to ensure that it has robust evidence on: the deliverability (and timing / rate of housing delivery expected from) its committed housing sites; development site selection (housing and employment – including a full audit trail for the decisions it takes in respect of which sites to allocate and which to omit); decisions taken in respect of any new settlement(s) promoted through the Plan (including robust evidence on the sustainability credentials of such proposals, environmental effects, deliverability, viability and timescales (the Aecom work on Strategic Development Sites is not robust and certainly does not constitute evidence sufficient for decision taking in the plan-taking context)); the definition of settlement boundaries; the need for biodiversity net gains and the scale of net gain specified in the Plan.

Question 3.A

Do you agree that the Vision should change?

- 2.2 Yes. The current Vision is overly / unnecessarily long and will need to be amended to reflect changes in circumstance, including new / amended legislation and Government policy and the redefined ambitions of the Council.

Question 3.B

Do you agree that the Vision should be shorter?

- 2.3 Yes. See above.

Question 4.A

Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

- a) **Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?**
- b) **What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?**

- 2.4 The Council should not set its own standards for construction but, instead, should rely on Building Regulations. It is not necessary or appropriate for planning policy to duplicate or expand on the Regulations and it is certainly not appropriate for individual Council's to use their planning policies as a means of specifying additional or different requirements.

Question 5.A

- a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?
- b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view

2.5 It is not necessary for the Council to include within the new Plan a Policy equivalent to Policy SP1 of the current Local Plan. Policy SP1 simply restates Government Policy and so adds nothing to the decision-taking framework.

Question 5.B

- a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer?
- b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

2.6 CEP has commissioned a critique and assessment of the Lichfields work. This has been produced by Hatch Regeneris and a copy of their Report is attached.

2.7 Our preliminary finding is that a housing requirement in the range of 650dpa – 700dpa would best reflect the Borough's need for housing and its wider growth ambitions. The attached Report explains in more detail how we have reached this preliminary conclusion (and why it is only a preliminary conclusion at this stage), however, the key points are as follows:

- the alternative demographic-led housing need figures which range from 267 to 334 dpa in Scenarios B and C are significantly lower than the Local Housing Need (LHN) figure of 408 dpa. The 2019 NPPF makes it clear that the LHN should provide the minimum housing requirement in Local Plans, and both Scenario B and C fail to meet this test and should not be regarded as potential housing requirements;
- recently published sub-national population projections (2018-based) point to a significantly larger increase in Stafford's population (860 per annum, 2018-43) compared to the projections (2014-based) used for the LHN method (450 pa, 2014-39) and the later 2016-based projections (285 pa, 2016-41). This implies a housing need which is substantially higher than the 408 dpa implied by the LHN method;
- no specific figure for future jobs growth is provided for the 408 dpa LHN figure. However, the EDHNA concludes that it generates a need for 68 ha of employment land, a figure that is slightly lower than the CE Baseline scenario (5,929 additional jobs 2020-40 and 69 ha). The implication is that delivery of housing at this level would support only modest jobs growth in the borough and this is inconsistent both with the emphasis on the need for positive plan-making in the 2019 NPPF (for example, paras. 15 and 16) and the Borough's economic growth objectives which include major employment generating investments (for example, Station Gateway Masterplan/HS2 related development);
- housing need at this level is more consistent with recent housing delivery rates in the borough (736 pa over the past 5 years).

- housing need in the 650-700 range would align with employment growth which is more consistent with the NPPF's emphasis on positive plan-making (c. 12,000-13,000 jobs), with recent past growth rates in Stafford and with the longer-term past growth rates implied by the EDHNA;
- a need figure of 650-700 dpa would also align with the EDHNA's Regeneration scenario which accounts for both forecast growth (Cambridge Econometrics) and two potentially significant employment generating initiatives (Station Gateway Masterplan, New Garden Community);
- a housing requirement in the order of 650-700 dpa also has the potential to contribute more substantially than the lower LHN scenario to an affordable need of 252-389 pa through the delivery of mixed market and affordable housing developments. This should be a key consideration in setting the housing requirement.

2.8 The Hatch Regeneris report points to additional analysis that the Council should carry out. This includes:

- analysis of the housing need implications of the newly released 2018-based sub-national population projections;
- further consideration of the likely timing of the delivery of the two major employment generating developments (Regeneration scenario) to justify the assumption that they will contribute substantially to employment growth in the borough during the 2020-40 Plan period;
- additional explanation of the assumptions about the net additional jobs in the Regeneration scenario, and accounting for the likely upward impact of multiplier effects (see Hatch Regeneris report para. 3.26 on this point);
- further work by the Council to determine whether other planned or potential investments both within the Borough and in neighbouring areas might generate additional demand for labour in the borough and therefore housing need; and
- further sensitivity testing of the EDHNA's assumptions in translating jobs into housing need. It should test the later OBR 2018 economic activity rates which might have the effect of dampening additional housing need, and a labour force to jobs ratio of 1.0 which would have the reverse effect (see Hatch Regeneris report paras 3.91-3.94 on these points).

2.9 These are important steps in ensuring that the housing need and requirement taken forward in Stafford's Local Plan are robust.

Question 5.C

In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031?

If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

- 2.10 Committed housing developments that are 'deliverable' will, by definition, help satisfy the Borough's need for new homes in the period 2020 to 2040. Deliverable developments cannot therefore be ignored and an allowance must be made for them when the Council calculates how many new homes need to be provided for by way of allocations in the Local Plan.
- 2.11 However, the Council must only make an allowance for developments that are genuinely deliverable in accordance with the NPPF and NPPG. The NPPF states that:
- 2.12 To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans); and
 - b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. The NPPG states that the 'evidence' referred to in the NPPF may include:
 - current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
 - firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
 - firm progress with site assessment work; or
 - clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.
- 2.13 To determine how many of its current commitments it should account for when calculating its residual housing requirement, the Council will need to assess each site / development carefully and, in so doing, apply the NPPF definition rigidly and in the spirit of the Policy (i.e. having regard to its purpose which is to significantly boost the supply of new homes). In other words, if there is any doubt about if or when a site might deliver new homes, the Council should err on the side of caution and ignore those sites for the purposes of calculating the residual requirement.
- 2.14 We note that there is no mention in Section 5 of the Issues and Options document of how, in setting its housing requirement, the Council is to build in the flexibility and resilience required by NPPF 11. This, we would suggest, requires the Council to make an allowance in its housing requirement for the non-implementation allocated or permitted housing developments, or simply slippage in the delivery of new homes. It can do this by making an upward adjustment to its housing requirement. There is no policy or guidance on how much of

an upward adjustment should be made but the Council will no doubt be aware that LPEG recommended an adjustment of 25%. Such an adjustment would be appropriate in this instance.

Question 5.D

i. **Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?**

ii. **Do you agree that the smaller settlements should be included in the Settlement Hierarchy?**

- 2.15 The Council appears, in paragraphs 5.14 to 5.25 to be conflating a number of related but very separate issues (eg settlement hierarchy and the spatial strategy for growth).
- 2.16 The Council's primary objective, in spatial planning terms, should be to ensure that development and growth in the Borough is sustainable and, that development occurs in sustainable patterns / locations. The Council will need to take great care to understand and evidence what 'sustainable growth / patterns / locations' means in the context of Stafford Borough.
- 2.17 A settlement hierarchy is a helpful way of illustrating, in simple terms, the relative sustainability credentials of a Borough's settlements and by distinguishing settlements in sustainability terms, the hierarchy can be used to inform decisions taken about where growth should and should not occur.
- 2.18 We have no issue with the Council basing its settlement hierarchy on an assessment of the sustainability credentials of each of its settlements and fully support a hierarchy that continues, quite rightly, to show Stafford occupying the top tier. We also have no issue with the hierarchy including all settlements in the Borough, so long as they are appropriately ranked according to their relative sustainability.
- 2.19 Looking ahead to the how new development might be accommodated within the Borough, the Council will need to take care not to assume (as it appears to be in the Issues and Options document) that just because a settlement is recognised in the hierarchy this does not mean that it is a suitable location for development. It is perfectly appropriate to identify a small settlement in a hierarchy, and allocate it to a low tier in the hierarchy, and then adopt a spatial strategy that presumes against development within or adjacent to it. If there is any contemplation of allocating anything other than very modest levels of growth to settlements that have limited services and facilities, or poor links to more sustainable settlements, this will need robust evidence.

Question 5.E

The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath /Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

- 2.20 As indicated in response to 5.D, we have no issue with the settlement hierarchy including all settlements in the Borough. However, in cases where only part of a settlement lies within the Borough, this ought to be noted in the Plan.
- 2.21 Just because a settlement is listed in the hierarchy does not mean that it is or will be an appropriate location for development and must necessarily grow. In the case of the northern built up areas, expansion is limited

by the North Staffordshire Green Belt and, irrespective of how sustainable they may be as settlements, their expansion into the Green Belt could only be justified if the Council could demonstrate that there are exceptional circumstances justifying alterations to the Green Belt boundary (see NPPF 136 and 137) and in the light of everything else that is said in the Issues and Options document, we consider it highly unlikely that such circumstances exist at this juncture. In addition, these settlements lie on the edge of the Borough, some distance from where the vast majority of housing needs arise and so developing in these locations would not be the optimum way of addressing the Boroughs requirements.

Question 5.F

- a) **In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?**
- b) **Are there any of these spatial scenarios that you feel we should avoid? If so, why?**
- c) **Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer**

2.22 We are satisfied that all reasonable options are described within the Issues and Options document.

2.23 When considering which of the options, or which combination of options, should be pursued, the Council must bear in mind that its over-arching objective is to deliver sustainable growth and to achieve that it must plan for development to occur in sustainable locations / patterns. That, we believe, will necessarily mean adopting a strategy underpinned by (i) the intensification of town and district centres and (ii) the intensification around the edges of the larger settlements.

2.24 All reasonable steps should be taken to take advantage of the sustainability credentials of Stafford (evidenced by its services and facilities, green infrastructure, and its public transport networks / connectivity). This means maximising the use of its urban capacity and growth options on the edge of the town, such as our Client's land at Tixall Road.

2.25 Development in other locations, including within and adjacent to Stone and Eccleshall for example, will be inherently less sustainable, and development within and adjacent to smaller settlements even more so. Directing substantial levels of growth to less sustainable settlements will give rise to a far greater range and scale of adverse effects – effects that will need to be avoided if the Council is serious about tackling climate change.

2.26 We are not convinced that a dispersal model, a string settlement model, or a wheel settlement cluster could deliver sustainable outcomes in this Borough. Dispersal would result in development occurring adjacent to small, unsustainable settlements that have neither the infrastructure nor the links with other, larger settlements to mitigate against adverse social and environmental impacts. A string approach relies on there being (i) a group of settlements that are close enough to one another to share services and facilities; (ii) sufficient diversity in services, facilities, infrastructure and employment opportunities across the linked settlements to mean that any sustainability shortcomings that might exist at the individual settlement level are overcome when the settlements are viewed as a collective; (iii) evidence that by developing within or adjacent to these settlements, their sustainability credentials would be enhanced and the development itself would be

sustainable; and (iv) high quality, high frequency public transport links between the settlements and between them and Stafford. We can think of no settlements in the Borough that have the potential to combine in this way and are capable of supporting genuinely sustainable development. In Stafford Borough, a wheel cluster would effectively mean dispersal or at least the development of a series of dormitory settlements which, plainly isn't sustainable.

- 2.27 A strategy including a garden settlement could be successful but all but one of the garden settlement options being considered by the Council is incapable, we say, of delivering sustainable outcomes.
- 2.28 Decisions taken in respect of which option or options to pursue will need to be appropriately evidenced and the less sustainable the option pursued, the more compelling the justification will need to be.

Question 5.G

Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements?

If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?

- 2.29 The Government has been careful to avoid providing a single template for garden communities. However, it has formulated criteria that can be used to form a picture of what a garden community is (or should be) (see its 2018 Prospectus). It is not clear whether the Borough Council (or Aecom) has had regard to the Government's Prospectus when selecting the garden community options that are described in the Issues and Options document but we note that the Prospectus talks specifically about garden communities being delivered as extensions to existing towns and so for the Council to not have considered garden community site options on the edge of Stafford (perhaps simply because, like our Client's site, they fall below the arbitrary 100ha threshold) constitutes a major, and possibly fatal flaw. If it persists without considering such options, there is a significant risk that its approach to site selection will be found unsound. We would recommend that the Council widens its consideration of garden community options to include large scale sites on the edge of Stafford, including our Clients land at Tixall Road.
- 2.30 We have no issue with the Council pursuing a strategy incorporating a new settlement so long as (i) this is not at the expense of making the most of Stafford (by continuing to expand the town in sustainable ways) and (ii) it being absolutely satisfied that one or more of the options available to it are capable of becoming genuine garden communities (see the criteria in the Prospectus). For reasons that we provide below, we are of the view that only one of the options that the Council is currently considering has the potential to satisfy the Government's criteria and that is Meecebrook.
- 2.31 If a garden community is to be promoted, the Council must pursue the option that will guarantee sustainable outcomes (i.e. is, as far as possible, self-sustaining and is sustainably linked). Moreover, the Council must make realistic assumptions about how such a settlement would be delivered, how long it would take to bring forward, when it would begin to deliver housing and at what rate it would deliver housing once under construction.

2.32 As far as the Council's current options are concerned, there is insufficient evidence to demonstrate that any are capable of being genuinely sustainable and delivered as a garden community and so insufficient evidence to enable us to say which, if any, is most appropriate. The Aecom study is helpful as a starting point but we have concerns about elements of it (methodology, assumptions, measures of sustainability / suitability etc) and consider that much more needs to be done to properly explore and evidence suitability, sustainability and deliverability.

2.33 Our preliminary observations on the Options currently being considered are as follows:

- **Gnosall (A1)** – Gnosall is not a sustainable settlement. It has a limited range of services / facilities, it offers very limited employment opportunities, it has poor public transport connectivity and is not well linked to Stafford or Stone where a most of Gnosall's residents have to travel to work, do the vast majority of their shopping, access leisure facilities and access train services to larger towns and cities. Moreover, even if the services, facilities and infrastructure in Gnosall centre could be improved, there is no physical capacity in the centre to enable a material change and, of course, an SUE of 2750 to 3500 homes would need its own or additional services and facilities and these would need to be centrally located within the development to make them walkable. The reality is an SUE in this location would simply be a bolt on. It would be impossible to integrate it into Gnosall and there is no obvious way to create a built form that enables the existing village and the SUE to function in a complementary fashion, creating a genuinely sustainable whole. In addition, it would be difficult if not impossible to upgrade to any material extent public transport links between the expanded village and Stafford. What would result is an enlarged dormitory settlement with poor services and facilities and poor links to higher order centres. We cannot, at this stage, see how bolting circa 3,000 new homes on to Gnosall would create a garden settlement or deliver sustainable growth. This is not an option that the Council should consider further.
- **Haughton (A2)** – the issues and challenges facing this option are not dissimilar to those afflicting A1. Haughton is even less sustainable than Gnosall and the option here is not for an extension to the village but a free standing settlement which, on the face of it, has no prospect of being in any way self-sustaining. It would be a dormitory settlement in a location that is not well served but public transport and in all practical terms is remote from higher order centres and associated facilities / infrastructure. This is not an option that the Council should consider further.
- **Seighford (B)** – this option envisages some 4000 to 5250 homes being bolted onto a poor quality, low grade industrial estate in location that has limited connectivity and poor links to Stafford that it would be impossible to upgrade to any material extent. It would have to be a free-standing settlement but at 5000 homes could not be self-sustaining. This fact, together with the major infrastructure, technical and financial challenges that present themselves here render this option wholly inappropriate in our view. It is not, therefore, an option that the Council should consider further.
- **North of Redhill (C)** – this option would involve developing a free standing settlement of 3500 to 5000 homes in strategic gap between Stafford and Stone. It would be wholly reliant on the A34 for links to Stafford and Stone and would give rise to huge impacts at Redhill and along A34 into Stafford as a consequence of residents having limited transport choices. Even at 5000 homes, there is no prospect of this being a self-sustaining settlement and so it would, in effect, be a dormitory village that is completely reliant on higher order centres for jobs, shopping, leisure and wider reaching public transport connectivity. The references in the Aecom study to pedestrian / cycle infrastructure improvements are

not on the face of it deliverable. We note also that this site suffers from major utilities issues and is impacted by HS2. This is not an option that the Council should consider further.

- **Meecebrook (D)** – at 9500 to 11500 homes, Meecebrook has the potential to be sustainable, a genuine garden community and self-sustaining, but the evidence suggests that it would require major investment in infrastructure (and willing partners in the form of the infrastructure providers) (e.g. new junction on M6, new railway station, new bus links, new pedestrian / cycle links, new water infrastructure, new power infrastructure). Meecebrook has the potential to make the most significant impact on housing land supply in the Borough, and over a long period (well beyond 2040) but there are significant questions to be answered in respect of deliverability, and if deliverable over what timescale given the nationally significant nature of the infrastructure required and facilities which would be required from the outset.
- **Hixon (E)** – Option E is being described as an extension to Hixon but is remote from the village itself and instead wraps around the airfield industrial estate. This option has issues that are not dissimilar to A1 and A2. Hixon is not a sustainable settlement and will not be made sustainable by adding 2250 to 2750 homes. Moreover, as with the Gnosall and Haughton options, it would be impossible to properly integrate a development here with the village, result in there being two essentially competing settlements adjacent to one another. The Hixon area suffers from poor connectivity by public transport and poor links into Stafford and Stone. Like Haughton and Gnosall, in all practical terms, it is remote from higher order centres and the services and facilities that they provide. The reference in the Aecom study to the potential for a new train station is nonsense and the site suffers major utilities challenges. This is not an option that the Council should consider further.
- **Weston (F)** – this option is similar to A1, A2 and E, albeit development here would be disconnected from Weston by the railway line. This would be a wholly unsustainable choice and the reference in the Aecom study to the potential for a new railway station here is nonsense. This is not an option that the Council should consider further.

2.34 In summary, we consider there to be major sustainability and practical (deliverability) issues with all of the options. However, Option D is the only option that, in our view, has the potential to deliver a genuine garden community and a genuinely sustainable set of outcomes. However, the challenges facing Meecebrook are considerable and these would need to be examined and evidenced in much more detail before the Council could say with any certainty at all that this is a deliverable proposition. And it must be able to do that if provision is to be made for such a development in the new Local Plan.

Question 5.H

- Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?**
- If you do not agree what is your reason?**
- Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.**

- 2.35 When determining which growth option to pursue, the Council must bear in mind the following:
- a) it will only be able to take a robust and appropriately evidenced view on which spatial strategy represents the most appropriate and sustainable for the Borough when it has determined what its housing and employment development requirements are;
 - b) decisions taken in respect of the spatial strategy need to be informed by a proper understanding / application of the NPPF and not the superficial assessment of NPPF compliance that is contained within the Issues and Options document; and
 - c) whatever strategy is pursued, it must focus as much growth as possible on the most sustainable locations (i.e. Stafford). Stafford has further capacity to grow and is the only settlement in the Borough that offers a comprehensive public transport network a full range of shops, services and facilities and a wide range of employment opportunities.
- 2.36 The Council is wrong to conclude that Growth Options 1 and 2 are at odds with the NPPF because they presume against development in smaller settlements. First and foremost, it requires local authorities to develop policies and proposals that guide development towards the most sustainable solutions, having regard to local circumstances including the character, needs and opportunities of each part of its area. As far as the rural areas are concerned, the NPPF goes no further than saying that:
- 2.37 To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.
- 2.38 The NPPF plainly does not mandate local authorities to provide for the growth of all villages / settlements in their areas (i.e it does not direct all local authorities to adopt dispersal strategies). What it does is require local authorities to consider whether it is appropriate to direct new development to rural settlements, having regard to whether such development is needed (in pure housing need terms) and / or whether it will help rural communities to thrive, including by supporting services and facilities that might otherwise cease to exist. So, it is perfectly possible for Growth Options 1 and 2 to be NPPF compliant. They would only not be if the Council determines, on the basis of research and analysis, that certain rural settlements need to grow but Options 1 and 2 presumed against any new development in such locations.
- 2.39 We agree that Growth Option 4 is not NPPF compliant. A spatial strategy that relies exclusively on a single new settlement or a series of very large developments is likely to conflict with numerous policies within the NPPF, including its over-arching provisions in respect of sustainable development, and its provisions in respect of flexibility and maintaining a supply of housing.
- 2.40 On the basis of the information currently available, the Growth Option that appears to represent the most sustainable strategy for the Borough is Option 3. However, the Council has so far failed to deliver on the Stafford focus that has been planning for over recent years and, as described in the Issues and Options document, Option 3 is at risk of setting the Council up to fail once again (by, for example, allowing for up to 20% of growth to go to the small and medium settlements and an additional 20% to the larger settlements (excluding Stone)). In any new strategy, the Stafford focus would need to be re-examined and re-addressed. In our view, this would mean directing at least 70% of any new development required to sites

within and on the edge of Stafford and, in accordance with NPPF 72, identifying additional large scale land releases to boost significantly the supply of new homes. Again, our Client's land at Tixall could and should play a key role in the mix of sites identified for Stafford.

- 2.41 There may be a role for Growth Option 5, or partial reliance on a Garden Community, but the Council needs to take great care when making assumptions about when such a development (or developments) might begin to deliver housing and then at what rate they might deliver year on year. In our considerable experience, local authorities grossly under-estimate the lead in times for major developments and grossly over-estimate delivery rates. And the Aecom work puts the Borough Council at risk of doing this also. The reality is there are very few examples in the Midlands (indeed outside the south east) of very large developments that have been taken from conception to completion and so few regional benchmarks that the Council can sensibly rely on as a guide to delivery. Examples from other regions are highly unlikely to give an accurate indication as to what can be expected in Stafford Borough. Key factors will obviously be (i) the time it takes to embed the principle of development in the development plan; (ii) the time it takes to develop the proposals and achieve planning permission; (iii) the time it takes to assemble the site; (iv) the time it takes to secure the necessary finance; (v) the time it takes to secure detailed approvals for housing and infrastructure and technical approvals from utilities and infrastructure providers; (vi) the time it takes to prepare the site and deliver facilitating infrastructure; and (vii) of course, developer capacity and absorption rates.
- 2.42 On the basis of the information currently available, we would urge the Council to assume, if it does plan to deliver a very large development (e.g. Meecebrook) that it does not assume that it will make a substantive contribution to housing land supply in this next Plan period. It may deliver some housing before 2040 but the chances are any contribution it does make will be small. Moreover, it should assume small number of homes in the early years and, for now at least, no more than about 160dpa – 200dpa once fully operational.
- 2.43 Growth Option 6, like most of the Garden Communities options, seems to us unlikely to deliver sustainable growth. Save for Stafford, Stone and Eccleshall, the settlements referred to in paragraph 5.59 are not sustainable and, on the face of it, are incapable of being made sustainable, or being satisfactorily linked to higher order centres. We would need to see considerably more evidence of the sustainability credentials of Option 6 (including the means by which genuinely sustainable outcomes are to be achieved) before it could be regarded as a realistic alternative.

Question 5.I

Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.

- 2.44 See our representations in respect of 5.F, 5.G and 5.H.

Question 5.J

What combination of the four factors:

- 1. Growth Option Scenario (A, D, E, F, G);**

2. Partial Catch Up**3. Discount / No Discount****4. No Garden Community / Garden Community****Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?**

- 2.45 We have highlighted elsewhere in our representations the need for further work to be done before the Council, or stakeholders, is in a position to select preferred options in respect of its housing requirement and its spatial strategy. However, at this stage, we consider that the evidence indicates the following combination:
- a) Growth Option / Scenario - Option E, but with modified jobs growth inputs;
 - b) PCU – adjustments to be made to the baseline position arrived at under E to account for the effects of the recession but for these to be made in the context of market signals;
 - c) Discount / No Discount – the Borough’s residual housing requirement should be calculated taking account of currently committed developments where they are genuinely deliverable having regard to the provisions of the NPPF; and
 - d) Garden Community / No Garden Community – provision may be made for such a development so long as this is not at the expense of growing Stafford (and taking full advantage of its sustainability) and so long as it can be demonstrated that the development would be genuinely sustainable and a genuine garden community.
- 2.46 See our representations in respect of 5.D – 5.H for our rationale.

Question 5.K**Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable? If not, what would you suggest and on what basis?**

- 2.47 The EDHNA’s conclusions provide the Council with a wide range of employment land requirements to select from. The study concludes only that the Regeneration scenario (109 ha) is a ‘realistic’ scenario and that the higher 181 ha need implied by the past take-up scenario is ‘valid’.
- 2.48 Commentary on the employment land need evidence is provided in the Hatch Regeneris Report at paras. 4.9-4.65. However, on the basis of the evidence presented in the EDHNA, it is reasonable to conclude that:
- the CE Baseline scenario (69 ha) is not appropriate since it implies jobs growth which does not represent positive plan-making and which suggests very little growth in key B use class jobs (ie office/R&D, light and manufacturing, warehousing);
 - two Scenarios (CE 50% Boost, 78.5 ha) and the past trends job-growth scenario (94 ha) are based on simple assumptions that are not sufficiently robust for these scenarios to be considered as an

appropriate basis for the plan-making. On the past trends jobs growth scenario, the EDHNA itself concludes that employment growth of 13,100 additional jobs is unlikely to be achieved:

- the past take-up based scenario (181 ha) has no employment growth figures associated with it, but may imply growth well beyond the scenarios described above. Other reasons for caution with this scenario include the recognition in the EDHNA that the past pattern of take-up has seen a small number of years when take-up was very high, and that this is carried through in the average that is projected forward. For this scenario to be robust, the Council should demonstrate that the factors that drove such take-up are likely to be repeated in future;
- on review of the EDHNA's evidence and conclusions on employment land need, the appropriate requirement will depend in part on its preferred jobs growth figure (and the housing need figure linked to it). If jobs growth of 12,000 to 13,000 is assumed then the appropriate figure appears to be in the range 94-109 ha. However, we comment further on the inclusion of a substantial 48 ha requirement to account for potential future losses in our response to question 5L;
- the Issues and Options document specifies that office (B1a/b) should account for 30% of future employment land, and the remaining 70% for B1c/B2 and B8 uses. It is not immediately clear why the Council has opted for this split when the EDHNA suggests that the appropriate split should be 25%:75% (although the difference is relatively small). A 25%:75% split would be consistent with data in the EDHNA (Table 7.17) which shows that past average take-up annually has been 23%:77%. This better aligns with the EDHNA's conclusion than that of the Issues and Options document.

Question 5.L

Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why.

- 2.49 The allowance for future losses of 48 ha is a major component of the future employment land need figures presented in the Issues and Options document and the EDHNA. It is essentially based on projecting forward past average losses.
- 2.50 In principle, assuming that some employment land will be lost to other uses (primarily residential) in future is reasonable. It ensures that there is headroom in the employment land supply to offset losses and provide choice in the market for developers and investors.
- 2.51 However, it is difficult to answer the question about whether the 48ha allowance is reasonable since the EDHNA provides insufficient detail on the past losses data on which it is based. For two main reasons, it is important to understand this if conclusions about the robustness of the approach are to be drawn. These are:
- past losses are likely to reflect some substantial, 'one-off' losses. The reasons for such losses and why they would be expected to be repeated in terms of scale need to be clear.
 - past losses will reflect structural changes in the economy (such as the growth of advanced manufacturing and leaner operations; reductions in the size of office requirements post-recession). Again, it needs to be clear why the underlying factors causing such changes would be expected to continue into the future.

- 2.52 The scale of the adjustment and its importance to the borough's future employment land requirement is such that further analysis and explanation of the data is essential.

Question 5.M

Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

- 2.53 As the Issues and Options document indicates, the current Local Plan employment land split is 56% to Stafford, 12% to Stone and 32% to the rest of the Borough. The Council should increase the percentages attributed to Stafford and Stone so as to take advantage of their superior sustainability credentials, public transport networks, connectivity and workforce availability.

Question 5.N

Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable? If not please explain your reasoning.

- 2.54 See our representations in response to 5.M. In the 'no Garden Community' scenario, the Council should direct at least 60% of the employment land requirement to Stafford. In the Garden Community scenario, it should direct at least 50% of the requirement to Stafford so as to (i) take advantage of Stafford's sustainability credentials and the scale of its workforce and (ii) provide flexibility and resilience in the light of uncertainties that will remain for some time about when a Garden Community will deliver employment development and at what rate.

Question 5.Q

Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.

- 2.55 The Council's approach to settlement boundaries and site options appears confused, illogical and in some respects inappropriate. Its approach should be: (i) define full extent of settlements as they currently stand (using desk based analysis and site visits) and make provision for committed developments that are deliverable but have not yet started or completed; (ii) define its settlement hierarchy; (iii) determine its housing and employment development requirements; (iv) determine its spatial strategy; (v) identify site options having regard to (iii) and (iv); (vi) assess all options in a robust, consistent and transparent way for suitability, availability, achievability and / or developability; and (vii) identify its preferred site options and then define revised settlement boundaries that account for the development of proposed site allocations. It is not clear whether this is what the Council intends to do / is doing but if it is taking an alternative approach, this will need to be fully explained and justified.

Question 8.K

a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?

b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?

- 2.56 As the Council will be aware, affordable housing will, in most cases, be delivered as a % of market housing schemes. The Council will need to test its affordable housing policy (i.e. % of affordable homes required in market housing schemes) by reference to viability. However, assuming that, say, 30% of all new homes delivered in the Borough are affordable in the next Plan period, (current Local Plan Policy is between 30% and 40%), the Council would need to specify a housing requirement of between about 850dpa and 1300dpa in order to satisfy its affordable housing needs in full. Both figures are above the highest of the housing requirements references in the Issues and Options document. So, neither is likely to be achievable. However, the need for affordable housing in the Borough is significant and the Council should be doing all that it can in order to satisfy as much of this need as possible. Accordingly, and as explained elsewhere in these representations, the Council should make an additional upward adjustment (additional to that embedded in the standard method) to its housing need to reflect current and forecast challenged in respect of affordability.
- 2.57 The provision of a diverse range of market housing will not compensate for an under-delivery of genuine affordable housing.
- 2.58 Note: the Council should have regard to the work that the West Midlands Combined Authority has recently completed on better defining what affordable housing means in the West Midlands context.

Question 9.C

Should the new Local Plan:

- a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;**
 - b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;**
 - c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites**
- 2.59 The NPPF provides that planning policies should contribute to and enhance the natural and local environment by, amongst other things, protecting and enhancing sites of biodiversity or geological value in a manner commensurate with their statutory status or identified quality in the development plan. It is right, therefore, that the Local Plan contains policies that provide protection for designated sites.
- 2.60 However, it would not be appropriate for the Plan to define 'buffer zones' around such sites unless there is evidence of the need for such a measure (i.e. the avoid, mitigate, compensate approach is demonstrably incapable of rendering development in the vicinity of the site acceptable in planning terms).
- 2.61 As far as requiring biodiversity enhancements is concerned, the Local Plan should be drafted so as to accord with the Environment Bill and should not go further than it. For example, it should not require biodiversity net gains exceeding 10%.

- 2.62 We would be concerned about the soundness of a policy requiring longer term monitoring of biodiversity mitigation and enhancement measures on development sites. If schemes of mitigation and enhancement are appropriately designed and implemented at the outset, there should be no need for longer term monitoring. Moreover, such monitoring would create an additional cost and practical burden on the development which ought not to be necessary.
- 2.63 Notwithstanding all of the above, it is noteworthy that our Clients land at Tixall Road offers the potential to deliver both a substantial development and material enhancements in biodiversity, in an area where two biodiversity 'opportunity' areas converge (woodland and wetland).

Question 9.L

To support a new Local Design Review Panel should the new Local Plan:

- a) Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?**
 - b) To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.**
 - c) Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.**
- 2.64 It ought not to be necessary to introduce a Design Review Panel. The Borough Council is capable of developing a policy framework that exerts an appropriate degree of control in design terms, whilst clearly articulating its ambitions, and then assessing proposals when they are submitted for determination. In addition, there is a risk that a Design Panel will slow planning processes down and bog schemes down in what are subjective matters open to interpretation.

Question 12.A

Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan? If not please give a reason for your response

- 2.65 The Council's overarching transport strategy is NPPF compliant and we take no issue with it. However, the Council's ambitions in this respect will only have effect if it pursues a spatial strategy and policy regime that gives it the very best chance of delivering sustainable outcomes. Building large numbers of new homes in remote locations that are not and cannot be well connected to higher order centres by public transport will render the Council's words on transport meaningless. Again, this points to the importance of embedding in the preferred spatial strategy the intensification of development within and adjacent to Stafford, including to the east of the town adjacent to Tixall Road.

Question 12.B

- a) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? If not please provide a reason for your response.

- b) How do you consider that high quality walking and cycling networks can be developed through new development?

2.66 We agree, in principle, with the concept of enhancing public transport services on the back of / in connection with large scale development. Our Client's land at Tixall Road offers precisely the kind of opportunity that is eluded to in the Issues and Options document, with potential for it to expand and enhance public transport links in the eastern half of the town, benefiting new and existing residents.

Appendix 1

Site Location Plan

Land at Tixall Road, Stafford Location Plan



Promapv2
LANDMARK INFORMATION

Ordnance Survey © Crown Copyright 2020. All Rights Reserved.
Licence number 100022432
Plotted Scale - 1:9000. Paper Size - A4

Appendix 2

Hatch Regeneris Report



HATCH
REGENERIS

Stafford Borough Housing and Employment Need Evidence: A Review

A Report by Hatch Regeneris
27 March 2020

Commercial Estates Projects Ltd

Stafford Borough Housing and Employment Need Evidence: A Review

This report contains the expression of the professional opinion of Hatch Regeneris (the trading name of Hatch Associates UK). It is based upon information available at the time of its preparation. The quality of the information, conclusions and estimates contained in the report is consistent with the intended level of accuracy as set out in this report, as well as the circumstances and constraints under which this report was prepared.

The report was prepared for the sole and exclusive use of Commercial Estates Projects Ltd. Hatch Associates Limited shall only be liable to Commercial Estates Projects Ltd and is not liable to any third party who intends to rely on or has relied or is currently relying upon this report (in whole or part).

27 March 2020

www.hatchregeneris.com

Contents Page

1.	Introduction	1
2.	The Issues and Options Consultation Document	2
3.	Economic Development and Housing Need Assessment (EDHNA)	5

1. Introduction

- 1.1 Hatch Regeneris was commissioned by Commercial Estates Projects Ltd to review Stafford borough's Local Plan Issues and Options (I&O) consultation document (February 2020) and the Economic Development and Housing Needs Assessment (EDHNA, February 2020) which provides supporting evidence on housing, employment land and affordable housing need. The purpose of the review is to assist Commercial Estates Projects Ltd with its representations on the I&O consultation.
- 1.2 The review considers the definition of the housing market area (HMA) and functional economic market area (FEMA) and the evidence that supports this; it assesses the appropriateness of the demographic and household projections-based scenarios for housing need, together with the jobs-led scenarios; it examines the EDHNA's employment land needs evidence; it comments briefly on affordable housing need and spatial distribution evidence.

2. The Issues and Options Consultation Document

- 2.1 This section briefly summarises the key figures on housing and employment land need from the I&O consultation document to provide context for the analysis of the EDHNA that follows.
- 2.2 It is not clear at this point whether Stafford Borough Council (SBC) has preferred housing or employment land need figures from what is a very wide range. Essentially, it sets out the detailed scenarios the EHDNA generates, and applies SBC's own adjustments to set out the implications for the required housing and employment land supply.

Housing Requirements

- 2.3 The I&O document sets out extensive details on future housing requirement scenarios and their implications for the allocation of housing land, including both residual requirements in light of planning commitments of 3,000 homes on committed sites and 3,000 uncommitted homes on Strategic Development Locations, so 6,000 in total.
- 2.4 The result is a detailed matrix of potential housing growth requirements for the borough which includes the following key information:
- Seven core scenarios in which the housing requirements range from a low of 267 dpa to a high of 746 dpa, or 5,350 to 14,900 additional homes 2020-40.
 - The indication that the Council has appropriately decided to reject two scenarios (B&C) because they are lower than the Local Housing Need (LHN) or Standard Method housing need figure (408 dpa) which the revised NPPF and PPG specify should be the minimum requirement that should be planned for. In effect, the I&O document therefore assumes that the range is 408 to 746 dpa.
 - Population growth ranging from 16,400 to 28,600 excluding the figures for scenarios B and C. No population growth figure is given in the I&O document for the LHN scenario.
 - Jobs growth linked to those scenarios which ranges from 5,900 to 13,200. No equivalent figure is given for the LHN scenario, and we have excluded the two rejected scenarios here.
- 2.5 What follows is a series of tables in which the Council shows both the alternative scenarios provided by the EHDNA and the adjustments the Council makes (the discount factor) to account for the 6,000 committed/uncommitted dwellings. The 6,000 is discounted from each of the scenarios, and applied only to the requirement for 2020-31 on the assumption that these homes would be delivered over this period, so are netted off the requirement for that 11 year period implied by the EHDNA.
- 2.6 The key table is 5.2. This shows that the discount has a very substantial impact on the potential housing requirement. For the high end scenario (14,900 or 746 per annum), the requirement falls to only 200 per annum between 2020 and 2031, and therefore to 8,915 or only 445 per annum.

Affordable Housing Need

- 2.7 The I&O document specifies that the affordable housing requirement for Stafford is 252 to 389 per annum. This exceeds the current Local Plan requirement of 210 per annum, although the Council suggests that it has a reasonable track record of 193 per annum since

2013. There is no indication at this stage as to which of the figures the Council regards as appropriate. The I&O consultation document suggests that the affordable need figure (para. 8.29) will be driven by the level of growth eventually decided upon by the Council. However, it is not clear what this implies and this is a point that will need to be clarified by the Council.

Employment Land Requirements

- 2.8 On future employment and employment land in the borough Table 6.1 sets out a range in which future employment ranges from 6,000 to 13,100 jobs, and for which related floorspace requirements range from 17,500 to 176,600 sq m.
- 2.9 The related employment land requirements range from 68-181 ha of B use class land. This range represents the gross requirements including in each scenario an allowance for the future loss of land of 48 ha in total. We comment on this issue in reviewing the EHDNA below.
- 2.10 In summary, the employment land scenarios give the following figures. It is not entirely clear why scenario 3 is excluded in Table 6.1 of the I&O document. It may imply that the Council does not regard this scenario as appropriate, although it does give the relevant land requirement for the scenario.

	Jobs	Floorspace (sq m)	Land (Ha)
1.CE Baseline	+5,900	+17,500	69
2.CE Regeneration	+12,500	+176,600	109
3. CE 50% Boost			79
4.Past Trends Jobs Growth	+13,100	+118,000	94
5.Local Housing Need (408 dpa)			68
6.Past Take-Up Rates			181

Sources: Issues and Options Consultation Document, Tables 5.9 and 6.1. Note: No jobs or floorspace figures given for scenarios 4, 5, 6 in the I&O document. All figures rounded for simplicity.

- 2.11 The Plan gives a very broad indication of the split of B classes. This is 30% B1a/b (essentially offices) and 70% (B1c, B2, B8).

Current Local Plan

- 2.12 By way of further context, Stafford's current Local Plan (2011-31) sets a housing requirement of 10,000 (500 dpa) and an employment land requirement of 160 ha (8 ha per annum). We note that:
- The 500 dpa figure is based on the 2012 SHMA which in turn uses 2008-based population projections. There is no indication in the Local Plan (Part 1 or Part 2) as to the population growth planned for, although it is clear in reviewing the supporting evidence for the current Local Plan that it represented a household growth figure to which some adjustments had been applied to take account of assumptions about migration.
 - No future jobs figure is provided in the Local Plan as to the jobs growth planned for. The employment land requirement is based on the past take-up of land rather than jobs forecasts, so we would not necessarily expect the jobs growth figure to be provided for a scenario of this type. Reference to the Local Plan evidence base

shows that a jobs-led projection for employment land was very downbeat suggesting only 25 ha of land required.

- 2.13 At the high end of the scenario ranges provided in the I&O document, the housing requirement would clearly be significantly higher than the current Local Plan, whilst the employment land requirements (181 v. 160 ha) appear better aligned in principle.

3. Economic Development and Housing Need Assessment (EDHNA)

- 3.1 The EDHNA provides the core evidence on future housing and employment land needs for Stafford borough, along with an estimate of affordable housing need. The EDHNA is a substantial document, which uses methodological approaches which have been tested through Local Plan Examinations elsewhere. It takes account of the revised NPPF and PPG, and in particular the new method for housing need assessment (LHN or Standard Method). Stafford's Local Plan will be made under the revised NPPF.
- 3.2 This is a key issue in determining what is the appropriate housing need/requirement figure for Stafford. The NPPF and PPG is reasonably clear that there must be robust justification to divert from the LHN figure (408 dpa for Stafford), which is the minimum requirement. However, the revised PPG (Paragraph: 010 Reference ID: 2a-010-20190220) allows for housing need figures that are higher than the LHN, with [economic] growth strategies listed as one of the factors which might justify it. This is central to the housing need scenarios set out in the EDHNA, several of which are substantially higher than the LHN figure, and these are driven by future employment growth assumptions. The robustness of these scenarios is therefore a key issue.
- 3.3 Whilst the EDHNA points to a very broad range of employment land and housing need scenarios, it concludes (para. 10.90) that a realistic approach is the CE Regeneration scenario. This has a jobs growth figure of 12,478, an employment land need of 109 ha, and a housing need of 647-711 dpa.

Housing and Functional Economic Market Areas

- 3.4 The EDHNA concludes that Stafford borough should be treated as a housing market area in its own right.
- 3.5 The key evidence that leads the EDHNA to this conclusion on a single borough HMA is household moves/migration data which shows that more than 70% of moves involving Stafford borough and the West Midlands region occur within Stafford. This is a self-containment measure and was established in the previous PPG as the appropriate threshold. It reflects in part the revised PPG (Plan Making, Paragraph: 018 Reference ID: 61-018-20190315) which specifies that migration flow analysis should consider particularly short (ie short distance) household moves. The EDHNA essentially excludes longer distance moves, which on the face of it is an appropriate step.
- 3.6 The EDHNA's conclusions also recognise that, as a predominantly rural district, Stafford has some overlapping HMAs with other neighbouring local authority areas. The implication is that these are not substantial enough to require a 'Stafford-plus' HMA. The report refers to a Stafford only HMA being 'reasonable and pragmatic' (para. 4.33) and a 'best fit' HMA for planning purposes. This is an important point that has been accepted by Planning Inspector's in local plan examinations elsewhere. The rationale is that, whilst there may be some overlap between HMAs, and a borough's housing market might extend into neighbouring areas, definitions are complex and often contested. A pragmatic approach is reasonable where HMA boundaries are not clear cut, and where a borough is substantially self-contained.
- 3.7 A review of relevant Office for National Statistics migration data and the EDHNA's treatment of other data for the HMA and the FEMA definitions points to several issues that the Council should consider further as it progress with the Local Plan:

- Analysis of the latest ONS migration data suggests that moves into Stafford from several of the West Midlands local authorities referred to in the EDHNA have increased numerically over the past decade (eg. Stoke-on-Trent 632 to 855, Cannock Chase 240 to 482). Unfortunately, the ONS does not provide up-to-date data on moves within Stafford, so we continue to be reliant on the 2011 Census, the data used by EDHNA as the latest available. SBC should consider evidence on changing flows of people from the West Midlands into Stafford. This may have implications for its HMA definition, but also for how housing need is considered as part of the exercise of the duty to cooperate. This applies both to neighbouring boroughs but also to the wider issue of the West Midlands Combined Authority area. On the latter the Greater Birmingham area is recognised as having significant challenges in meeting its housing need, and this has implications for whether and how Stafford borough (and others in the West Midlands) might absorb some of this need.
- There is a brief reference in the EDHNA to the issue of unmet housing needs (paras. 10.78-10.80). This simply reasserts the conclusion that Stafford borough is a stand-alone HMA, but recognises that the borough is part of a 'broader functional area' with the LPAs to the north and also with the economic centre of Birmingham to the south. It is suggested that no surrounding borough has unmet needs to which Stafford borough might contribute through its planned housing.
- The EDHNA's decision to treat commuting data as part of the definition of the functional economic market area for employment land assessment purposes, but not for the HMA. The study's conclusion on the FEMA is that it 'predominantly aligns with Stafford Borough's administrative boundary'. However, the commuting data shows Stafford to have a self-containment figure for residents in jobs in the borough out of total employment which is slightly lower at 64.6% (para. 4.42) than the widely accepted threshold of 66.7%. This is probably not sufficient to suggest that the EDHNA's conclusion is inappropriate, but is also an issue that the Council should consider further.

3.8 In summary, there are several issues that SBC needs to consider further, including both aspects of the evidence to define the HMA and FEMA, and clarity on the exercise of the duty to cooperate.

Employment Land Needs

3.9 Employment land needs in the EDHNA are based on range of scenarios including jobs growth-based scenarios (labour demand), labour supply (linked to population growth and housing need) and past trends in employment land take-up.

3.10 The approach to the use of alternative scenarios in the EDNHA is consistent with good practice and the PPG. The report has considered a wide range of evidence in constructing its scenarios, including locally-specific evidence (data and consultations). However, there are some limitations in the employment growth scenarios which are highlighted below. It has also carried out some sensitivity testing on the figures, although it would benefit from more thorough testing as we suggest in comments on this issue below.

Jobs Growth Scenarios

3.11 We comment below on each of the main scenarios:

1) Cambridge Econometrics Baseline (CE Baseline)

- 3.12 This scenario uses a widely recognised and authoritative CE model which forecasts future employment growth across different sectors of the economy. As such, it can be considered an objective forecast and one which is not directly influenced by policy considerations.
- 3.13 However, Hatch Regeneris has previous experience with the model which essentially takes evidence on past employment trends, current employment, labour force change (and population projections), forecast future employment nationally and translates this into detailed forecasts for Stafford (and other UK local authority areas).
- 3.14 The CE Baseline scenario is the starting point and lowest of the jobs growth scenarios. It forecasts growth of only 5,929 jobs 2020-2040 (296 per annum), of which B use class jobs (the driver of employment land needs) account for just 368 net jobs or only 6% of the total increase. The EDHNA shows (Table 7.2) that this generates forecast growth of only 437 office jobs (B1a/b), -479 (B2 Manufacturing) and 410 distribution (B8 jobs). The remaining 5,560 are non-B class jobs. Gains in sectors including food and beverage services, health, warehousing, business support and construction are offset by losses in other sectors including manufacturing.
- 3.15 This raises questions about the validity of this scenario. The EDHNA itself (Table 7.2) shows that 37% of current jobs in the borough are in the main B use classes (ie B1a/b, B1c/B2, B8). Hatch Regeneris's experience of employment in other locations is that B uses typically account for between 30% and 50% of jobs, so the current Stafford figure is in line with this.
- 3.16 The EDHNA shows (Table 7.2) that B use class employment falls from its current 37% to 35% by 2040, the impact of a forecast in which only 6% of net additional jobs are in B use classes.
- 3.17 The EDHNA rightly observes that it has some concerns about both the alignment of the CE forecasts with LEP priority sectors (eg. decline in manufacturing) and the implication of major planned developments such as offices in the Stafford Station Gateway scheme. Whilst it stops short of discounting the scenario, the implication is that it considers the scenario to be poorly aligned with growth strategies for Stafford and the wider area.
- 3.18 Our review of the EDNHA's past growth evidence suggests that future growth (0.39% pa) is much lower than past growth (0.8%) pa. Whilst current uncertainty around Brexit, a sluggish global economy and structural changes in employment driven by technological change and shifting consumer behaviour means it is reasonable to conclude that historic growth rates may not continue, the scenario takes no account of key sector strengths and investment priorities for the area, and might be considered not to represent the positive planning that the NPPF (2019) requires (for example, NPPF paras. 15 and 16).
- 3.19 We would also note that the Cambridge Econometrics model is proprietary, so the detailed assumptions which underpin the Stafford forecast are not published. We cannot comment on the underlying assumptions. If SBC relies on one of the scenarios in which CE forecasts feature, it should publish key assumptions about population growth, the labour force (eg. size, economic activity rates, commuting) and more detailed data on its employment growth by sector) in due course.

2) **CE Job Growth: Regeneration**

- 3.20 This scenario starts with the CE Baseline, but layers on substantial jobs growth linked to proposals for a new Garden Community or Major Urban Extension in Stafford Borough, and to the Station Gateway proposals.
- 3.21 The outcome of a complex scenario is jobs growth of 12,478 jobs 2020-40 (624 pa) of which is somewhat higher than past trends data suggests. This equates to 0.83% growth per annum, which is equivalent to the long term past trends growth rate shown elsewhere in the EDHNA.

- 3.22 Of this total, 6,000 jobs (c. 48%) are identified in B class uses, including 3,600 in B1a/b offices, 1,600 in B1c/B2 manufacturing and 800 in B8 distribution. This is markedly higher than the current proportion of jobs in B uses (37%) but reflects the inclusion of major developments in which office and industrial floorspace is substantial.
- 3.23 The strengths of this scenario is that it is both more consistent with a policy emphasis on supporting growth, and with Stafford's past record on jobs growth based on the CE data provided in the EDHNA. It is also clearly linked to one established investment priority for Stafford (Station Gateway) and a potentially substantial garden community development anticipated to include large scale employment development. It should be acknowledged that Inspectors have accepted scenarios of this type (essentially policy on scenarios) elsewhere in examinations.
- 3.24 We have reviewed other past jobs growth data published by the ONS (Business Register and Employment Survey or BRES, Jobs Density)¹ and this provides further context for assessing whether the higher jobs growth figure implied by this scenario is appropriate:
- Jobs density data indicates an increase of 390 total jobs per annum between 2000 and 2018, a growth rate of 0.56% per annum, so somewhat lower than the rate implied in the Regeneration scenario. However, this period contained several years of deep recession.
 - Data for the period 2015-18 (BRES) shows that the borough saw a 2,000 increase in employee jobs and total employment (670 pa). This equates to very strong growth rates over this period of 1.1% pa. This is higher than the implied growth rate in the Regeneration scenario, but the jobs growth figures are more closely aligned (624 pa v. 670 pa).
 - Total employment and employee jobs data for 2013-18 show an average annual increase of 600 jobs and a growth rate of 1% pa. It is generally accepted that 2013 was the first post-recession year, so includes the effects of a bounce back from recession when business investment and recruitment increased.
 - BRES data shows that the borough added only 1,000 jobs between 2009 and 2018, a growth rate of 0.17% pa. However, this period includes several recessionary years and we have reservations about its reliability as an indicator of longer-term past employment trends.
- 3.25 Assessed in the context of this alternative past employment growth data, the Regeneration scenario therefore appears reasonably consistent with more recent growth in Stafford, but would be markedly higher than longer term past growth including the period of recession.
- 3.26 However, in a number of areas the Regeneration scenario requires further explanation and analysis by the Council. They are:
- The need for clarification about the timing and certainty about the New Garden Community and the Station Gateway Masterplan.
 - In the case of the Garden Community, the EDHNA assumes that delivery of employment would commence in 2030, and that 30% (3,700) of the total jobs that the indicative proposal has the potential to generate (12,400) could be generated during the Plan period. Further clarification is needed to establish that a substantial and complex development of this type could commence in 2030, and that the large quantity of employment land and floorspace that is identified for it is realistic and

¹ The ONS data is used here for indicative purposes. There are discontinuities in the BRES as the ONS survey method is periodically adjusted meaning that it is difficult to construct an entirely consistent time series. Jobs density captures employee jobs, self-employment, government-backed trainees and the armed forces. There are also understood to be some issues with consistency in long-term time series data for this data source.

deliverable. The latter will depend on many factors including its location, infrastructure and market appeal (amongst other factors). We assume that the SBC would need to provide evidence of this type to justify its allocation in the Plan at a later stage.

- It appears that the EDHNA makes no allowance for multiplier effects in its employment figures for the two initiatives. This is essentially the wider employment supporting impacts that new employment development would generate, and include both supply chain (indirect) impacts and the employment supported in the area by the expenditure of salaries of employees working in the two developments (induced). Typical multipliers of this type might range from 1.2-1.3 and would therefore add 1,800 to 2,800 jobs to the figures included in the EDHNA.
- Conversely, the related issue of displacement should probably also be considered in determining how many net jobs the two initiatives might generate in Stafford. Some of the future jobs would be likely to displace existing employment in the borough, which would have the effect of reducing the net increase each initiative represents.
- This raises also a question about the EDHNA's approach to the issue of double counting in the scenario. Essentially, the CE forecast is likely to include some of the jobs that either of the two developments might generate. The EDHNA's allowance for double counting is to apply a simple 50% assumption to the Station Gateway jobs. There is no explanation as to why this assumption is justified and this should be provided. All of the Garden Community jobs are assumed to be net additional. This assumption also needs to be explained.
- The need for SBC to consider whether there are other potentially significant employment generating sites or initiatives which might arise in the borough over the Plan period.

3.27 In summary, this scenario offers a view of employment growth potential that is much more in line with the positive planning required by the NPPF than the CE baseline forecast. It also takes account of two key potential growth drivers for Stafford borough, and is broadly in line with recent growth trends in the borough and the long-term past growth rate implied by CE.

3.28 However, more justification needs to be provided for this scenario to be considered robust and a sound basis for planning both employment land and housing need.

3) 50% Boost

3.29 This is the weakest of the jobs growth scenarios. It simply applies a 50% uplift to the CE Baseline, giving jobs growth of 8,900 (445 pa) of which only 1,400 are B class jobs.

3.30 It appears the result of SBC's request that a 50% uplift be modelled to reflect 'growth aspirations' arising from HS2 and other major projects including the New Garden Community.

3.31 The EDHNA gives no explanation to justify the 50% uplift in the EDHNA beyond the description above.

3.32 Its only strength is that it lies between the higher jobs growth scenarios and the CE Baseline, so effectively shows a midpoint which is a sensible alternative to consider in reaching a view on distinctly different employment growth scenarios.

4) Past Trends Jobs Growth

3.33 This scenario applies the rate at which past jobs growth is assumed to have occurred in Stafford between 2000 and 2018, and projects this rate forward from 2020-40 (0.83%). It

uses CE's long-term past jobs growth data (2000-18) which is show in Figure 7.1 and the accompanying commentary. We do not have access to the underlying data, which is necessary to understand how CE has constructed a time series from government survey data in which there are discontinuities.

- 3.34 The result is a scenario in which the borough generates 13,100 additional jobs (655 pa), of which B class jobs account for only 2,900 (22%) with 1,230 in offices, 540 in manufacturing and 1,130 in distribution.
- 3.35 There is merit in testing a past growth-based approach of this type, and note also that it is very broadly in line with the CE Regeneration scenario in terms of total jobs (albeit it suggests a markedly different trajectory for B use class jobs).
- 3.36 However, it has several weaknesses. First, it is simplistic. Assumptions that past growth rates will continue in the long-term are not consistent with evidence that the UK economy is changing, and with what are fairly downbeat expectations about future economic growth nationally and internationally. Whilst we cannot assume that low rates of growth will continue in the long run, the scenario goes against the grain of many forecasters' expectations, including Cambridge Econometrics.
- 3.37 Second, it also applies the proportional shares of each sector in the CE Baseline forecast to construct the forecast for this higher growth scenario. It takes the CE forecast's expectations about how the share of sector growth will change in future, but uses a past growth rate when sectors changed in a different way. As such there are inconsistencies both in the way that the CE baseline forecast's assumed sector growth is simply applied to a higher growth rate, and the use of a past growth rate which is likely to have reflected a different pattern of sector growth. If this scenario is to be taken forward, the underlying CE data should be provided so that the past and future forecast can be compared in detail.
- 3.38 Furthermore, the EDHNA conclusions (para. 10.74) suggest it does not consider this jobs growth rate could be sustained over the Plan Period. It is not clear whether the same conclusion applies to Scenario 2 (CE Regeneration) in which the implied growth rate of 0.79% is only a little lower than the rate in the Past Growth scenario.
- 3.39 Two additional scenarios are also considered in determining employment land requirements.
- 3.40 **Labour Supply:** This uses projected growth in the borough's population and labour force linked to the LHN scenario (408 dpa) and asks how many jobs would be required/implied by this additional resident workforce.
- 3.41 The outcome is total jobs growth of 5,588, a lower figure than that of the other jobs growth scenarios, of which only 248 jobs are in B class uses.
- 3.42 We have reviewed Lichfield's assumptions that translate the population to jobs, and these appear to be sound for the most part. We comment further on these assumptions in para. 3.82 below.
- 3.43 The scenario is also likely to be seen as credible because its growth rate is line with the CE Baseline scenario, suggesting the alignment of LHN and employment forecasts.
- 3.44 It has a number of weaknesses. First, its alignment with the CE forecast may in part reflect the extent to which CE's model takes account of projected population and labour force growth. In other words, it is similar because the CE forecast's assumption about population change is drawn from the same source data as the projections behind the LHN. We cannot be certain about this and it is not possible to test this further without access to the CE model. Second, it does not present an optimistic picture of future growth in the borough, so may would not be consistent with either the NPPF's requirement for positive planning for growth or with known strategic economic growth priorities for Stafford and the LEP area.

- 3.45 **Past Take-Up Scenario:** This is an alternative scenario not based on employment but on the pattern of the completion of employment development in the borough historically. The scenario is built as follows:
- Annual B class take-up of 8.28 ha annually from 2002-2019, a total of 140ha. The source is completions monitoring data from SBC. We think there is a minor error in the reporting of the figure, with Table 7.15 showing an annual gross take-up rate of 8.24 ha per annum.
 - Recognition that around 2.41 ha per annum has been lost each year from 2009/10 to other uses including residential.
 - This gives a net take up figure of 5.83 ha per annum.
- 3.46 The result of this scenario, shown in Table 7.15, is a total gross requirement of 164.8 ha 2020-40 (ie 8.24 ha per annum), and net need of 116.6 ha (ie 5.83 pa X 20 years). This includes:
- 38 ha of office land (B1a/b)
 - 26.5 ha of manufacturing (B1c/2)
 - 100.5 ha of warehousing (B8)
- 3.47 The EDHNA sensibly weighs up (paras. 7.69-7.70) the strengths and weaknesses of this scenario. In summary, this includes:
- Economic change in which business activity is shifting towards a business services (ie office-based economy).
 - Restructuring of the manufacturing sector with a move to advanced and modern manufacturing premises, and recycling of older sites.
 - Permitted development rights which are likely to see a further conversion of employment premises and land to housing uses.
 - Economic conditions including the likely impact of the UK's exit from the EU. We would highlight also the as yet unknown negative economic consequences of the COVID19 crisis which may be short term but will be very significant.
 - Reduced public spending available to recycle brownfield sites.
 - The need to recycle sites for uses other than B class use or residential.
- 3.48 The risk of planning employment land provision on the basis of past take-up is that a small number of very large developments can skew the average, without any robust justification for such large developments being repeated in future.
- 3.49 The EDHNA recognises this, pointing to large-scale take-up in 2002/03 (25 ha) and 2006/07 (26 ha) in the past figures. However, it rightly points to a recent pattern of developments between 2015 and 2018 (eg. 21 ha of B8 at Jasper Way; 4 ha at Redhill Business Park) as evidence of continuing demand. We have reviewed the Council's AMR and this shows a substantial take-up of 27 ha in 2018/19.
- 3.50 Furthermore, the EDHNA also points to 48.5 ha of land with extant planning permission for employment development, the largest of which is 32.5 ha of land at Meaford.
- 3.51 The EDHNA is clear (para. 7.71) that it considers 165 ha to be a 'valid' figure going forward for the Plan period, although it stops short of recommending that this is the figure which SBC should plan for.

Converting Jobs to Floorspace and Land Requirements

- 3.52 The EDHNA uses what appears to be a standard set of assumptions to allocate jobs to use classes, to translate this into floorspace, and finally into employment land needs. We comment on each of these briefly below:
- Jobs to use class: Little detail is provided in the EDHNA. It footnotes the sectors allocated to each of the three main use classes, and these assumptions appear reasonable. However, ideally fuller detail should be supplied about how sectors map to use classes. There is no immediately obvious flaw in the basic assumptions, but the opportunity to sense check them should be given.
 - Jobs/use class to floorspace: This uses the standard set of employment densities drawn from Homes and Communities Agency guidance, a source which is widely-used and currently remains the best available. These are 12.5 sq m per FTE job, 53.5 sq m per FTE B1c, 36 sq m per FTE B2, a composite for B1c/B2 of 45 sq m per FTE, and 65-74 sq m per FTE for warehousing with jobs split 50:50 between standard smaller warehousing and high bay warehousing (para 7.24).
 - A vacancy rate assumption of 10% (para. 7.28) although it is not entirely clear whether this is a flat rate assumption for all use classes, or whether it is reduced over the projection period from current rates of 11% for industrial space and 13% for offices. This would have the effect of adding to the need for floorspace beyond that implied by jobs growth to allow for some supply being vacant at any given point in time. How this is applied should be more fully explained in the Council's evidence.
 - Converting floorspace to land: The EDHNA applies a plot ratio of 40%, meaning that the floorspace need represents 40% of the land need to accommodate it. It is not clear why the EDHNA uses what appears to be this single assumption. Whilst plot ratios of 40% are reasonable for B1c/B2 and B8 uses, for office uses this would be more consistent with business park type development out of town rather than urban offices. It is unclear whether 40% would be an appropriate figure either for office uses generally or for the Station Gateway development specifically, which indicatively generates a substantial number of office jobs.
 - Whilst the study suggests that it has sensitivity tested the plot ratio assumptions (paras. 7.86-87), it does not appear to have run any alternative figures. This includes potentially the assumption that office floorspace might be developed on multiple storeys, effectively accommodating forecast jobs across several floors, and so requiring a smaller plot of land than the assumption that all office development occurs in single storey buildings. This would have the effect of dampening the need for office land.
- 3.53 There are two final steps in determining the employment land needs of each of the scenarios.
- 3.54 **Allowance for Losses:** First, the EDHNA makes what appears to be a substantial allowance for the future loss of employment land to other uses. This is 2.41 ha per annum, or 48.2 ha over the 20 year plan period. (para. 7.76). It is based on the average annual losses of land over the past 10 years. The EDHNA reports that the data is drawn from SBC Annual Monitoring Reports (AMR) and from Lichfields' own calculations, and is briefly summarised in Figure 6.7.
- 3.55 The study discusses the merits and drawbacks of making such an allowance, which includes whether it is reasonable to assume that past losses will simply be repeated in the long term. It recognises (para. 7.73) also that not all losses will need to be replaced on a like for like basis, since it will reflect restructuring in the economy and the possibility that businesses are requiring less (or quite different) types of floorspace.

3.56 Conversely, it justifiably points to the advantage of ensuring that choice remains available to businesses for sites and premises, and that there is potential for further losses of employment land through PDR implementation. Essentially, this is the EDHNA's allowance for 'choice and churn' as far as we understand it.

3.57 The weakness of this adjustment are:

- It is impossible at this point to sense check the losses data since no detail is provided in the EDHNA other than total losses by year. We have reviewed several of the borough's AMR and, whilst later reports refer to losses of employment land to other uses, we have been unable to find such data in earlier AMR (for example, 2012-13) when the EDHNA's data suggests that losses were high. We have no straightforward means of testing and suggesting why alternative adjustments might be appropriate.
- As a consequence it is not possible to determine the nature of the losses and therefore whether it is reasonable to assume that such losses would continue in future. For example, the loss of a specific business on a large site might make a significant contribution to past losses, but might be a 'one-off' loss for which there are no reasonable grounds to allow for it to be repeated in future.
- It also takes no account of structure changes in the economy and the scale, type and location of employment land and premises which might be required in future. Past losses are likely in part to reflect structural shifts in employment and business, and caution should be exercised about projecting forward what is the result of such past structural changes. For example, continuing change in the manufacturing sector (including offshoring) has seen across the UK larger and older operations closed down with companies shifting to newer and more efficient modern premises.

3.58 **Flexibility Factor:** Second, the study allows for a so-called flexibility factor (safety margin), also an uplift to the need calculation intended to allow for flexibility in the provision of employment land. The EDHNA's justification is that there may be delays in allocated sites coming forward, and a risk that demand that matches our outstrips supply might lead to shortages of land at any given point in time. It also rightly points to the uncertainty about the forecasts, implying that shortages are more likely if demand exceeds forecast levels of need.

3.59 The EDHNA's adjustment is two years of average gross take up, totalling 16.5 ha of which 3.8 ha is office land (Ba1/b) and 12.7 ha of industrial land (B1c/B2/B8). The figures are based on average annual take-up since 2002 (para. 6.13).

3.60 We agree with the inclusion of a safety margin in employment land need calculations. The two year average method is widely-used, and in principle a sound basis for determining the appropriate margin. The main reservation about the 16.5 ha figure for Stafford lies in the use of the long-term take-up figures in which the EDHNA itself recognises that very large completions total in a small number of years influence the figures. This means that the assumption about future need with the safety margin included will effectively assume that this pattern of take-up continues. Commentary on the reasons for the larger past take-ups and the likelihood that they will be repeated should have been provided in the EDHNA.

Employment Land Need Conclusions

3.61 The scenarios presented in the EDHNA produce a wide range of needs across the different use classes. The 48 ha allowance for past losses gives the difference between net and gross (2020-40). The flexibility factor is the 16.5 ha added in each of the scenarios. We replicate the key table from the EDHNA, and provide further comment on it below.

Figure 3.1 EDHNA Employment Land Need Summary

Table 7.18 Stafford Borough Gross Employment Land Comparisons 2020-2040

		B1a/b	B1c/B2	B8	TOTAL
1) CE Baseline	2020-2040 (net)	0.53	-2.70	6.56	4.39
	2020-2040 (gross)				52.59
	+ Flexibility factor				69.07
2) CE Regeneration	2020-2040 (net)	11.53	18.51	14.10	44.14
	2020-2040 (gross)				92.34
	+ Flexibility factor				108.82
3) CE 50% Boost	2020-2040 (net)	1.66	-0.34	12.56	13.88
	2020-2040 (gross)				62.08
	+ Flexibility factor				78.56
4) Past Trend Job growth	2020-2040 (net)	3.27	5.10	21.12	29.50
	2020-2040 (gross)				77.70
	+ Flexibility factor				94.18
5) LHN 408 dpa	2020-2040 (net)	0.40	-3.00	5.87	3.30
	2020-2040 (gross)				51.49
	+ Flexibility factor				67.98
6) Past Take Up Rates	2020-2040 (net)	26.83	89.81		116.64
	2020-2040 (gross)				164.84
	+ Flexibility factor				181.32

Source: Lichfields Analysis

3.62 The following key points arise from this concluding table:

- It gives a very wide range of needs from 68 ha (labour supply/LHN scenario) to 181 ha (past-take up rates). This is the range taken forward into the Local Plan without any commitment by SBC to a preferred scenario.
- The biggest variation is in the office need totals, which range from just 0.40 ha (net) in the past trends job growth scenario to 26.8 ha net in the past take-up rates scenario. The higher figures imply very substantial office floorspace being generated in the borough over the next 20 years.
- We assume this would have to be driven by the Stafford Station Gateway and HS2 related developments, and possibly the Garden Settlement. The implication is that Stafford would generate many times more jobs in office-based sectors than the CE forecasts suggests, and there is limited evidence in the EDHNA to suggest why this might reasonably be expected to occur. Stafford is not currently a strongly performing office market. Recent major office developments in the West Midlands and elsewhere have tended to concentrate in major city centres. Furthermore, other HS2 locations (for example, Crewe) are proposing substantial new office development around stations, and there are reasons to be cautious about whether

there is sufficient investment and business growth for Stafford to achieve high levels of office development in the face of strong competition from other locations.

- The allowance for losses has a particularly significant impact in those scenarios where the need implied by employment growth is relatively low (CE Baseline, CE 50% Boost, past trend jobs growth, labour supply/LHN scenario). This points to the how important the 48 ha added to each of the need figures is in the final totals. In the case of the CE Baseline scenario, it represents an 11 fold increase on the need figure implied by the jobs forecast. SBC needs to demonstrate that past losses should be expected continue at the same rate.
 - The labour supply/LHN scenario (68 ha) is aligned with the LHN need figure of 408 dpa for housing. If SBC decided to proceed with this scenario, and if it were ultimately to be accepted by a Planning Inspector, the implication is that 68 ha might be regarded as the most appropriate employment land need figure because it is aligned in this way. Alternative employment land need figures, whether lower or higher, would raise questions about whether the borough would generate the labour force necessary to support jobs growth (ie 408 dpa would not be enough if SBC opted to allocate higher amounts of employment land). Conversely, if it opted for a lower employment land need figure, the issue might be a surplus of resident labour (ie a need for more residents to commute to other locations).
 - For all of the scenarios, there is a substantial part of the need calculation in which it is not clear what is the appropriate proportion of B1a/b, B1c/2 and B8. This is because the allowance for past losses and flexibility factor part of the calculation do not distinguish the use class. To address this, the EDHNA assumes (para. 7.93) that 25% will be in B1a/b and 75% in industrial (B1c, B2, B8). This would need to be applied by SBC in the Local Plan. In principle, this is not an unreasonable split to assume but it is not clear how this derived from the evidence in the EDHNA and may therefore be open to challenge.
 - Table 7.17 of the study shows that B1a/b has accounted for c. 23% of past average take-up, and B1c/2 and B8 77%. This may be a reasonable basis for the 25%:75% conclusion drawn by the EDHNA, but it should be made clear in the study.
- 3.63 There are strengths and weaknesses in each of the scenarios, and the adjustments that are added to the core scenarios figure. The 181ha scenario appears to be reasonably well aligned with the current Plan figure (160ha), and has the advantage of reflecting how employment land has been absorbed in Stafford in the long-term past.
- 3.64 Its downside is that the 181ha figure contains the 48 ha allowance for past losses increase, which may be challenged as the Plan progresses. Furthermore, it does (and cannot) recognise structural economic changes and the way they impact upon demand for employment land. This is most evident in the office land figure, which is more likely to reflect past trends in office development such as out of town business parks and larger floorplate office developments than the more space efficient, urban centre based pattern of office development we are currently seeing.
- 3.65 On the scenario that the EDHNA concludes is 'realistic' (Regeneration scenario), it is apparent that the scenario is reasonably well aligned with recent past employment growth in Stafford, is better aligned with positive planning, and takes account of what would be the two largest growth initiatives in Stafford over the Local Plan period. However, more detail is needed to justify the assumptions the scenario makes, and we have some reservations about the robustness of adding a large amount of employment growth to the CE forecast for initiatives whose deliver remains uncertain.

Demographic and Household Projections

- 3.66 The starting point for the EDHNA on future housing need is the LHN or Standard Method. The report follows what we regard as the appropriate approach to establishing this figure in that:
- It uses the 2014-based household projections (which draw on the 2014-based sub-national population projections) for a period from 2019-29 (ie 10 years from the current date) as required by the PPG. This gives 337 households per annum.
 - It applies the appropriate adjustment for market signals, using the current affordability ratio (7.39) to give an upward adjustment to the 337 households of 71 per annum.
 - This gives a total of 408 dpa.
- 3.67 There are only two minor points to note here. First, the EDHNA labels the affordability ratio figure 2017 when it is actually the 2018 figure (the latest). Second, the calculation uses the 2019-2029 household growth figure and a 2018 affordability ratio figure. Aligning the two start years (ie 2018) would give a housing need of 416 dpa, so only slightly higher than the EDHNA figure.
- 3.68 The EDHNA looks at a number potentially exceptional circumstances which might justify a higher figure than the LHN. In summary:
- It first considers the later, 2016-based population projections. These show that population growth is projected to be lower than is the case in the 2014-based projections (essentially 280 people pa v. 450 pa in the earlier projections). We do not consider that the later projections should be treated as a better alternative. It implies a lower housing need figure and is inconsistent with Government policy objectives for housing growth.
 - Related 2016-based household projections reviewed in the EDHNA confirm lower housing need figures (229 households per annum). This reflects a combination of lower population growth and changed assumptions about household formation. On the latter, the ONS used more recent trends in household formation which effectively embed the affordability and housing supply problems in the England, and project them forward. The Government itself advised in the publication of the revised PPG that the 2014-based projections should continue to be used.

Adjustments to Demographic and Household Projections

Sub-national Population Projections, 2018-based

- 3.69 March 2020 saw the publication of newly released sub-national population projections by the Office for National Statistics. The 2018-based projections (SNPP 2018) point to a substantially larger population increase in Stafford than either the 2014-based projections on which the LHN method is based (ie 408 dpa) and the later, 2016-based projections.
- 3.70 The key population growth figures are shown in the table below. The population growth figures are shown for the relevant 25 year period covered by the projections along with the annual change.
- 3.71 The key point is that the SNPP2018 suggest population growth that is nearly double that of SNPP2014, the population data which underly the LHN method (ie 408 dpa). They are more than three times the annual figure implied by SNPP 2016.

	Population Growth	Annual Change
SNPP 2018 (2018-43)	21,500	859
SNPP 2016 (2016-41)	7,100	285
SNPP 2014 (2014-39)	11,250	450

Source: ONS 2018-based, 2016-based and 2014-based Sub-national Population Projections

- 3.72 The much higher population growth figures indicated in the SNPP 2018 do not mean that the relevant housing need should be double that of the LHN method. The composition of the population is different to that implied by the SNPP 2014, and this will have a bearing on the number and type of households which form.
- 3.73 However, the key point is that the SNPP 2018 implies that Stafford's housing need would be substantially higher than the LHN method. The Council should test the implications of the newly released projections for housing need as it progresses with the Plan's preparation.

Household Formation Rates

- 3.74 The EDHNA sensitivity tests all of its demographic and household projections by applying an adjustment to the calculation that translates population into households. It assumes that there is a 'partial catch-up' or PCU in household formation rates in the 15-34 age group.
- 3.75 Essentially, the study assumes that the rates projected in the official government projections for younger age groups reflect the significant constraints on household formation (price, supply) that have affected the 15-34 cohort over a long period of time. It uses a method in which it models alternative rates to the final year of the plan period using the 2008-based household projections, essentially projections which pre-dated the recession and part of the long-run worsening of affordability.
- 3.76 This approach has been extensively used by Lichfields and accepted at several Local Plan EIPs. It also featured in the Local Plans Experts Group (LPEG) report which preceded the revised PPG.
- 3.77 The downside is that the 2008-based projections are now significantly out-of-date. The 2008-based projections are used for adjustments of this type in part because they are assumed to reflect pre-recessionary trends in household formation, they use longer-past trends (from 1971-2001) as reference years, and they reflect only part of the long-run rise in house prices that occurred from the mid-1990s through to the present. However, the underlying data which informed them is now well over a decade old, and their appropriateness needs to be justified. As it stands, the EDHNA makes only one, brief reference (Modelling Assumptions, p. 211) to their use, and gives no explanation as to why they are a reasonable basis for an alternative trajectory for household formation in younger age cohorts.
- 3.78 Furthermore, some caution is needed about the relationship between household formation rates and the underlying characteristics of the population forming households. Household formation behaviour is driven by the characteristics of a population and how they form households. This includes economic, social and cultural factors (for example, availability of mortgage finance, couples leaving it longer to form households compared with earlier years).
- 3.79 In this regard, further analysis should be provided to justify why applying adjusted rates that reflected these characteristics in the period before 2008 to the population of 2018-19 and beyond is robust.

Affordability Adjustment

- 3.80 The previous PPG included provisions for a market signals adjustment to be applied to the starting point housing need figures. This was to address long-standing affordability problems, with the rationale that planning for housing at a level higher than that implied by household growth (ie demand) would shift the demand-supply balance such that house price inflation might decelerate.
- 3.81 This was always one of the most difficult adjustments to make in calculating housing need, in that the PPG provided no clarity on what would constitute an appropriate adjustment on what is a highly complex issue. In practice, market signals uplifts varied substantially in Local Plans, with some EIPs concluding that no uplift should be made in areas with very poor affordability, but others concluding on figures of 20%+.
- 3.82 Sensibly, the EDHNA recognises that an affordability uplift is important. With a median affordability ratio of 7.39 that has risen markedly over the last decade, we agree that there are grounds for an adjustment. The EDHNA simply uses the 21% uplift implied in the LHN, which it applies to each of its alternative scenarios.
- 3.83 We are not aware of this type of uplift having been accepted in Local Plans tested under the revised NPPF, and this may be a risk to whether the numbers will be accepted. However, we think this is a reasonable approach which applies a significant uplift of a scale that might be expected to have some long-run impact on house prices compared with no uplift or a very small adjustment.
- 3.84 Having set out the PCU adjustment and the affordability adjustment, the EDHNA runs several housing need scenarios based on population and household projections. We summarise them in the table below, including the EDHNA's implied jobs growth for each of the scenarios where provided.

Table 3.2 Summary of Population Change-Based Scenarios

Scenario	Population Growth 2020-40	Housing Growth 2020-40	Annual Housing Need (dpa)	Annual Need with Affordability Adjustment (21%)	Jobs Growth
A Local Housing Need - with PCU adjustment	-	-	408		-
B SNPP 2014 based - with PCU adjustment	8,250	5,760 6,680	288 334	349 404	1,230
C Using latest (2018) population estimates - with PCU	8,500	5,350 6,300	267 315	324 381	1,370

- 3.85 In the I&O consultation document, SBC has reasonably concluded that the alternative scenarios all result in figures lower than the LHN figure. As such they do not represent a sound basis for the borough's planned housing requirement.
- 3.86 We agree with this conclusion. The figures would be inconsistent with planning for growth as required by the NPPF, implying housing growth which is:
- Lower than the current Local Plan target (500 dpa)
 - Well-below average completions between 2001 and 2019 (587 pa) and the more recent 5 year average of 736 as major sites have been delivered.

- 3.87 We have compared the implied population growth figures with past trends in Stafford. The headlines are that:
- Population growth in the alternative scenarios would be only 410-425 pa compared to long-term past growth of 892 pa (2001-18) and 790 pa between 2013 and 2018.
 - No population projections are given with the LHN figures in the EDHNA. However, we have reviewed the underlying figures from the ONS projections and this shows annual growth of 480 from 2019-29, so also significantly lower than past trends.
- 3.88 Finally, the projections imply very low employment growth of only 62 to 68 jobs per annum.

Jobs-Led Housing Need

- 3.89 This is critical to the case for higher housing requirement figures than the LHN method. The EDHNA uses its modelling tools to show what the housing need would be if it were driven by future jobs growth. This involves the following steps.
- Establish what additional jobs Stafford might be expected to deliver over the 2020-40 Local Plan period.
 - Calculate what additional resident working population (ie working Stafford residents) this would require, allowing for some of the additional jobs being taken by in-commuters.
 - Using the population projections as a starting point, calculate what these imply about how many additional working the borough will have in future, allowing for changes in economic activity rates and unemployment.
 - Calculate whether the population projections (with adjustments) imply that the borough would have sufficient working residents to support jobs growth. If not, the model assumes additional migration of people into the borough to fill the shortfall in resident labour.
 - It is this combination of the future resident labour force and additional migrants to meet any shortfall that determines whether the housing need is higher than that implied by the population projections. The model translates the extra migrants into additional households and housing need.
- 3.90 We have reviewed the assumptions and evidence the EDHNA uses in each of these steps which are set out in para. 10.55 of the report. We consider them to be sound, but the study should provide details of the data that underlies each of the main assumptions. Our comments are as follows:
- 3.91 **Unemployment:** Use of the 2.8% ONS model-based figure is sound. It uses the most recent several quarters of data, and assumes that this figure holds constant. This has the effect of not releasing additional residents into the workforce which would dampen the housing need figure. This is a low unemployment rate which reflects a labour market in which an ageing population is seeing relatively low rates nationally, and we do not consider any allowance for the rate to fall further would be appropriate.
- 3.92 **Economic Activity Rates:** The EDHNA uses Office for Budget Responsibility labour force projections (cited as January 2017) for future economic activity rates. Whilst the study should have shown these rates for transparency, this is a reasonable source of evidence to use and one produced by an authoritative body which advises the UK government on fiscal planning. It assumes that there will be increases in economic activity rates in numerous age groups (male and female) including in the over 65s, and is a sensible basis on which to model future changes in rates.

- 3.93 However, newer, 2018 data (Fiscal Sustainability Report, 2018, Supplementary Data Series) has been published which shows that economic activity rates in most age groups are projected to be higher by 2040 than was the case in the January 2017 version. The implication is that more of the borough's labour force need would be met by higher economic activity rates in the existing population, reducing the need for additional in-migration and therefore the housing need implied by the jobs-led scenarios. This should be sensitivity tested in any update to the EDHNA.
- 3.94 **Labour force ratio:** Again, the EDHNA should have supplied the data behind its calculation of a 0.93 ratio of working residents to jobs, which is held constant in the modelling. The implication is that Stafford is a net in-commuting borough, with fewer working residents than jobs. The EDHNA uses a combination of mid-year population estimates (2018), economic activity rates in that year and the number of jobs given by the CE forecast for 2018. Whilst holding 0.93 constant is appropriate, the EDHNA should have considered modelling a 1.0 ratio (ie for every additional job, an additional working resident). This would increase the housing need in each scenario, possibly offsetting the downward effect of the economic activity rates update described above. However, it would be consistent with Local Plan strategy in which targets to increase the number of jobs would be accompanied by an objective of reducing reliance on in-commuting and the adverse sustainability implications of travel-to-work movements by private vehicle, for example.
- 3.95 Three employment scenarios are used, and are drawn from the scenario modelling which underpins the employment land need assessment (see our earlier commentary).
- 1) Cambridge Econometrics Baseline Scenario: Using a widely recognised CE forecast model which suggests 5,929 jobs (c. 300 pa) 2020-40. This is a robust scenario in that it is based on independent employment forecasts. However, its flaws lie in both what is a downbeat view of future jobs growth and the problem that CE itself uses population projections (amongst other inputs) to determine the forecast employment figure. The EDHNA does not use the CE population inputs but instead used its own population model to estimate the housing need associated with it. The risk here is that the scenario is open to the challenge that there is a logical inconsistency – the forecaster's underlying assumptions are different to those of the EDHNA's.
 - 2) CE Jobs Growth Regeneration: A total of 12,473 additional jobs which takes account of the employment floorspace that major projects would deliver. The strength of this scenario is that it accounts for some of the borough's key investment priorities and therefore is both upbeat and ambitious. We have described the downside risks earlier in our report.
 - 3) Past Trends Jobs Growth: A total of 13,126 additional jobs. As we have commented earlier, we (and Lichfields) do not regard this scenario as robust.
 - 4) CE Baseline + 50%: A total of 8,900 jobs. We do not regard this scenario as robust for reasons described earlier in our report.
- 3.96 We summarise the key figures in the table below.

Table 3.3 Key Data for EHDNA Employment Growth-led Scenarios

	Population Growth 2020-40	Housing Growth 2020-40	Annual Housing Need (dpa)	Jobs Growth
CE Baseline with PCU	16,400	8,700 9,800	435 489	5,929
CE Regeneration with PCU	27,200	12,900 14,200	647 711	12,473
Past Trends with PCU	28,650	13,700 14,900	683 746	13,126
CE Baseline + 50% with PCU	23,000	10,800 11,900	540 597	8,900

3.97 With the exception of the CE Baseline scenario, which gives housing need figures of 435-489 dpa, the jobs-led scenarios imply housing needs substantially higher than the LHN of 408 dpa. The key points to highlight are:

- In three scenarios (Regeneration, Past Trends, +50%), the implied population growth must be substantially higher than that implied by the LHN (408 dpa). The implication is that the borough would need higher levels of in-migration (ie new working residents) to meet future demand for labour.
- In the same three scenarios, the implied population growth ranges from c. 1,100 to 1,400 per annum). This is somewhat higher than past population growth (790-890 pa) in the borough, but reflects the additional migration that is necessary to support employment growth in light of an ageing, existing population in the borough.
- In each of the scenarios, the PCU adjustment makes a reasonably significant difference to the housing need figures of at least 1,000 homes in total and c. 60 dpa. As we have suggested, we have some reservations about the validity of this method in light of the revised PPG and the out-datedness of the 2008-based household projections it uses.

3.98 No population growth and housing need is modelled for the highest of the employment land need scenarios (past take-up rates, 181 ha). This is because the scenario is driven entirely by projecting forward patterns of land-take up and includes no jobs projections. It would be very difficult and disproportionate to SBC's assessment to attempt to generate a jobs figure for this scenario.

3.99 However, given that the past take-up scenario is the highest of all of the employment land need scenarios, the implication is that SBC would need to opt for a housing need figure which is significantly higher than the LHN scenario (408 dpa). That scenario has an employment land need of only 68 ha, suggesting that it would result in a shortfall of working residents. If the borough is to achieve more ambitious employment growth, then the higher requirements for employment land and housing should be its preferred figures.

3.100 This raises the broader question of how the population growth and housing need figures align with the employment land need figures. The alignment of jobs and housing has become an established part of testing the soundness of local plans. The key issues are:

- That a substantial component of the employment land need figures (the allowance for losses and flexibility factor) gives no indication as to job numbers. For this reason, it will be impossible to assess their alignment with the LHN and demographic-led housing need figures.
- SBC needs to carefully consider which of the employment land need figures it prefers. If it opts for any of the scenarios other than past-take up based scenario,

the implication is that it should also select the corresponding jobs-led housing need figure.

- 3.101 It is difficult to conclude that a single housing need scenario stands out as the appropriate figure for Stafford. However, weighing up the employment land needs evidence and the EDHNA's modelling of housing needs, the evidence points to figures around 650-700 dpa being more appropriate than the 408 LHN figure, or the other alternatives presented in the study.
- 3.102 In this regard, the EDHNA's own conclusions on the scenarios (paras. 10.68-10.77) should be noted:
- It points to the LHN being only the minimum housing growth to be considered.
 - It concludes that the CE Baseline (5,929 jobs, 435-489 dpa) is well below past trends and is not consistent with SBC's growth aspirations.
 - The CE Jobs Growth Regeneration scenario (12,478 jobs, 647-711 dpa) is consistent with SBC's growth aspirations.
 - The past trends jobs growth scenario (13,130 jobs, 683-746 dpa) assumes a level of jobs growth that is unlikely to be achieved. It is not clear why this is distinct from the 12,478 jobs growth scenario, since the difference is modest.
 - The EDHNA makes no substantive comment about the CE Baseline + 50% scenario, but notes that it includes only the Station Gateway jobs and not the Garden Settlement proposals.
 - The study also notes that Stafford has substantially exceeded the LHN figure of 408 dpa over the past few years (average 815 dpa in the past 4 years and 579 dpa in the longer term). It suggests (para. 10.82) that this could imply a 'greater level of housing need' compared with that of the LHN method.
 - The EDHNA concludes that the CE Regeneration scenario should be considered a realistic approach (para. 10.90).
- 3.103 Of the scenarios set out in the EDHNA, each has both strengths and weaknesses. Our conclusion on review of the evidence is that further work should be carried out by SBC to address the lack of detail and justification for some of the assumptions and figures used in the scenarios. Without this, it is not possible to conclude that one scenario currently stands out as significantly more robust than others.
- 3.104 However, there are good reasons not to accept the LHN or lower figures as the full, objectively assessed housing need for Stafford. They are:
- It implies that only limited employment growth could be supported by the delivery of housing, and the resident workforce it provides, at this level.
 - This would be inconsistent with the positive approach to planning required by the NPPF and with Stafford's aspirations to deliver sustained employment growth.
 - The population growth figures associated with housing need in the 400-500 dpa range appear out of line with past population growth in Stafford.
- 3.105 Of the jobs-led scenarios, the CE baseline forecast would in our view fail to meet the positive approach to planning required by the NPPF, and suggests very little growth in key B use class sectors. The Regeneration scenario better reflects both past trends in the borough and priority investments for Stafford, and is clearly much more consistent with positive planning. We do not consider the past jobs growth and the 50% uplift scenarios to be sound and these should not be taken forward.

- 3.106 There are some weaknesses, however, in jobs-led scenarios generally which SBC should address as work on the Local Plan progresses. In particular:
- For the policy-on scenario regarded in the EDHNA as realistic (Regeneration Scenario), more evidence is needed to demonstrate that the scenario is robust.
 - Sensitivity testing is needed of alternative assumptions about economic activity rates and the labour force to jobs ratio, and its impact on the associated housing need figures.
 - Accounting for multiplier effects and other relevant adjustments in the Regeneration scenario.
 - Taking account of any other significant economic drivers of future housing need both within the borough and possibly in neighbouring areas (for example, growth in advanced manufacturing on the M45 corridor and at I54. This might generate additional demand for labour from Stafford, and therefore housing need.
- 3.107 Our conclusions are interim at this stage. However, on the balance of the evidence presented in the EDHNA, housing need at 650-700 dpa appears better aligned with a positive approach to employment growth in the borough than the lower, demographic-led scenarios presented in the study.

Affordable Housing Need

- 3.108 The EDHNA concludes that affordable housing need ranges from 252 to 389 (net) for Stafford borough. This takes account of both current and unmet needs from residents in need of affordable housing, and future affordable need based on newly forming households and what is affordable to them.
- 3.109 We have reviewed what is an extensive sequence of steps to arrive at these figures. They follow a recognisable methodology that is well-established practice, and the study makes what we regard as reasonable assumptions about what represents affordable housing in arriving at its conclusions. In particular, the higher figure (389 pa) uses the assumption that housing costs at 33% of income represent the affordability threshold, above which newly forming households would be in need of affordable housing. The lower figure (252 pa) is based on a 25% threshold.
- 3.110 We do not have access to the full, underlying data on current needs and the projected number of current households likely to fall into need which are based on the CORE database and on data supplied to Lichfields by the Council. In any event, the need figures are substantial, with 252 pa representing 62% of the LHN annual figure of 408 dpa, and 389 dpa 95% of the 408 dpa figure. The scale of the affordable need in the borough is clearly significant.
- 3.111 It is for SBC to determine whether it selects a preferred housing need figure and/or sets a planned housing requirement to maximise the delivery of affordable housing. Paragraph 024 (Reference ID: 2a-024-20190220) specifies that total affordable housing need can be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. It suggests that an 'increase in the total housing figures in the plan may need to be considered where it could help deliver the required number of affordable homes'.
- 3.112 The implications are that:
- SBC should consider housing need figures at the higher end of the range of scenarios, since this would increase the prospects of delivering more of the affordable need of the borough.

- 389 pa (the higher of the affordable need figures) represents 54% of the highest of the housing need figures that SBC considers a 'realistic' scenario (711 dpa). This reinforces the case for planning housing growth at a level well in excess of the LHN minimum.

4. Conclusions

- 4.1 Stafford Borough Council's Issues and Options consultation document sets out a wide range of potential housing need/requirement figures, a similarly wide range of employment land requirements, and an affordable housing need ranging from 252 to 389 per annum over the 2020-40 Plan period.
- 4.2 At this juncture, no preferred scenario for either housing or employment land requirements is stated by SBC. However, it sensibly recognises that housing requirements that are lower than the 408 dpa implied by the LHN method are below what the National Planning Policy Framework (2019) clearly specifies should be the minimum housing requirement in plan making.
- 4.3 The following key points arise from a review of the EDHNA which provides the detailed housing and employment land need evidence for the emerging Local Plan.
- 4.4 **Housing market area:** The conclusion that Stafford borough is a stand-alone HMA is both reasonable on the basis of the evidence and pragmatic. However, the Council should consider further analysis of recent patterns of in-migration from surrounding boroughs and the wider West Midlands area where ONS data suggest there have been increased inflows
- 4.5 **Functional economic market area:** The Council's evidence recognises that the FEMA boundary aligns with Stafford's administrative area. Data indicating that commuting self-containment is slightly lower than the threshold typically used to determine self-containment is an issue which might be considered further, particularly given the borough's relationship with employment centres to the south in the Black Country and to the north in the Stoke-on-Trent conurbation. Flows of people to work and related housing needs are important issues in the context of the exercise of the duty to cooperate.
- 4.6 **Employment Growth:** The EDHNA provides a wide range of employment growth and related employment land need scenarios for the borough. Of these scenarios, the Regeneration Scenario (12,478 jobs) is described as realistic in by the study and is much better aligned with the requirement for positive plan-making in the NPPF. The lower scenarios (CE, CE with 50% boost) are insufficiently positive, are not consistent with long-term and recent growth trends in the borough, and lack robustness as the EHDNA recognises. The higher scenarios (Past Trends Growth) is also insufficiently robust.
- 4.7 We have set out in the report where the Regeneration scenario and the employment growth scenarios in the EDHNA would benefit from further analysis and clarification, including aspects such as multiplier effects that might increase the implied employment growth.
- 4.8 **Employment Land Needs:** Employment land needs in the EDHNA (68-181 ha) are derived from the employment growth scenarios. The assumptions used to convert employment to employment floorspace and land are broadly sound, but our report points to one or two aspects of the modelling that needs further explanation or justification. The key issue to consider is the inclusion of 48ha of land to allow for future losses in all of the figures, an adjustment based on past data. The Council should provide more detail to support this adjustment.
- 4.9 **Housing Need:** The LHN (408 dpa) provides the minimum housing need figure for the borough. However, the recently published SNPP 2018 points to population growth that is substantially higher than the population projections that underpin the LHN method, and this implies a much higher housing need. The new projections should be tested by the Council for their implications for housing need.
- 4.10 Each of the employment growth scenarios produces higher housing need figures, a result of the additional migration into the borough of the working residents that would be necessary to support employment growth. The assumptions used to convert jobs growth

to housing need are largely sound, although the Council should test both the implications for housing need of the 2018 OBR economic activity rates and a labour force to jobs ratio of 1.0.

- 4.11 Our conclusion is that housing requirement for Stafford Borough should be at least 650-700 dpa on the basis of the evidence so far presented by the Council. However, there is potential for the housing need figures to be higher, and we would seek to carry out further, detailed analysis during the next stage of the Plan process of both the employment growth figures and the newly released SNPP 2018. The implied related employment land need would lie in a range between 94-109 hectares to be consistent with these housing need figures.
- 4.12 With an affordable housing need of at least 252 per annum, the overall housing requirement set by the Local Plan should take account of this need. The Council could consider setting a requirement at or higher than 700 dpa on the grounds that the delivery of affordable housing should be increased through the delivery of mixed market and affordable housing developments.



HATCH
REGENERIS

www.hatchregeneris.com

Contact Details

Enquiries

Craig Alsbury



Visit us online

avisonyoung.co.uk



**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		John
Surname		Coxon
E-mail address		[REDACTED]
Job title (if applicable)		Director
Organisation (if applicable)	The Strategic Land Group	Emery Planning
Address		[REDACTED]
Postcode		[REDACTED]
Telephone Number		[REDACTED]

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan- or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
John Coxon		Emery Planning on behalf of The Strategic Land Group		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.B	Other
2. Please set out your comments below				
Please see attached statement for representations				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.C	Other
2. Please set out your comments below				
Please see attached statement for representations				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.D	Other	
2. Please set out your comments below					
Please see attached statement for representations					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.F	Other	
2. Please set out your comments below					
Please see attached statement for representations					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.G	Other	
2. Please set out your comments below					
Please see attached statement for representations					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.I	Other
2. Please set out your comments below				
Please see attached statement for representations				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.J	Other
2. Please set out your comments below				
Please see attached statement for representations				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.H	Other
2. Please set out your comments below				
Please see attached statement for representations				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.0	Other
2. Please set out your comments below				
<p>Please see attached statement for representations & separate call for sites submission</p>				

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to

transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk



Representations

New Stafford Local Plan 2020-2040 – Issues and Options

for The Strategic Land Group

Emery Planning project number: 20-167

Emery Planning

[Redacted]
[Redacted]
www.emeryplanning.com

Project : 20-167
Consultation : Issues and Options
Client : The Strategic Land
Group
Date : April 2020

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited
trading as Emery Planning.

Contents:

1. Executive summary	1
2. National Planning Policy and Guidance	2
3. Response to Questions	4
4. Appendices	13

1. Executive summary

- 1.1 We are instructed by our client, The Strategic Land Group (SLG), to respond to the current consultation on the New Stafford Local Plan: Issues and Options.
- 1.2 To summarise, our key points in response to the consultation are as follows:
- The housing requirement should align with planned economic growth and the economic aspirations of the borough. We therefore consider that Scenario E should be selected with Partial Catch Up applied. This results in a housing requirement of 14,215 dwellings over the plan period (711dpa).
 - The preferred Growth Option is 3 or 5. However, Stone should accommodate a significantly higher proportion of development than is distributed to the settlement in either of these options, to reflect the sustainability credentials of the town, its role within the settlement hierarchy and the need and demand for new housing.
 - New garden communities would be slow to deliver new housing and should not be relied upon to meet housing need in the short to medium term. There is a need to allocate smaller scale, deliverable sites which can meet housing needs now, and to provide flexibility within the supply.
- 1.3 SLG is promoting the land north of Uttoxeter Road, Stone as a draft allocation for approximately 150 dwellings. The site is surrounded by permanent development on 3 sides and is extremely well related to the existing settlement. The allocation of the site would comprise a logical rounding-off to the urban edge of Stone, and would represent a highly sustainable development which would assist in meeting the needs of the borough.
- 1.4 The site is submitted separately to the Council's call for sites which is taking place alongside this consultation.

2. National Planning Policy and Guidance

National Planning Policy Framework

2.1 The revised Framework was published in February 2019. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The Framework, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system.

2.2 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

2.3 Paragraph 35 provides the following in relation to soundness:

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs [19]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

19. Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.

National Planning Practice Guidance (PPG)

- 2.4 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published. Local Plan making is addressed under Section 12.

3. Response to Questions

Question 5.B

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer?

3.1 Paragraph 60 of the Framework provides:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

3.2 Local Housing Need is defined in Annex 2 of the Framework:

"The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework)."

3.3 The application of the current standard method results in a minimum local housing need of 408dpa for Stafford. However, the standard method does not take into account the Council's economic strategy or ambitions.

3.4 The wider context is that using data published in September 2017 as part of the *Planning for the right homes in the right places* consultation, the standard method would, in aggregate, only plan for around 266,000 homes across England. Furthermore, this figure (266,000) was based on the household projection data for the period 2016 to 2026. We calculate that the household growth based on the projections between 2019 to 2029 (i.e. the 'current year', as applied by Stafford in its calculation of the standard method) are approximately 3% lower nationally than for the period 2016 to 2026. Therefore, the gap to 'bridge' to meet the Government's target of 300,000 homes annually is even greater than the shortfall of 34,000 homes per annum previously identified. As the Government explained in the technical consultation on updates to national planning policy and guidance (October 2018), the Government expects the gap to be bridged by ambitious

authorities going above their local housing need, including through housing deals with the Government.

3.5 Paragraph 2a-010 of the NPPG provides guidance :

“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

3.6 The circumstances in Stafford provide clear justification for the application of an alternative method in accordance with the Framework and paragraph 2a-010 the NPPG. These are as follows:

- There is a growth strategy in the area in the form of the three Stoke-on-Trent and Staffordshire Growth Deals, which provide Government funding to deliver key infrastructure and facilitate additional growth.
- HS2 Phase 1 is currently under construction. The line is expected to open to passengers between 2028-2031. HS2 services will serve Stafford via the existing rail network as part of Phase 1. HS2 will enable services to go from Stafford to London Euston in just 54 minutes. The Government has also recently confirmed HS2 Phase 2. The Government's HS2 Outline Business Case produced by DfT makes clear that the economic impacts of Phase 1 alone amount to £28bn, including £4.3bn in wider economic impacts (such as agglomeration and increased labour force participation).
- The housing requirement in the adopted Local Plan (500dpa) is significantly higher than the minimum housing need figure produced by the standard method, and furthermore significantly higher completion figures have been achieved in the past (604dpa for the period 2011-2018).
- The housing growth associated with planned and projected employment growth is likely to significantly exceed that set out in the standard method.

3.7 The above factors indicate that Scenarios A-D should be immediately discounted. The only option that realistically reflects the planned level of economic growth in Stafford is Scenario E. This is the only scenario which includes for the growth projected to occur at Stafford Station Gateway (linked to HS2), delivering labour force growth of approximately 12,000¹. Applying the past trends job growth of 0.83% (achieved between 2000 and 2018) would equate to labour force growth of just over 12,500². This demonstrates that Scenario E is not unrealistic. It is founded in a level of labour force growth which aligns with long term trends.

3.8 Furthermore, there is a need to uplift the requirement from the minimum local housing need to meet affordable housing needs. Paragraph 2a-024 of the NPPG states:

“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

¹ EHDNA, Table 10.5

² EHDNA, Table 10.6

- 3.9 The Economic and Housing Development Needs Assessment (EHDNA) identifies a need for between 252-389 net additional affordable houses per annum. The range reflects the proportion of income assumed to be spent on housing; the lower end of the range being 25% and the upper end 33%. Even at the lower end of the range, this represents 62% of the local housing need figure derived by the standard method. Only under the higher options (i.e. Scenarios E & F) would there be a realistic prospect of meeting the affordable housing need. Under Scenario E (including Partial Catch Up), the lower end of the range would still represent 35% of the overall housing requirement of 711dpa.
- 3.10 To conclude, SLG considers that Scenario E would best meet Stafford Borough's future housing growth requirements, and is the most appropriate figure to apply as a housing requirement for Stafford.

b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

- 3.11 Yes. Applying Partial Catch Up rates is necessary to rebalance the household formation rates, reflecting the fact that formation rates were depressed during and immediately after the 2008 recession. Recent household formation rates have also been depressed by a failure to build enough new homes – the UK is the only western country to see average household sizes increase over the last decade, breaking a trend that has lasted more than a century. Not applying Partial Catch Up effectively guarantees that an adequate supply of homes can never be delivered. This approach is advocated by the Council's EHDNA.

Question 5.C

In calculating the Housing Requirement figure for the New Local Plan 2020- 2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?

- 3.12 No. The housing land supply should be fully re-assessed from the new base date. Existing allocations which are not committed should be reviewed through the plan. The deliverability of the existing supply should also be reviewed.

Question 5.D

i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

- 3.13 SLG agrees that Stone should be identified as the second tier in the settlement hierarchy. It has a very important role to play in meeting employment and housing needs in the borough. We set out below why we consider that Stone should accommodate significantly more development than was planned in the current Local Plan.

Question 5.F

c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer

- 3.14 A combination of options will be needed. We note that the consultation document does not identify any significant disbenefits in relation to intensification around the edges of larger settlements and strategic extensions. In our view urban extensions to the existing settlements should be a key focus for delivering the housing requirement, particularly in the short-medium term.

Question 5.G

Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements?

- 3.15 SLG is generally supportive of new Garden Communities. However, realistic lead-in times and build rates need to be applied in the housing trajectory if a new Garden Community is taken forward in the plan. It is likely that the provision of a Garden Community would need to be balanced by the allocation of smaller sites where development could start more quickly.
- 3.16 We refer the Council to the Lichfields report: Start to Finish (Second Edition), which is a publicly available report. It assesses lead-in times and build rates on very large sites across the country. That report finds that the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwelling was over 8 years, and furthermore that delivery on such sites tends to ramp up after several years.

3.17 Therefore, on the basis that a planning application on any of the sites would be several years away, the Council should not rely on delivery from any new Garden Communities until towards the end of the plan period. This means that intensification around the edges of larger settlements and strategic urban extensions should form the key focus for the housing land supply in the short and medium term. A new Garden Community could then play a key role towards the end of the plan period.

Question 5.I

Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?

3.18 As per our response to question 5.G, realistic lead-in times and build rates need to be applied for a new Garden Community.

3.19 Under economic Scenario E, we note that an allowance is made for 3,000 dwellings from a new Garden Community. It is not clear how this figure has been derived. If the the average time from validation of the first planning application to the first dwelling being completed on schemes of 2,000+ dwelling is over 8 years³, then the lead-in time from the base date taking into account plan preparation and adoption, and preparation of an outline application, will be significantly in excess of 10 years. Even assuming a build rate of 160 dwellings per annum⁴, we cannot see how 3,000 dwellings could be delivered before 2040 unless the Council intends to identify multiple new Garden Communities.

3.20 We consider that a balanced approach would be to identify one new Garden Community, with existing settlements accommodating a significant proportion of new development. Allocating new development sites in existing settlements need not constitute "development pressure" as this question describes it. Properly planned new housing schemes can provide significant benefit to existing communities by providing a greater population to support existing services and facilities while also off-setting their own impacts through the S106 and Community Infrastructure Levy regimes.

³ Lichfields report: Start to Finish (Second Edition)

⁴ Lichfields report: Start to Finish (Second Edition)

Question 5.J

What combination of the four factors: 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount 4. No Garden Community / Garden Community Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?

3.21 To summarise our responses to the individual questions above:

- Growth Scenario E is the most appropriate.
- Partial Catch Up should be applied.
- The housing land supply should be re-assessed from the new base date; and,
- If a new Garden Community is identified, then realistic lead-in times and build rates will need to be applied.

Question 5.H

i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?

ii) If you do not agree what is your reason?

iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

3.22 We consider that Options 3 and 5 are the most sustainable in the context of the evidence base. There is a need to disperse development across the settlement hierarchy, albeit in our view Stone should be a significant focus for development and should accommodate significantly more development than is currently identified in Options 3 and 5.

- 3.23 Stone currently accommodates approximately 13% of households in the borough⁵. The settlement is a key focus for retail, commercial and industrial uses which serves its own population and the surrounding rural areas.
- 3.24 In the current plan, 70% of housing growth is to be delivered in Stafford and just 10% in Stone (see paras 6.39 to 6.64 of the adopted Plan for Stafford Borough). However, Stafford has not delivered as the plan anticipated. The 2019 Housing Land Monitor indicates that 51% of new development has taken place in Stafford, with 20% of new development has taken place in Stone.
- 3.25 Of the 3 SDLs in Stafford with a total capacity of approximately 3,700 dwellings, less than 250 completions have been achieved. In fact, more than 2,200 units on the SDLs don't even have permission yet. The Council's 5 year housing land supply is predicated on annual completion rates from each of those SDLs far exceeding anything that has been delivered to date on them. A further over-reliance on large allocations in Stafford would exacerbate that problem. It is time for Stone, a highly sustainable location for growth, to take its fair share.
- 3.26 The EHDNA identifies that house prices in Stone are much higher than in Stafford and, subject to allocating the right sites in the right place, development in Stone would ensure viable early delivery in the plan period, including the delivery of significant amounts of affordable housing.
- 3.27 To conclude, whilst SLG broadly supports Options 3 or 5, it is considered Stone should accommodate a significantly higher proportion of development. Our client is promoting a site in Stone as part of a sustainable urban extension, which would be suitable for accommodating a proportion of that growth.

⁵ EHDNA, Table 12.1

Question 5.O

Are there any additional sites over and above those considered by the SHELAA that should be considered for development?

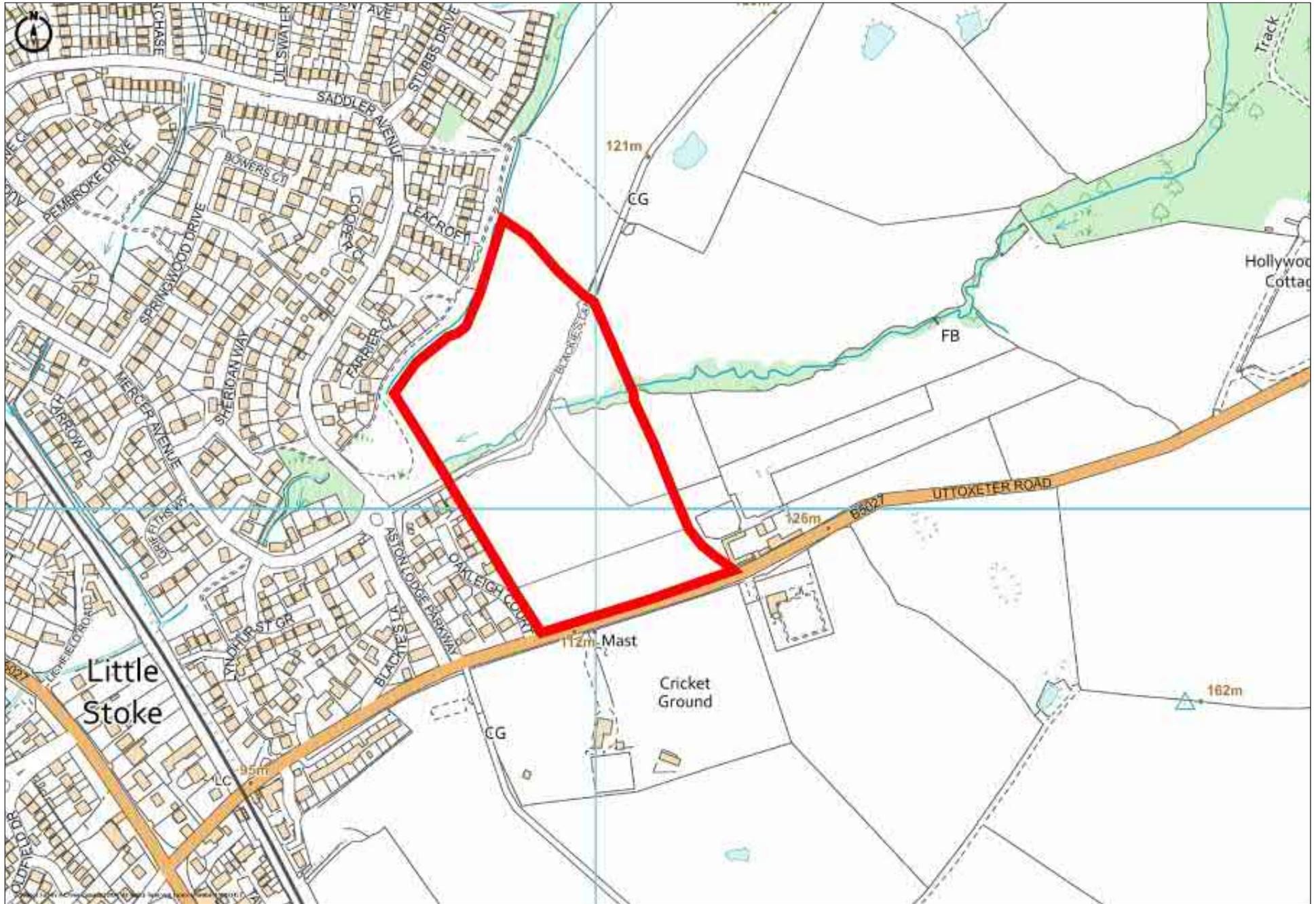
Land north of Uttoxeter Road, Stone

- 3.28 SLG is promoting the land north of Uttoxeter Road, Stone as a draft allocation for residential development. SLG are a land promoter with an established track record of delivering sites for residential development.
- 3.29 The site comprises approximately 6.5 hectares and could deliver approximately 150 dwellings. A site location plan is provided at Appendix **EP1**.
- 3.30 The site is currently greenfield land used for grazing, and is designated as open countryside. However, the site adjoins the existing settlement and is surrounded by permanent build development on 3 sides, namely Uttoxeter Road to the south and existing residential development to the west and north. The allocation of the site would therefore comprise a very logical rounding-off of the settlement, with the site currently being set against a backdrop of existing development.
- 3.31 It is also important to note that Little Stoke Cricket Club is located to the south of the site. Further east along Uttoxeter Road, Stone Crown Green Bowls Club is located to the south of the road and Acton Lodge Stables is located to the north of the road, adjoining the site. The speed limit also changes to 30mph at this point, including a sign for Stone. Any user would feel that they have entered the settlement at this point, and the residential development at Oakleigh Court is clearly visible from Uttoxeter Road and benefits from little existing screening. The site is better related to the settlement than it is the wider countryside.
- 3.32 There are no physical or legal/ownership constraints to development and, if allocated, the site could come forward immediately for development. The site is deliverable and would assist in meeting the needs of the borough in a highly sustainable way. We therefore propose that the site is allocated in the emerging plan for residential development.
- 3.33 The site is submitted separately to the Council's call for sites which is taking place alongside this consultation.

4. Appendices

EP1. Site location plan - land north of Uttoxeter Road, Stone

EP1



**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	Mr
First Name	Graham	Carl
Surname	Heath	Copestake
E-mail address		
Job title (if applicable)		
Organisation (if applicable)	Graham Heath Group Limited	Knights plc
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;

- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	3.A	Other	
2. Please set out your comments below					
See paragraph 2.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	3.A	Other	
2. Please set out your comments below					
See paragraph 2.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.D.II	Other	
2. Please set out your comments below					
See paragraph 3.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	

Figure		Question	5.F.C	Other	
2. Please set out your comments below					
See paragraph 4.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.G	Other	
2. Please set out your comments below					
See paragraph 5.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.H.I	Other	
2. Please set out your comments below					
See paragraph 6.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.I	Other	
2. Please set out your comments below					
See paragraph 7.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation					

paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.M	Other	
2. Please set out your comments below					
See paragraph 8.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	B.B	Other	
2. Please set out your comments below					
See paragraph 9.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	B.C	Other	
2. Please set out your comments below					
See paragraph 10.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	B.F	Other	
2. Please set out your comments below					
See paragraph 11.1 of Supporting Document					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					

Name		Organisation		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	B.H	Other
2. Please set out your comments below				
See paragraph 12.1 of Supporting Document				

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name		Organisation		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	B.K	Other
2. Please set out your comments below				
See paragraph 13.1 of Supporting Document				

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 21 April 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

Town and Country Planning Act 1990 (as amended)

New Stafford Borough Local Plan 2020-2040: Issues and Options Report Consultation

Supplementary Document to Support Feedback Form

Submitted on behalf of Graham Heath Group Limited



Our ref: GRA1267/22

Document date: April 2020

Knights plc



CONTENTS

1.	INTRODUCTION.....	3
2.	QUESTION 3.A: VISION AND STRATEGIC OBJECTIVES.....	7
3.	QUESTION 5.D.II: THE 2019 NEW SETTLEMENT HIERARCHY.....	7
4.	QUESTION 5.F.C: POTENTIAL SPATIAL OPTIONS.....	8
5.	QUESTIONS 5.G: POTENTIAL GARDEN COMMUNITIES IN STAFFORD BOROUGH.....	8
6.	QUESTION 5.H.I: POTENTIAL GROWTH OPTIONS.....	8
7.	QUESTION 5.I: ECONOMIC SCENARIOS.....	9
8.	QUESTION 5.M: MIRRORING POLICIES SP5, E2 AND E3.....	9
9.	QUESTION B.B: EMPLOYMENT SPACE.....	10
10.	QUESTION B.C: EMPLOYMENT SPACE.....	10
11.	QUESTION B.F: TYPE OF EMPLOYMENT.....	11
12.	QUESTION B.H: EMPLOYMENT IN RURAL AREAS.....	11
13.	QUESTION B.K: EMPLOYMENT IN RURAL AREAS.....	11
14.	SUMMARY.....	13

APPENDIX A - LOCATION PLAN

APPENDIX B - INDICATIVE MASTERPLAN SHOWING DEVELOPMENT POTENTIAL AT
MOORFIELDS INDUSTRIAL ESTATE

APPENDIX C - LANDSCAPE APPRAISAL BY PGLA

1. INTRODUCTION

- 1.1 Knights have been instructed by Graham Heath Group Limited to make representations in response to the Issues and Options consultation of the Stafford Borough Local Plan 2020-2040. This representation is submitted on their behalf.
- 1.2 Our client is the land owner of the 7.25 hectare site known as Moorfields Industrial Estate which is located in Coates Heath. The site was formerly a Ministry of Defence site and now provides a range of commercial uses across the site. A Location Plan showing the extent of the site in red is included at **Appendix A**.
- 1.3 The site is identified within Policy E3 of the Plan for Stafford Borough as one of the six Recognised Industrial Estates (RIEs) within the Borough, but is the only one which is located within the Green Belt (with the balance of the sites located within the open countryside and not subject to this additional policy constraint).
- 1.4 Moorfields Industrial Estate is the only one of the six RIEs which is also subject to the additional requirement of Policy E5 'Major Developed Sites in the Green Belt' of the Plan for Stafford Borough. There are two other sites which are subject to Policy E5 which are Hadleigh Park and the Former Meaford Power Station (however these are not allocated as RIEs). Policy E5 states that Moorfields Industrial Estate *"will be identified as previously developed sites (whether redundant or in continuing use, excluding temporary buildings) within the Green Belt, where limited infilling or the partial or complete redevelopment will be supported for employment purposes consistent with Spatial Principle SP7, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development"*. An extract of the Proposals Map showing the existing land allocation is set out in Figure 1.



Figure 1 - Extract of Policies Map showing Moorfields Industrial Estate

- 1.5 The wording of Policy E5 essentially restricts new development in these areas along the line of the Green Belt policies set out in the National Planning Policy Framework (the 'Framework') at paragraph 145, most notably at criterion 'g' paragraph 145 which accepts that development in not inappropriate within the Green Belt if it comprises *"limited infilling or the partial or complete redevelopment of previously development land whether redundant or in continuing use ... which would not have a greater impact on the openness of the Green Belt than the existing development"*. **The application of this policy by the LPA is proving to be very restrictive to our client's aspirations to continue to operate this site competitively with other employment areas given the potential limitations that this puts on the ability to construct new buildings to meet the growth aspirations of its tenants and the wider economy.**
- 1.6 By way of example, during the determination of the most recent planning application for new buildings on this site (LPA reference: 17/25653/FUL, which proposed the erection of 5 industrial units) the LPA granted planning permission on the basis that the development would trade-off other buildings on the site in order to ensure that the development would not have a greater impact on the openness of the Green Belt than the existing development. The delegated report that accompanied that decision sets out that the Council have previously formed the view that new development on this site will only be permitted where it does not exceed 125% the area of the original total floor area across the site. Reading from the previous delegated reports, based upon the extant policy context, the LPA appear to have formed the view that the site is currently at its limit in terms of the volume of new buildings that would be supported at the site (without existing buildings first being demolished).
- 1.7 Notwithstanding this the delegated report for 17/25653/FUL also acknowledges that the site has planning permission under condition 2 of 09/12874/COU to store plant, materials and vehicles across the site up to a height of 5 metres and that the approval of planning application 17/25653/FUL reduced the available area for uncontrolled storage which whilst this was considered to have a lesser impact upon openness was nevertheless considered to have a potentially worse appearance than the new building. Our client is currently operating substantial parts of the site for the storage of domestic caravans (which he is entitled to do under existing planning permissions relating to the site) in order to utilise the areas of the site which do not presently have planning permission to be redeveloped with commercial units. This however employs only minimal numbers of staff and as a consequence provides little wider economic benefits to the Borough.
- 1.8 In fact Policies E3 and E5 appear to be at odds with each other, with Moorfields Industrial Estate the only site which is required to satisfy both policies. It is considered that the requirements of these two policies are irreconcilable; given that Policy E3 seeks to promote development falling within Classes B1, B2 and B8 subject to complying with character and other factors and acknowledges that a number of the RIEs have capacity for further development; whereas Policy E5 only supports economic development that would not have a greater impact on the openness of the Green Belt.
- 1.9 Our client has implemented the planning permission granted under 17/25653/FUL and these units are now fully occupied, providing starter units for local businesses which are proving to be very popular. In light of the clear demand for a range of commercial units to be developed

across the site, our client is keen to redevelop other areas of the industrial estate with a range of sizes of commercial units, and intends to submit a number of planning applications over the plan period (with two planning applications intended to be submitted in 2020).

- 1.10 In addition to the existing RIE boundary for Moorfields Industrial Estate, there is an area of hardstanding which is situated to the west of this allocation which bounds the A519, which is also within the ownership of our client. This land could also reasonably be utilised for commercial purposes to supplement the main industrial estate, potentially providing a more positive entrance feature to the wider estate which could be landscaped and provide complementary facilities to the wider estate.
- 1.11 It is important to stress that the LPA appear to be taking a very different approach when determining planning applications within the Former Meaford Power Station site (which is also subject to Policy E5 but does not have the policy status of an RIE). At this site, outline planning permission was first granted under 98/35897/OUT and the committee report when assessing the proposal against Policy E&D13 (which was the policy in respect of Major Developed Sites in the Green Belt at the time) made a qualitative assessment in terms of the impact on openness by acknowledging that the proposed development would have a larger floor area the replacement buildings would be lower and the development would be screened from outside views by the proposed landscaping scheme. When approving the subsequent reserved matters planning application, the LPA assessed the scheme against Policy E5 and accepted that the permanent development proposed would not have a greater impact on openness as it would not be visible from the outside.
- 1.12 Paragraph 136 of the Framework states that "*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*". It is understood that the Council will not be undertaking a Green Belt Review as part of the preparation of the Stafford Borough Local Plan however, the Council should nevertheless recognise that the site in its current form is not able to deliver on its full potential. An indicative masterplan has been prepared which demonstrates how the site could reasonably be developed if it was not restricted by Policy E5 of the Plan for Stafford Borough. This plan is contained in **Appendix B**. The site could feasibly provide approximately 10,650 square metres of additional commercial floor space.
- 1.13 Notwithstanding the above, as stated previously paragraph 145(g) of the Framework does provide provision for this site to be developed, provided that the new development has no greater impact on the openness of the Green Belt than the existing development. The existing industrial estate is heavily screened from all vantage points by the presence of established mature landscaping which offers only very limited views into the site. An aerial photograph showing the site in context is set out at Figure 2.



Figure 2 - Aerial photograph of Moorfields Industrial Estate

- 1.14 A Landscape Appraisal has been produced by PLGA. This appraisal demonstrates that the existing development has minimal impact on openness and also forms the view that the redevelopment of the site to its full potential capacity would not result in a greater impact on openness. This report is contained at **Appendix C**.
- 1.15 Furthermore, when assessing this site against the five purposes of the Green Belt (as set out in paragraph 134 of the Framework) it is considered that the further redevelopment of this site would satisfy these requirements for the reasons set out below:

To check the unrestricted sprawl of large built-up areas

The redevelopment of this site would not result in the coalescence of any of the nearby large built-up areas of Stafford, Stone, the North Staffordshire conurbation, Eccleshall or Loggerheads.

To prevent neighbouring towns merging into one another

The site is located in the general proximity of the nearby settlements of Swynnerton, Cold Meece and Yarnfield, as well as a number of smaller settlements and hamlets including Cotes, Cotes Heath and Cranberry. The further redevelopment of this site would not result in any of these settlements merging into one another, given that the new development would be contained within the existing ownership boundaries.

To assist in safeguarding the countryside from encroachment

The site is entirely contained and would not result in any extension beyond the established and defensible boundaries of the Moorfields Industrial Estate, this resulting in no physical encroachment into the countryside.

To preserve the setting and special character of historic towns

The site is not located within the setting of a historic town.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The site comprises entirely previously developed land, and by focusing development within this site would reduce the need to redevelop other less suitable greenfield sites within the Borough.

- 1.16 The document provides a comprehensive response on behalf of our client to the Issues and Options consultation of the Stafford Borough Local Plan and should be viewed as a supplementary document to the completed feedback form.

2. QUESTION 3.A: VISION AND STRATEGIC OBJECTIVES

Question: Do you agree that the Vision should change?

YES

- 2.1 Our client supports the Vision that underpins the emerging Local Plan, most notably the followings sections:

- (a) - *“retained and enhances its high quality unique charcter made up of the County Town of Stafford, the market town of Stone and extensive rural area containing smaller towns and historic villages”;*
- (d) - *“reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas”;*
- (f) - *improved accessibility to services and facilities by providing save, attractive and convenient sustainable connections from and to new developments”;*
- (i) - *“delivered new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough’s selected villages”.*

3. QUESTION 5.D.II: THE 2019 NEW SETTLEMENT HIERARCHY

Question: Do you agree that the small settlements should be included in the Settlement Hierarchy?

YES

- 3.1 The further redevelopment of Moorfields Industrial Estate would complement this strategy by providing improved local employment opportunities to enable the sustainable growth of the ‘smaller settlements’ including Cold Meece, Cotes Heath, Croxton and Norton Bridge.

4. QUESTION 5.F.C: POTENTIAL SPATIAL OPTIONS

Question: Which of these spatial scenarios (or a combination) do you consider is the best option?

A COMBINATION OF 'GARDEN COMMUNITIES', 'DISPERSAL OF DEVELOPMENT' AND 'STRING SETTLEMENT / SETTLEMENT CLUSTER'

- 4.1 A combination of the above options, alongside the relaxation of the policies controlling the extent of redevelopment at Moorfields Industrial Estate would accord with paragraph 78 of the Framework which seeks to promote sustainable development in rural areas especially where they will support local services, and paragraph 84 which seeks to encourage the use of previously developed land where opportunities exist.

5. QUESTIONS 5.G: POTENTIAL GARDEN COMMUNITIES IN STAFFORD BOROUGH

Question: Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?

YES - MEECEBROOK

- 5.1 Our client supports the Meecebrook option which seeks to provide up to 11,500 new homes and supporting employment land around the Cold Meece Area. The expansion of Moorfields Industrial Estate would complement the employment growth of this strategy as is it located directly to the north of the MoD site and is located on the main route along the A519 leading to Junction 15 of the M6 Motorway.

6. QUESTION 5.H.I: POTENTIAL GROWTH OPTIONS

Question: Do you agree that the only NPPF-compliant Grown Options proposed by this document are No.3 (Disperse development across the new settlement hierarchy) and No.5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No.6 (Concentrate development within existing transport corridors)?

YES

- 6.1 We raise no objections to this strategy and would stress that the redevelopment of Moorfields Industrial Estate would align with these growth options.

7. QUESTION 5.I: ECONOMIC SCENARIOS

Question: Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?

YES

- 7.1 The provision of a Garden Community (particularly the option at Meecebrook which would make efficient use of previously developed land) would take pressure off the need to develop on greenfield land. It is however necessary that, should Meecebrook be taken forward, given Moorfields Industrial Estate's close proximity to this site, it should be able to compete on a level playing fields with the other RIEs in the Borough which are not unduly restricted by Green Belt policies.

8. QUESTION 5.M: MIRRORING POLICIES SP5, E2 AND E3

Question: Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan?

YES

- 8.1 It is considered appropriate for the current Recognised Industrial Estates to remain the focus for providing rural employment within the Borough. However it is important that the policies for developing Moorfields Industrial Estate are amended in order to enable them to facilitate further growth across the site. The most recent planning application to provide commercial buildings at this site (LPA reference: 17/25653/FUL) suggested that this estate is has already been developed to its maximum **based upon the application of Policy E5 of the Plan for Stafford Borough**. Notwithstanding this, paragraph 83 of the Framework states that *"planning policies ... should enable the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings"*. Furthermore, paragraph 117 of the Framework states that *"planning policies ... should promote an effective use of land in meeting the needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions"* whilst going on to state that *"strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"*. It is important to stress that Moorfields Industrial Estate comprises land that falls entirely within previously developed land and would not require greenfield land to be utilised to bring forward further economic development through at this site. This is particularly pertinent given that the Council's Monitoring Report published in December 2019 sets at paragraph 4.5 that during 2018/19 only 25% of completions were on brownfield land. This figure is much lower than the 66% levels achieved the year before (as a result of the implementation of planning consents at Meaford and Hixon). It should also be noted that the 2018/19 report acknowledged that 6.3 hectares of employment land were lost to housing over the 2018/19 monitoring year. The Monitoring Reports over recent years have also shown the trend that, despite the Green Belt constraints, Moorfields Industrial Estate has generally performing better than the other

RIEs when it comes to delivering new employment land, which show the latent potential of this site to deliver economic development into the forthcoming plan period.

- 8.2 **Our client would therefore request that Policy E5 is amended to make it more flexible and to enable this brownfield site to be developed to its potential in order to assist in delivering the employment development required to satisfy the Council's economic aspirations.** If this estate were to be developed to its full extent as illustrated within the indicative masterplan that is provided at **Appendix B** then the scheme could deliver a total of 10,650 square metres of new employment development over the plan period, which in turn would result in generating a significant increase in jobs within the Borough (conservatively predicted to create in the region of 200no new jobs). This potential economic growth is particularly important should the Meecebrook Garden Community option be taken forward during the Plan Period (which would generate 11,500 new homes within the immediate area) as the Moorfield Industrial Estate could provide sustainably located employment opportunities for those future residents (and supplementing the economic development that may come forward as part of the Garden Community) which would minimise the use of the private vehicle whilst taking the pressure off other greenfield sites to be development to meet the identified need.
- 8.3 Notwithstanding this, even if the Meecebrook Garden Community did not come forward, Moorfields Industrial Estate is nevertheless already in a sustainable location that can help to deliver economic growth in line with the Council's aspirations of directing growth to the nearby Key Service Villages of Yarnfield, Tittensor and Eccleshall and the smaller settlements of Cold Meece, Cotes Heath, Croxton and Norton Bridge.
- 8.4 Our client could also deliver the economic development at this site within the early stages of the Plan Period, and indeed is intending to submit a number of planning applications for industrial units within the site during the year 2020.

9. QUESTION B.B: EMPLOYMENT SPACE

Question: To ensure optimal economic prosperity, do you consider that the Council should:

- a) Allocate employment land so that it extends existing premises / areas in the Borough?*
- b) Allocate employment in both urban and rural areas?*

YES

- 9.1 The expansion and intensification of the Moorfields Industrial Estate could assist in delivering this objective.

10. QUESTION B.C: EMPLOYMENT SPACE

Question: Which specific locations (if any) do you think would benefit from the increased provision of employment premises? If so, for what type of activity?

YES - EXPANSION AT MOORFIELDS INDUSTRIAL ESTATE

- 10.1 Moorfields Industrial Estate would benefit from increased provision of employment premises. If developed to its maximum it would provide a range of Class B1, B2 and B8 uses through the comprehensive redevelopment of the site. In particular, this site could deliver employment uses such as Class B2 uses that would not necessarily be suitable on other sites which are in closer proximity to residential areas.

11. QUESTION B.F: TYPE OF EMPLOYMENT

Question: Where do you consider small and medium size units should be made available?

- 11.1 The recently implemented starter units at Moorfields Industrial Estate which were approved under planning permission 17/25653/FUL have been extremely popular and our client is aware of the additional demand to provide more units, both for new tenants, and for existing tenants looking to expand their business. The provision of small and medium sized units would form part of the suite of units that could be provided at this site.

12. QUESTION B.H: EMPLOYMENT IN RURAL AREAS

Question: To assist the rural economy should the Council:

a) Allocated land for employment purposes throughout the rural areas of the Borough?

b) If so, which area(s) do you consider would be appropriate for this purpose? Extend existing rural business parks? If so, which ones?

- 12.1 Moorfields Industrial Estate should be extended along the parameters set out in **Appendix B**. This would include the area to the west of the existing Policy E.5 allocation which in turn could provide small and medium sized commercial units, thus creating a more legible entrance to the main industrial estate. It is however imperative that the policies directed towards delivering new commercial development across this site are worded in a way that does not simply replicate the existing restrictive policies that govern the determination of planning applications at present.

13. QUESTION B.K: EMPLOYMENT IN RURAL AREAS

Question: Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion?

NO

- 13.1 Moorfields Industrial Estate is already identified as a Major Developed Site in the Green Belt and it is considered that this site be allowed to be redeveloped to its full potential before other sites are brought forward through the Local Plan. Notwithstanding this, it is recommended that the existing allocation around this site be extended to incorporate the adjacent land to the west, as shown in Figure 3.



Figure 3 - Proposed Extension to Moorfields Industrial Estate allocation

- 13.2 The existing Policy E.5 of the Plan for Stafford Borough and its amplification text should be amended to provide greater clarity for decision making within Major Developed Sites in the Green Belt in respect of what constitutes 'infilling' and 'partial redevelopment or complete redevelopment' which would enable the site to be developed to its full capacity, and therefore bring forward significant economic development during the Plan Period. It has been demonstrated in the landscape appraisal provided at **Appendix C** that the scheme would not have an adverse visual impact, furthermore in previous paragraphs within this submission it has been demonstrated that the underutilised areas of the estate could be redeveloped with new commercial units without resulting in a greater impact on openness or contradicting the purposes of including land within the Green Belt. This would enable future planning applications to be submitted with a greater degree of certainty thus enabling new economic development to come forward quickly to respond to the growing economic needs of the Borough, in recognition of the Government placing significant weight to support economic growth and productivity as set out in paragraph 80 of the Framework.

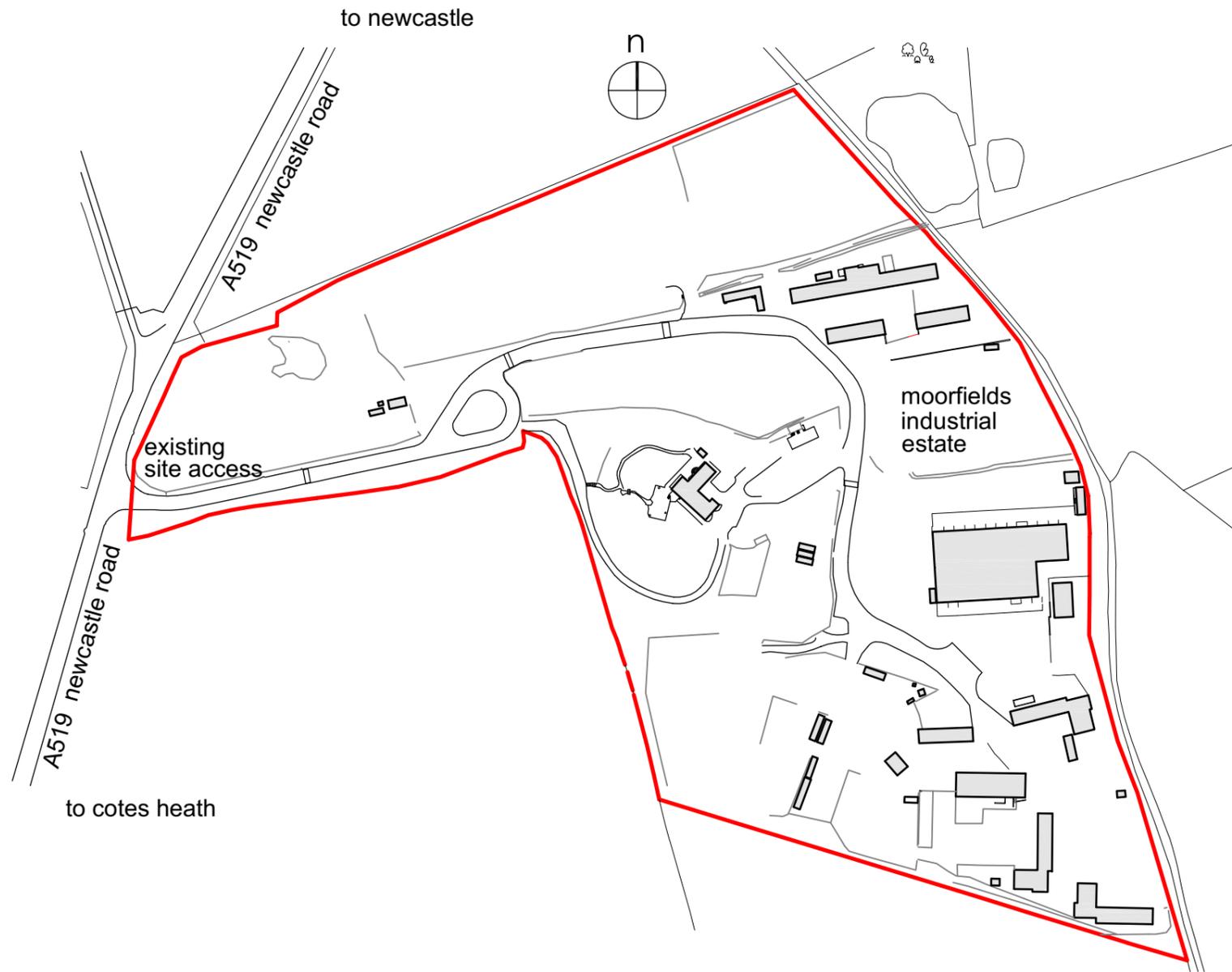
14. SUMMARY

- 14.1 Paragraph 16 of the Framework requires the new Local Plan to *“be prepared with the objective of contributing to the achievement of sustainable development”, “be prepared positively, in a way that is aspirational but deliverable” and “contain policies that are clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals”*. Paragraph 80 of the Framework applied significant weight to the need to support economic growth and productivity whereas paragraph 81 states that *“planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industry Strategies and other local policies for economic development and regeneration”*.
- 14.2 In summary, our client considers that the approach adopted in the Issues and Options Local Plan is broadly sound. However Knights consider that there is a missed opportunity to provide greater clarity in relation to the policies surrounding the provision of additional economic development at Moorfields Industrial Estate in order that it can continue to grow and contribute to the Council’s economic aspirations during the plan period in a way which is sustainable and makes efficient use of previously developed land. We welcome the opportunity to meet the local planning authority in due course in order to demonstrate how our client’s site can assist in the delivery of the additional 199 hectares of employment development that is identified as being required by Council’s during the new Local Plan period.

Knights plc

APRIL 2020

APPENDIX A - LOCATION PLAN



Rev ID Date Comment

wood | goldstraw | yorath
 ARCHITECTS QUANTITY SURVEYORS CDM CO-ORDINATORS

[Redacted Client Name]

Client.
GRAHAM HEATH GROUP LTD

Project.
PROPOSED REDEVELOPMENT OF EXISTING INDUSTRIAL SITE

Scale 1:2500	Issue Date 11/03/2020
-----------------	--------------------------

Sheet Size A3	Drawn
------------------	-------

Title.
LOCATION PLAN 1:1250

Drawing Number 4696-01-03	/ (Revision)	Revision ID
-------------------------------------	--------------	-------------

CAD file path:
 X:\0 PROJECTS\4696 Graham Heath Group Ltd\4696-01 Proposed Redevelopment of existing site
 \Design\ArchiCAD\PROPOSED REDEVELOPMENT.pln
 Copyright. Wood Goldstraw Yorath LLP.
 Contractors are to check all dimensions on site and refer any discrepancies to the Architects immediately. Do not scale from this drawing.

**APPENDIX B - INDICATIVE MASTERPLAN SHOWING DEVELOPMENT POTENTIAL AT
MOORFIELDS INDUSTRIAL ESTATE**



Rev ID Date Comment

wood | goldstraw | yorath
 ARCHITECTS QUANTITY SURVEYORS CDM CO-ORDINATORS
Churchill House, Regent Road, Stoke on Trent, ST4 3PL

Client:
GRAHAM HEATH GROUP LTD

Project:
PROPOSED REDEVELOPMENT OF EXISTING INDUSTRIAL SITE

Scale: 1:500 Issue Date: 05/03/2020
 Sheet Size: A0 Drawn:
 Title:
site master plan

Drawing Number: **4696-01-A.C** Revision ID:

CAD file path:
 K:\PROJECTS\4696 Graham Heath Group LEA\05-01 Proposed Redevelopment of existing site
 Design\DWG\4696-01-A.C.dwg
 Copyright: Wood Goldstraw Yorath LLP
 Issued in accordance with the terms and conditions of the Architect's contract. Do not scale from this sheet.

APPENDIX C - LANDSCAPE APPRAISAL BY PGLA

Moorfields Industrial Estate

Landscape Report

FOR GRAHAM HEATH GROUP LIMITED

MARCH 2020

PREPARED BY

PGLA Landscape Architects



1. Introduction

- 1.1. PGLA Landscape Architects have been commissioned to analyse the principle of Moorfields Industrial Estate accommodating more development and how that may impact upon the landscape character and visual amenity of the surrounding area. The site is located off Newcastle Road – see Figure 1.
- 1.2. The site is comprised of a number of buildings and hard stand areas that serve the industrial estate for a number of businesses. The boundaries are well vegetated with hedges and mature trees. The site is accessed off Newcastle Road to the west. There are no public rights of way that travel through the site but footpath Standon 32 and bridleway Standon 33 travel around the northern and eastern perimeters respectively.
- 1.3. The site is also within the Stoke on Trent Green Belt and is located to the west of Swynnerton.

2. Landscape Character

- 2.1. The site falls within the Regional Character of Staffordshire Plain and within Landscape Character Type: Sandstone Hills and Heaths and sub-type Farmland.
- 2.2. The following is a summary of the characteristics:
- 2.3. *“This landscape type occurs at rather higher elevations than the sandstone estate lands: it has the same underlying geology and range of soils but the landform is more pronounced, comprising hills and dissected plateaux. Significant areas of this type in Staffordshire - in particular Cannock Chase - have the original heathland vegetation or coniferous forests established on heathland. Where conversion has been to farmland stock rearing is the predominant land use, in large hedged fields of a regular pattern, indicating relatively recent enclosure. Significant clusters of ancient woodlands are characteristic. The settlement pattern is generally dispersed, with expanded hamlets. The ‘type-landscape’, described below is farmed.*

Visual character

- 2.4. *This is a landscape varying from intensive arable and pastoral farming, where hedgerows are closely trimmed and in decline, to small-scale intimate areas in which large grown-up intact hedges and numerous hedgerow oaks limit views through or across the landscape. In the more intensively farmed arable areas hedgerow tree cover of oak and occasional ash is sparse. This results in an open, smoothly textured landscape with extensive views across. A pronounced landform, strongly undulating but flattening considerably in parts, results in the landcover elements being viewed as individual components of the landscape and field pattern showing up from elevated viewpoints. Woodland cover in these areas of medium to large scale tends to be small broadleaved or conifer plantations providing more localised relief along stream corridors and ridge tops. Small woodlands and copses are also often associated with*

farm buildings. Characteristically, where landform becomes more strongly rounded the intimate nature of the steep sided valleys and associated extensive broadleaved woodlands become the important factors in controlling scale. In these smaller scale valley landscapes there is little evidence of any agricultural pressure which would lead to further changes, but commuter pressures are apparent and these are subtly changing the character of settlements.

- 2.5. *The network of winding ancient lanes, linking the small to medium sized farms, hamlets and individual properties of typical Staffordshire red brick, are often sunken and have extensive sandstone banks in the areas of more pronounced landform. These dictate views and give a very rural feel to the landscape. Areas of former heathland are apparent by the presence of a more regular field pattern, straight lanes, bracken and birch woodland, and these areas are often associated with newer rural properties.*
- 2.6. *Generally, this is a landscape where distinct characters are determined by different landform and woodland characteristics. The open flatter areas where everything is on view - including intrusive elements such as commuter properties, main roads and electricity pylons - are characterised by medium sized farms and large estates, whilst the ancient pattern of small fields and predominantly pastoral land-use of the steep valleys imparts a more peaceful character to the areas of smaller scale.*

Characteristic landscape features

- 2.7. *Strongly undulating landform with steep sided valleys; a well treed landscape of field ponds, stream valleys and meres; ancient narrow sunken lanes; farms of traditional red brick; intensive arable and pasture farming; hedged field boundaries; hedgerow oaks; broadleaved and conifer woodlands.*

Incongruous landscape features

- 2.8. *Introduction of extensive post and wire fencing; field trees; modern housing; industrial development busy main roads.*

Factors critical to landscape character and quality

- 2.9. *The critical factors which currently limit landscape quality are the loss of characteristic landscape features, the poor condition of those that remain, and the introduction of the incongruous features noted above. The area between Standon and Chapel Chorlton has been identified as a 'landscape at risk' of sudden loss of quality (see Section 7.18 et seq. of the Supporting Documentation) and measures to meet the BAP targets listed below will be critically important in preventing such a loss. This landscape character type is locally sensitive to the impacts of development and land use change."*
- 2.10. *The site falls within Policy Objective Landscape Enhancement – This is a policy that relates to the quality of the landscape and this is deemed to be Moderate and is described as:*
- 2.11. *"Landscape enhancement - These areas have suffered some erosion of strength of character and loss of condition of landscape elements. In some, but by no means all cases, this appears to be linked to a change in the farming pattern, from grassland to arable production. It may be that in time a new*

character will emerge from that change, but it is unlikely that the condition of traditional features such as small woodlands and hedges will improve without intervention. There is a particular need, therefore, to encourage relatively small-scale landscape conservation schemes such as hedgerow maintenance, habitat creation and tree and woodland planting, to stem the decline in landscape quality that will otherwise become more evident."

3. Potential Effects on Landscape Character and Visual Amenity.

- 3.1. The previous section outlines the landscape and visual baseline conditions and this section considers whether the proposed development will have any potential adverse effects. It will also analyse if the development will alter the perception on the visual impact of the site.
- 3.2. Figures 1-2 in Appendix A demonstrate that fabric of the site within the red line boundary will undergo major change as a result of the development. The layout of the existing industrial estate will be altered as a result of the erection of buildings across the site including infill development and alteration to the layout of the site. The type of proposed development is very much in keeping with the existing uses of an industrial estate and although the magnitude of change is considered to be major the sensitivity of the site to this type of development can be considered to be low. The significance of the overall effects within the site are therefore likely to be moderate and neutral.
- 3.3. The setting of the site can be deemed to be of high sensitivity due to the consideration that it is on the interface of the open countryside and the Green Belt. The landscape quality of the Landscape Enhancement area is moderate and therefore the overall sensitivity can be considered to be medium/high. The proposed development will place buildings closer to the site boundary than the current buildings but none of the existing vegetation should be removed as a result of this. Therefore the magnitude of change will be low to none. The potential significance of effects on the setting are likely to be moderate/minor and neutral.
- 3.4. The wider landscape character as described in Section 2 above can be deemed to be of medium sensitivity and is unlikely to undergo any change as result of the proposed development. Therefore the overall potential significance of effects is likely to be negligible.
- 3.5. In terms of effects on the visual amenity the key receptors are as follows:
 - Footpath Stanton 32;
 - Bridleway Stanton 33;
 - Newcastle Road (A519)
- 3.6. Footpath Stanton 32 travels from the north west of the site along the northern boundary and connects with the bridleway to the north east of the site. The footpath is well vegetated on the site boundary side as demonstrated in Viewpoints 1 -3. Currently, glimpses of some of the industrial units are just visible in places where the vegetation at lower levels is gappy. This will be more obvious in winter months.

- 3.7. The proposed development will result in more buildings being located closer to the northern boundary of the site. The proposed buildings are approximately 8.3m high to the ridge but it is unlikely that the whole structures will be visible through the vegetation. The sensitivity of the footpath is deemed to be medium high but the magnitude of change of the quality of the view is likely to be low. The visibility of the large buildings will not appear out of place or incongruous within the industrial estate. Therefore the overall potential significance of effects is likely to be moderate/low and neutral.
- 3.8. Bridleway 33 runs from Cotes to the south of the development and passes the site on its eastern boundary and then continues northwards to the A519. As with Stanton Footpath 32 the boundary to the site is comprised of existing dense vegetation with very few views into the industrial estate. The proposed buildings are unlikely to be visible in their entirety even in winter months and therefore the overall potential significance of effects is likely to be moderate/low and neutral.
- 3.9. The A519 is an arterial road that travels to the west of the site linking the A500 in the north to Eccleshall in the south. The road has no footpaths in the vicinity of the site and therefore is only suitable for vehicular traffic. Views of the well vegetated site boundary are achievable across the fields when travelling towards the site entrance from the north and likewise when travelling from the south. Transport receptors are considered to be low sensitivity due to the speed of travel and the proposed development is unlikely to cause any change in the quality of views. Therefore, the potential significance of effects is likely to be negligible and neutral.
- 3.10. The site is within the Stoke-on-Trent Green Belt and the proposed development will be contained within the site boundary. The general principles of the Green Belt that relate to coalescence and sprawl will not be compromised as a result of the development. The additional buildings that are proposed as part of the development are likely to have an adverse effect on the visual impact of the site due to the increased volume over that which is currently on the site. However, the increased volume will be totally contained within the site boundaries and will not be visually noticeable from any of the visual receptors surrounding the site.

4. Conclusions

- 4.1. The proposed development will introduce a number of new buildings into the Moorfields Industrial Estate, off Newcastle Road, Staffordshire. The effects of the changes within the site will be major but these will be localised and contained within the site boundary.
- 4.2. It is likely that there will be minor to moderate effects on the setting of the site as the existing vegetation will remain intact as a result of the proposals.
- 4.3. The overall broad landscape character will remain unchanged as a result of the development and the key characteristics will remain unchanged.
- 4.4. The site is visually well contained and surrounded by dense and mature vegetation and therefore none of the effects are considered to be significant to the surrounding visual receptors.

- 4.5. The additional buildings that are proposed as part of the development is likely to have an adverse effect on the visual impact of the site due to the increased volume over that which is currently on the site. However, the increased volume will be totally contained within the site boundaries and will not be visually noticeable from any of the visual receptors surrounding the site.
- 4.6. Overall, it is considered that the proposed development will not have any significant undue or adverse effects on the surrounding landscape character, the visual amenity or the Green Belt.

Paul Gray CMLI March 2020



Appendix A: FIGURES

FIGURE 1: Site Location

FIGURE 2: Proposed Development

FIGURE 3: Viewpoint Location

FIGURE 4: Viewpoints

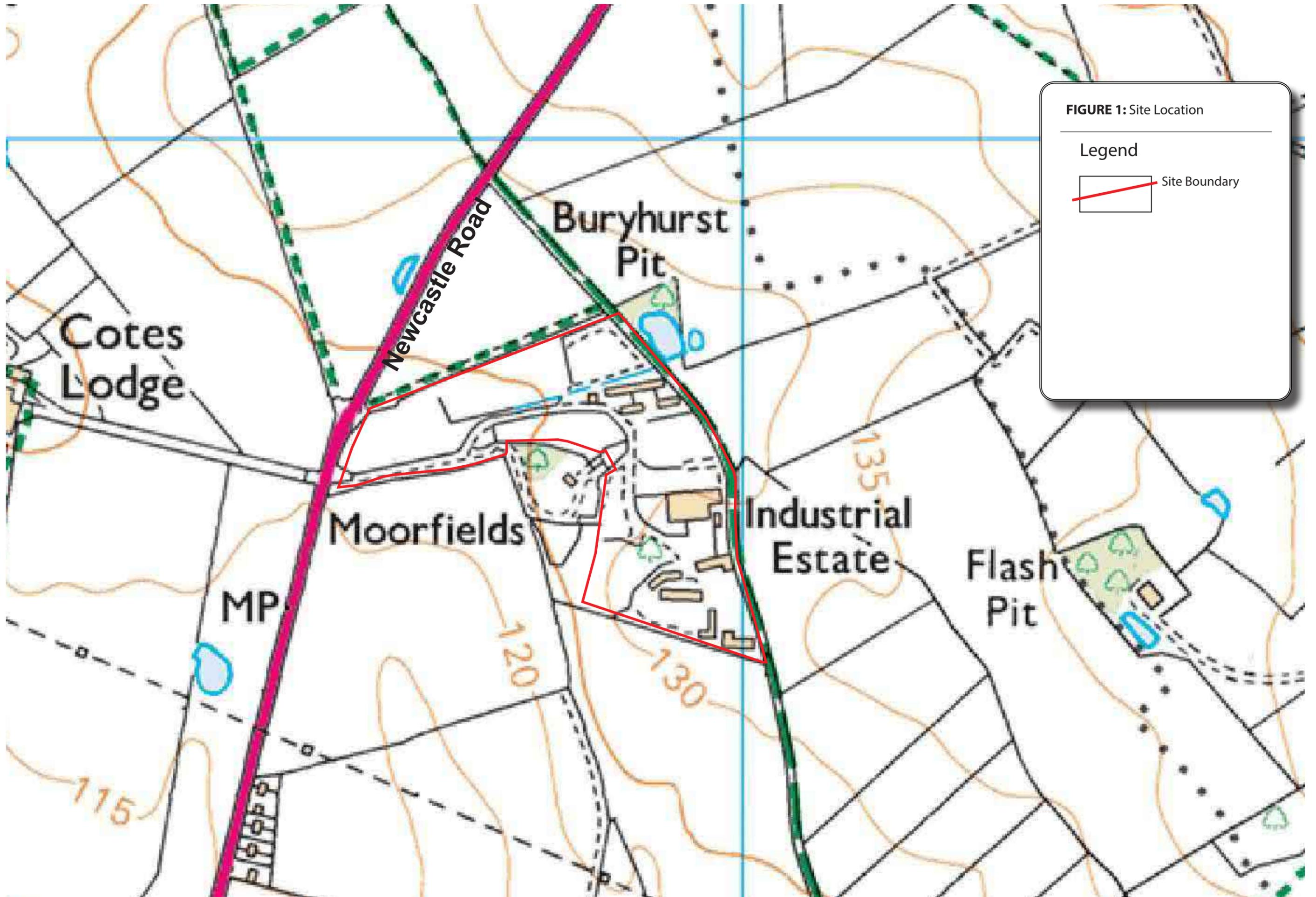
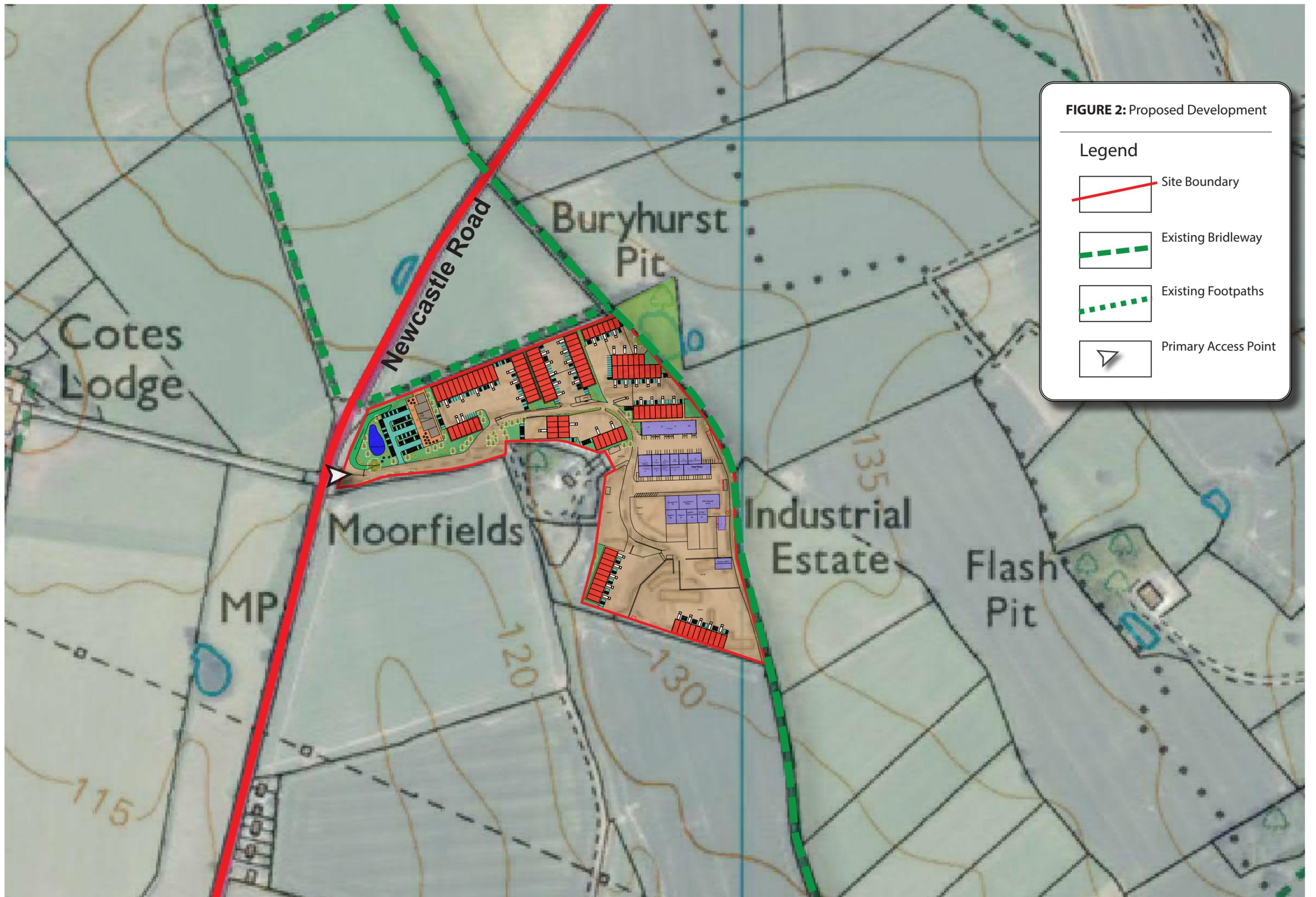
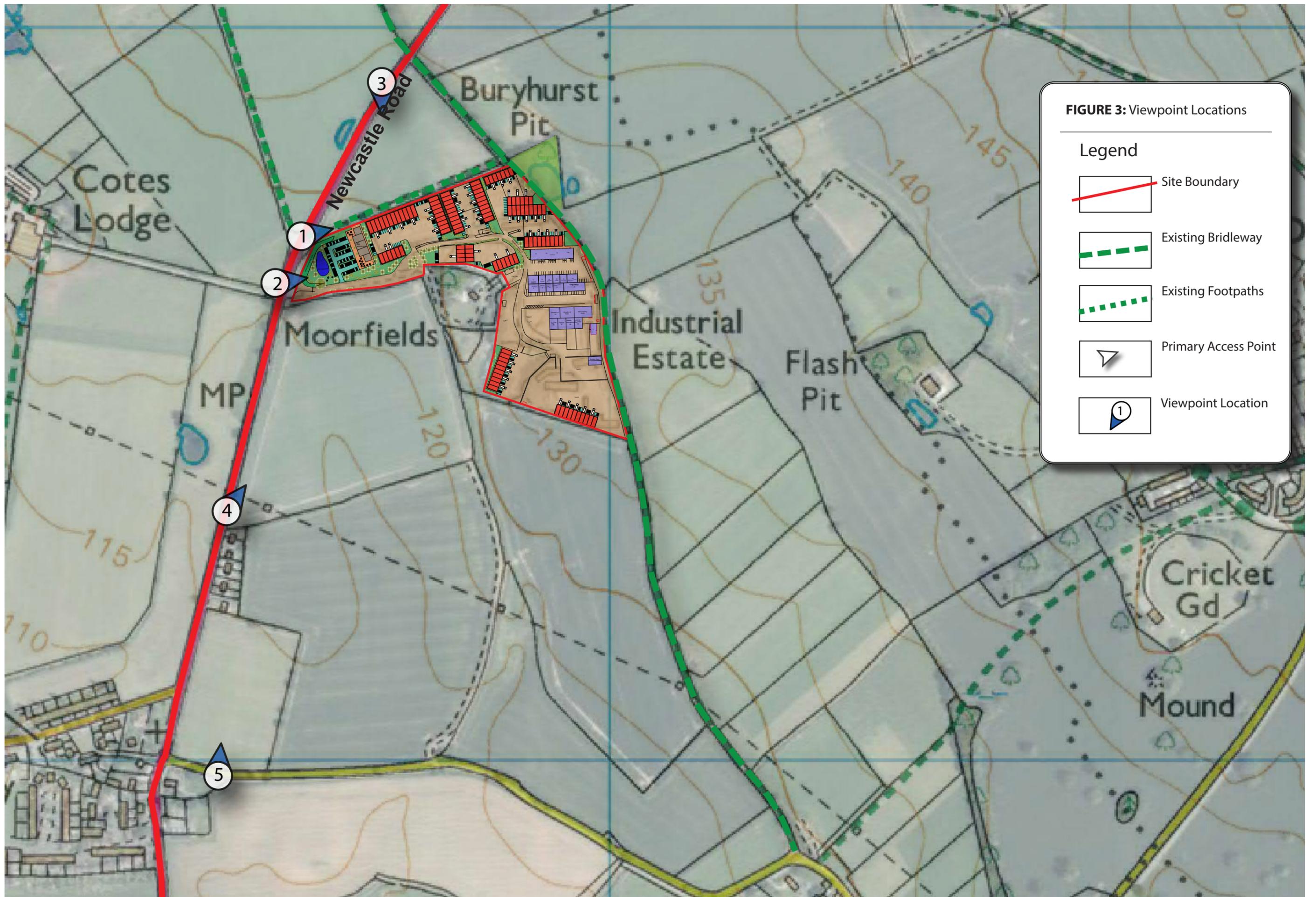


FIGURE 1: Site Location

Legend

 Site Boundary





Viewpoint 1



Viewpoint 2



Viewpoint 3



Viewpoint 4



Viewpoint 5



FIGURE 4: Viewpoints - Google StreetView
Page 308

**New Stafford Borough Local Plan 2020-2040
 “Issues and Options” Consultation - Response Form**

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Clarkes Farms Ltd and the Dugmore Family.	Mr
First Name		Hugh
Surname		Lufton
E-mail address		
Job title (if applicable)		
Organisation (if applicable)		Lufton & Associates
Address		
Postcode		
Telephone Number		

Thank you for taking the time to provide your comments on the “Issues and Options” document for the Stafford Borough Local Plan 2020-2040. All comments will be considered when preparing the Preferred Options for the New Local Plan.

Please return this form either by email (preferred) to: forwardplanning@staffordbc.gov.uk

or by post to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 31 March 2020.**

For advice on how to respond to the consultation and how to fill in this form, please see the Consultation Guidance Notes on the Council’s website at: www.staffordbc.gov.uk/new-local-plan or call 07800 619636 / 07800 619650.

Please note:

- Comments must be received by 12noon on Tuesday 31 March 2020. Late comments will be considered “not duly made” under the Regulations;

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name		Organisation		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	1.A	Other
2. Please set out your comments below				
<p>Generally yes, however a critical part of the evidence base the <i>Stafford Borough Strategic Development Site Options Reasonable Alternatives Study - Stafford Borough Council - December 2019 and the Sustainability Appraisal (SA) of the New Stafford Borough Local Plan 2020-2040 Interim SA</i> (January 2020) both by consultants AECOM fail to address the opportunity for a sustainable community of 2000-2500 dwellings and mixed use major strategic development site north-east of Stafford.</p> <p>It is unclear from these studies why land to the NE of Stafford has been omitted for assessment as a MUE. Land at Brickhouse / Beacon Farm had been promoted and well documented through the 2014 Local Plan process and included in all subsequent SHLAA and SHELAA assessments.</p> <p>A case is made for this allocation is made in the submitted document <i>Report on the Planning, Sustainability and Accessibility Case for the Allocation of Brickhouse Farm / Beacon Farm, North-East Stafford as a Strategic Development Location by Lufton & Associates, Chartered Planning Consultancy (April 2020)</i>.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	4.A	Other
2. Please set out your comments below				
<p>a) It is not necessary for the Local Plan to exceed the standards required by building regulation it is an unnecessary duplication of requirements. Building regulations are any way moving towards zero carbon homes.</p> <p>b) There should be a requirement for strategic allocations for development to meet at least 60% of the energy needs by power generation on site. This would easily be achieved on a strategic allocation NE of Stafford at Brickhouse / Beacon Farm and the landowners are willing to support such a policy.</p>				

--

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	4.B	Other	
2. Please set out your comments below					
<p>The Borough has great potential for wind and solar energy. Land at NE of Stafford at Brickhouse / Beacon Farm has particular capacity for wind power generation and such potential would be incorporated into a Masterplan.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	4.C	Other	
2. Please set out your comments below					
<p>Yes. A minimum of 60%.</p>					

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	4.D	Other	
2. Please set out your comments below					

Yes. In accordance with the potential identified;

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Further%20Information%20and%20Evidence/Energy/Staffs-County-Wide-Renewable-Low-Carbon-Energy-Study.pdf>

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	5.B	Other	

2. Please set out your comments below

a) **730 dwelling per annum.** This is a figure midpoint between Scenarios E and F including the assumption of incorporating a catch-up allocation to address the repressed headship rate for the 15-34 year old age group of the national household projections.

Our selection of this AHR is not driven by the job growth scenarios set out in the Issues and Options and supporting documentation. Our recommended figure is based on a demographic (OAN) based household projection from the standard methodology but based on 2017 mid-year population estimates with a PCU boost and an additional 8,000 dwellings over the plan period 2020-2040 to allow for a substantial shortfall in provision likely to be made in the Development Plans of South Staffordshire and the Black Country to meet Birmingham’s overspill need and that of the 13 local authorities SHMA requirement.

It is also considered as a precautionary principle that Stafford Borough housing provision reflects general under performance in meeting OAN in the North Staffordshire authorities (Stoke, Newcastle and Staffordshire Moorlands) although no upward adjustment has been made to the figure to address this.

This figure of **730 dwellings pa (14,600 2020-2040)** reflects the ability of Stafford Borough and Stafford town to deliver new dwellings where other authorities and areas have failed and would continue the general ‘growth point’ principle established by previous Regional Strategies and the role of Stafford in the Stoke on Trent and Staffordshire Structure Plan.

In the previous RSS Stafford town was required to meet housing provision that reflected a sub-regional and not just a local need.

This is not being reflected through the evidence of the ‘duty to co-operate’ and joint regional working and is not aided by an assumption in higher level studies that Stafford Borough is a functionally independent HMA. There is strong evidence of inter-regional and local migration and that Stafford could provide sustainable development outside of the protections of Green Belt.

b) Yes.

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	5.C	Other	

2. Please set out your comments below

The Plan needs to address a more sophisticated mechanism to consider the 6,000 dwellings consented with permission and on Strategic Sites to assess whether these will be delivered at sufficient pace by 2031.

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	5.G	Other	

2. Please set out your comments below

Yes, however a critical part of the evidence base the *Stafford Borough Strategic Development Site Options Reasonable Alternatives Study - Stafford Borough Council - December 2019 and the Sustainability Appraisal (SA) of the New Stafford Borough Local Plan 2020-2040 Interim SA* (January 2020) both by consultants AECOM fail to address the opportunity for a sustainable community of 2000-2500 dwellings and mixed use major strategic development site north-east of Stafford.

It is unclear from these studies why land to the NE of Stafford has been omitted for assessment as a MUE. Land at Brickhouse / Beacon Farm had been promoted and well documented through the 2014 Local Plan process and included in all subsequent SHLAA and SHELAA assessments.

A case is made for this allocation is made in the submitted document *Report on the Planning, Sustainability and Accessibility Case for the Allocation of Brickhouse Farm / Beacon Farm, North-East Stafford as a Strategic Development Location* by Lufton & Associates, Chartered Planning Consultancy (April 2020).

The delivery rates of the larger proposed Garden Community alternatives is unclear and not documented in terms of the quantum of social and transport infrastructure that

would be required. With particular reference to Meecebrook the Garden Community proposal seems to have been largely justified in terms of the available 'redundant' brownfield land. That this is actually redundant land and not required in the long-term planning of the MoD is unclear and not well evidenced. Much of the land described in the documentation as a 'military training base' is sparsely developed with very large areas of intervening mature vegetation and tree cover, no evidence is given as to the ecological value of the site.

The AECOM (December 2019) report particularly identifies the considerable infrastructure that would be required to deliver a new community at Meecebrook that includes a new junction link from the M6 that would be entirely at odds with the strategy of the Highways England to ensure free flow of regional and national traffic. The M6 is not part of a local highway network. Extending electrical, water and gas supply to support a new community at Meecebrook is difficult and high cost as the AECOM evidence report identifies.

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?

Section		Paragraph		Table	
Figure		Question	5.H	Other	

2. Please set out your comments below

- i) No. It is unclear why these are the only NPPF-complaint options and the documentation is unclear on the reasoning. The most complaint and sustainable strategy is likely to involve elements across a number of strategic options and needs to more explicitly consider the deliverability of the land available in the Borough and the environmental, planning, transport and highway opportunities and constraints that apply.
- ii) as i) above.
- iii) N/A.

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.I	Other
2. Please set out your comments below				
<p>Generally yes, however a critical part of the evidence base the <i>Stafford Borough Strategic Development Site Options Reasonable Alternatives Study - Stafford Borough Council - December 2019 and the Sustainability Appraisal (SA) of the New Stafford Borough Local Plan 2020-2040 Interim SA</i> (January 2020) both by consultants AECOM fail to address the opportunity for a sustainable community of 2000-2500 dwellings and mixed use major strategic development site north-east of Stafford.</p> <p>It is unclear from these studies why land to the NE of Stafford has been omitted for assessment as a MUE. Land at Brickhouse / Beacon Farm had been promoted and well documented through the 2014 Local Plan process and included in all subsequent SHLAA and SHELAA assessments.</p> <p>A case is made for this allocation is made in the submitted document <i>Report on the Planning, Sustainability and Accessibility Case for the Allocation of Brickhouse Farm / Beacon Farm, North-East Stafford as a Strategic Development Location</i> by Lufton & Associates, Chartered Planning Consultancy (April 2020).</p>				

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	5.J	Other
2. Please set out your comments below				
<p>Midpoint between growth scenarios E and F - 730 dwelling per annum.</p> <p>Yes, the assumption of incorporating a catch-up allocation to address the repressed headship rate for the 15-34 year old age group of the national household projections is endorsed.</p> <p>Our selection of this AHR is not driven by the job growth scenarios set out in the Issues and Options and supporting documentation. Our recommended figure is based on a demographic (OAN) based household projection from the standard methodology but based on 2017 mid-year population estimates with a PCU boost and an additional 8,000 dwellings over the plan period 2020-2040 to allow for a substantial shortfall in provision likely to be made in the Development Plans of South Staffordshire and the Black Country to meet Birmingham’s overspill need and that of the 13 local authorities SHMA requirement.</p> <p>It is also considered as a precautionary principle that Stafford Borough housing provision reflects general under performance in meeting OAN in the North Staffordshire authorities (Stoke, Newcastle and Staffordshire Moorlands) although no upward adjustment has been made to the figure to address this.</p>				

This figure of **730 dwellings pa (14,600 2020-2040)** reflects the ability of Stafford Borough and Stafford town to deliver new dwellings were other authorities and areas have failed and would continue the general 'growth point' principle established by previous Regional Strategies and the role of Stafford in the Stoke on Trent and Staffordshire Structure Plan.

In the previous RSS Stafford town was required to meet housing provision that reflected a sub-regional and not just a local need.

This is not being reflected through the evidence of the 'duty to co-operate' and joint regional working and is not aided by an assumption in higher level studies that Stafford Borough is a functionally independent HMA. There is strong evidence of inter-regional and local migration between the neighbouring SHMAs.

The Plan needs to address a more sophisticated mechanism to consider the 6,000 dwellings consented with permission and on Strategic Sites to assess whether these will be delivered at sufficient pace by 2031.

Yes provision for a garden community is supported, however a critical part of the evidence base the *Stafford Borough Strategic Development Site Options Reasonable Alternatives Study - Stafford Borough Council - December 2019* and the *Sustainability Appraisal (SA) of the New Stafford Borough Local Plan 2020-2040 Interim SA* (January 2020) both by consultants AECOM fail to address the opportunity for a sustainable community of 2000-2500 dwellings and mixed use major strategic development site north-east of Stafford.

It is unclear from these studies why land to the NE of Stafford has been omitted for assessment as a MUE. Land at Brickhouse / Beacon Farm had been promoted and well documented through the 2014 Local Plan process and included in all subsequent SHLAA and SHELAA assessments.

A case is made for this allocation is made in the submitted document *Report on the Planning, Sustainability and Accessibility Case for the Allocation of Brickhouse Farm / Beacon Farm, North-East Stafford as a Strategic Development Location* by Lufton & Associates, Chartered Planning Consultancy (April 2020).

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	8.B	Other	
2. Please set out your comments below					

No. There is no clear evidence that this is a necessary policy or that it would deliver any particular social or economic benefit.

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	8.F	Other	
2. Please set out your comments below					
It is difficult to see how this policy could be implemented based on existing consented development.					

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	8.K	Other	
2. Please set out your comments below					
a) Yes. Subject to sufficient allocation of strategic sites and other permissions to allow delivery of 730 dwellings per annum. b) Possibly, yes.					

Please use a continuation sheet if necessary

All comments should be made in writing preferably using this form and should be received by Stafford Borough Council **no later than 12 noon Tuesday 31 March 2020.**

You can view the documents online at www.staffordbc.gov.uk/new-local-plan-

Please e-mail your comments (Preferred) to: forwardplanning@staffordbc.gov.uk

or post your comments to: Forward Planning, Civic Centre, Riverside, Stafford, ST16 3AQ

Thank you for taking the time to contribute to this consultation.

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

All representations received to the Stafford Borough New Local Plan 2020-2040 Issues & Options consultation document will be included in a schedule and made publicly available once the consultation has closed.

Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

Report on the Planning, Sustainability and Accessibility Case for the Allocation of Brickhouse Farm / Beacon Farm, North-East Stafford as a Strategic Development Location

**Stafford Borough
Local Plan Issues & Options Consultation**

April 2020



**Lufton & Associates, Chartered
Planning Consultancy, Stafford
on behalf of Clarkes Farms Ltd
and the Dugmore Family**



Contents

	Page
Site Opportunities and Constraints	3
Relationship and Integration with High Speed Rail 2 (hs2)	8
Assessment of Development Constraints	14
Flooding and Waste Water Management	14
Ecology, Biodiversity and Habitats	15
Landscape and Topographical Setting	20
Landfill and Ground Contamination	22
Mineral Sterilisation	22
Utilities and Services	23
Gestation of a Masterplan	27
Principles of Accessibility	32
Vehicular Access	33
Public Transport Access	35
Principles of Integration	36
Conclusion	37

Introduction

This case is made in the context of the Stafford Borough Local Plan 2020-2040: Issues and Options consultation, February to March 2020.

Land at Brickhouse / Beacon Farm is included in the current Borough Strategic Housing and Employment Land Availability Assessment (SHELAA) 2019 taken forward from submissions in 2018.

A case was made for the land to allocated for housing and employment in the last Local Plan/Core Strategy with a planning case submission made to the Borough in 2013 and then put before Public Examination of the Plan in 2014.

At this time in the Examination process the Inspector focussed on testing and assessing the three major Strategic Development Locations allocated by the Borough (North, East and West of Stafford town), concluding that the promotion of land at Beacon Farm (Brickhouse Farm) was too late in the process. The Inspectors Report stating;

*"In some cases, these options came forward at a late stage in the preparation of the Plan, but SBC has examined their suitability through the sustainability appraisal and consultation processes, in a consistent and transparent manner, with sound reasons for their rejection [A12-13; A22-23; N1e; N2.3]. Although some of the assessments involve matters of judgement, there is little conclusive evidence to suggest that any of these alternative/additional sites are more appropriate than the selected SDLs, or that any of the SDLs have serious shortcomings in terms of their sustainability, viability or deliverability which question their overall soundness. Moreover, none of these other sites are needed to deliver the proposed level of housing and other development envisaged in the submitted Plan, and the smaller sites could be reconsidered, if necessary, at the Site Allocations/Neighbourhood Plan stage."*¹

¹ *Inspectors Report – Report to Stafford Borough - REPORT ON THE EXAMINATION OF THE PLAN FOR STAFFORD BOROUGH DEVELOPMENT PLAN DOCUMENT – Stephen J Pratt – June 2014 paragraph 84.*

Site Opportunities and Constraints

Land at Brickhouse Farm (**Plan 1**) provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF 2019) and the emerging Plan for Stafford Borough 2020-2040.

Plan 1: Brickhouse / Beacon Farm: Site and Surrounds



The area proposed for potential allocation (*see Plans 2 and 3 below*) relates very well to the existing urban form with minimal encroachment into open countryside and fitting into a natural landscape and topographical crescent under higher land to the north and north-east of the town. There are a number of defensible boundaries that can be used to provide a clear definition to the urban extent of the town and the proposed alignment of the hs2 line encloses an obvious urban extension and long-term defensible boundary.

The allocation of land at Brickhouse Farm would also provide an excellent opportunity to screen and mitigate the impact of hs2 that can be incorporated into the development form and landscaping strategy.

Furthermore the allocation of land at Brickhouse Farm provides a logical opportunity to integrate with the long-term plans of the MoD on adjoining land at Beacon Barracks. It is clear that the MoD may require additional land to meet the demand to provide additional housing for military personnel as well as having some flexibility to expand and further reconfigure Beacon Barracks for the operational needs of a modern and adaptable military presence in the town.

No significant constraints; planning, environmental, technical or otherwise have been identified that would either limit the scope of development or prevent it absolutely. These are considered further below. A generalised topographical plan is provided at **Plan 4 below**.

The only technical limitation at present is providing adequate multiple vehicular accesses to the site and working with the uncertainties of military planning and the adjoining land ownership of the Ministry of Defence. Some assistance may be required from the public authorities to expedite these matters if the town is going to development rationally and sustainably beyond the next 5-10 years.

Since promotion of the site in 2013 with the desire for a long-term major access from Beaconside it now appears with the success of Beacon Business Park and the development of a local centre there on the east side of the potential allocation to logically take the main access from the A518. This coincides logically with the direction of successful development, services and infrastructure.

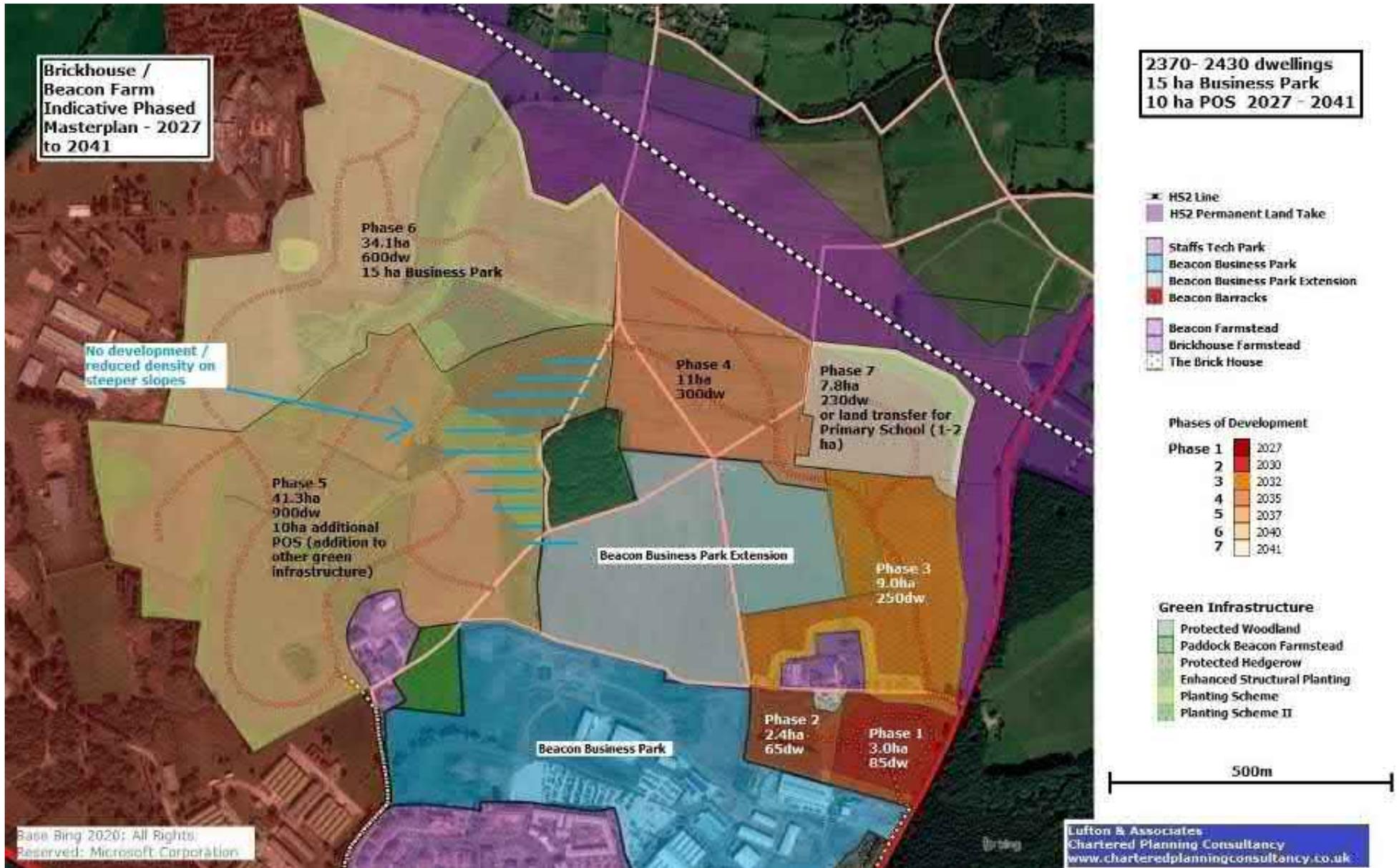
This would mean the site was developed in phases east to west. It would also expedite better coordination with the works proposed in relation to hs2.

Further to a main access on the east side there are a number of potential options for accessing the site and improving the connectivity, links between land-uses and increasing opportunities for walking and cycling in the north-east of the town. This is considered and documented further in this report.

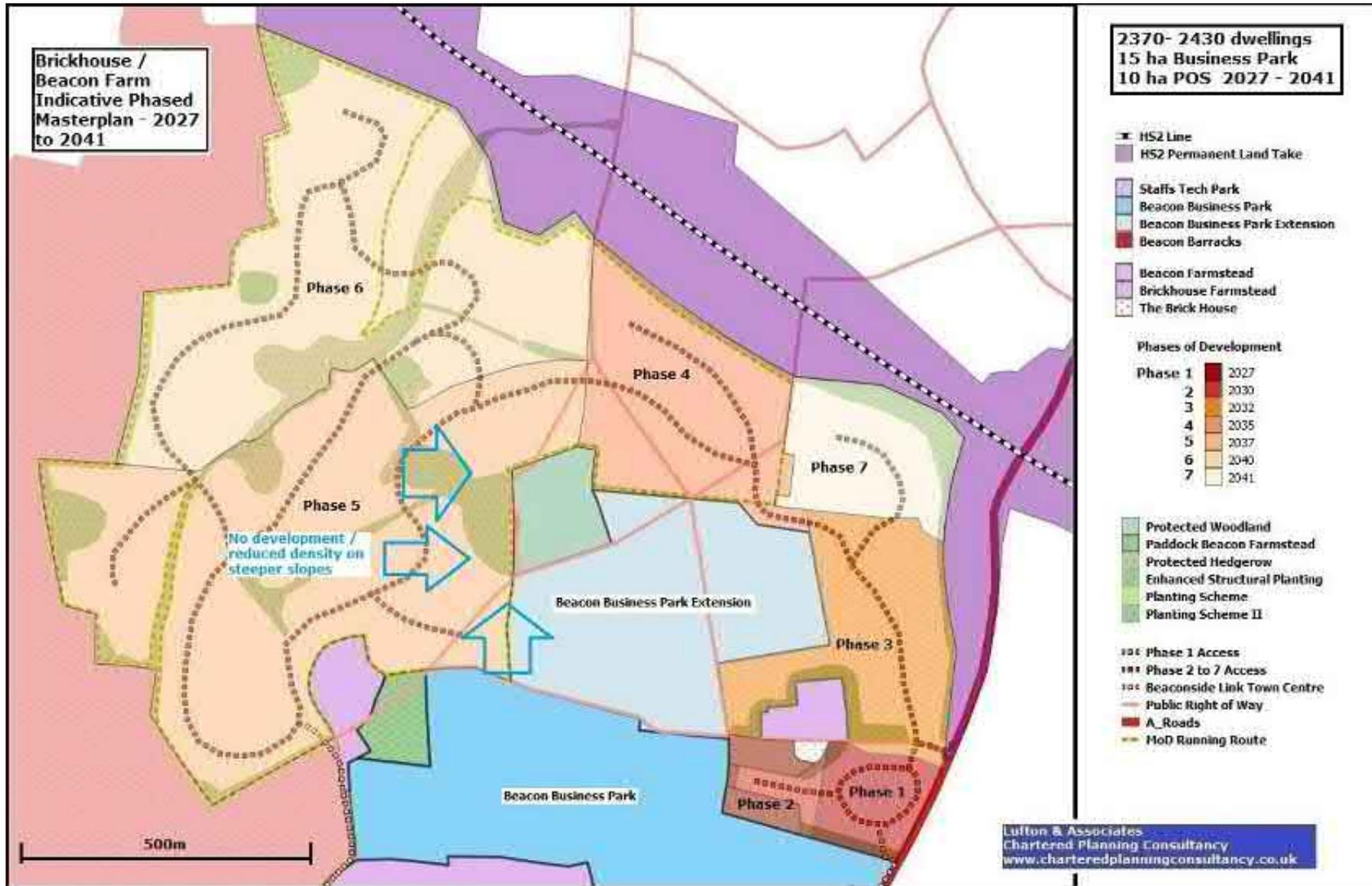
The allocation of land at Brickhouse Farm / Beacon Farm, North-East Stafford as a Strategic Development Location is proposed as providing for the development of around 2,000-2,000 new dwellings in 7 phases and over a period of around 15 years. The first phase would be anticipated to provide around 85 new dwellings beginning in 2027 as the major urban extension sites in Stafford build out. The early phases of development coincide conveniently with major works off the A518 that would any way be required as a consequence of hs2.

Opportunities arise in the later phase to provide for the development and a primary school as well as extensive areas of public open space, formal areas for sport, areas of significant ecological enhancement, habitat creation and a public park.

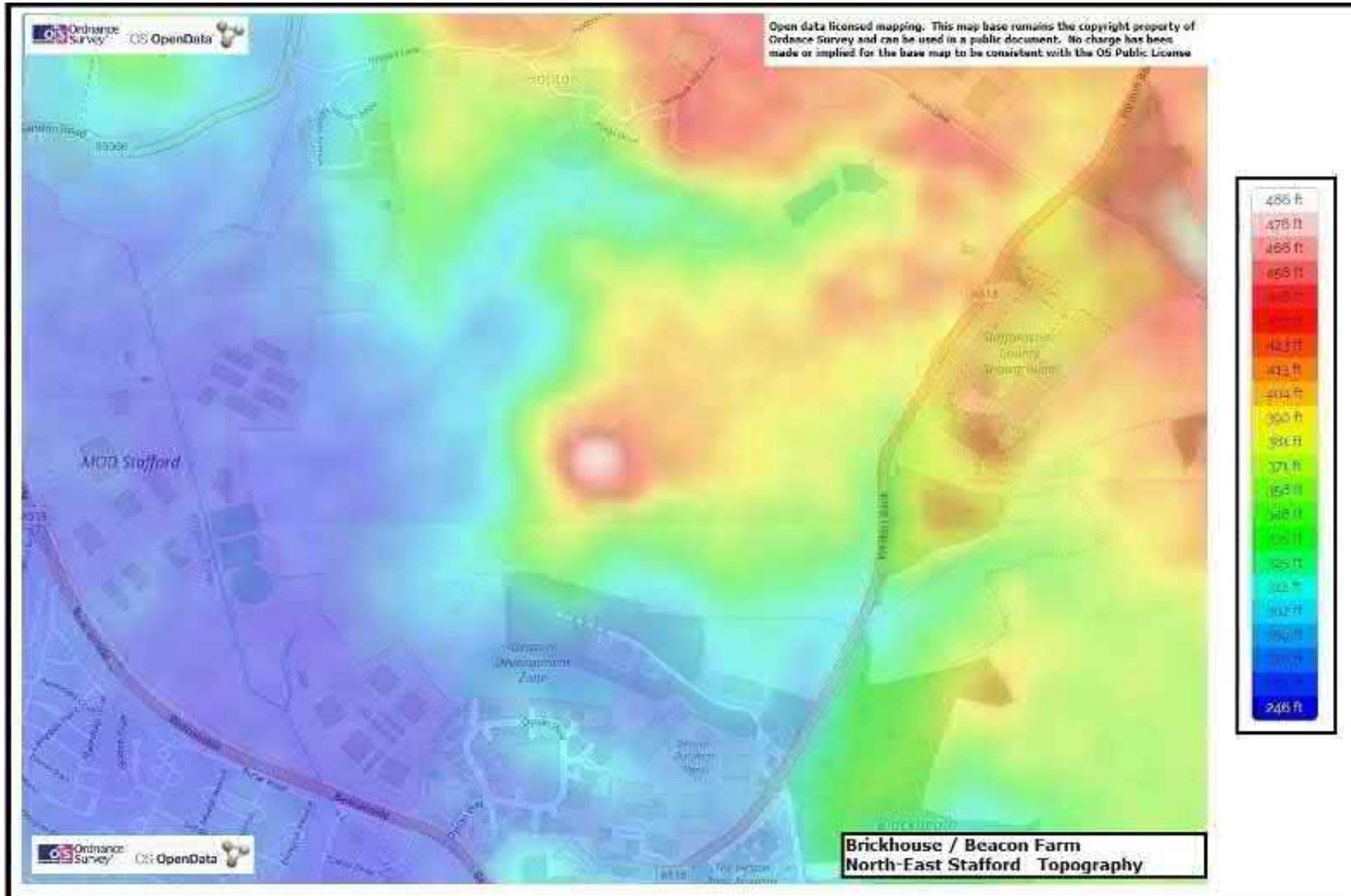
Plan 2: Brickhouse / Beacon Farm: Indicative Masterplan - Aerial Base



Plan 3: Brickhouse / Beacon Farm: Indicative Masterplan – Schematic



Plan 4: Brickhouse / Beacon Farm: Topography



Relationship and Integration with High Speed Rail 2 (hs2)

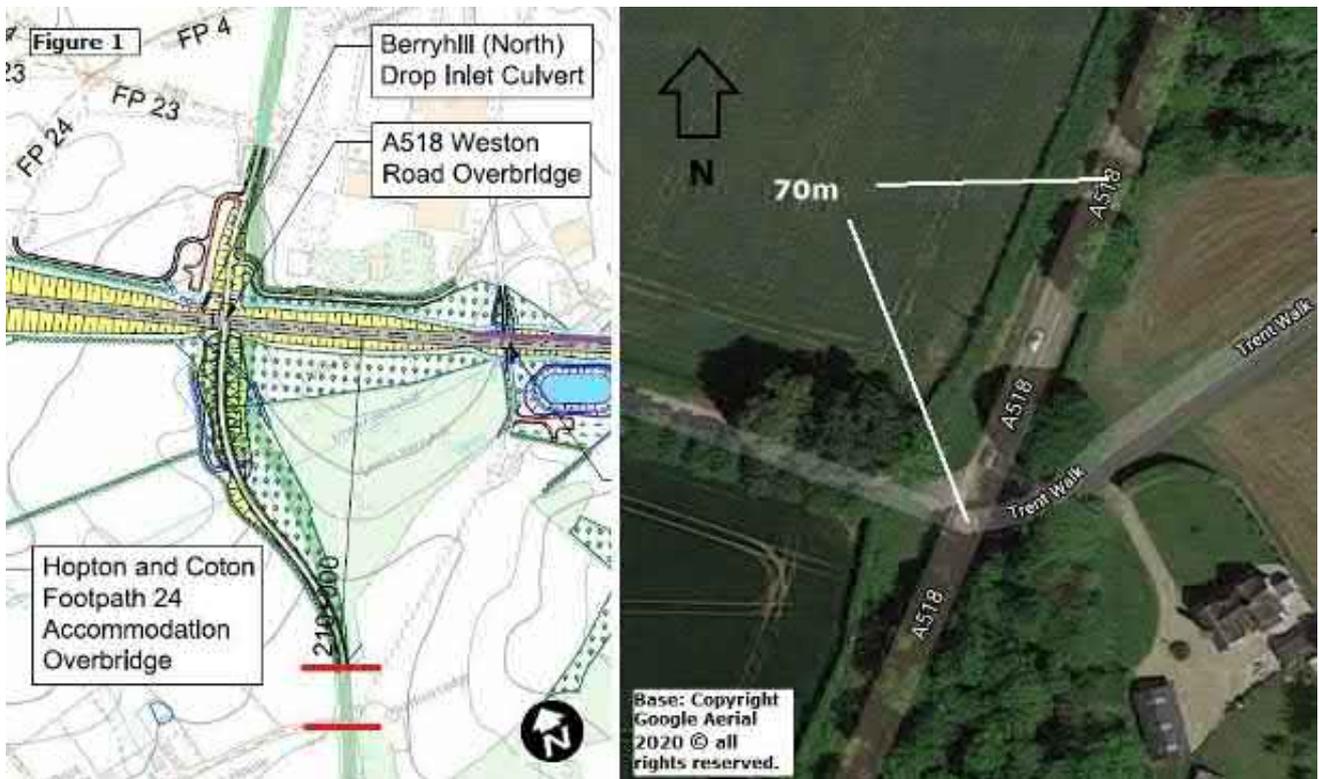
The confirmed route alignment of hs2 is carefully reflected in the Indicative Masterplan for the development of Brickhouse/Beacon Farm and would be constructed over a similar timescale of the initial phases 1 to 3. The 'D7: HS2 Phase 2a Construction Timetable' produced by hs2 in July 2017 states at paragraphs 2.2 to 3.3;

"The construction and commissioning of the Proposed Scheme is expected to take place in stages between 2020 and the end of 2027...."

The duration, intensity and scale of works along the route will vary over this period. Following site clearance work, the main construction works for the Proposed Scheme will take approximately six years, ending with completion of railway installation...

This will be followed by a period of testing and commissioning before the first services commence in 2027..."

Given the current progress on hs2 Phase 1 and various intervening ministerial announcements since this publication some slippage on the end date of 2027, perhaps as much as 5 years, is assumed although as of April 2020 none had been clearly notified in published hs2 documentation. One of the most relevant issues would be the co-ordination of highway works to access the land for the Phase 1 development as the realignment of the A518 is undertaken for hs2 (as shown below in **Figure 1** and **Plan HS2** below) although the disruption to traffic flow with off-site works in both cases would be minimal.

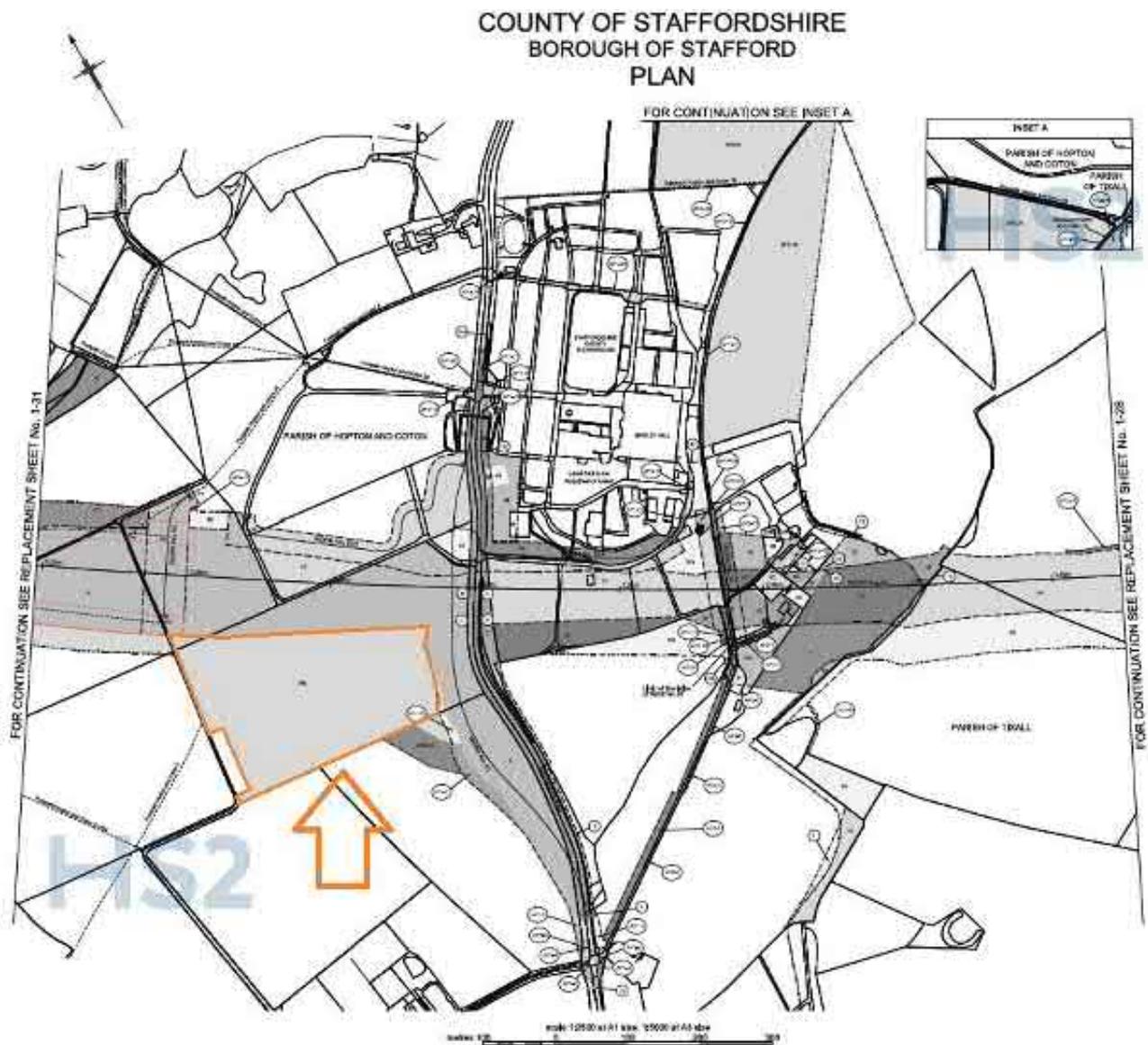


As shown in **Figure 1** the realignment of the A518 would begin approximately 70m

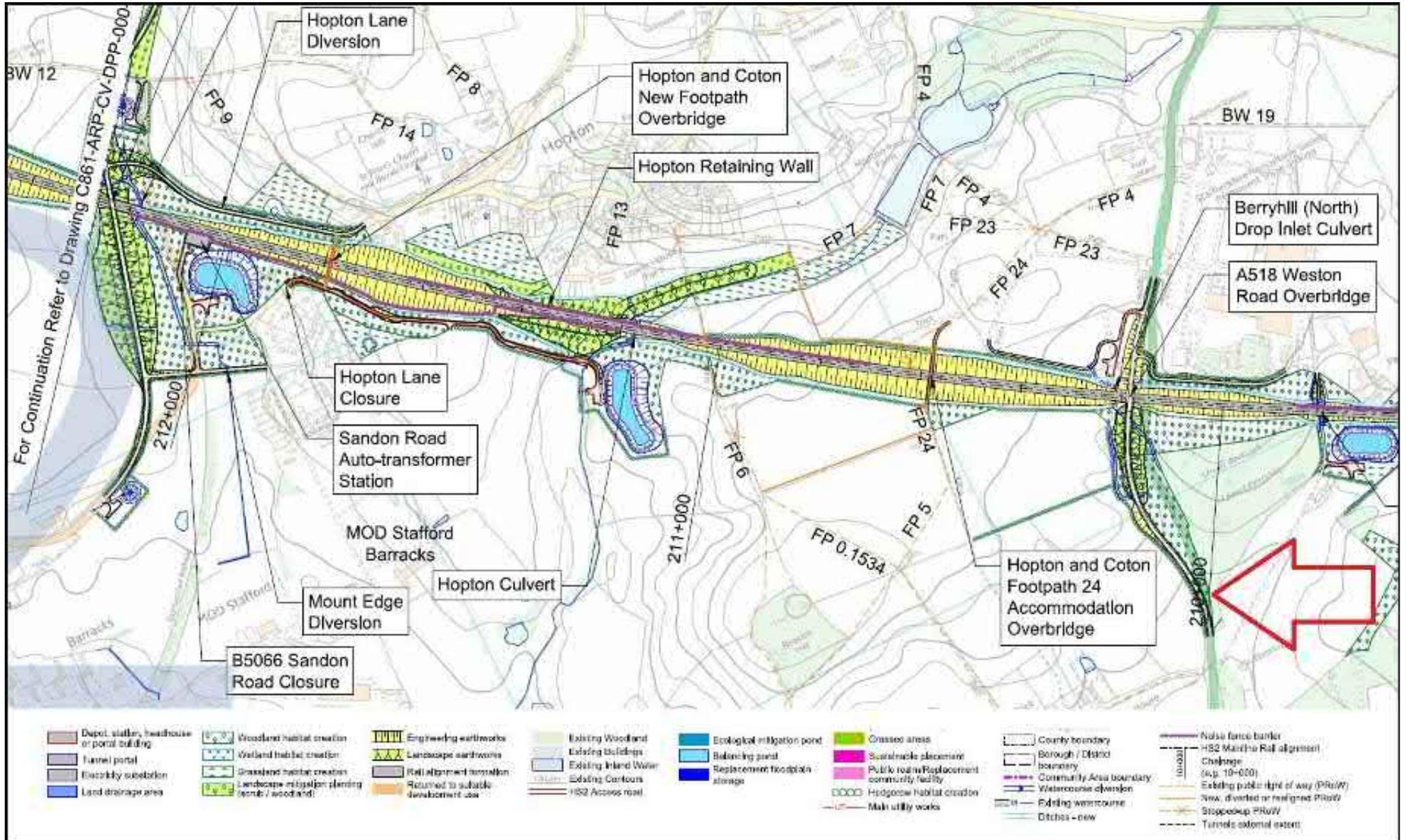
north of the access to the proposed land allocation.

In terms of the permanent land take requirement for hs2 this is shown clearly on the Indicative Masterplans with the centre of the track alignment. As indicated below on **Plan HS1** further land is safeguarded (marked with an orange outline) that would be an area of non-permanent works and materials. At the end of the construction period this land would be made good and returned for productive use. On the Masterplans this is shown as a Phase 7, the final development phase, with a lag period of around 14 years or so from the initial development of Phase 1.

Plan HS1: Extract from hs2 Drawing Replacement Sheet No. 1-30 West Midlands – Crewe – May 2019



Plan HS2: Extract from hs2 Drawing Main Line Sheet 4 Colwich to Yarlet (Revision P10)



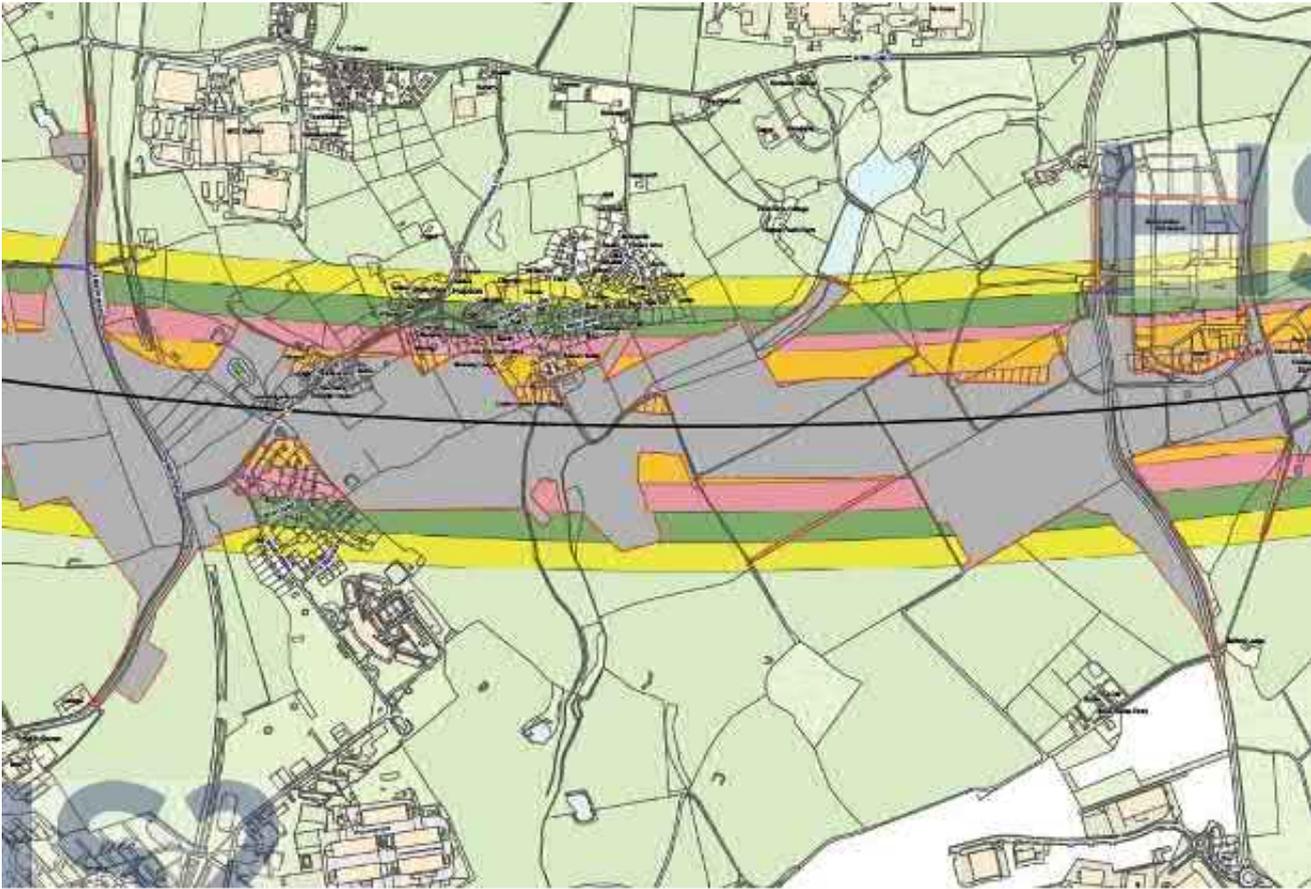
Plan HS3 shows an extract of the proposed hs2 line and the homeowner payment compensation zones. The yellow band indicates the extent of the outer Homeowner Payment zone (Zone 3) that lies within 240-300m of the track alignment. As shown a significant number of existing properties fall within this zone, these are not properties that are scheduled for demolition, they are recognised entirely habitable but attributable a scaled level of compensation.

Plan HS4 shows the outer perimeter of the hs2 homeowner compensation payment zones superimposed on the Indicative Masterplan. The yellow line is the outer limit of the 'Rural Support Zone' and the compensation zones fall at 60m intervals parallel to the proposed line as shown in black, orange and pale pink.

Only a very small part of the land proposed for development in Phases 6, 4 and 7 lies within 120m of the track. In detailed planning this would almost certainly remain undeveloped and offers an excellent opportunity to further protect north-east Stafford from the impact of the hs2 line particularly in terms of noise pollution. In Phase 7 the land closest to the line could be used as a substantial play area for a primary school with a substantial mitigation bund and planting. Any planning consent secured in an early phase (1, 2 and 3) would be expected to include wider off-site mitigation for hs2, the planting mitigation would therefore be up to 15 years ahead of development of the later phases. As clearly shown on **Plan HS2** mitigation within the NE Stafford Masterplan boundary would be additional to that anyway proposed by hs2. Further it is significant to note that the proposed line is deeply cut across most of the profile through the area appearing only at the Hopton culvert (marked on **Plan HS4**) for an above ground profile section of approximately 30m.

The proposal of NE Stafford as suitable for major development is not in any way dependant on the implementation of hs2. The line offers the opportunity to provide a clear rational and defensible settlement boundary to the town, however these topographical and landscape features that would naturally define the outer logical limit of development are in no way dependant on hs2 being built.

Plan HS3: Extract from hs2 Drawing PC-02-007 Phase 2a Property Schemes – June 2019



Legend			
Route on surface	Limits of Land Subject to Safeguarding Direction	Rural Support Zone (RSZ)	Homeowner payment (HOP) zone 3: 240m – 300m
Route in tunnel	Safeguarded Area: Surface	Homeowner payment (HOP) zone 1: 120m – 180m	Extended Homeowner Protection Zone
Route in cut and cover tunnel	Safeguarded Area: Sub-surface	Homeowner payment (HOP) zone 2: 180m – 240m	Local Authority boundary

Plan HS4: Extent of hs2 Homeowner Payment Zones



Assessment of Development Constraints

Flooding and Waste Water Management

There is no record of any significant flooding on land north-east of Stafford and there are no significant watercourses, aquifers or water reserves that would prevent development (*see Plans 5 and 6*).

The landowners and any development partner would co-operate to provide and meet high environmental standards for water recycling, on-site water treatment and the implementation of sustainable drainage techniques (SuDs).

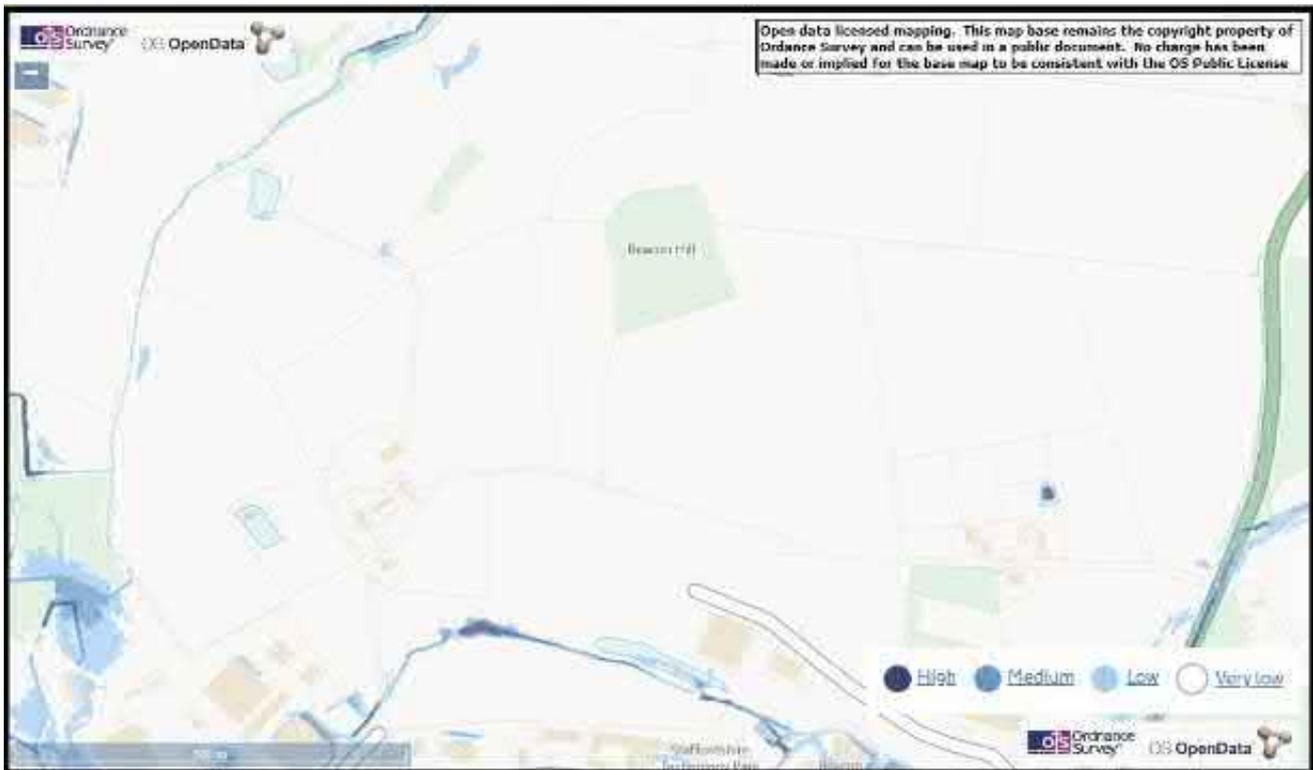
It is not anticipated that any development of the site in phases would complicate or impinge on the wider sewage, waste water or drainage network.

As indicated through the indicative Ecological Framework Plan (*Plan 17*) it is anticipated that areas of woodland, wetland or other valuable habitats can be created as part of the development. These would be planned in accordance with professional advice of the appropriate environmental and planning authorities. The ecological framework and natural topography of the area affords an opportunity for the area to be a net store of surface water and offer flood alleviation and mitigation to a wider area and not increased run-off.

Plan 5: Brickhouse / Beacon Farm: Risk of Flooding: Rivers and Seas



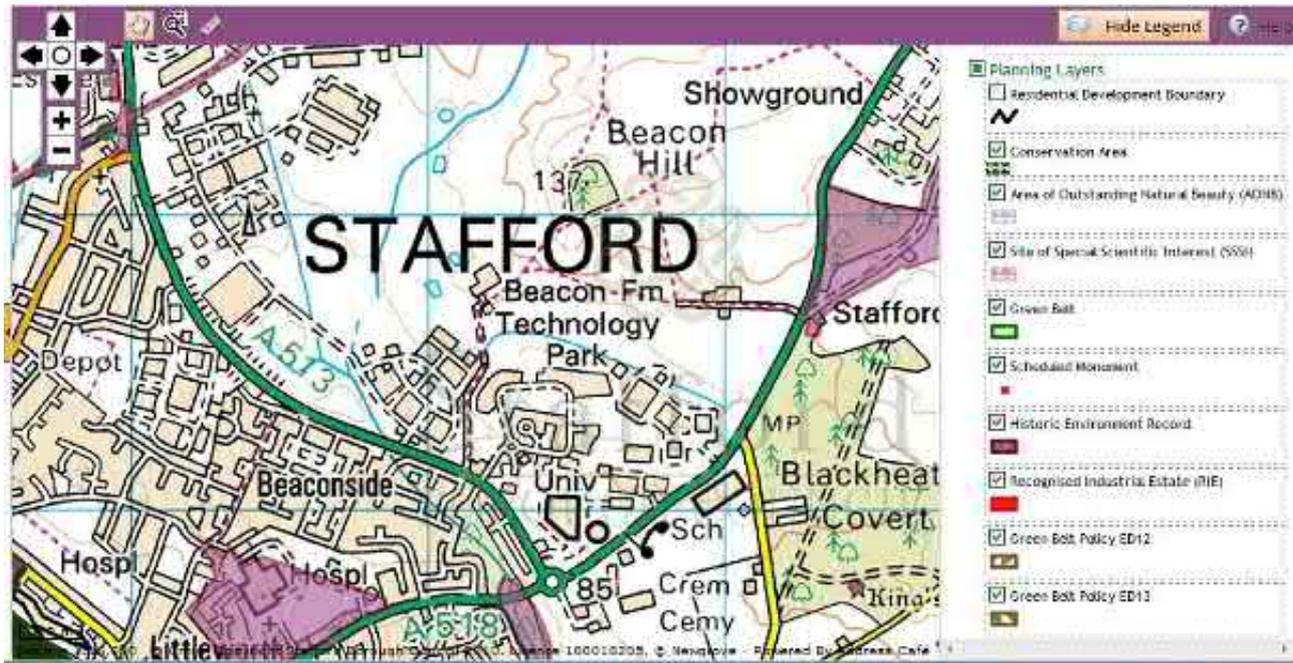
Plan 6: Brickhouse / Beacon Farm: Risk of Flooding: Extent of Surface Water Flooding



Ecology, Biodiversity and Habitats

Plan extracts 7 and 8 are reproduced from the Stafford Borough Local Plan Proposals Map 2001 and **Plan 9** is an extract is reproduced from the current (2020) Defra Magic Geographic Information System.

Plan 7: Extract of Stafford Local Plan 2001(1)



Plan 8: Extract of Stafford Local Plan 2001(2)

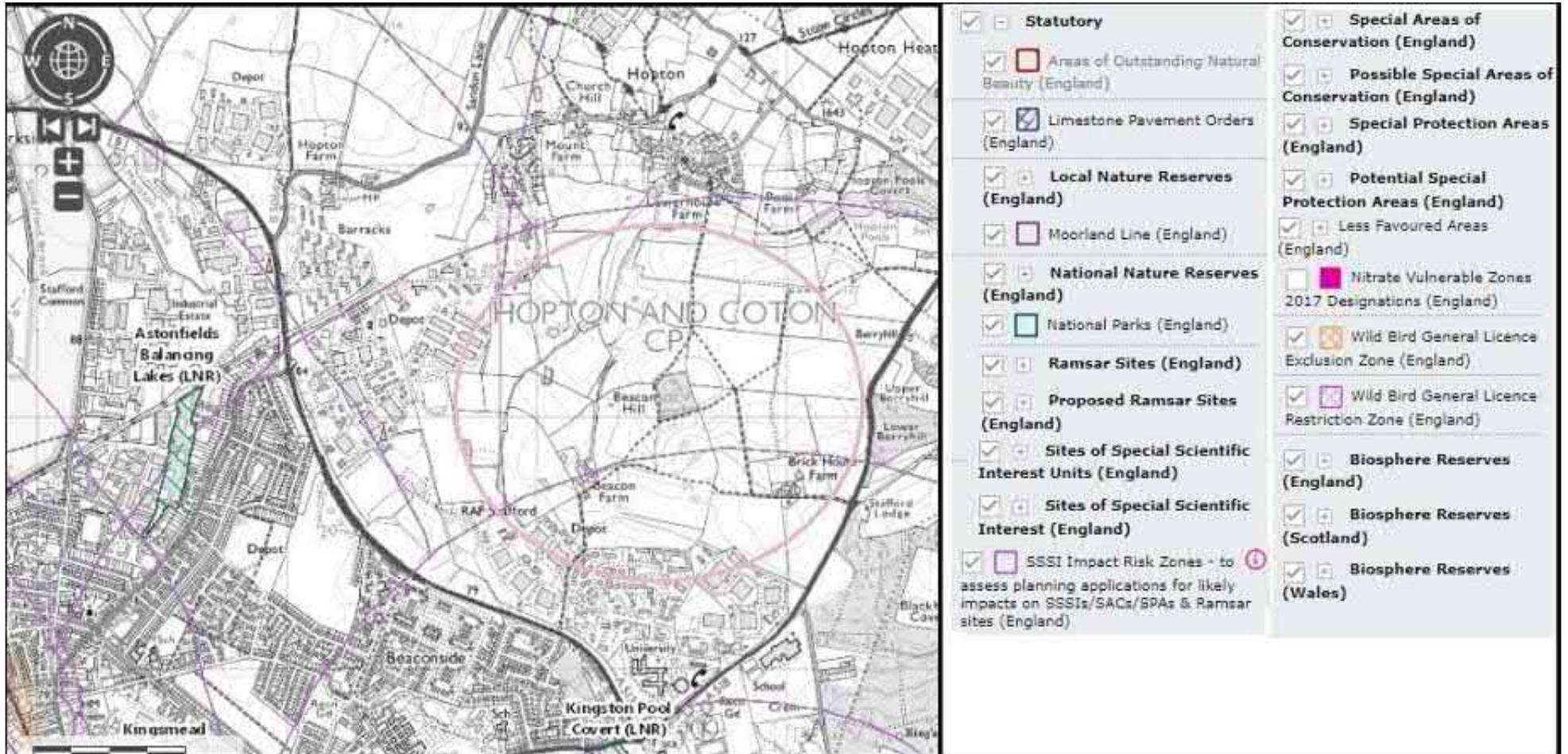


The land area proposed for development is covered by no significant environmental designations in relation to ecology, biodiversity or habitats. The proposed development area contains no sites of special scientific interest (SSSI's), no designation as a special area of conservation (SAC), no RAMSAR designation (for bird habitat) or any designation national, regional or local as a nature reserve.

As **Plan 9** shows the only land-based designation of the area is for nitrate vulnerability² that is an issue that impacts on the whole of Stafford Borough.

² Not shown as it covers to whole map base.

Plan 9: Brickhouse / Beacon Farm: Extract of Defra Magic: Land Based Habitat Designations



The distant Kingston and Astonfields Balancing Lakes Local Nature Reserves are indicated to the south and west respectively. The SSSI Impact Risk Zones (purple lines on Plan 8) relate to radii around that of Baswich Meadows SSSI (all land within and around Stafford town falls in some similar designation for Baswich Meadows SSSI or another SSSI nearby).

The woodland at Beacon Hill, adjacent to the proposed development area, is recognised and included in the Inventory of Woodland and Trees administered by English Nature and recorded as deciduous biodiversity action plan priority habitat (**see Plan 10**). As indicated through the indicative Ecological Framework Plan (**Plan 17**) it is anticipated that the development of land would provide enhancement to the established woodland with adjoining complementary planting and/or wetland and habitat creation. Further woodland to the immediate south of Brickhouse Farmstead shown on **Plan 10** would be rigorously protected.

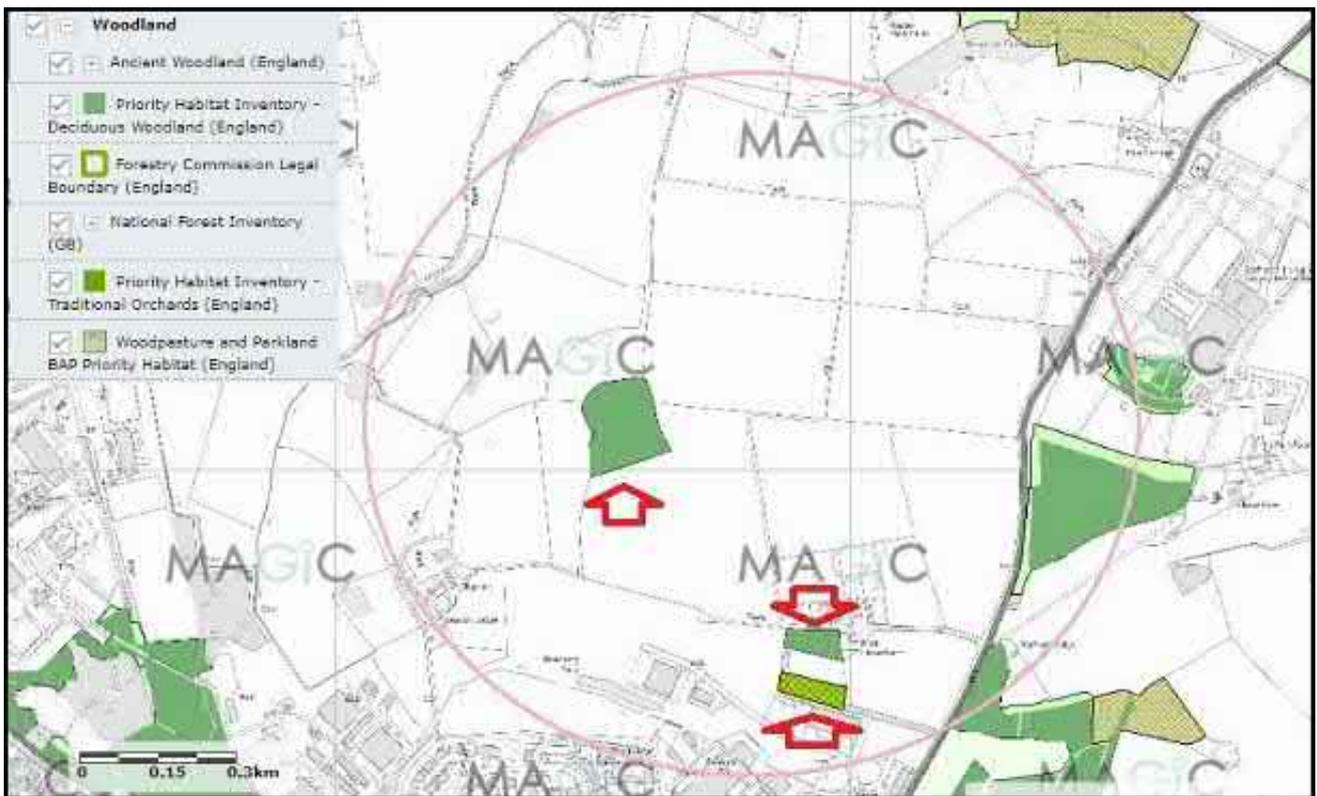
Land adjoining Beacon Farm within the wire of Beacon Barracks also contains some deciduous biodiversity action plan priority habitat (**see Plan 10**) and the landowners, Lufton & Associates as agents and any development partner would co-operate with the MoD in any potential joint development project to assist them in the protection of this asset.

In terms of grassland and lowland habitats the proposed development area contains no priority areas (**See Plan 11**).

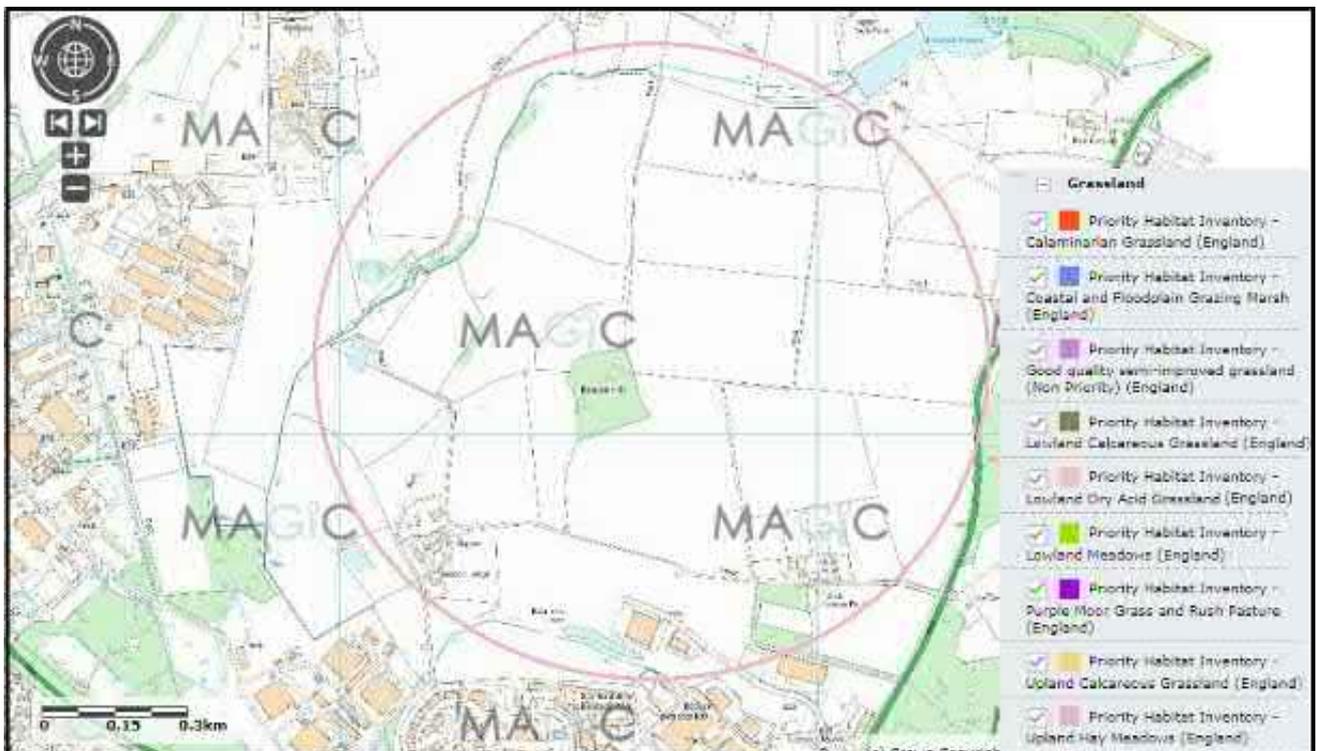
The proposed development area is not recognised as an area important for birds (**See Plan 12**).

The landowner is aware of some presence and activity of badgers benefitting from the habitat provided by the established hedgerows on Beacon Farm. Numbers have declined in recent years. In accordance with protection legislation these areas cannot of course be identified in a public document. These habitats would be fully protected in accordance with the indicative Ecological Framework Plan (**Plan 17**) recognising that badgers while a protected species under their own 1992 Act.

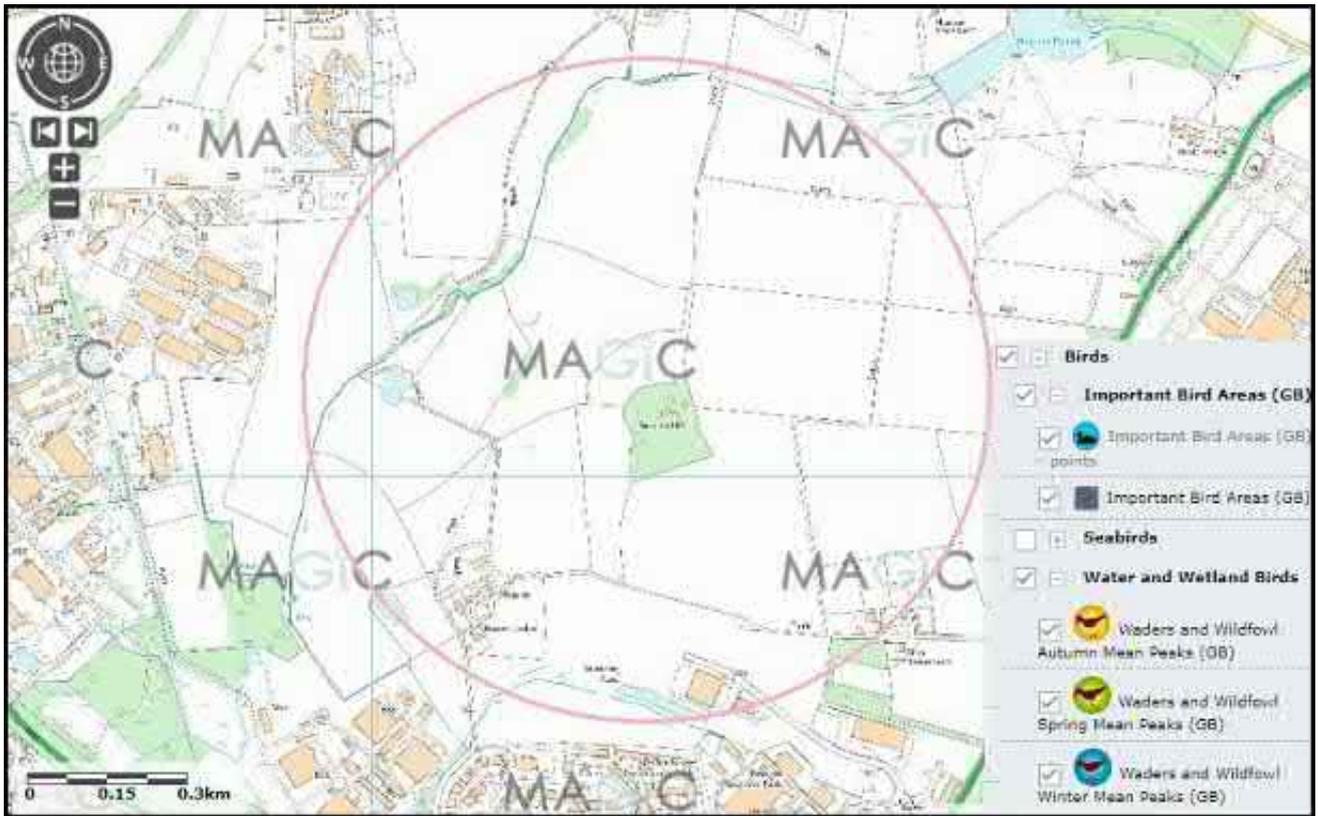
Plan 10: Brickhouse / Beacon Farm: Extract of Defra Magic: Woodland Habitats



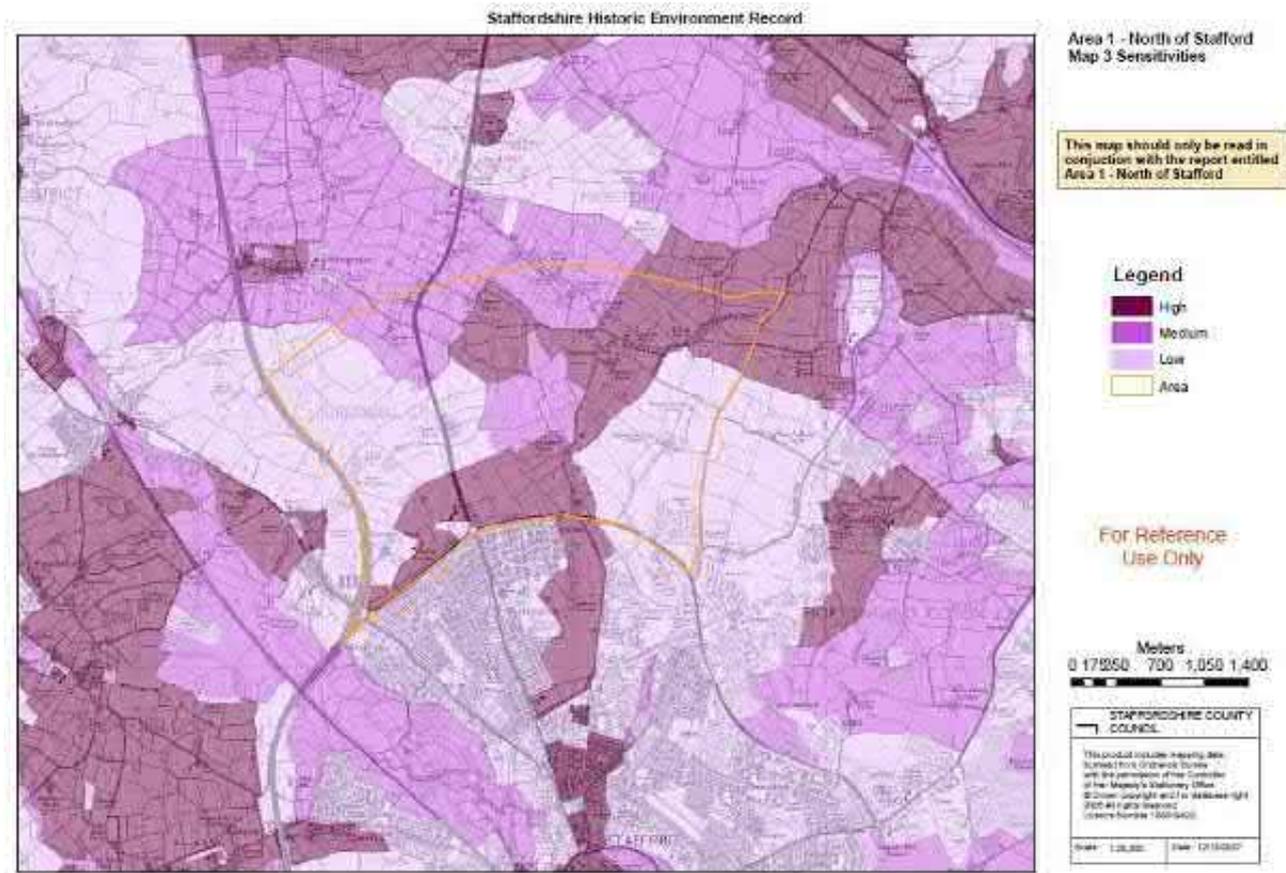
Plan 11: Brickhouse / Beacon Farm: Extract of Defra Magic: Grassland Habitats



Plan 12: Brickhouse / Beacon Farm: Extract of Defra Magic: Areas of Protection for Birds



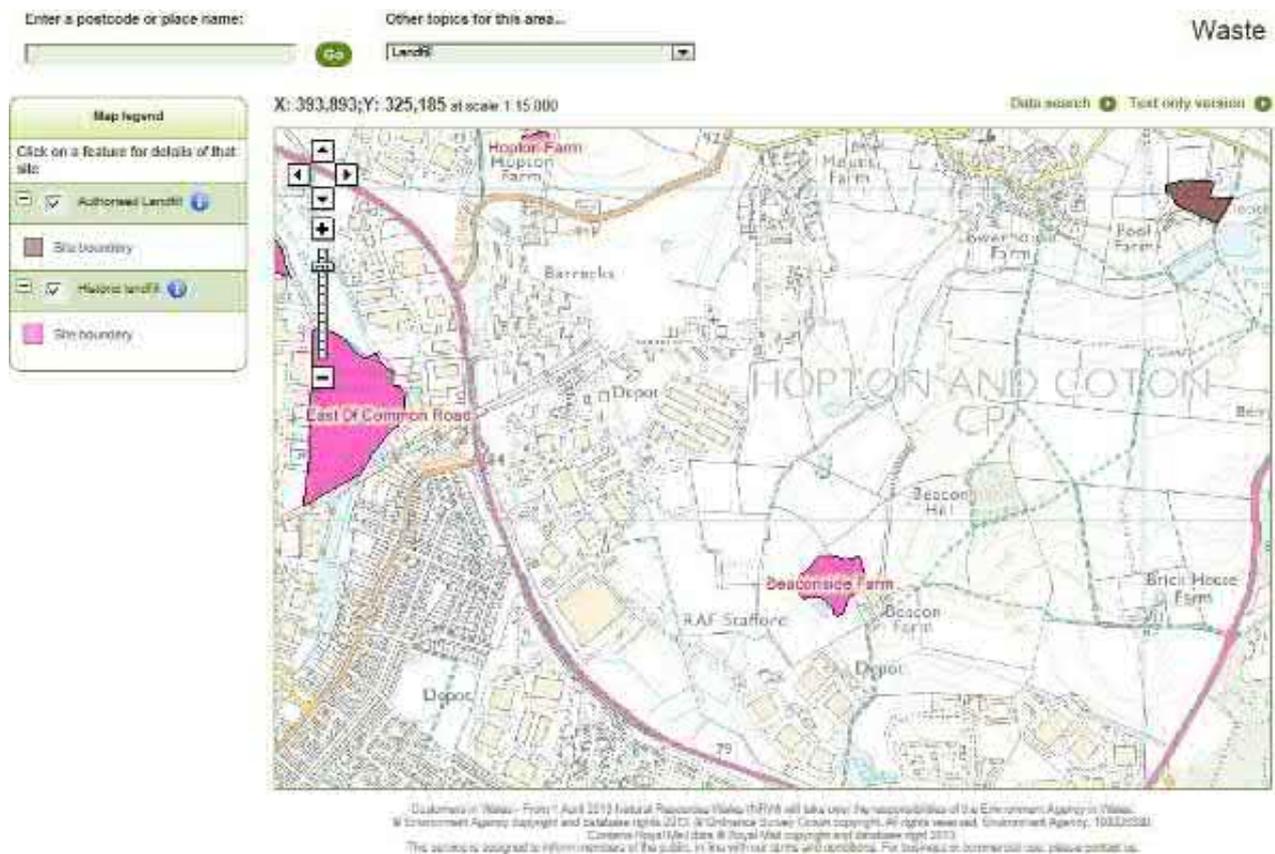
Plan 14: Beacon Farm : Extract from Historical Land Characterisation Sensitivity for North of Stafford



Landfill and Ground Contamination

Land directly to the west of Beacon Farm farmstead has historically been landfilled (**see Plan 15**). Planning records available to Lufton & Associates indicate this is likely to be non-hazardous inert building and commercial waste.

Plan 15: Brickhouse / Beacon Farm : Environment Agency Record of Landfill



Mineral Sterilisation

Research and assessment undertaken by the British Geological Survey (2006) to assist Staffordshire County Council in identifying Mineral Consultation Areas appears to indicate that if there are any workable mineral resource lying beneath the proposed development area that this would be bedrock sand or near surface superficial sand and gravel.

These minerals in reserve and currently being worked are abundant in the local, Staffordshire and national context with significant extant permitted reserves. It is not anticipated the presence of any mineral resource would be a significant constraint to the development of Beacon Farm.

Utilities and Services

The work commissioned by the Borough Council in 2009 to inform infrastructure planning from the consultants Colin Buchanan (Buchanan, LEVVEL, Hewden and Mott McDonald, July 2009) covers the issues of gas, electricity and water supply at a macro town wide scale.

In relation to gas supply the report states;

"Gas supply is generally based on three networks:

- the high pressure system which transports gas over large distances*
- the medium pressure system which provides gas to specific locations and Settlements.*
- the low pressure system which distributes gas at a local level.*

Stafford has a medium pressure ring main which runs around the majority of the town supplying gas to off take stations feeding small low pressure minor networks which service individual properties.

From our discussions with Fulcrum Infrastructure Services none of the locations considered for this study are known to have any requirement for works to the high pressure system. The ring main around Stafford is a medium pressure system, which would be extended to service sites such as SF-h on the northern edge of Stafford without the requirement any works to the high pressure system.

In general, there are no major gas infrastructure works required in Stafford. The gas supply network appears to be robust and has the potential capacity to accommodate all of the proposed developments. As a result, the majority of the proposed sites only require 'standard' connections into the medium pressure system. The costs of these connections would appear as a standard cost for developers."

In relation to electricity supply the report states;

"For any significant development it is likely that a new local substation will be required to service specific locations. The majority of the developments proposed in Stafford town are on the outskirts of the existing urban development and as a result of this and their proposed scale it is likely that they will all require a new local substation. The cost of this (estimated at around £70,000 each) would be expected to be borne by the developer/landowner. Costs of additional infrastructure required to support a development may also require a contribution from the developer.

In order to deliver the proposed scale of housing developments, 11kv network improvements would be required for all of the proposed sites. Across the whole of Stafford, if all of the proposed developments were to come forward these infrastructure improvements would cost in the region of £12 million.

In addition to the 11kv network improvements, if proposed site SF-2 (3,000 units) is developed, a new major substation connected to the 132kv supply network would be required. This could also serve SF-1 (800 units). This infrastructure improvement would have a longer lead time than the local improvements and would cost in the region of £6 million."

In relation to water supply the report states;

"Clean water can be supplied from a number of sources and in Stafford Borough these include boreholes and reservoirs (to the north, south-east, and south-west of Stafford town) as well as a number of groundwater sources. Two out of the three reservoirs (south-east and south-west) are at capacity. However, the network layout does not currently allow optimum use of the capacity available at the northern reservoir at Peasley Bank.

The northern direction of growth could be supported without any further infrastructure improvements. However, the network has been identified as needing re-inforcement in order to meet the western growth requirements. Further re-inforcements will be needed if growth in the south and east is to be supported.

Severn Trent Water will not fully fund the provision of infrastructure to support development although an allowance for this infrastructure is included within their business plan. A contribution to the cost of infrastructure from a developer is calculated as a 'commuted sum' which is based on the cost of the infrastructure minus the potential income which the new connections will generate for Severn Trent over a 12 year period.

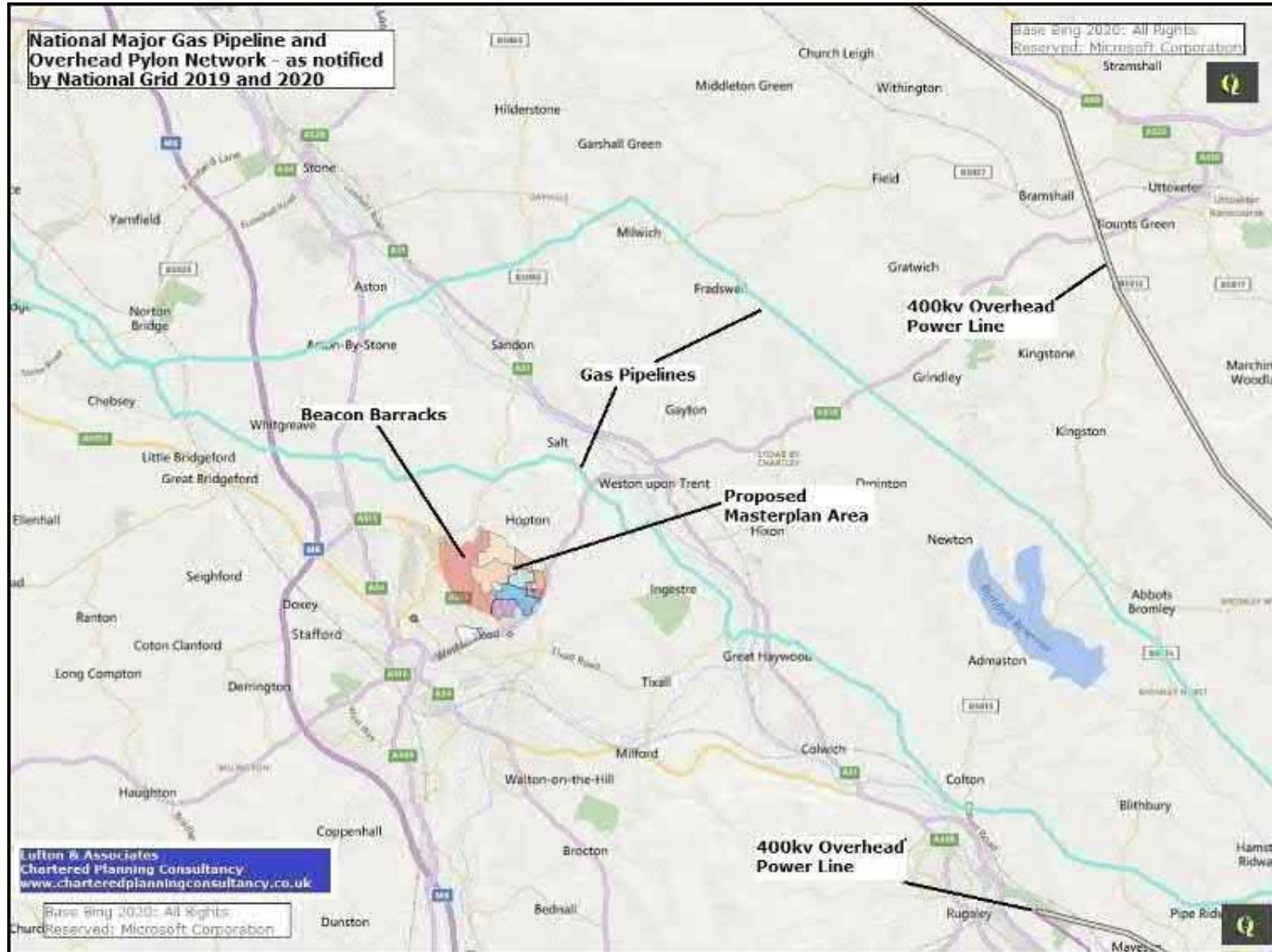
In general lead times for reinforcement works to the network are in the region of 18 months with a construction period of around 12 months."

The report considers only the Strategic Development Locations favoured by the Borough Council in 2013 however the findings are as relevant to the proposed allocation of land NE of Stafford at Brickhouse / Beacon Farm.

Plan US1 is shown below to indicate the proximity of the major gas pipeline and overhead line network. The Plan is included particularly as it fails to be addressed for NE Stafford by the Borough Council study commissioned from AECOM (December 2020).

In this case these would be considered a constraint to development as they are part of the national network and would require standoff protection from development. These are all substantially distant from NE Stafford and do not represent any impediment to development.

Plan US1: Brickhouse / Beacon Farm : Proximity to Major Gas Pipelines and Electricity Pylons



Delivery: Gestation of a Masterplan

The landowners and agents, Lufton & Associates, consider that in view of Issues and Options process and the assessment of major strategic allocations in terms of alternative garden communities an indicative Masterplan for the proposed development area North-East of Stafford would be helpful.

This is shown at a wider scale on page 5 and 6, **Plans 2** and **3** below (**Plan 16**) focussed more closely on the development area.

Plan 16: Brickhouse / Beacon Farm: - Indicative Land-Use Masterplan



The Land-Use Masterplan is borne from a series of incremental and iterative planning and design stages building further on work done in 2013. It reflects the constraints and site opportunities considered above.

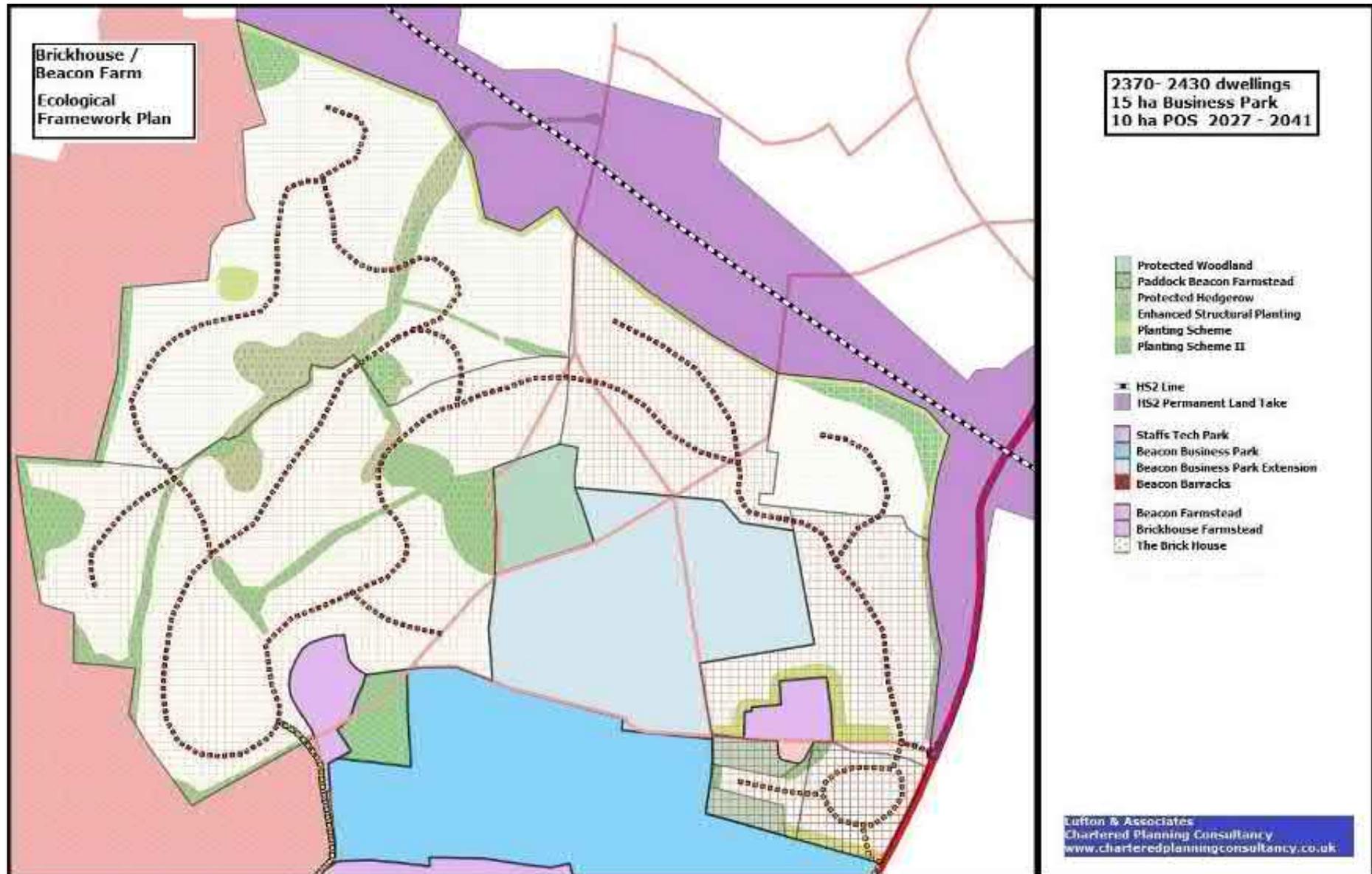
In particular the wider regeneration and planned changes within the Borough have been considered, as have transport initiatives and investment, the landscape setting and the topography of the site location, the proximity of local communities and their sensitivity to change and pressures on supporting infrastructure.

The indicative Masterplan seeks to integrate development with ecological improvements and enhancement and create a mix of land-uses with the objective of reducing the need for travel and minimising the generation of vehicular trips. A public park, access

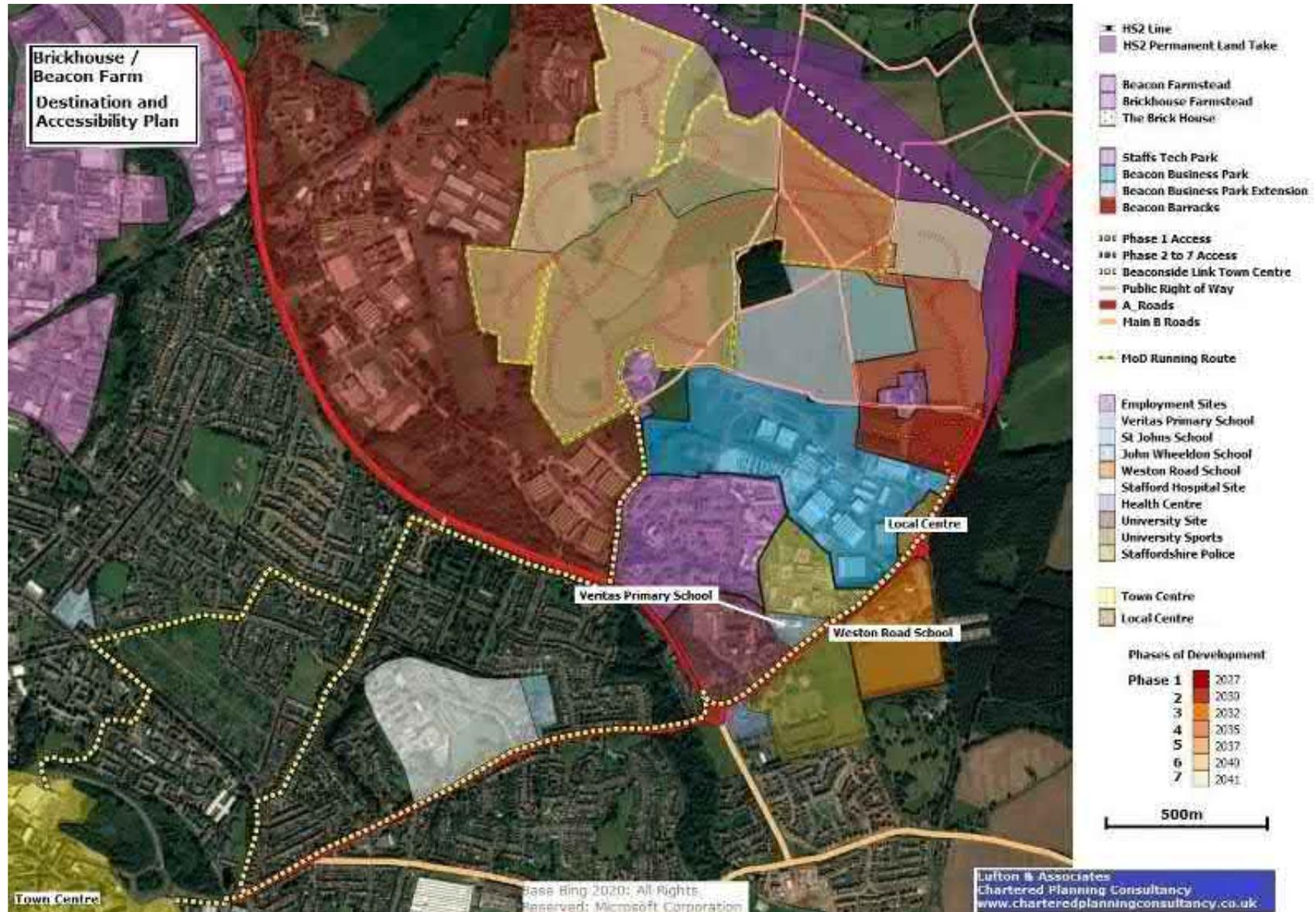
to a nearby local centre and the Business Park, a primary school in the late stage of Phase 7 and extensive areas of public open space are integral and central to the design philosophy.

The Ecological Framework Plan (**see Plan 17**), the Destination and Accessibility Plan (**see Plan 18**), and the Access, Transport and Integration Plan (**see Plan 19**) were prepared in advance and informed the Land Use Masterplans.

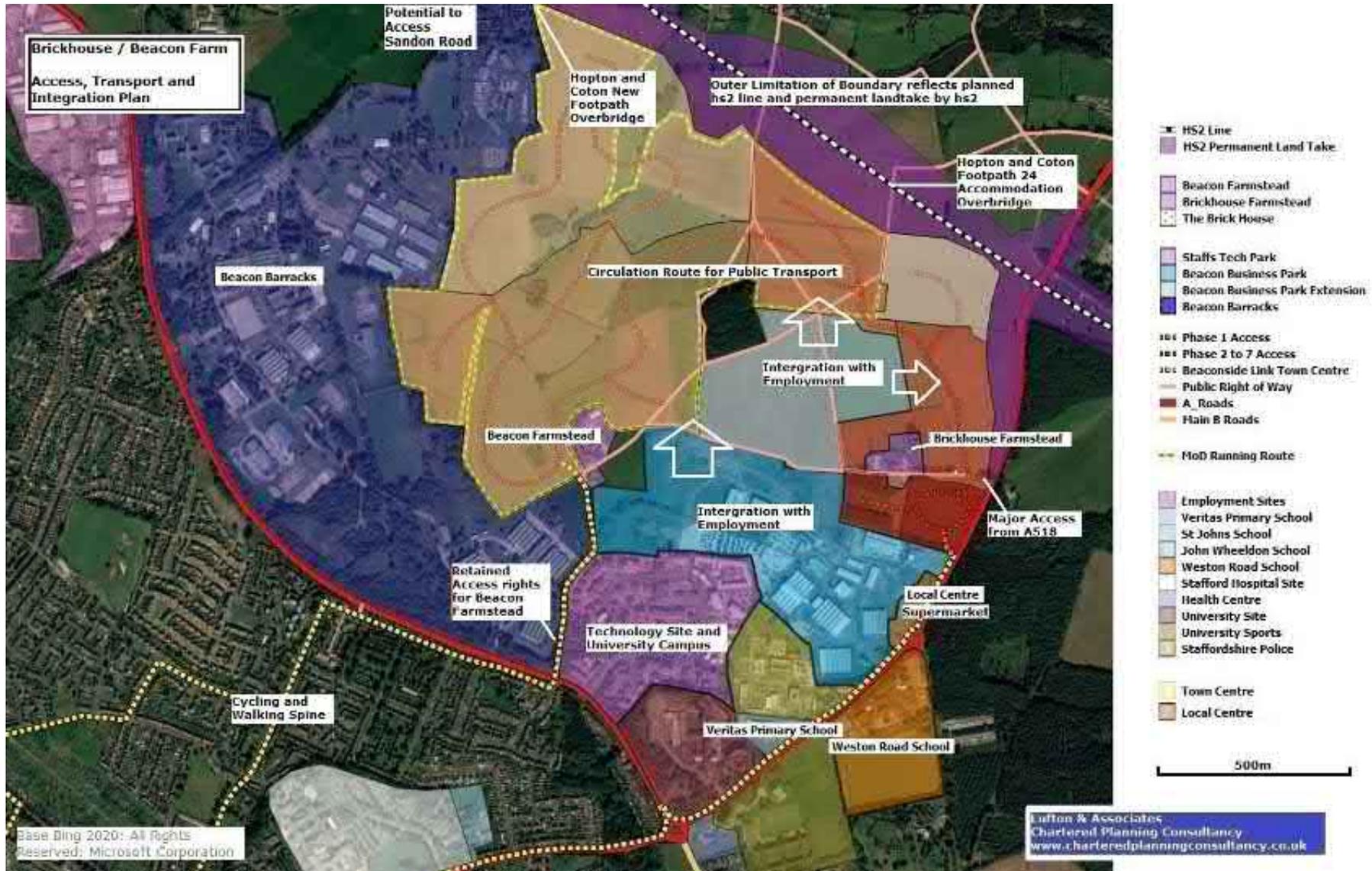
Plan 17: Brickhouse / Beacon Farm: Ecological Framework Plan



Plan 18: Brickhouse / Beacon Farm: Destination and Accessibility Plan



Plan 19: Brickhouse / Beacon Farm: Access, Transport and Integration Plan



Principles of Accessibility

Plan 18 graphically represents an initial appraisal of the proposed development area in terms of accessibility to key locations, services and facilities and adjoining areas.

This is an assessment that the landowner and agent working with a future development partner intend to investigate further to support the proposal further through the plan process to Preferred Options and beyond.

The town centre is less than 2.5km from the centre of the proposed development area when connected using a route around Beacon Barracks via Trenchard Avenue, Tithe Barn Road and Corporation Street. It would require a controlled crossing or refuge on Beaconside to complete a viable route. A cycling and walking spine here though would draw together a number of high intensity land-uses including Stafford Hospital, the Beaconside south housing site of the MoD and the major redevelopment of St. Georges Hospital.

The cycling and walking spine (**Plan 19**) would connect right through the whole of the phased development site and to any land substitution for a future Business Park in a later phase (see **Plan 2**).

Using existing footpath alignment and over the hs2 line a pedestrian route would connect Hopton village and could act as a sustainable transport connection integrating the whole north-east quadrant of the town. As shown (see **Plan 19**) this would have very significant further benefits in improving accessibility by a short branch connection to link to the ex-Staffordshire University and Education campus and the Technology Park. A short branch of cycle and walking route to Dyson Way (see **Plan 19**) would also connect the proposed development area to a central cycling and walking spine through the Technology Park and University/Education Campus and to Weston Road (Academy) High School.

Vehicular Access

As indicated on **Plan 19** above and shown in more detail as a location the main access is proposed from the A518 (see **Figure 1** and **Plan 20**). This access aligns 440 metres north of the main access

to the Business Park and is preferred over a closer access to the existing roundabout to align with highway works that are a requirement for hs2.

In the longer term as the phases develop out there is an opportunity to upgrade the access to a roundabout and widen the line of the existing track between the Technology Park and Beacon Barracks (shown **Figure 2** and **3**, on **Plans 18** (as the town centre link) **Plan 19** and **Plan 21** below). This secondary access is not in control of the two landowners and will require negotiation to accomplish the required highway and junction engineering standards once full developer backing has been secured. Those negotiations are in hand. There appears to be no technical, physical or other impediment to access, the constraint issue it is purely a matter of land ownership and control that will be resolved through negotiation. A final design would reflect the security requirement for the adjoining Beacon Barracks.

The visibility, the controlled



Figure 2 Access from Beaconside looking East



Figure 3 - Access from Beaconside looking West





traffic speed, the existing junction arrangements and the road safety record on the A518 all appear favourable to securing an adequate junction arrangement in this location. In supporting the case now (March 2020) traffic counts had been planned on the A518. As our work programme progressed it was very clear that the Covid-19 pandemic would have such a significant impact on traffic flows that they could be misleading in comparison to normal conditions and were unfortunately abandoned.

In future an alternative access could be made if there was a more significant redevelopment of Beacon Barracks although it is respected at present this would not be possible for reasons of operational security on the site. Alternative vehicular access might also be made through to the Sandon Road to link to the northern strategic housing site allocated in

the current Local Plan and currently under construction (see **Figure 2** and **Plan 19** above).

As of April 2020 the landowners and agents working with a future development partner intend to work on access solutions as a matter of priority to support the proposal through the planning process.

Public Transport Access

In a phased development of the site public transport access and service enhancement would be a priority and a circulation route for buses is shown on **Plan 16**. The proposed development would offer opportunities to improve public transport services for north-east Stafford increasing connectivity with the town

centre and providing better links for the Technology Park and the University/Education campus.

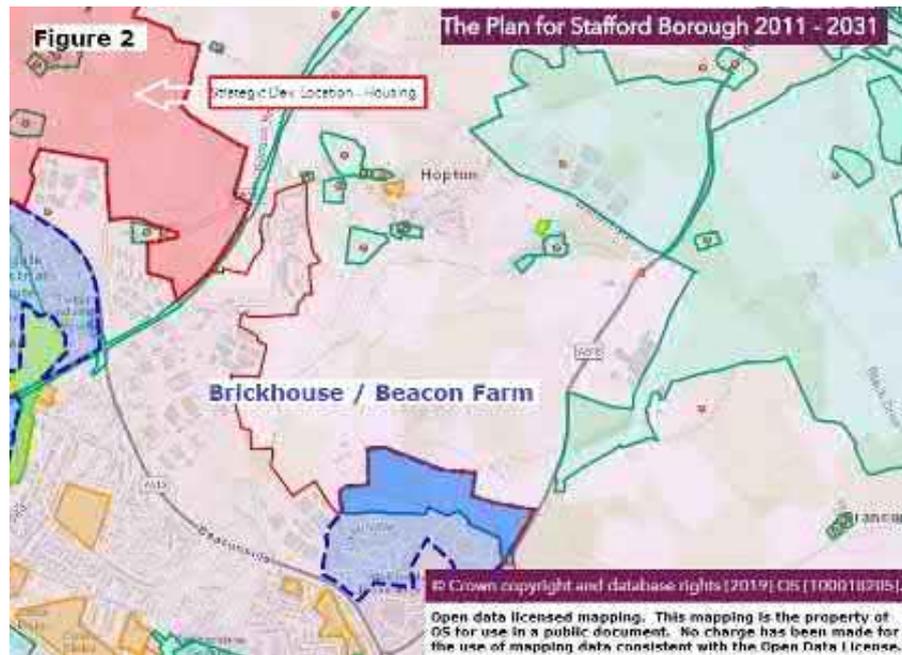
Principles of Integration

The indicative Masterplans, **Plans 2 and 3**, and the Access, Transport and Integration Plan, **Plan 19**, indicate the importance recognised in

integrating the proposed development area with the surrounding urban form, activities and communities. Particular attention in detailed design and planning would be given to integrating the proposed housing with the Business Park extension, the Local Centre and the Business Park and with any redevelopment or programmes of the MoD.

Later phases propose a Business Park (15ha) in Phase 6 and land for transfer to a Primary School in Phase 7, the latter subject to assessment of need and supply by the Education Authority (Staffordshire County Council).

In relation to the adjoining MoD at Beacon Barracks detailed design and planning could accommodate the relationship of the land-uses in any number of ways from integration to clear delineation, division and security. The site is already linked to the Barracks in that it provides an important location for outdoor fitness as an established running route, this would require to be considered in future more detailed planning.



Conclusion and Closing Comments

Land at Brickhouse / Beacon Farm is included in the current Borough Strategic Housing and Employment Land Availability Assessment (SHELAA) 2019 taken forward from submissions in 2018. It was promoted through the Local Plan in 2013. It is not understood why the land has not been assessed alongside the potential Major Urban Extension sites in the Issues and Options background documentation.

This report has sought to fill a gap in that evidence base. It strongly concludes that there is no significant impediment to the development of Brickhouse and Beacon Farm as a major strategic housing development for Stafford town starting as early as 2027. It would have significant delivery and sustainability advantages over the development of a new settlement, or other incremental sites in Stafford although it is recognised it could be developed in tandem should the housing and employment land requirement support it.

The landowners and agents are willing to engage with the Council, development partners, the highway and education authorities, adjoining landowners and the utilities companies in justifying and bringing this land forward as a major development allocation in the 2020-2040 Local Plan.

**Photo Document
Appendix to**

**Report on the Planning, Sustainability and
Accessibility Case for the Allocation of Brickhouse
Farm / Beacon Farm, North-East Stafford as a
Strategic Development Location**

**Stafford Borough
Local Plan Issues & Options Consultation**

April 2020

**Lufton & Associates,
Chartered Planning
Consultancy, Stafford
on behalf of Clarkes Farms
Ltd and the Dugmore Family**



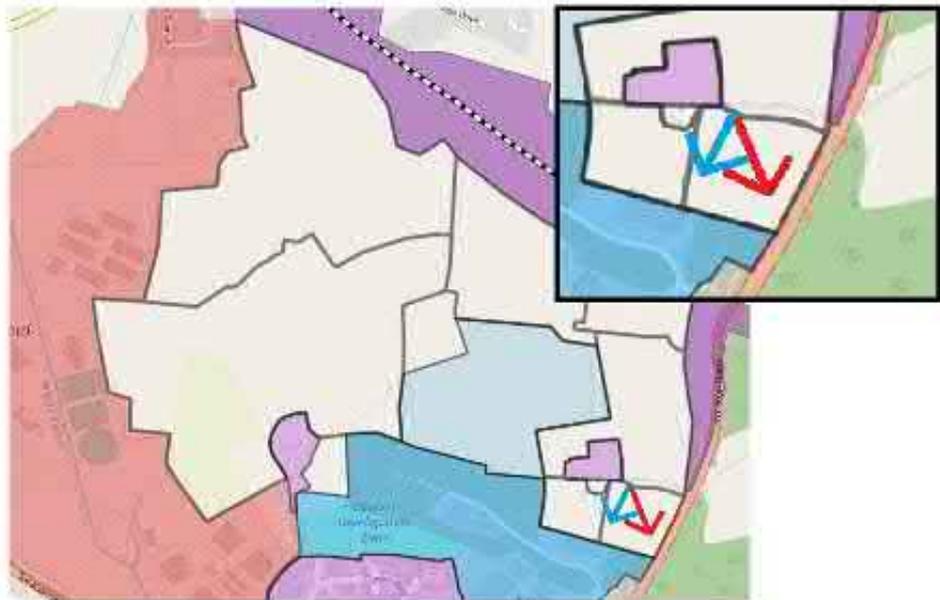


Photo 3

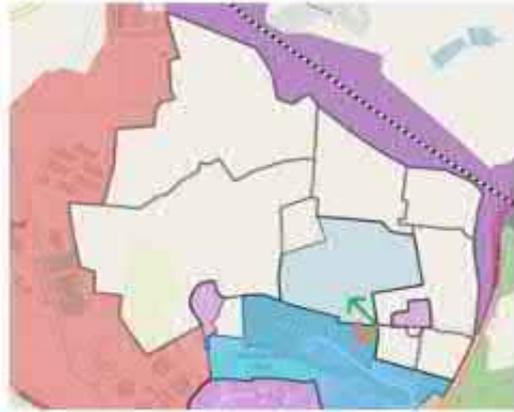


Photo 4



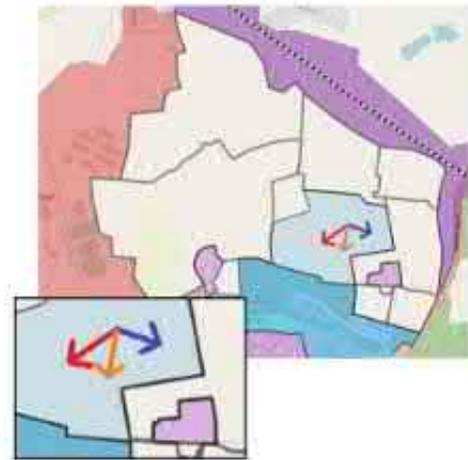
Photo 5



Photo 6

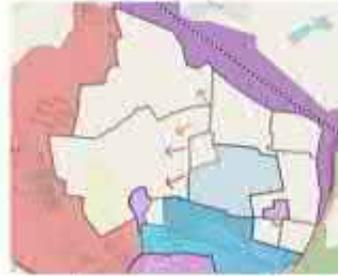






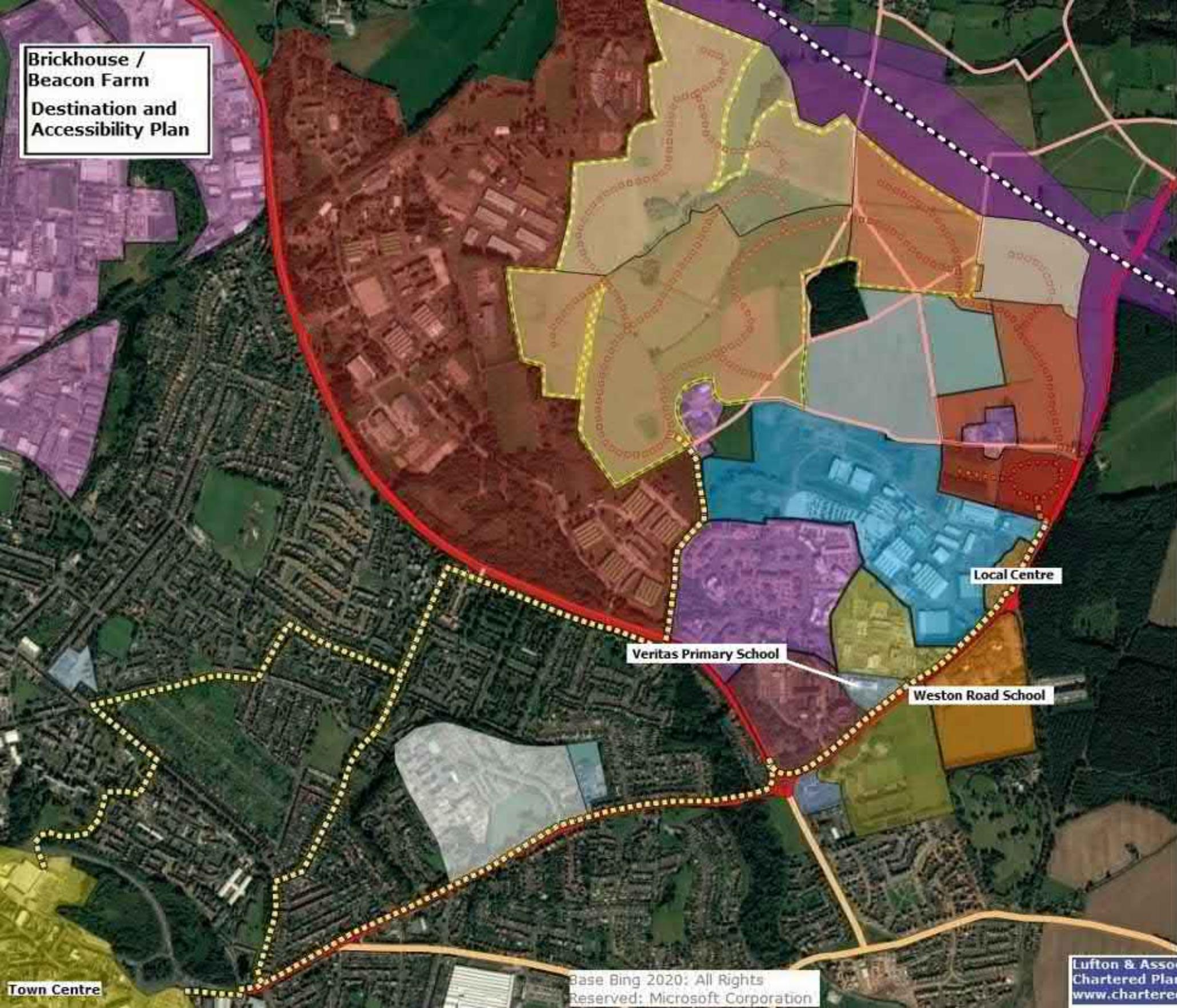








Brickhouse / Beacon Farm
Destination and Accessibility Plan



- ✖ HS2 Line
- HS2 Permanent Land Take
- Beacon Farmstead
- Brickhouse Farmstead
- The Brick House
- Staffs Tech Park
- Beacon Business Park
- Beacon Business Park Extension
- Beacon Barracks
- ⋯ Phase 1 Access
- ⋯ Phase 2 to 7 Access
- ⋯ Beaconside Link Town Centre
- Public Right of Way
- A_Roads
- Main B Roads
- MoD Running Route
- Employment Sites
- Veritas Primary School
- St Johns School
- John Wheeldon School
- Weston Road School
- Stafford Hospital Site
- Health Centre
- University Site
- University Sports
- Staffordshire Police

- Town Centre
- Local Centre

Phases of Development

Phase	Year
1	2027
2	2030
3	2032
4	2035
5	2037
6	2040
7	2041

500m

Town Centre

Veritas Primary School

Local Centre

Weston Road School

**Brickhouse /
Beacon Farm
Ecological
Framework Plan**

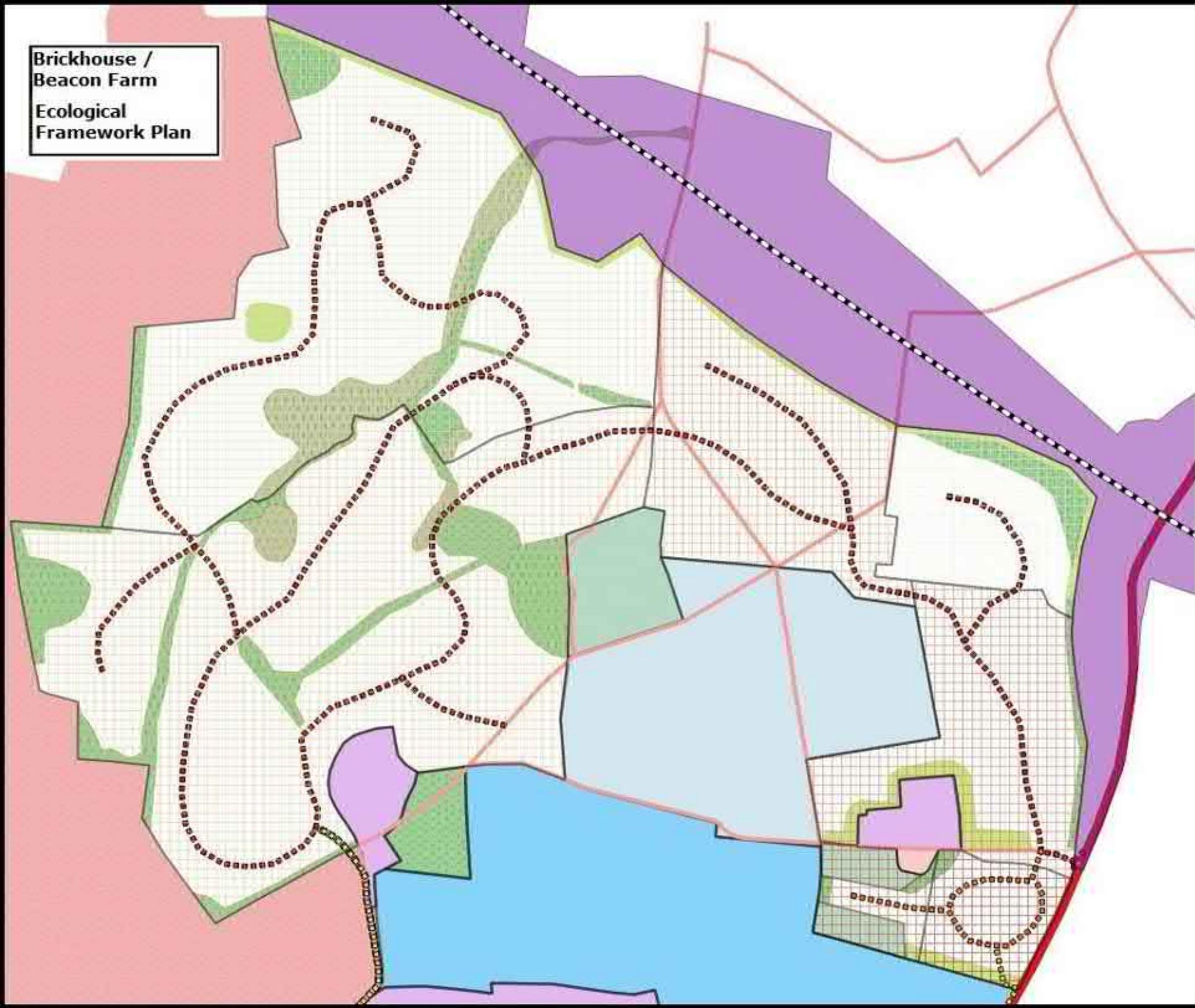
**2370- 2430 dwellings
15 ha Business Park
10 ha POS 2027 - 2041**

- Protected Woodland
- Paddock Beacon Farmstead
- Protected Hedgerow
- Enhanced Structural Planting
- Planting Scheme
- Planting Scheme II

- HS2 Line
- HS2 Permanent Land Take

- Staffs Tech Park
- Beacon Business Park
- Beacon Business Park Extension
- Beacon Barracks

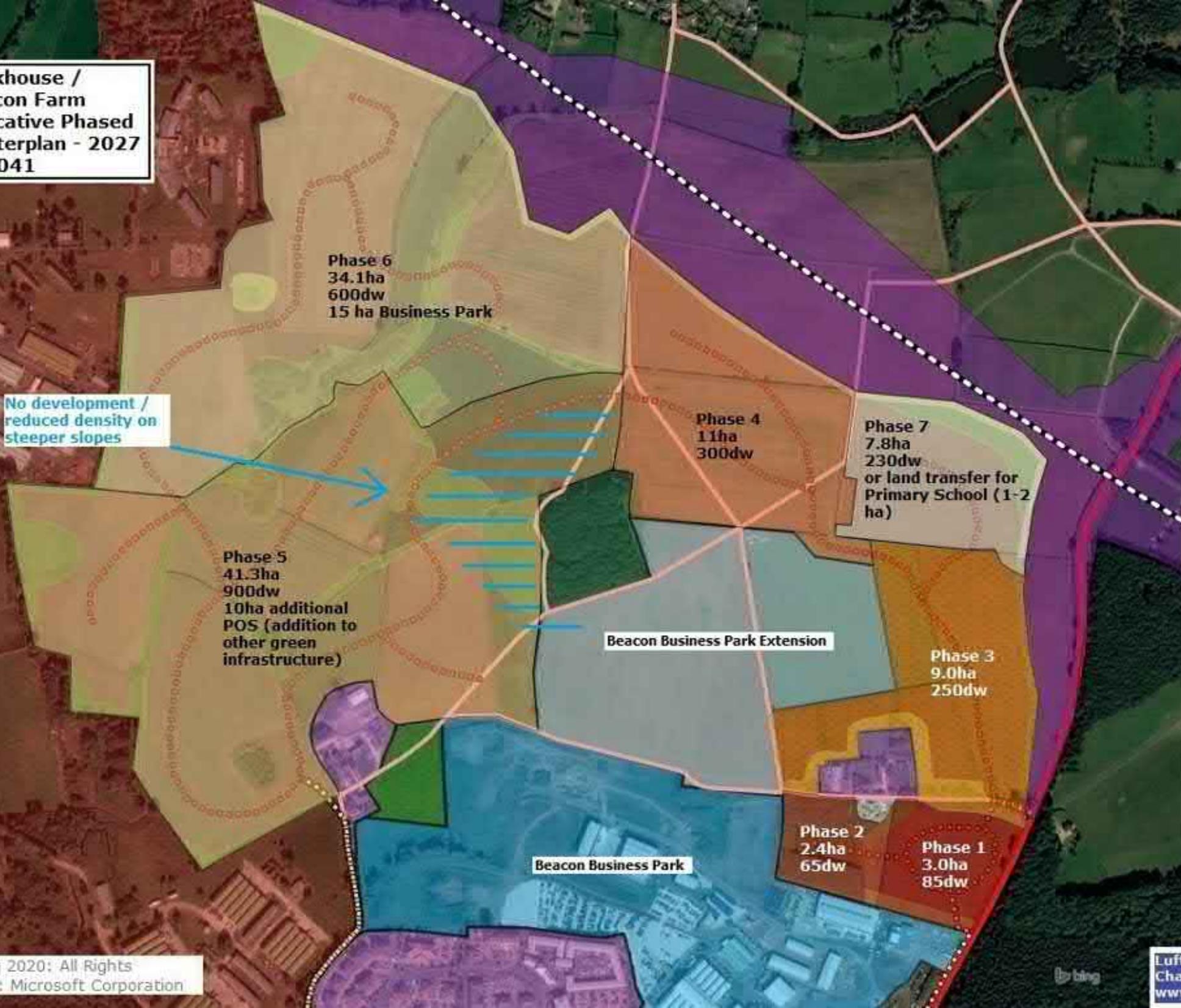
- Beacon Farmstead
- Brickhouse Farmstead
- The Brick House



**Brickhouse / Beacon Farm
Indicative Phased
Masterplan - 2027
to 2041**

**2370- 2430 dwellings
15 ha Business Park
10 ha POS 2027 - 2041**

No development /
reduced density on
steeper slopes



- ✂ HS2 Line
- HS2 Permanent Land Take
- Staffs Tech Park
- Beacon Business Park
- Beacon Business Park Extension
- Beacon Barracks
- Beacon Farmstead
- Brickhouse Farmstead
- The Brick House

Phases of Development



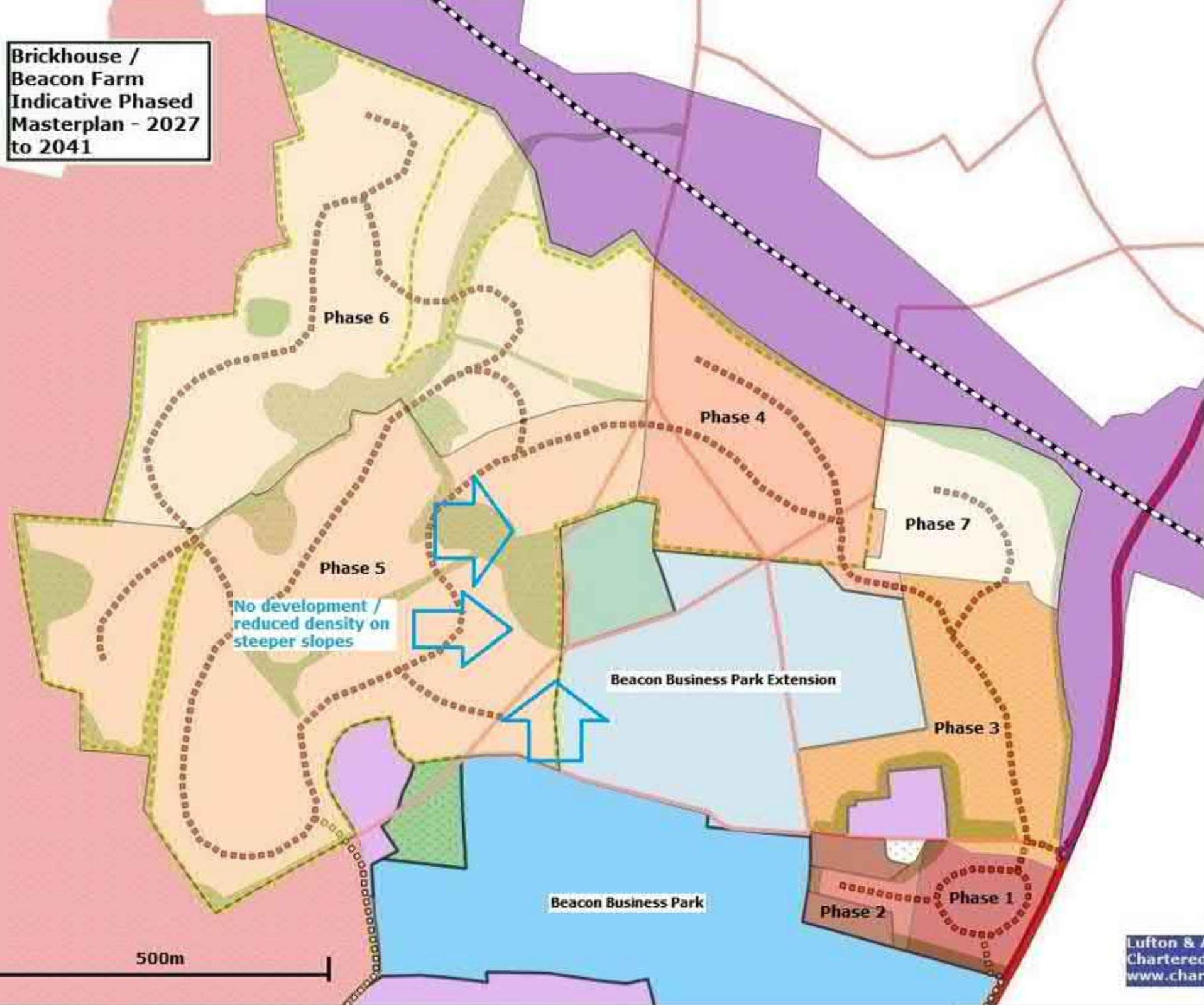
Green Infrastructure

- Protected Woodland
- Paddock Beacon Farmstead
- Protected Hedgerow
- Enhanced Structural Planting
- Planting Scheme
- Planting Scheme II



**Brickhouse / Beacon Farm
Indicative Phased
Masterplan - 2027
to 2041**

**2370- 2430 dwellings
15 ha Business Park
10 ha POS 2027 - 2041**



- ✕ HS2 Line
 - HS2 Permanent Land Take
 - Staffs Tech Park
 - Beacon Business Park
 - Beacon Business Park Extension
 - Beacon Barracks
 - Beacon Farmstead
 - Brickhouse Farmstead
 - The Brick House
- Phases of Development**
- | | |
|---------|------|
| Phase 1 | 2027 |
| 2 | 2030 |
| 3 | 2032 |
| 4 | 2035 |
| 5 | 2037 |
| 6 | 2040 |
| 7 | 2041 |
- Protected Woodland
 - Paddock Beacon Farmstead
 - Protected Hedgerow
 - Enhanced Structural Planting
 - Planting Scheme
 - Planting Scheme II
- ⋯ Phase 1 Access
 - ⋯ Phase 2 to 7 Access
 - ⋯ Beaconside Link Town Centre
 - Public Right of Way
 - A_Roads
 - MoD Running Route

500m

**2370- 2430 dwellings
15 ha Business Park
10 ha POS 2027 - 2041**

- HS2 Line
- HS2 Permanent Land Take
- Staffs Tech Park
- Beacon Business Park
- Beacon Business Park Extension
- Beacon Barracks
- Beacon Farmstead
- Brickhouse Farmstead
- The Brick House

Phases of Development

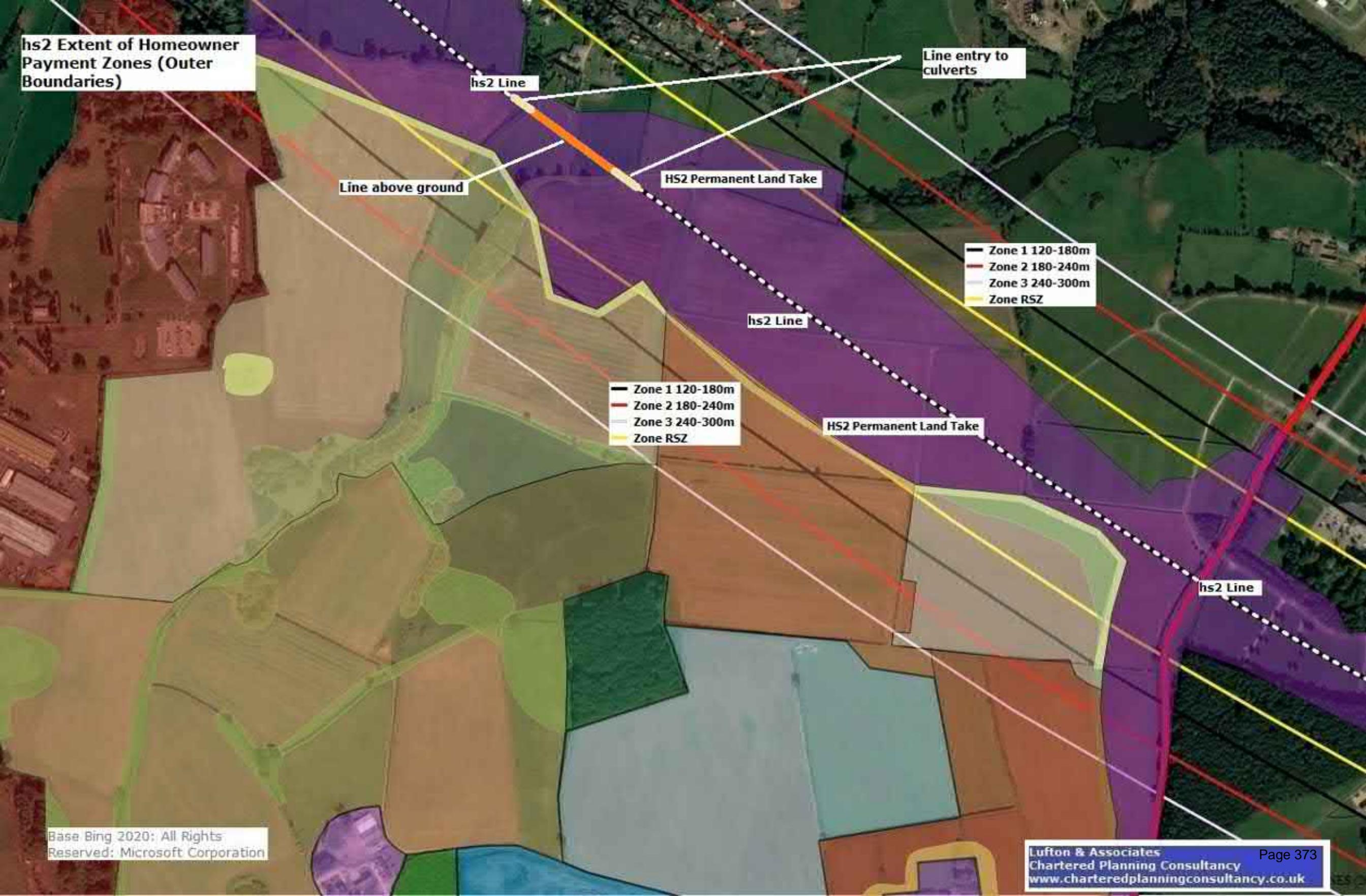
- Phase 1** 2027
- 2** 2030
- 3** 2032
- 4** 2035
- 5** 2037
- 6** 2040
- 7** 2041

- Protected Woodland
- Paddock Beacon Farmstead
- Protected Hedgerow
- Enhanced Structural Planting
- Planting Scheme
- Planting Scheme II

- Phase 1 Access
- Phase 2 to 7 Access
- Beaconside Link Town Centre
- Public Right of Way
- A_Roads
- MoD Running Route

400m

hs2 Extent of Homeowner Payment Zones (Outer Boundaries)



Line above ground

hs2 Line

HS2 Permanent Land Take

Line entry to culverts

- Zone 1 120-180m
- Zone 2 180-240m
- Zone 3 240-300m
- Zone RSZ

hs2 Line

- Zone 1 120-180m
- Zone 2 180-240m
- Zone 3 240-300m
- Zone RSZ

HS2 Permanent Land Take

hs2 Line

Brickhouse/Beacon Farm: Site and Surrounds

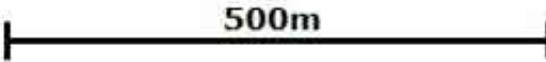


 **Boundary of Strategic Development Site - Brickhouse / Beacon Farm**

 **HS2 Line**
 **HS2 Permanent Land Take**

 **Staffs Tech Park**
 **Beacon Business Park**
 **Beacon Business Park Extension**
 **Beacon Barracks**

 **Beacon Farmstead**
 **Brickhouse Farmstead**
 **The Brick House**

 **500m**